

Appendix D
East of England Plan
Draft partial response – Overall scale of development

Key RSS Policy references

Policy SS1: achieving sustainable development
Policy SS2: overall approach to the spatial strategy
Policy SS4: use of previously developed land and buildings
Policy SS7: Green Belt
Policy SS10: the regional economy
Policy SS11: priority areas for regeneration
Policy SS13: overall housing provision
Stansted/M11 sub-regional policies (ST1-7)
Policy E2: job growth
Policy E9: regional structure of retail centres
Policy H1: distribution of dwelling provision 2001-2021
Policy H2: affordable housing and mix of housing types
Policy H3: phasing of housing development

Summary

- D1. The provisions of the draft RSS represent a substantial shift in previous development rates, particularly in East Herts. While the District Council welcomes the decision not to make provision for the additional 18,000 dwellings requested by Government, the overall development rates are still considered to be unacceptably high. The economic predictions on which the Plan is based are questionable and unrealistic. The dwellings figure, which is based on the economic assumptions, is therefore also flawed.
- D2. There is a need to phase and manage three important elements of development: economic development, housing development and infrastructure investment. All three elements are required in a timely manner in order to create a sustainable community.
- D3. East Herts Council welcome the emphasis on affordable housing but question whether the necessary investment will be forthcoming.
- D4. The role of a large new settlement in the region has not been given sufficient attention in the production of the draft RSS. Green Belt boundaries have largely been ignored as a consequence of the strategy, while the requirement that Green Belt releases be made to provide for development up to 2031 is inappropriate. The emphasis on focusing development on previously development land is welcomed but the quantum of development required by the draft RSS in East Herts will involve substantial greenfield releases.

- D5. Further clarity is required on certain aspects on the Stansted/M11 sub-regional strategy and the geographical extent of this sub-region.

Detailed Response

- D6. As the draft RSS indicates, the level of growth required is “not a continuation of the status quo”. It involves higher development rates across the region, and substantially so in some places. The introduction of the Government’s Sustainable Communities Plan (SCP) has meant that, in addition to a level of development equivalent to a “roll-forward” of previous Structure Plan housebuilding rates, there is also now a significant additional element of growth in the form of the “growth areas” component.
- D7. The housing targets set out in Policy H1 for the most part reflect previous Structure Plan development rates. Development is distributed to each district on the basis of urban capacity and identified greenfield sites. However there is also the “growth areas” element, over and above the former rates. In the southern part of the region the additional development is focused on major urban extensions to Harlow and Stevenage, smaller extensions to Bishop’s Stortford and Great Dunmow and the North Weald proposal. Aside from these specific proposals, the development rates in both Hertfordshire and Essex are broadly comparable with previous Structure Plan rates, and while not necessarily easy to accommodate, do not require major changes in planning strategy. These figures appear to be closely aligned with the total supply of housing land from existing planning permissions, Local Plan allocations, contingent sites and urban capacity, as estimated by Colin Buchanan & Partners in their August 2004 study of the London-Stansted-Cambridge-Peterborough growth corridor.
- D8. It is the additional development proposals, the “growth areas” portion that will form the focus for the East Herts response. East Herts Council acknowledges the need for new housing provision, particularly affordable housing, over the next twenty years. Establishing the quantum of development required is not a precise science and there will inevitably be debate over whether the chosen quantum is too high or too low. The approach taken in the draft RSS of assessing the “supply” of land (existing sites, allocations and urban capacity) and then focusing growth over and above this level in key areas is, in principle, supported. However it is to the location of this additional growth and its distribution throughout the region that objection is raised.
- D9. It has been a common criticism of many of the studies supporting the RSS process that they have been capacity-based rather than need-based or strategy-based. A certain amount of capacity-based study is important to ensure urban capacity is maximised and used efficiently. However once this supply is exhausted the search must be extended

and this is where an assessment of need and an overall strategy is required. Greenfield capacity is available right across the region but the choice of which areas to focus on needs to be based on more than simply the availability of sites. A strategic planning document must create a vision of the role to be played by this additional development and how it can have a positive impact.

- D10. The draft RSS does not make provision for the additional 18,000 dwellings, as required by the ODPM to reflect the aims of the SCP. This stance is strongly supported by East Herts Council. No case has been advanced for the actual number, or justification for this additional amount.
- D11. It is worth pointing out at this stage that the Government's Sustainable Communities Plan, on which so much of the draft RSS and other recent policy direction is based, was not subject to any form of public consultation or a sustainability appraisal. The decision, by the Government, to enlarge the Growth Area by widening it and extending it to Peterborough, was also not subject to consultation. It is only at the later, more detailed stage in the planning process when the provisions of the SCP are being incorporated into the draft RSS that such decisions are subject to public consultation and scrutiny.
- D12. As a result of the SCP, the focus of the draft RSS is on the London-Stansted-Cambridge-Peterborough Corridor, rather than other parts of the region. The consultation process on the draft RSS does not allow for consideration of the wisdom of allocating this corridor for growth, as it is effectively a *fait accompli*.
- D13. The RPG14 Strategy Review, which appears to have been particularly influential to the content of the draft RSS in certain respects, made some important comments regarding the growth area. Based on discussions with stakeholders, the Strategy Review commented that there was a general agreement that the growth area was not a coherent spatial entity, or a development corridor in the sense implied in the SCP. There is only a weak relationship between the various towns in the corridor and the land in between is mostly unsuitable for development, making the consolidation of the corridor undesirable. This is considered to undermine the approach both in the SCP and the draft RSS, which seeks to treat the corridor in a holistic way.
- D14. The key issue regarding the draft RSS as a whole is the robustness of the economic projections that underpin the calculations. The strategy is described as being "jobs-led" or "economy-led" yet the economic projections on which the strategy is based are questionable to say the least.
- D15. Much is made of the complementarity or "synergy" between the Regional Economic Strategic (RES) and the draft RSS. This synergy is

superficial. At their cores, the two documents are based on entirely different views of the future development of the regional economy.

- D16. There was initial agreement between the East of England Regional Assembly (EERA) and the East of England Development Agency (EEDA) that the jobs target in the RSS should reflect the aspiration to reach the top 20 regions in Europe by 2021. This indicated that around 330,000 jobs would be required in the Plan period. This was considered to be an ambitious target given the baseline predictions of between 220,000 and 250,000 jobs.
- D17. However this job target has since been significantly increased to the 421,500 figure included in the draft RSS. This is way in excess of both the previous baseline predictions and RES aspirations, such that serious doubts are cast over the robustness and achievability of the targets that underpin the strategy. These doubts are further reinforced by the fact that to achieve the job growth targets would require an increase in the regional share of national jobs from an existing 12.5% to around 21%. This represents a major shift in regional economic activity, the implications of which do not appear to have been fully investigated.
- D18. It has been pointed out that the draft RSS job growth target is comparable to that achieved over the previous twenty year period. However such a comparison is flawed in that it compares two periods at vastly different stages in the economic cycle. The first period (1981-2001) began with a relative economic low-point and ended with a peak around 2001. Almost all economic forecasters do not predict a similar pattern of growth over the next twenty-year period.
- D19. A key issue is the balance between jobs and dwellings. The recent study of the alignment between jobs and dwellings showed a regional balance but imbalances at a more local level. The region currently has an existing imbalance of around 300,000 jobs below the number of dwellings. Any calculation of proposed net job growth must make allowances for the need to reduce this deficit, therefore leading to lower overall job growth targets.
- D20. The balance between jobs and dwellings is particularly pronounced in the Stansted/M11 sub-region. Studies have shown that there is existing misalignment with a surplus population above the number of jobs. This is partially due to the accessibility of the London job market via rail links. The proposals in the draft RSS would worsen this current surplus considerably, even though the job growth targets for Harlow used are substantially higher than the economic forecasts. The job growth targets for Harlow are ambitious and will require substantial intervention. There is a risk that such job growth will not appear, thereby worsening the situation further.

- D21. A more realistic and sustainable, but still an ambitious, approach would involve using lower job targets to underpin the RSS. This would result in a corresponding reduction in the dwelling requirements.
- D22. As the dwelling requirements were purportedly based on the job growth targets they are open to the same criticism. However there are also two other elements to the calculation of the overall dwelling requirement – the overall housing need and the affordable housing need.
- D23. The calculation as to the overall housing need of the region is considered to be too reliant on a “predict and provide” approach. Regional planning has moved away from this approach as it fails to properly take account of the implications of simply meeting demand. While there are social and economic implications with a failure to meet housing demand there are also environmental and infrastructure implications of providing for unconstrained demand. A balanced approach is required which meets genuine needs but factors in all the implications of housebuilding.
- D24. The need for an increased supply of affordable housing is not disputed. East Herts Council has undertaken its own survey of housing needs and found significant unmet need. However the provision of a proportion of affordable housing does not justify a corresponding “scaling-up” of the overall housing requirement, for example taking the affordable housing requirement as 40% and simply multiplying by 2.5.
- D25. Overall East Herts Council support the importance given to affordable housing provision in draft RSS. It is one of the key issues limiting the region’s social and economic capacity.
- D26. The requirement in Policy SS13 that affordable housing constitutes at least 30% of housing supply in local authorities areas means that a target well in excess of 30% will be required on “suitable sites” i.e. those that meet local requirements in terms of thresholds etc.
- D27. There are significant funding issues with the provision of affordable housing and while developer contributions will have a substantial role to play, additional sources of funding are likely to be required to meet the overall affordable housing targets in the draft RSS.
- D28. The dwelling requirements set out in the draft RSS represent such a vast change from existing RPG rates (around a 65% increase in housebuilding rates across East Herts, Broxbourne, Harlow, Uttlesford and Epping Forest). Change on this scale, and with such potentially harmful implications, must be robustly justified. The three underlying influences on the dwelling requirements are all questionable in some respect. Such uncertainty and a lack of robustness seriously undermine the value of the strategy.

