

**Amendments to the Council's Response to the Strategy for
the East of England Plan made by the Regional Spatial
Scrutiny Panel at the meeting on 3 March 2005**

Para.	Proposed changes following RSS Scrutiny Panel
D3.	East Herts Council welcomes the emphasis on affordable housing but requires that question whether the necessary investment <u>is provided</u> . will be forthcoming. This has yet to be demonstrated.
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.
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 a <u>very</u> ambitious target given the baseline predictions of between 220,000 and 250,000 jobs.
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-, <u>which is a flawed concept</u> .

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 will be required to meet the overall affordable housing targets in the draft RSS.
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 inevitable 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” “ <u>parcels</u> ” 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.
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, but simply involves the <u>redefinition of land</u> . 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.

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 <u>can be built on previously developed land</u> . The target of 60% in Policy SS4 cannot be met in East Hertfordshire given other provisions <u>the significant greenfield development proposals in of</u> the draft RSS in Policy ST4.
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 <u>and poor quality of existing employment areas</u> , deficiencies in the layout of the town and recent under-investment.
D52.	<p>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.</p> <p><u>(New para. D52a)</u></p> <p><u>On this basis, the encouragement in the draft RSS of university-level education in Harlow would not seem to be the type of skills improvement most needed in the town. While there is a certain “kudos” associated with attracting a university to Harlow, the lack of 16 and 17 year olds currently participating in education means that a university would be beyond the reach of most. It would be more likely to draw in students from outside the area rather than improving the skills base of Harlow. A more realistic, more practical and far more effective method of enhancing the skills base and enabling regeneration would be to focus on improving the basic skills of the existing population.</u></p>

D53	<p>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. <u>In addition, the town's employment areas are generally in poor condition and are not attractive to new businesses. The regeneration of these employment areas must be seen as a key regeneration priority.</u></p>
D57.	<p>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 the <u>is population</u> figure <u>by around 45,000 people, to make a population of</u> approximately 125,000. A larger population does facilitate the provision of higher-order services and infrastructure improvements in certain situations.</p>
D58.	<p>However the viability of the provision of such services is not solely based on the population of that town. <u>There is a relatively large population in the wider Harlow area that may wish to use services in Harlow if they were offered. 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.</u> 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.</p>
D63.	<p>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 <u>commercial and residential</u> 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 <u>enhance the image of ensure that any kudos is associated with</u> 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.</p>

D66.	<p>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 <u>and affordable housing, in addition to the costs of actually constructing the development,</u> 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.</p>
D72.	<p>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 <u>seem to</u> 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 the in <u>the</u> 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.</p>
D79.	<p>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 RSS to prescribe the direction for growth at Harlow.</p>
D99.	<p>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 <u>County boundary, as well as the long-established Green Belt boundary and the</u> Hertfordshire hills beyond reinforce the idea that Harlow stops <u>one the south</u> side of the Stort Valley and the countryside begins <u>to the north-on-the other</u>. 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.</p>

D115.	There are widespread traffic and congestion issues in Harlow <u>and the immediate surrounding area</u> 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.
D122.	It is not East Herts Council's intention here to set out an alternative development strategy for Harlow. Rather t 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.
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 "historic assessment", however, was 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 <u> affect the total potential residential capacity of the area.</u>
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, <u>and the final caveat regarding the production and review of airport masterplans. These two issues are particularly crucial for the long-term planning of the airport and surrounding areas. The issue of the funding of infrastructure provision should be also be included as part of the second caveat, as the source of this funding is by no means clear.</u>