- D29. A consequence of the uncertainty over job growth targets is the need for a mechanism by which housing growth can be monitored and managed in accordance with the rate of job growth and the level of infrastructure provision. The coordination of these three vital elements represents a major challenge to the RSS. The need for phasing of growth is referred to in several places in the Plan. If the economic growth on which the strategy is based does not materialise, one can only assume that, using the principles of phasing included throughout the RSS, the supply of housing development must be managed accordingly. If this were not to happen and housing built without associated job opportunities, unsustainable commuting patterns would be the likely result.
- D30. In East Hertfordshire the demand for housing, particularly from those working in London, is such that almost any amount of new development would be quickly taken up. However providing housing for London residents is not part of the strategy for the East of England. The “jobs-led” draft RSS seeks to create mixed communities rather than dormitories for commuters. This underlines the importance of having robust economic principles on which to base the RSS but also the need for a detailed mechanism by which the timing of housing development can be managed to relate closely to economic growth and infrastructure provision. The supply of development land therefore needs to be flexible and to be able to come forward in “chunks” as and when necessary. The need for flexibility and proper phasing should influence the type of urban expansion proposed and East Herts Council have commented on this issue in relation to Harlow.
- D31. There are several overarching issues that also need to be addressed as part of the overall picture. The issue of a new settlement is raised in Policy SS2, which indicates the need for an early review of the RSS to consider the need for, the role and timing of, and the implementation mechanism for a large new settlement. This is an issue that has been raised regularly throughout the process leading up to the publication of the draft RSS. It is considered that inadequate consideration has been paid to the contribution that a new settlement could make to the housing targets in the period up to 2021. The “strategy” in the RSS is to focus development on existing towns and cities yet the implications of this have not been properly assessed against alternative strategies. This issue was highlighted as a weakness in the Sustainability Appraisal/Strategic Environmental Assessment of the draft RSS.
- D32. One of the implications of a strategy of focusing development around existing towns and cities is the impact on the Green Belt. Policy SS2 states the need for a strategic review of Green Belt boundaries at “Harlow, the Upper Lee Valley and Bishop's Stortford”. In light of the Council’s comments on the specific proposals at Harlow and Bishop's Stortford, it is not considered necessary or appropriate to undertake such as strategic review as these issues can be dealt with through local development documents.

- D33. PPG2: Green Belts indicates that “very special circumstances” are required to exist in order to justify release of Green Belt land. The uncertainty over the economic underpinnings, and therefore the dwelling requirements, means that doubt exists as to whether very special circumstances can be proved.
- D34. Paragraph 5.141 indicates that it would be desirable to make compensating additions to Green Belt. However, the principle of making compensatory additions to the Green Belt in no way lessens the harm of developing the Green Belt in the first place. The principle of the Green Belt is undermined by an approach that allows development on the basis of a compensatory addition to Green Belt elsewhere. The word "compensatory" should be deleted from this paragraph.
- D35. Policy SS7 also states “Reviews will ensure that sufficient land is identified to avoid further green belt review before 2031”. The strategy of the draft RSS is to concentrate development on existing towns and cities, but it is acknowledged in the draft RSS that this strategy cannot continue indefinitely. There is no formative spatial strategy for the post-2021 timeframe and it is likely that such a strategy would be different to that in the draft RSS. Under these circumstances it is not possible to establish what scale of “sufficient land” would need to be identified to meet needs to 2031 and therefore to plan Green Belt releases post-2021 at this stage. The early review of RSS, set out in Policy SS2, also negates the need to plan post-2021 Green Belt releases at this stage.
- D36. While significant Green Belt releases are proposed by the draft RSS, Policy SS4 still requires 60% of development across the region to be on previously developed land. There is an argument to say that this target should not apply in the Growth Areas, since the decision to allocate growth areas was not based on identified capacity but on strategic need.
- D37. An approximate breakdown of the proposed figures for East Hertfordshire indicates that once recent completions, planning permissions and existing Local Plan allocations have been disregarded, urban capacity makes up only about 30% of the remaining dwellings required in the District. The target of 60% in Policy SS4 cannot be met in East Hertfordshire given other provisions of the draft RSS in Policy ST4.
- D38. There is also a general point to be made about the correct level of detail for a Regional Spatial Strategy to contain. It must avoid being site specific, an objection that East Herts Council has made in respect of other policies, particularly in the Stansted/M11 sub-region. However it must also avoid simply repeating national guidance without adding a regional dimension. Policy SS4 is an example of a national guideline that is repeated without being regionally specific or adding any value to

the development plan. Policy SS4 and its associated text should be deleted.

- D39. It is also considered necessary to make some general and also some detailed points about the strategy for the Stansted/M11 sub-region. Firstly, the definition of the Stansted/M11 sub-region does not make it clear which parts of the District of East Hertfordshire are included and which are excluded. In the interests of the clarity of the RSS, paragraph 5.121 needs to be more specific in its description of which parts of East Hertfordshire are within the Stansted/M11 sub-region.
- D40. A similar lack of clarity exists in relation to the Lee Valley. The Draft RSS makes reference to both the "Lee Valley" and the "Upper Lee Valley", without distinguishing between the two. The extent of the area referred to is not defined anywhere in the Plan. The Lee Valley actually extends from London to the Luton area. However the references to the Lee Valley in the Plan relate to a much smaller area.
- D41. RPG9 for the South-East defined a Priority Area for Economic Regeneration (PAER) as East London/Lower Lea Valley, which extended from "London Docklands up to and including the urban areas of Waltham Cross, Cheshunt, and Hoddesdon in Herts."
- D42. It is therefore considered that all reference to the "Lee Valley" or "Upper Lee Valley" should therefore be deleted and replaced with "Lower Lea Valley". A definition should also be given at an appropriate place in the plan to define the East of England section of the Lower Lea Valley encompassing the Hertfordshire urban areas of Waltham Cross, Cheshunt and Hoddesdon.
- D43. Comments have been made earlier regarding the nature of the Growth Area not being a coherent spatial entity. At a more detailed level paragraph 5.124 refers to "a corridor of development up the Lee Valley, northwards through North Weald and Harlow towards Stansted Airport". This corridor does not exist in reality. The railway line runs up the Lea Valley, then through Harlow and on to Stansted Airport, but this is not a corridor of development, more a corridor of movement. There is the potential to link, by public transport, the proposed developments at North Weald, Harlow and Stansted. This would then produce a corridor of movement, but again not a corridor of development.
- D44. The fourth bullet point of paragraph 5.124 should therefore contain no reference to corridors of development, which do not and will not exist, even under the draft RSS proposals. Should the RSS choose to focus on the corridor option, reference should be made to corridors of movement rather than development. Greater clarity should be provided in relation to the proposed corridor, and a choice made as to whether this corridor follows the existing rail route (Lea Valley-Harlow-Stansted) or the proposed public transport link (North Weald-Harlow-Stansted).

East of England Plan

Draft partial response – Harlow

Key RSS Policy references

Stansted/M11 sub-regional policies (ST1-7)

Summary

- D45. This section of East Herts Council's response to the East of England Plan deals with the proposals for growth around Harlow. It begins with a discussion of five particular regeneration issues for Harlow. The important issue of the relationship between growth and regeneration is investigated and the assumption that growth at Harlow will achieve, or even contribute to, the regeneration of the town is questioned.
- D46. It is acknowledged that an element of growth is likely to be beneficial to the regeneration of Harlow, but not on the scale proposed. Other, more focused strategies, or indeed a robust regeneration strategy for the town, which currently does not exist, would be able to achieve the suggested benefits of growth for regeneration. The potential harm to the regeneration of the town caused by the proposed scale of new growth is considered to outweigh these benefits.
- D47. On the basis that a case for growth at Harlow can be made, this report moves on to discuss the relative merits of growth locations around Harlow. In particular, the numerous constraints to development that exist to the north of Harlow are explored, including the issue of integration with the existing urban area of Harlow, landscape constraints, aircraft noise and the original Gibberd principles for the town.
- D48. Growth at Harlow on the scale proposed in the draft RSS has not been, and it is argued cannot be, justified on its contribution to the regeneration of Harlow. Vital questions remain unanswered. Why does Harlow need to grow? If it needs to grow, how much would be appropriate? If a certain level of growth can be justified, where would it best be located to serve the town and its regeneration needs?
- D49. As a general principle, it is inappropriate for a Regional Spatial Strategy to enter in to the level of detail that is included in RSS in relation to Harlow. However, if the RSS must make specific proposals for the Harlow area, they must be fully justified by baseline data and form a robust and coherent strategy. The remaining unanswered questions over the relationship between growth and regeneration at Harlow seriously undermine the credibility of the Plan.

Detailed Response

D50. The draft RSS proposes significant growth around Harlow in order to strengthen its sub-regional role. In terms of the number of dwellings, the growth proposed at Harlow, amounting to 20,700 dwellings, is the largest growth proposal for any settlement in the plan. Proposals of this magnitude must be robustly justified in terms of their scale and location and supported by empirical information, in the interests not only of good planning but also of the soundness of the Plan.

Should Harlow grow? Growth v Regeneration

D51. Harlow is in need of regeneration. The District Council is of the view that there are five particular issues needing to be addressed if regeneration is to occur: the poor quality housing stock, the achievement and aspirations of residents, the lack of economic diversification, deficiencies in the layout of the town and recent under-investment.

D52. The available housing stock affects who moves to, stays in or moves out from a town. It has an influence on the skills mix, and therefore on the quality of the workforce, of the town. Harlow has suffered from population loss in recent years, particularly among young people and those with higher-level skills, and the poor quality housing stock is considered to be at the root of this problem. In tandem with this, educational achievement and the general skills level in Harlow is low compared with surrounding areas. There are estimated to be around 5,300 more residents in Harlow who are qualified to NVQ3 level or less than there are appropriate jobs. Conversely there are around 3,700 more jobs requiring NVQ4/5 level qualifications than there are qualified residents. This skills shortage is a key factor in many of the problems faced by the town. Worryingly, participation in education or training for 16 and 17 year olds is also low, indicating that the next generation of Harlow residents may also face similar problems.

D53. Harlow's economy is over-reliant on several large employers and is therefore relatively more vulnerable to changes in key sectors of the economy. The small-to-medium size enterprises that would usually add diversification to a town's economy are not present in large numbers in Harlow, probably reflecting the skills and training shortages outlined above.

D54. The route of the A414 through the town is one illustration of the deficiencies in the town's layout. While the original Gibberd structure of the town may have merit, failures or changes in the implementation of that structure have been contributory factors in the town's decline. This has been matched by the simultaneous obsolescence of much of the fabric of the town and a lack of investment in maintenance and

renewal. The result is a poor quality built form that adds to the economic and social problems referred to above.

- D55. A key priority of the RSS must be to achieve regeneration in Harlow, to deal with these existing social, economic and physical problems. Few would disagree with this. The role of RSS in this respect is to set out a strategic planning policy framework to guide the more detailed local planning functions in order to facilitate this regeneration. A further, Government-given role of the RSS is to meet the requirements of the Sustainable Communities Plan (SCP), by providing for an increased level of housing growth, notwithstanding the fact that the SCP itself was not subject to any form of public consultation. Harlow, as with other settlements in the M11 corridor, has a role to play in meeting these housing targets.
- D56. The view of the draft RSS in respect of this crucial relationship between securing regeneration and allocating housing growth is oversimplistic. In seeking to distribute large amounts of housing growth across a sensitive region, and in particular in the M11 corridor, it has been assumed that areas in need of regeneration can accommodate substantial housing growth and that this will automatically achieve a number of regeneration aims. This assumption has barely been tested and, without solid supporting evidence, is not a valid basis for a strategy. There can be benefits associated with regeneration schemes that include an element of new development but there can also be considerable drawbacks.
- D57. There appear to be four arguments in favour of allocating growth to those areas in need of regeneration. Firstly there is an issue of size. Harlow currently has a population of just under 80,000. A further 20,700 dwellings in and around Harlow would increase this figure to approximately 125,000. A larger population does facilitate the provision of higher-order services and infrastructure improvements in certain situations.
- D58. However the viability of the provision of such services is not solely based on the population of that town. Harlow currently has a relatively wide potential catchment area beyond the town itself, which includes the towns of Sawbridgeworth, Ware and Hertford, the upper Lea Valley towns of Hoddesdon and Broxbourne, as well as settlements in Essex such as Epping. The existing lack of certain higher-order services is not considered to be primarily down to a lack of population, but rather because of issues of image, and particularly access and transport difficulties. It is not merely a case of the quantity of growth but the quality and nature of such new development.
- D59. There is also a competitive element to securing higher order services. With growth at other strategic locations in the region, Harlow will need to make a case as to why it is the location of choice for the various

retail, leisure and other services that are sought. This issue of competition will be expanded on below.

- D60. It is often assumed that a larger settlement is a more sustainable settlement. This may be on the basis that it can provide a greater range of services and therefore reduce the need to out-commute or that it can support a more effective public transport system. However there are limits to such “economies of scale” and in some situations larger settlements may mean longer journeys that are less attractive by non-motorised means such as walking and cycling. There is a complex relationship between settlement size and transport demand that include various socio-economic factors. However it does not necessarily hold true that the larger a settlement grows, the more sustainable its travel patterns become.
- D61. There is also no evidence to suggest that size is essential for urban health. The rapid rise in popularity of market towns and the continuing movement of population away from large cities to less urban areas indicates that, in many cases, smaller communities are the location of choice, particularly for families. An increase in the size of Harlow is not considered to enhance the town as a residential location. An improvement in the housing stock and built form are more likely to achieve this aim.
- D62. A second possible benefit for regeneration associated with development is the provision of additional housing capacity into which existing populations can be “decanted” while these areas are redeveloped. While this may be a valuable benefit of including an element of new housing in any regeneration scheme, it is unlikely to be sufficient to justify the levels of new housing growth proposed for Harlow in the draft RSS.
- D63. A third area where new development may contribute to regeneration efforts is in terms of generally raising the profile of a location and focusing attention on regeneration schemes. New development can add kudos to a town like Harlow through high quality design. However such new development would be better located within the existing town in order to ensure that any kudos is associated with Harlow as a whole, rather than simply the new areas of Harlow. There is clearly a danger that new peripheral greenfield development will attract new businesses, new residents, new services and facilities, while the existing town would probably worsen. The problems of social and economic decline would remain unaddressed.
- D64. The idea of competition for scarce resources between new development and the existing town centre also applies at a wider, sub-regional or even regional level. Many towns in the sub-region will be upgrading their town centres facilities to exploit the opportunities presented by growth. Stevenage is one obvious example of a town that has similar growth proposals to Harlow and that would be competing

for the same investment. This competition will not only be for retail facilities, but also for the key issue of infrastructure investment and Government funding, together with leisure and sports facilities, business relocations and even the skilled and mobile workers that will support economic growth. Towns against which Harlow may be competing could be said to have an advantage over Harlow at this stage. A substantial step-change will be required to actually achieve the growth aspirations of the town.

- D65. It is a serious weakness of the draft RSS, and one that may undermine the strategy as a whole, that it promotes and requires such radical shifts in the economic characteristics and performance of towns right across the region. The plan's growth aspirations for Harlow are virtually identical to those for Stevenage, a town less than 20 miles away. Considerable doubt must exist as to whether both of these towns can compete in the same market for the same resources and both achieve the aims set out in the draft RSS.
- D66. The final, often referred-to potential regeneration benefit is related to the capacity for new development to contribute towards regeneration schemes through Section 106 contributions or "planning gain". Such contributions can be financial or through the provision of additional infrastructure or land for other uses. While planning gain will have a role to play in facilitating regeneration, it is important that a realistic approach is taken to developer contributions and that the burden of infrastructure provision rests on the appropriate shoulders. Significant developer contributions towards infrastructure provision could affect the financial viability of development proposals, particularly in a low value market area such as Harlow that is in competition with other higher value residential locations (Bishop's Stortford, Great Dunmow etc). Development north of Harlow, for example, would involve the provision of a wide range of uses, not just residential. Such uses are not as profitable as residential development and the scope of planning contributions will need to be considered accordingly.
- D67. There is a danger in justifying peripheral greenfield development largely on the financial contribution it can make to the regeneration of the town. Local residents will be entitled to question whether the limited contribution made by new development towards regeneration is justification enough for the development of hundreds of hectares of Hertfordshire countryside.
- D68. These four issues have been used as arguments in favour of allocating large amounts of development to places such as Harlow and Stevenage. However these issues point to *potential* or *theoretical* benefits that *might* occur if regeneration and growth were to take place together. There has been no firm justification as to why growth is required at Harlow in order to facilitate regeneration. There is a lack of

a robust reasoning and justification, along with supporting evidence, for what is the largest single growth proposal in the draft RSS. The benefits for regeneration of the four issues above can all be questioned and do not stem from local evidence or technical justification gathered around Harlow. East Herts considers the benefits associated with new development have been overestimated.

- D69. Furthermore, it is not simply a question of there being few definable benefits for regeneration, but crucially there could be considerable drawbacks in including such large amounts of new growth. Key among these is the danger for growth to become the priority rather than regeneration. The most important issue for Harlow is regeneration and this must be the policy emphasis. Any new development must be subservient to this principle. New greenfield development should only be considered where there are clear-cut regeneration and sustainability benefits and the scale and location of the development has been thoroughly considered, such that it maximises the contribution to regeneration.
- D70. A specific example of where growth is already beginning to divert attention away from the real issues is found in bullet point 5 of Policy ST1. Local development documents and related strategies are required to provide for:
- “achieving a new vision for Harlow as an employment and housing growth area and a strong sub-regional centre allied with physical, social and economic regeneration”.
- (Policy ST1, Draft RSS, December 2004)
- D71. The emphasis of this passage is at odds with the primary objective of regeneration. If the vision is primarily for Harlow to become a growth area, attention will be directed to those areas of new growth and not the existing areas in need of a remedy for deep-seated social and economic problems. New development is often considered the “easy option”, whereas regeneration takes far longer, requires far more resources and is generally more difficult to achieve. New investment and development will therefore naturally gravitate towards new areas “with a clean slate” rather than areas in need of regeneration. The policy “vision” must try to redress the balance by stating regeneration as the key priority, with growth provided for only where it meets regeneration aims.
- D72. It is vital that the profile or the image of Harlow is one of a regeneration centre, rather than a growth centre. In marketing terms, it would be much easier to attract new businesses to new development north of Harlow because it would not have the same stigma attached to the existing town. However such a marketing strategy would completely undermine any regeneration efforts going on in the main town. The branding of Harlow is likely to be key to its successful regeneration and

policy wording such as that in ST1 is considered to be unhelpful and misleading.

- D73. There is a potential alternative strategy worthy of consideration for the regeneration of Harlow to that set out in the draft RSS. The proposed RSS strategy relies on regeneration driven by planned growth. However an alternative to this would be that regeneration occurs through a targeted regeneration strategy for the town. This strategy is a fundamental element of the process that must be in place before growth is allocated, and particular before growth locations are chosen. Such a strategy would examine the role of Harlow in its sub-region, what its relative strengths and weaknesses are, what precisely needs to happen for regeneration to take place and how can this be brought about. The role of new development in bringing about regeneration could then be properly explored and an appropriate quantum provided for.
- D74. The draft RSS has not examined alternative approaches to growth-driven regeneration. A substantial element of growth has been allocated on the assumption that it will support regeneration but without any clear perspective or justification as to how this will happen or how realistic this approach is. The alternatives must be examined in order to produce a robust strategy.
- D75. To summarise this section of the East Herts response, growth at Harlow on the scale proposed in the draft RSS has not been, and it is argued cannot be, justified on its contribution to the regeneration of Harlow. Vital questions remain unanswered. Why does Harlow need to grow? If it needs to grow, how much would be appropriate? If a certain level of growth can be justified, where would it best be located to serve the town and its regeneration needs? As a general principle, it is inappropriate for a Regional Spatial Strategy to enter in to the level of detail that is included in RSS in relation to Harlow. However, notwithstanding earlier comments, if the RSS must make specific proposals for the Harlow area, they must be fully justified by baseline data and form a robust and coherent strategy. The remaining unanswered questions over the relationship between growth and regeneration at Harlow seriously undermine the credibility of the Plan.

If Harlow needs to grow, where should it grow?

- D76. The draft RSS considers that Harlow should grow, and grow by a total of 20,700 dwellings. Without prejudice to the points made above as to whether this growth is appropriate and the justification for this particular level of growth, this section of the East Herts response considers the different options available for growth at Harlow, and their various advantages and disadvantages.

- D77. Before the detailed locations are discussed, it is worth considering whether the RSS should actually prescribe the direction of growth. In principle, a strategic, regional planning document should not stray beyond the realms of the strategic issues, into issues of detail that should more appropriately be dealt with by local planning documents. PPS11 indicates that the EiP process is not suitable for the hearing of site-specific representations. The identification of the site north of Harlow goes beyond the selection of a “broad location” allowed by PPS11 and will necessitate extensive discussion at the EiP on the merits, or otherwise, of the various directions for growth. This is particularly the case given that the timescale for the draft RSS has not allowed sufficient time to produce robust information on the options for growth. The inability of the EiP to fully investigate growth options around Harlow must mean that it is inappropriate for the RSS to be as locationally specific as it currently is.
- D78. While it could be appropriate for the RSS to identify a certain approximate level of growth for Harlow (subject to rigorous justification), it is not considered to affect the spatial strategy for the region whether this growth takes place to the north, east, south or west of Harlow. The RSS should therefore not contain a specific direction for growth as such detail can be added through local development documents at the appropriate stage. Proposals for growth in other sub-regions referred to in Chapter 5 of the draft RSS do not contain the same level of detailed prescription. This leaves the reader with the impression that Harlow is being handled differently from other parts of the region. The same points would also apply to the growth proposed at Stevenage.
- D79. In addition, the level of detail appropriate in the RSS must relate to the amount of technical work undertaken to inform the strategy. It is considered virtually impossible to carry out sufficient statistical and survey work to inform the direction of any growth at Harlow within the confines of the timetable for regional spatial strategies. The content of an RSS should therefore not pre-empt the outcome of more detailed, local studies. This constitutes further justification for the view that it is inappropriate for the draft RSS to prescribe the direction for growth at Harlow.
- D80. This point is further emphasised by the East Herts view that the draft RSS has come to the wrong conclusion on the direction for growth around Harlow, and that any evidence that emerges through the production of local development documents will not be able to influence this direction of growth. Insufficient work has been done to date to justify the direction for growth and when this work is actually carried out, the matter will already have been decided by the RSS. The final section of Policy ST4, which indicates that detailed proposals for the areas mentioned will be determined by local development documents or masterplanning studies, has little relevance to Harlow as

the RSS already goes beyond its remit in determining the direction for growth.

- D81. The detailed locational choices available for growth at Harlow are set out in paragraph 5.136, and are broadly north, east, south, west and central.
- D82. With regard to development within the built up area of Harlow, as mentioned above, this must be the first option to be considered, in line with PPG3's sequential approach to housing provision and sustainability principles. The draft RSS contains an allocation of 8,000 dwellings within and to the east of Harlow. The structure of paragraph 5.136 would seem to indicate that northern expansion is of the highest importance, both because it is the first area to be described in the paragraph and also because it is discussed in far more detail than other locations. This does not help to reassure the reader that, in line with PPG3 and the sequential approach, attention is being paid first and foremost to development and redevelopment within the built up area.
- D83. Once the full capacity for development within the existing built up area has been identified, and on the assumption that a case can be made for new growth around Harlow, over and above urban capacity, then it appears the next most suitable area for development is to the east of Harlow. As set out above, the draft RSS suggestion is for 8,000 dwellings within Harlow and to the east, and it is not clear what proportion is specifically to the east. Early estimates indicate that up to 5,000 dwellings could be provided for to the east of Harlow, west of the M11.
- D84. Landscape analysis around Harlow has indicated that land on the east of the M11 may also be appropriate for development. A ridge exists that encloses an area of land to the east of the motorway and this has been described as "pleasant if unremarkable with few constraints". There will obviously be urban design and integration issues to consider here but there is no reason why the RSS, as a strategic document, should rule out development to the east of the M11 at this stage.
- D85. Moving round Harlow in a clockwise direction, certain development potential exists to the south of the town. A landscape ridge exists just beyond the current limit of the town and this would need careful consideration with any development proposals. However there may be scope to incorporate this ridge as part of the town, for example as a built ridge. Again, it is not the place of the RSS to indicate such detailed planning proposals but there remains greater scope for development to the south of Harlow than is acknowledged in the current wording of paragraph 5.136.

- D86. A further advantage of this growth location is the proximity to those southern estates of Harlow in greatest need of regeneration. Studies have shown that many of the most deprived Harlow estates are located in the south of the town and this should form the focus for any regeneration-related growth.
- D87. Growth to the south of Harlow, as with growth to the east or west, can be in the form of extensions to existing communities or neighbourhoods. This would have considerable regeneration benefits that are not associated with development to the north of the town. Existing community facilities can be enhanced to the benefit not only of the new residents but to the town as a whole.
- D88. Similarly, development potential exists to the west of Harlow between the town and the eastern edge of the Lea Valley. Such development would be well located in respect of the employment areas to the west of the town.
- D89. There are landscape constraints here, as with all directions for growth, but these are not critical constraints. A large area around Roydon and Nazeing has been designated as a Conservation Area. While the Planning (Listed Buildings and Conservation Areas) 1991 has been used to designate areas of landscape importance in many locations, the overall focus of Conservation Areas is more often on the built environment. The degree of control exercisable in Conservation Areas could be considered to be more appropriate in smaller, more urban environments rather than large areas of historic landscape. In any case the level of control does not extend to an absolute restriction on new development but rather seeks to ensure that new development preserves and enhances the character and appearance of the Area. While any new development here would need to be sensitively designed and located, there is no justification for such a large area of land to be seen as an absolute constraint to development. Furthermore, new development here may open up opportunities for the enhancement of areas of poor or degraded landscape quality.
- D90. The remaining potential growth direction around Harlow is the one that receives the most attention in paragraph 5.136. Northward growth of Harlow would release perhaps the largest area of land for development but would also involve the greatest number of constraints and difficulties.
- D91. The proposal for 10,000 dwellings north of Harlow appeared at a relatively late stage in the production of the draft RSS. The “banked” RPG (as was then called) published in February 2003 included no such provision and recommended growth to be directed to the east, south and west of the town. This was, in part, influenced by the outcome of the Stansted/M11 Corridor Development Options Study (December 2003) by Colin Buchanan and Partners. This study recognised the constraints associated with development north of the town and came to

the conclusion that growth on the scale envisaged by the banked RPG should be directed initially to the east and west of the town, followed by development to the south.

- D92. In the period between the “banking” of the draft RPG and the publication of the consultation draft RSS (November 2004) several further studies were undertaken and it can only be assumed that the proposals for north Harlow stemmed from the outcome of these studies. During this time Colin Buchanan and Partners continued their earlier work and produced the report entitled “A Study of the Relationship between Transport and Development in the London-Stansted-Cambridge-Peterborough Growth Area” (August 2004). This study continued the previous theme of development focusing on the east, south and west of Harlow.
- D93. A further study completed during this time was the RPG14 Strategy Review for the London-Stansted-Cambridge-Peterborough Corridor by Robin Thompson Associates (September 2004). This study was commissioned in order to review the strategy in the “banked” draft RPG and the various studies that contributed to it and to formulate any amendments to the strategy.
- D94. This Review appears to have been particularly influential in significantly changing the development strategy for the Region, particularly in respect of Harlow, from that contained in the March 2004 “banked” draft RPG, to that in the eventual consultation draft RSS of December 2004. This study was commissioned at a late stage in the process leading up to publication of the consultation draft and was required to report over a short time scale. The formation of an alternative “strategy” at this stage in the process, when other strategies such as the transport strategy and the retail strategy had already been largely completed, undermines the coherence of the Plan. This is evidenced in a draft RSS that appears to display a number of disparate strategies grouped together rather than an integrated overall development strategy for the region.
- D95. On the subject of Harlow the RPG14 Strategy Review found in favour of a northern extension to Harlow. This was mainly on the basis of the town’s existing urban structure, the proximity to the railway station and the employment area in the north. It was also considered that “a development of up to 10,000 homes and of substantial employment uses should be deliverable before 2021”.
- D96. It can be acknowledged that development north of the River Stort has the advantage of relative proximity to the railway station. However, there is a recognised need for a town-wide public transport system to solve the existing problems of congestion and it is likely to mean that access to the station is a fundamental part of such a system. The provision of such a link would aim to reduce car-borne travel to the

station and would therefore lessen the relative advantage of proximity to the station associated with development north of Harlow.

- D97. The proximity of residential areas to employment areas is an important factor, but again one that would be less relevant if a high quality public transport system for the town was introduced as recommended. Essentially the proximity of a potential northward expansion of Harlow to the northern employment site is an advantage, in the same way that the proximity of a potential westward expansion to the western employment areas is also an advantage. The northward expansion has no relative advantage over the westward expansion in this respect.
- D98. Unlike other directions for growth, northward expansion would not be in the form of an extension to existing communities or neighbourhoods. New communities would need to be established with the full range of employment, leisure and community opportunities. This will take longer to develop and consume more resources than extending and adding to existing facilities. Development north of Harlow would also have little direct beneficial impact on the more deprived of Harlow's neighbourhoods in the south of the town.
- D99. One of the most important issues related to a northward expansion of Harlow is the relationship between the town and any new development. The town's northern edge is defined sharply by the railway line, the River Stort and its floodplain, and the A414 dual carriageway. The Hertfordshire hills beyond reinforce the idea that Harlow stops one side of the Stort Valley and the countryside begins on the other. The floodplain of the Stort Valley extends between the railway line and the dual carriageway so little development will be possible between these points, a distance of over 500m.
- D100. While this separation presents real practical problems of integrating the new development with the town, perhaps more importantly is the sense of separation that would be experienced between the two locations. In reality the new development is likely to retain a high degree of self-sufficiency and have only marginal links with the existing town. Experience elsewhere in Hertfordshire indicates that towns that are bisected by railway lines are often bisected socially. The case for Harlow is made worse by the combination of barriers (railway, road and river valley).
- D101. Experience with recent development at Church Langley in Harlow has shown that such new developments have little in common, socially or economically, with the existing town. The economic profile of Church Langley shows that a much higher proportion of residents work outside of Harlow, particularly in London, compared with residents of the rest of Harlow. The issues of separation from the existing town mean that such differences are likely to be accentuated in any development north of Harlow.

- D102. One acknowledged problem with the layout of Harlow is the fact that the A414 runs through the town, which not only adds to traffic congestion but causes segregation between communities and hinders pedestrian and cycle access within the town. The need for a bypass to deal with these problems is accepted by the draft RSS. However the preferred route for this road set out in the draft RSS is proposed to run north of the existing urban edge and effectively segregate the RSS development proposals. This will not solve the traffic problems of the town but simply move the problem from one part of the town to another. It would be absurd to repeat such a clear previous planning error in any new development.
- D103. The level of segregation likely between new and old would mean that the new development is effectively a new settlement. The number of houses involved would be the equivalent of a town the size of Hertford tacked on to the northern edge of Harlow. The contribution of such development to the regeneration and renewal of the town is likely to be minimal, or even negative as the new development competes with the regenerated areas of Harlow for new investment and employment activity.
- D104. The site of the proposed 10,000 dwellings north of Harlow is seriously affected by noise from aircraft approaching Stansted Airport. Aircraft approaching from the south-west will be completing changes of direction over the proposed development area, in order to line up onto the final runway approach path. The tracking data available from the airport indicates that aircraft are at a height of only about 600 metres (2,000ft) above ground level over the Harlow North potential development area. This issue formed part of Hertfordshire County Council's case against the Harlow North Proposal, at the South East Regional Planning Public Examination in May 1999.
- D105. While attention will no doubt be paid to avoiding the 57dBA contour, such current available noise contour information concentrates on aircraft taking off, as they are noisier than landing aircraft. It, therefore, reflects only a partial picture of the noise situation, and is not considered to adequately reflect that relating to landing aircraft.
- D106. A crucial factor in this context is the recent Aviation White Paper, which proposes a further runway at Stansted by 2012. Notwithstanding the fact that the draft RSS expresses no support for growth beyond the capacity of the existing runway and also the recent legal challenge of the White Paper, the White Paper proposals are nevertheless a consideration. The potentially substantial growth in air traffic in the Stansted area could seriously exacerbate existing problems.
- D107. It is therefore, concluded that to deliberately place 10,000 more homes and up to 25,000 extra people, in a position where they would be subject to the day and night noise environment produced by rapidly

increasing numbers of aircraft movements directly overhead, and at low level, would not only be undesirable, it would be irresponsible.

D108. Development of the area north of Harlow is also considered to be inconsistent with the original Harlow New Town Design Principles of Sir Frederick Gibberd, of a semi-circular form with a strong base line (in the north against the Stort River/Navigation). Gibberd's views on subsequent expansion proposals for Harlow in the 1970's expressed concern that expansion to the north would mean the loss of some attractive Hertfordshire landscape. Further, he considered the Stort Valley had to be retained as a flood valley, with the consequence that there would be a wide gap between buildings north and south of the river and the new development would tend to be a separate community. Gibberd also saw that building to the north of Harlow would result in the loss of the visual connection between the town centre and the open landscape of Hertfordshire.

D109. Gibberd considered that the area between Harlow and the M11 would be suitable for expansion but in terms of the design the expansion would focus development on one side of the town, which would violate the design principle based on symmetrical development. Development to the west would be on comparatively low-grade agricultural land, where the landscape is already adversely affected by glasshouses and scattered building development and, therefore, of lower quality than other areas surrounding the town. Expansion on the Roydon area would balance Old Harlow, thus distributing population evenly on the base line of the town.

D110. There are considerable landscape and environmental constraints to the north of Harlow. Colin Buchanan & Partners, in their August 2004 Study, found a large number of overlapping constraints present.

“Land to the north of Harlow was considered to be the most sensitive and development here would have significant environmental impacts. Absolute constraints that were identified included Scheduled Ancient Monuments (SAMs), floodplain and the eastern section of the search area is located within the 57 dB(A) Leq Noise contour. These absolute constraints would preclude development completely. In addition, there is also a high concentration of partial constraints that consequently overlap to the north of Harlow. These include the 54 dB(A) Leq noise contour, areas of archaeological significance and an abundance of county wildlife sites distributed across the whole of the search area.”

D111. East Herts Council endorse these comments. It is also worth expanding on the particular merits of the Stort Valley by using elements from the Hertfordshire County Council response to the request for advice from Strategic Authorities.

“The Stort Valley is of high landscape and ecological value with ‘*numerous significant conservation designations*’ (paragraph 4.2.2 Landscape Report). It holds the most important floodplain grasslands in Hertfordshire and is highly valued for its distinctiveness. It would be damaged by urban-fringe pressures, and by new crossings which would detract from its integrity and limit the movement of wildlife, including protected species.”

- D112. Beyond the Stort Valley, the draft RSS proposals include developing on a wider area, which is designated Metropolitan Green Belt and includes a number of environmental designations, including at least 16 County Wildlife sites, 3 Scheduled Ancient Monuments, 6 Areas of Archaeological Significance, several historic gardens, and the Conservation Area covering the village of High Wych. Development in this area would introduce a harsh urban element in to what is currently a rural environment. Development would swallow up the villages of Eastwick, Gilston and Gilston Park, as well as causing coalescence with High Wych and Sawbridgeworth.
- D113. A key issue for any development north of the Stort Valley is the issue of where such development should end. Once the Stort Valley has been crossed, there is little in the way of a natural limit to development. The landowner of a large parcel of land north of the Stort Valley has put together speculative proposals for around 25,000 dwellings. East Herts Council is wholly opposed to such a proposal but it gives an indication of land being offered for development and the potential direction of a potential “second phase” of Harlow expansion. Such a proposal would have profound implications for the whole of Hertfordshire and west Essex. While it does not form part of the draft RSS, the potential knock-on effects of the proposed 10,000 dwellings must be considered in the wider sense.
- D114. The significant environmental impact of development is not limited to the actual development area. The RSS development proposals require an outer bypass to the north of the existing urban area of Harlow from the A414 to the M11. While no route has been identified it is likely to follow the Stort Valley for at least a section of its length. The environmental impact of building a new, presumably dual carriageway route through such a sensitive area would be tremendous. The cost, the timescale and the practicality of such a route should not be underestimated. Such a route would also require a new junction 7a on the M11. The Highways Agency has consistently been opposed to such a proposal.
- D115. There are widespread traffic and congestion issues in Harlow that need to be addressed in order to facilitate effective regeneration. However surveys have shown that the majority of traffic present in Harlow is either local or terminating traffic, while only a relative small proportion (approximately 20%) is through-traffic. This highlights the importance

of equipping Harlow with an effective public transport system and diminishes the congestion-easing role of a bypass.

- D116. There are other options for a Harlow bypass other than the northern route set out in the draft RSS. A south-west distributor road would be more effective in terms of easing local and terminating traffic concerns. The northern bypass option was dismissed by Buchanans in their 2003 report on the basis that it encouraged car-borne travel to Stansted and would therefore make any public transport alternatives relatively less attractive.
- D117. One final issue regarding northward expansion is the issue of deliverability. It is acknowledged that large areas of land are owned or controlled by a single landowning interest and this may have implications for the delivery of development. However single ownership can also have a negative impact as it may be in the landowner's interest to manage the release of land from a land value perspective.
- D118. The practicality of actually building 10,000 new homes, together with the related facilities and substantial infrastructure required has not, to date, been assessed. Over 10,000 new homes are to be built elsewhere in Harlow, together with 14,400 homes in the Stevenage area and considerable emphasis on increased development across the whole southern part of the region. The capacity of the construction industry to complete such a project and the implications of a capacity shortfall should have been thoroughly investigated prior to the production to the draft RSS.
- D119. This issue of capacity is a further reason why development to the north of Harlow is not the appropriate choice as a growth location. Being detached from the main town itself, development north of the river Stort would need to be self-sufficient to a large degree to be a maintainable community. This requires a certain volume of development to achieve a critical mass. If only half of the proposed development north of Harlow took place, this would have considerable sustainability implications as residents would not have the appropriate range of services within reach of their homes and this could lead to unsustainable commuting patterns.
- D120. The development to the north of Harlow is therefore less flexible than other Harlow growth locations in terms of the rate at which development can come forward yet still be sustainable.
- D121. In any case the easy implementation of development does not necessarily make it the correct planning solution or the most sustainable and appropriate solution for Harlow. It is considered that the issue of potential ease of deliverability should not carry weight in terms of regional planning policy and formulating a long-term, robust regional spatial strategy.

Harlow – Conclusions

D122. It is not East Herts Council's intention here to set out an alternative development strategy for Harlow. Rather the above issues are raised to illustrate the difficulties associated with growth around Harlow, the flaws in the proposed strategy in the RSS and the need for further investigative work at the local level to achieve a robust approach. It could be considered that the draft RSS is trying to achieve the impossible by being so specific and should instead focus on a broad set of policy aims for Harlow's regeneration and, if appropriate, a certain level of growth, while leaving the detailed growth direction work to local development documents. This is considered a more appropriate and robust approach to the RSS.

D123. There is development potential around Harlow in almost any direction but there are also constraints associated with such development. With regard to the north of Harlow, the degree and nature of the constraints present mean that an extremely pressing need would be required to be established, together with a clear analysis of the positive direct contribution towards regeneration in the town. Few of the studies that have been carried out differ over whether constraints exist. The difference arises over whether sufficient justification exists to override the constraints. East Herts Council firmly considers that, in respect of development north of Harlow, such justification does not exist and the RSS should therefore contain no proposals for development north of Harlow.

Harlow – East Herts preferred strategy

D124. Given the uncertainty over the economic forecasts, region-wide and particularly in the Stansted/M11 sub-region, a more sustainable and robust strategy for Harlow would be based on a more modest level of jobs growth. This more modest level would still remain optimistic and aspirational but more would be more realistic given the level of competition for resources and investment that is likely to exist between other, arguably better positioned centres in the south of the region.

D125. The strategy for Harlow would be based, first and foremost, on regeneration. It must focus on Harlow's strengths rather than simply being based on the standard collection of economic aims that can be found in the economic strategy for any town or city across the country. This tailor-made strategy would not be possible under the terms of the draft RSS given the over-specific nature of the policies it contains.

D126. The role of Stansted in the Harlow economy could be investigated and the outcome could then be established in policy. The draft RSS

contains vague assumptions that Harlow will benefit from growth at Stansted despite the findings of various studies that the impact of growth beyond the airport itself is likely to be limited. Stansted Airport is a very different airport from Heathrow, for example, and the knock-on impacts experienced around Heathrow will not materialise at Stansted.

- D127. A corollary of a more modest jobs growth target would be a lower dwellings target. Housebuilding could then be targeted to the real areas of need within the town by “pepperpotting” new development throughout existing town. Such an approach is far more likely to spread any regeneration benefits of new development throughout the town, where it is most needed, rather than clustering them in new development separated from the existing town.
- D128. The choice of location for new development should not be made at this stage without detailed justification and a regeneration strategy. Local development documents can deal with this issue more competently and appropriately. The basis for the decision on the location of new development must be the contribution towards regeneration and sustainability aims and the minimisation of any environmental impact. This basis could be spelled out by the RSS, while the detailed decisions are left to local development documents.
- D129. The innovative, high-quality public transport system to deal with Harlow’s internal traffic problems is a vital element in any regeneration strategy and this is likely to take precedence over the need for a bypass, at least in the short term. This approach would be far more sustainable given the well-documented problems of new traffic generation caused by road building. If a robust sustainability and environmental case can be made for new road building, the south-west distributor option is preferable to the northern link road on the basis that it deals with the real cause of Harlow’s transport problems, i.e. internal access problems.
- D130. It is not East Herts Council’s role to put forward a detailed alternative strategy to the RSS. However there are clear problems with the proposed RSS strategy and credible alternatives do exist. These alternatives must be examined prior to a determination on the strategy.

East of England Plan **Draft partial response – Bishop’s Stortford**

Key RSS Policy references

Policy SS7: Green Belt

Policy ST4: strategic growth locations

Summary

- D131. The draft RSS makes a specific allocation of 2,000 dwellings on the ASRs at Bishop's Stortford. While the District Council acknowledges the historical planning policy status of the ASRs, the specifics of the allocation should be left to local development documents. There is not considered to be any need for a strategic review of Green Belt boundaries around Bishop's Stortford.
- D132. The potential, implied in the draft RSS, to increase the capacity of the ASRs beyond the figure of 2,000 dwellings needs to be considered against the mix of non-residential uses needed to support a sustainable community. Significant infrastructure investment is required to make up the existing deficit and support further growth in the town.

Detailed Response

- D133. The draft RSS identifies Bishop’s Stortford as a strategic growth location. Under the terms of policy ST4 and supporting text, existing ‘safeguarded land’ – the Areas of Special Restraint (ASRs) to the north of the town – would be released to provide for at least 2,000 dwellings. The District Council acknowledges the historical planning policy status of the ASRs.
- D134. Draft RSS Policy SS7 – Green Belt, proposes, *inter alia*, a review of Green Belt boundaries around Bishop’s Stortford, “as part of an appraisal to identify the most sustainable locations for new development in line with the sub-regional strategies (see chapter 5) and to respond to the Government’s Sustainable Communities Plan.”
- D135. The District Council’s detailed objection to Policy SS7 is dealt with in its representation on Policy SS7. In essence the District Council does not consider there is a need for a strategic review of Green Belt boundaries to accommodate the draft RSS development proposals. The issues can be adequately addressed through local development documents.
- D136. No Green Belt review is required to accommodate the allocation of 2,000 dwellings as set out in Policy ST4. Contrary to Paragraph 5.134

of the draft RSS, the ASRs are not within the Green Belt but are excluded. Areas of Green Belt do exist adjacent to the ASRs and within the A120 but these are valuable wildlife, recreation and amenity areas and have long been protected from development. These areas are likely to be covered by any masterplanning for the area but are in no way suitable for development. All reference to a Green Belt review at Bishop's Stortford should be deleted as unnecessary.

- D137. As in relation to Harlow, the draft RSS is far too specific in terms of the location of growth around Bishop's Stortford. It should be the responsibility of local development documents to establish where any such allocation should be located.
- D138. The East Herts Local Plan Second Review Redeposit Version (November 2004) proposes that, in line with PPG3 and the sequential approach, brownfield sites within the built up area should come forward prior to greenfield sites.
- D139. This approach is important in relation to the over-specific nature of the RSS because a key role of local development documents is to ensure the proper phased release of land for housing development, in accordance with PPG3 and the sequential approach. The draft RSS may prevent such an approach and lead to a development strategy at odds with PPG3. It is worth pointing out at this stage that the ASRs have not been subject to consideration through a Local Plan inquiry process since the publication of PPG3.
- D140. Paragraph 5.136 contains a reference to the areas of special restraint at Bishop's Stortford North being released to provide for at least 2,000 new dwellings and associated development. It goes on to state that "it is likely that new approaches to design, layout, and density will enable an increase over this historic assessment of the area's development capacity".
- D141. The District Council's estimates of capacity, updated in the late 1990s, indicate that the five ASRs together could accommodate around 2,700 dwellings. This is, however, based on an almost purely residential scheme. A recent District-wide Employment Land Study, commissioned by the Council, has highlighted the need for further employment land in Bishop's Stortford. The draft RSS itself acknowledges the need to create a sustainable mix of development here and this will inevitably have implications for residential capacity.
- D142. East Herts Council has recently commissioned a Masterplanning study of Bishop's Stortford. This has highlighted the need for employment and commercial uses within the Bishop's Stortford north area, together with a need for a primary school or schools and a possible need for a secondary school. East Herts Council understands the need to maximise the efficient use of land but does not consider that simply

increasing residential densities and overall site capacities is the most appropriate way of doing so.

- D143. Bishop's Stortford is a town that has grown substantially over the last few decades. The number of dwellings in the town has risen from just over 8,000 in 1981 to around 14,000 in 2001, as a result not only of local needs but also of strategic growth related to Stansted Airport. The provisions of the draft RSS would involve Bishop's Stortford not only accommodating the 2,000 dwellings specific allocation but also further growth as a share of the District's non-specific allocations figure of 8,800. Estimates indicate that this share would amount to around 3,000 dwellings, making a total of 5,000 dwellings over the 20-year Plan period.
- D144. Growth on this scale has represented, and will continue to represent, a significant challenge for the town in general and for local service delivery in particular. An essential pre-requisite for accommodating such growth is a firm commitment to ensuring funding provision for a wide range of necessary infrastructure, particularly transport, education, health and community facilities.
- D145. Transport is a key issue in Bishop's Stortford. The town centre's historic core is unable to accommodate large volumes of vehicular traffic and this has led to serious congestion. Large development schemes already planned in the town have the potential to worsen existing traffic problems. It is in this context that potential development of the ASRs must be considered.
- D146. On a point of detail, the final part of Policy ST4 reads: "Detailed proposals for development in these areas will be determined by local development documents or master planning studies." This effectively allows masterplanning studies to circumvent statutory local development documents in drawing up proposals for development on the sites allocated by policy ST4. While masterplanning studies will have a role to play in determining detailed aspects of proposals they should not in any way replace statutory local development documents. The words "or master planning studies" should be deleted from the final part of Policy ST4.

East of England Plan **Draft partial response – Stansted Airport**

Key RSS Policy references

Policy ST5: Stansted Airport

Policy E14: regional airports

Policy T5: airports

Summary

- D147. The District Council welcomes the decision not to endorse a second runway at Stansted. The acceptance of the maximum use of the existing runway subject to a number of important caveats is considered a pragmatic stance for the RSS to take.
- D148. However the robustness of the Plan's economic underpinnings will need to be demonstrated in the absence of the second runway on which much of the economic forecasting was based. In addition, the particular role and characteristics of Stansted Airport need to be taken into account when considering the impact of the airport on the economy of the surrounding area.

Detailed Response

- D149. Stansted Airport is frequently referred to throughout the Draft RSS as an important economic driver within the region, and particularly within the Stansted/M11 sub-region. East Herts Council recognise Stansted as an important regional feature but question whether the extent of the airport's positive economic impact on the local economy is sufficient to outweigh the significant environmental impact.
- D150. The Sustainability Appraisal report of the draft RSS states that "the emphasis on significant growth in the use of Stansted, Luton, Norwich and Southend airports directly conflicts with the sustainability objective of reducing the need for air travel". It goes on to point out that while major strategic aviation decisions are beyond the remit of the RSS, the decision as to whether to support economic development that feeds off and encourages the growth in air travel is not. Alternative forms of economic development should be considered that involve less environmental damage.
- D151. East Herts Council's views, together with those of Hertfordshire County Council, Essex County Council and Uttlesford District Council, on the Government's Airports White Paper (December 2003) have been made clear through responses to the White Paper and the recent Legal

Challenge. The District Council remains wholly opposed to a second runway at Stansted and, as such, welcomes the stance taken in the draft RSS against a second runway. It is, however, noted that the Regional Economic Strategy endorses and is based on proposals for a second runway at Stansted, as included in the Aviation White Paper.

- D152. The acceptance in the draft RSS of the expansion of Stansted Airport up to the full capacity of the existing runway is seen as a pragmatic stance for the RSS to take. While East Herts Council would not wish to pre-empt a decision on whether a scheme for increased capacity at the airport is acceptable in planning terms, in principle the maximum use of the existing runway is acknowledged.
- D153. The District Council supports Policy E14: regional airports in setting out the conditions on which airport growth is supported. Such conditions are essential if the harmful impact of the airport is to be minimised. Particular support is given to the second caveat regarding the effective and timely implementation of infrastructure requirements.
- D154. East Herts Council also supports the draft RSS in not making any further provision for direct employment or housing needs as a result of the maximum use of the existing runway.
- D155. The issue of the role of Stansted Airport in the local and regional economy reflects the concern raised elsewhere in the response in relation to the robustness of the growth predictions on which the RSS is based. East Herts Council would not want to encourage EERA to base the RSS on a second runway at Stansted. However it is not considered to be a sound planning approach to base the draft RSS on economic forecasts that assume a Regional Spatial Strategy with provision for a second runway. It serves to cast doubt on the achievability of the economic predictions and undermine the “jobs-led” approach of the RSS.
- D156. The RSS will need to show that the ‘limited’ development accepted for Stansted and Luton has not compromised the strategy’s sub regional employment targets. If it has, the employment targets should be revised not the airports policy.
- D157. Much emphasis is placed on the relationship between Stansted Airport and the regeneration of Harlow. The underlying assumption is that the proximity of Harlow to the Airport will facilitate economic regeneration, both in terms of opportunities for direct, on-site employment and indirect or catalytic business activity locating in Harlow.
- D158. Comparatively few Stansted employees currently come from Harlow and it cannot be assumed that this will change overnight. Good public transport links from Harlow to the airport already exist but this is not in itself enough to encourage greater take-up of Stansted jobs by Harlow residents. Low-skilled employees currently travel in from North London

and there may be scope to bring the focus nearer the airport for such employees. However, it is doubtful that the skills base available in Harlow would fill a wider range of higher-skilled jobs.

- D159. Stansted Airport is a focus for the low-cost airline industry and this has implications for direct and indirect employment generation. The available evidence indicates that the increase in throughput associated with maximum use of the existing runway will not generate substantial numbers of jobs, either direct or indirect. Businesses within reach of the airport (often stated as 2 hours drive time) may be located where they are partly on account of the airport. However, simple proximity is likely to be less important a factor than the details of location itself. Harlow is not currently considered to be a desirable business location and it appears unlikely that it would become a magnet for induced or catalytic employment as a result of the airport without significant policy and fiscal intervention.

East of England Plan **Draft partial response – Transport**

Key RSS Policy references

Stansted/M11 sub-regional policies (ST1-7)
Transport Chapter – Policies T1-17

Summary

D160. There is a transport infrastructure deficit across much of the southern part of the region. Significant investment is required to deal with existing problems regardless of further development proposals. The Regional Transport Strategy, while containing many supportable policies and objectives, is considered to be short on detail, particularly in respect of public transport measures, and is poorly related to the spatial strategy set out in the draft RSS.

Detailed Response

D161. One of the consistent messages East Herts Council has received from groups and individuals throughout the consultation process is the need for infrastructure investment, particularly transport investment, to deal with existing problems, regardless of any proposed growth.

D162. The Regional Transport Strategy (RTS) is a vital tool in coordinating the necessary transport investment to support the spatial strategy set out in the draft RSS. There must therefore be a clear link between the strategy and growth proposals in Chapter 4: Spatial Strategy and Chapter 5: Sub-Regional Policies and the RTS in Chapter 8. This link is not considered to be sufficiently strong to enable the full support of the growth proposals and this threatens to undermine the spatial strategy.

D163. Much of the strategy is reliant on transport infrastructure provision. East Herts Council's response in respect of the Stansted/M11 sub-regional policies, particularly at Harlow and Bishop's Stortford, set out the fact that traffic congestion is already a problem in this part of the region. Further growth has the potential to significantly worsen this situation. Paragraph 8.35 indicates that while the transport network in much of the region, with suitable enhancements, can cope with the emerging spatial strategy, the network in the London Arc "and particularly in the Stansted/M11 sub-region" cannot.

D164. It has been acknowledged that although road building has a role to play in relieving congestion hotspots, its role is limited by the tendency for new roads to create additional traffic. If the spatial strategy is to be

genuinely sustainable, modal shift has to be one of the key areas for the RSS to tackle. There is little evidence to suggest that the RTS will achieve the modal shift required to avoid gridlock as a result of the spatial strategy's growth proposals.

- D165. This is evidenced in the list of proposals in Table 8.3. The list is dominated by road building schemes, and where public transport is mentioned it is only in vague or aspirational terms. The Stansted/M11 section (section I) mentions two public transport corridor schemes carried forward from Policy ST6. However little research has been undertaken as to whether these routes are in any way possible. A fundamental omission from this list is the proposal for public transport improvements within Harlow itself. Most of the traffic problems in Harlow are caused by local or terminating traffic, partly as a result of the car-orientated urban form. Major and radical measures are needed if Harlow is to become sustainable in transport terms. The provision of a north-south bus link and improvements to the town's public transport interchange are not considered to be in any way sufficient.
- D166. East Herts Council is supportive of Policy T6: Strategic Network Hierarchy in principle but considers that the accompanying map 8.2 does not adequately cover the strategic route network (e.g. there is no illustration of the A10, parts of the A120 or A414 in regard to roads, nor the Hertford East from Broxbourne branch of the Liverpool Street mainline of the rail network). Furthermore, although the A120 is not detailed on the map, a scheme specifically involving improvements to the A120 (A10 to M11) is included within the scheme proposal list as a sub-regionally significant priority.
- D167. Additionally, the proposals list provides insufficient detail to allow consideration of the implications of any actual schemes. Whilst some of the schemes listed in tables 8.3A and B are quite specific, the information is very generalised in respect of schemes that would potentially affect East Hertfordshire. Thus, while lending support to the overall aims of the Policy, the Council is concerned that this should not be seen as tacit support for individual schemes before they have been devised and the opportunity for representations to be made. Map 8.2 should be revised to adequately reflect the strategic network in both road and rail terms and proposals for any further development of this network need to be clarified.
- D168. There is regular reference throughout the draft RSS to funding from developer contributions. There is clearly a role for developers to contribute, through the planning system, to alleviating the impact of a development on the local network. However this should not obscure the fact that major investment is needed in transport infrastructure of all kinds, partly as a result of previous under-investment, and that public money is likely to be required.

- D169. East Herts Council generally supports Policy T13: Public Transport Accessibility in terms of its intention to improve public transport provision. However, it questions the minimum accessibility levels given and considers that not enough account has been taken of differences in sizes of market towns across the region and the ability to provide the services, given such disparity. Definitions of the Area Types should be provided and greater flexibility should be given over minimum levels of service provision, which could be tailored to the characteristics of each settlement.
- D170. Policy T14: Traffic Management contains laudable intentions of reducing the rate of car traffic growth and stabilising car traffic levels in the Regional Interchange Centres at 1999 levels. However the likelihood of this actually being realised given the substantial development proposed for the region is questionable. Achieving this aim in Harlow, for example, without the full support of the RTS in terms of promoting sustainable alternatives will be extremely challenging.
- D171. While East Herts Council supports the principle of Policy T15: Road User Charging, it considers that it takes insufficient account of the need to ensure that traffic is not displaced from roads where charging is applied onto rural roads where it would be undesirable for increased traffic levels to apply. Furthermore, in light of the fact that the policy is not underpinned by any empirical research to suggest that such a scheme is feasible or sustainable in a region as diverse as the East of England, the Council considers that the policy is premature in application.
- D172. East Herts Council considers that Policy 16: Parking is too rigid and does not make allowances for discretion and flexibility at the local level. It fails to recognise the size differences of market towns in the region and the knock-on correlation of service provision levels of passenger transport whilst applying a policy that reduces car-parking provision to a level significantly below that set by the Government for the national context. Furthermore, the proposed policy fails to take account of economic and environmental factors and, importantly, the key aspect of residential provision is conspicuous by its absence in the policy, supporting text and accompanying table.
- D173. East Herts Council supports the proposed improvements to the A120 between the M11 and the A10 as set out in Policy ST6: Transportation (Stansted/M11 sub-region) provided they are limited to the areas detailed (“widening the Bishop’s Stortford bypass and bypasses for Little Hadham and Standon”) and not expanded to any larger scheme. While no detailed schemes have been agreed for any of the specific locations mentioned in the Policy, they are well-known trouble spots for traffic congestion and the recognition that solutions are required is supported.

D174. It should be noted, however, that Standon lies within an internationally important Late Iron Age settlement complex that extends over 5 km² and that there are many ecological implications associated with the A120 corridor which affect both Standon and Little Hadham. In respect of these issues, potential solutions for the traffic difficulties will need to be carefully thought through.

East of England Plan **Draft partial response – Environmental Resources, Culture & Implementation**

Key RSS Policy references

Chapter 9: Environmental Resources (Policies ENV1-19)
Policy SS14: Development and Flood Risk
Chapter 10: Culture (Policies C1-5)
Chapter 11: Implementation and Delivery (Policies IMP1-4)

Summary

D175. This section deals with three Chapters towards the end of the draft RSS. All three chapters contain many laudable and useful policies and statements. However the degree to which they add to or expand on existing national policies is uncertain. To be included in a Regional Spatial Strategy policies must have a regional element to them and there is doubt as to how much value is added to the overall Development Plan. Nevertheless support is offered, in principle, to many of the policies within these three chapters.

Detailed Response

Chapter 9: Environmental Resources

- D176. The principles on which the draft RSS seeks to manage the region's environmental resources are set out in Box 9.1. These principles are supportable and are broadly compatible with the emerging East Herts Local Plan Second Review.
- D177. Similarly, the broad scope of many of the policies in Chapter 9: Environmental Resources can be supported by East Herts and adopt a similar approach to the Local Plan.
- D178. However, despite the good policy intentions of the policies in this chapter, the development proposals elsewhere in the draft RSS threaten not only to directly undermine the environmental quality of parts of the District but also to indirectly increase the pressure on environmental resources across this part of the region. This issue was acknowledged in the oft-quoted section from the Strategic Environmental Assessment/Sustainability Appraisal of the draft RSS:

“The basic challenge underlying the whole RSS is that the rate and intensity of economic and housing development which the region faces is intrinsically damaging to the environment and threatening to many aspects of quality of life.”

- D179. Increased development rates lead to a greater population with a greater demand for water, sewage and landfill facilities, as well as travel demands, particularly by car. There will also be increased pressure for countryside recreation. There will be an impact on air quality, particularly for two areas within East Herts (Hockerill junction, Bishop's Stortford and the A1184 in Sawbridgeworth) that have been or are close to being designated Air Quality Management Zones.
- D180. In East Herts the south of the District tends to be the more valuable in terms of biodiversity with its characteristic mosaic of woodland areas, yet this is where the majority of the development is to be allocated. It must be borne in mind that while much of the draft RSS highlights environmental protection as a key issue, other parts threaten environmental damage.
- D181. Policy ENV4: Woodlands seeks to increase the overall level of woodland cover in the region, subject to various conditions and local considerations. The benefits of increased woodland cover have also been identified in the East Herts Local Plan Second Review Re-Deposit Version (November 2004) and Policy SD4 seeks to involve housing developers in certain “compensatory” tree planting. Policy ENV4 of the draft RSS offers useful support for this Local Plan approach.
- D182. Policy ENV5: The Historic Environment contains numerous types of historic environment designations but does not include Registered Historic Parks and Gardens. This is a policy omission. Registered Historic Parks and Gardens make up an important element of the landscape of East Herts and are protected through the emerging East Herts Local Plan Second Review. Registered Historic Parks and Gardens should be named in Policy ENV5 as an important feature of the historic environment.
- D183. Policy ENV8: Renewable Energy and Energy Efficiency is an important policy in setting the regional context for both renewable energy and energy efficiency. However the requirement in section (b) of this policy is not considered appropriate for a regional-level strategy. The requirement for developers to compile statements covering the implications of their development on a variety of issues is a well-known planning tool. It is currently used in a variety of ways across the region and with a variety of thresholds.
- D184. The emerging East Herts Local Plan Second Review seeks to require “Sustainability Statements” from developers covering a range of issues, including energy efficiency and renewable energy. There would

therefore be an element of confusion if the region-wide “energy consumption statement” were implemented alongside the local “Sustainability Statement”.

- D185. The usefulness of statements covering energy consumption, and various other issues is recognised. However, in order to provide more flexibility in the application of this principle, it is considered that the RSS should not contain a specific requirement for such statements but should enable and strongly encourage Local Planning Authorities to do so in their Local Development Documents.
- D186. Policy ENV9: Water Supply, Management and Drainage deals with the particularly important issue of water across the region. The draft RSS does not appear to contain any genuine attempt to tackle the problem of potential water shortages in the region, nor does the overall spatial strategy appear to have been influenced by this issue. Policy ENV9 requires new development to be “located to allow for the sustainable provision of water supply”. However, there is no evidence to suggest that water availability, or the lack of it, has influenced the strategic growth locations in set out in Chapter 5: Sub-regional and Sub-area Policies. The movement of water from one part of the region to another involves significant energy demand and this aspect must be considered as part of an overall water strategy.
- D187. Increased water abstraction rates would have significant impacts on the district of East Herts in terms of the impact on river flow levels. Lower flow rates would not only affect the aesthetic appeal of the District’s streams and rivers but would have a big impact on the biodiversity and habitats that rely on them.
- D188. Conversely, there is a risk that development could increase flow rates rapidly through surface water runoff etc. For example, the area north of Harlow proposed to accommodate 10,000 dwellings is intersected by several streams flowing south where they meet the River Stort. The proposed development around these streams may increase the speed of runoff and pose a risk of flooding in the locality and further down the Stort Valley.
- D189. This issue of development causing flooding problems is addressed in Policy SS14, which advocates a sequential approach to development locations in relation to flood risk. The issue of flooding does not appear to have had much influence in the selection of development sites around Harlow. This reinforces the District Council’s contention that the draft RSS cannot realistically grapple with a sufficient level of detail to properly justify a development site selection. A far more appropriate way forward would be for the RSS to allocate a certain amount of growth to Harlow (see East Herts Council’s response in relation to the appropriate amount of growth) and allow local development documents to specify the location of such growth. This is further reinforced by the fact that the Strategic Environmental Assessment/ Sustainability

Appraisal was not able to investigate the detailed locational options for growth around Harlow.

- D190. The issue of infrastructure for sewage disposal is related to the water demand issue. The additional water demanded by new development must also be disposed of after use. Not only does this have infrastructure implications but there is potentially a greater risk of contamination of water courses.
- D191. Hertfordshire County Council are the Waste and Minerals Planning Authority and their views on Policies ENV10-19 should be considered. However a general issue of concern to East Herts Council are the implications of the overall level of growth proposed in the region, and particularly in the Stansted/M11 sub-region, for both mineral extraction and waste management.
- D192. A substantially higher development rate will require substantially higher raw material extraction rates compared with existing rates. There are areas within East Herts with mineral deposits but these areas are mostly situated within the Green Belt and are valuable landscape and wildlife areas.
- D193. The waste management implications of a higher development rate also need consideration. The proximity principle, which dictates that waste should be dealt with close to its source, means that there will be increased pressure on the few remaining landfill sites in the area, but also potential pressure for incineration facilities.
- D194. The implications of the higher development rate proposed in the draft RSS would thus extend beyond those areas directly affected by development. The cost of these indirect impacts in terms of lost landscape features and habitats further reinforces East Herts Council's view that the level of development proposed is too great.

Chapter 10: Culture

- D195. Chapter 10: Culture contains many policies and statements that are broadly acceptable and consistent with the East Herts Local Plan Second Review Re-Deposit Version (November 2004). However many of these are only loosely related to spatial planning and are not particularly region-specific.
- D196. The draft RSS does not appear to specifically encourage the joint provision and dual use of sporting facilities, particularly Policy C4: Sporting Facilities and its supporting text. Such dual and joint use can lead to a more efficient use of facilities and its omission from both the policy and text should be rectified.

Chapter 11: Implementation and Delivery

- D197. Policy IMP2: Developer Contributions is important in setting out the benefits and limitations of developer contributions towards infrastructure provision. While planning gain will have a role to play in facilitating regeneration and infrastructure provision, it is important that a realistic approach is taken to developer contributions and that the burden of infrastructure provision rests on the appropriate shoulders. Significant developer contributions towards infrastructure provision could affect the financial viability of development proposals.
- D198. The fact that the suspension of EERA's support for the draft RSS was based on inadequate commitment from central Government to infrastructure funding, highlights the importance of the issue of infrastructure funding for the region. East Herts Council considers the issue of infrastructure provision to be vitally important, such that it would be inappropriate to allow certain schemes to come forward in advance of key infrastructure projects. The draft RSS must contain some mechanism by which the provision of new dwellings can be managed in line with infrastructure provision and job growth.
- D199. Policy IMP3: Establishment of Local Delivery Vehicles (LDVs) is welcome guidance and is supported by East Herts Council. However the crucial element in the creation of LDVs is local accountability. East Herts Council acknowledge that the scale of intervention necessary at Harlow, for example, is likely to need support at various levels. The role of an LDV in stimulating the regeneration of Harlow needs a thorough investigation. However East Herts Council considers that this should not be at the expense of local democratic accountability.