

HERTFORDSHIRE COUNTY COUNCIL: COMMENTS ON HARLOW OPTIONS STUDY FINAL REPORT

Introduction

Hertfordshire has been involved in the Harlow Options Study process with officer representation on the steering group. It has commented on a number of draft reports but is very disappointed with the content and findings of the Final Draft Report published in June.

It considers the study to be technically flawed and as such it should not be used as a basis for any development proposals in further studies, including the M11 Corridor Study. Its concerns are set out below but can be summarised briefly as:

- The tight timescale for the study has made effective public involvement and consultation impossible and resulted in inadequate and questionable technical findings.
- The regeneration objectives for Harlow and Broxbourne were not adequately analysed and the role of development to achieve the objectives is not clear.
- There is insufficient justification of either the need for or the quantity of the proposed growth and particularly for growth in Hertfordshire.
- The needs of the area must be more clearly defined before greenfield sites can be recommended for development.

In the light of these concerns it is not considered that the Study findings can be simply assimilated into the Stansted M11 Corridor Options Study as originally envisaged. It would be quite wrong for that Study to adapt a spatial strategy using sites identified in the Harlow Study as the technical and consultation process leading to the choice of those sites is considered inadequate.

Comments on Draft Final Report

1. Growth Levels

- 1.1 The Study has 4 growth scenarios of differing levels of housing and employment land growth. The methodology for arriving at these levels is not adequately presented so there is no justification for any particular level.
- 1.2 Alternative growth levels for the sub region as a whole will be considered in the Stansted M11 Corridor study. The Harlow Study should have provided a view as to the level of development, if any, which would best serve to meet the regeneration objectives of Harlow and, if relevant, Broxbourne.
- 1.3 The Study discounts the Low, existing policy, figure as not meeting the regeneration needs of the area without fully explaining why. The High figure is discounted as it implies a scale and rate of delivery that would be difficult to deliver which is almost certainly true.
- 1.4 The benefits of the High Intermediate Growth Scenario over the Low Intermediate (Table 2.1 of the Report) are over exaggerated. More housing,

employment land and transport infrastructure gives more scope for economic development but lower levels of growth may be adequate to meet actual needs and avoid congestion and other problems.

- 1.5 The evidence for the higher (beneficial) impacts of the High Intermediate Scenario is not apparent while some of the environmental impacts are questionable. For instance the higher growth scenario is seen as giving significantly more development opportunities for business investment such as airport related businesses even though large amounts of new employment land is proposed for the lower growth scenario. The High Intermediate scenario is also claimed to allow development to take place with less damage to the environment and quality of life in the study area which Hertfordshire would question.
- 1.6 As a result Hertfordshire have no confidence that proposed levels of growth, an additional 10,000 dwellings over the existing policy level plus commensurate employment land, or an additional 19,000 dwellings are required to meet the needs of Harlow regeneration. The Study must therefore be treated as a capacity study looking at the options and implications for meeting 2 theoretical levels of growth.

2. Choice of Sites

- 2.1 The study has carried out a sieve analysis to arrive at areas of search for development (Figure 4.4 of Report). It is unclear why some of the potential search areas (Figure 4.3) were excluded from the chosen areas of search particularly when some had been included as proposed development sites in earlier drafts.
- 2.2 Similarly within the areas of search some sites previously included and proposed are not included in the final report. The reasons for the choice of sites are therefore unclear and the technical evaluation of sites is not available for comparison within the study area or with areas in the wider growth corridor.
- 2.3 The sieve process was carried out late in the study process with the result that one constraint, landscape conservation areas in East Hertfordshire, was missed out. This area is not proposed as a development site but its inclusion serves to illustrate the county's concerns over the technical work of the Study.
- 2.4 The changes in the choice of sites also seriously detracted from the public consultation process. The stakeholders having commented on certain sites in one meeting saw different sites, on which they had not had the opportunity to comment, included in the final report.

3. Development Options

- 3.1 The Study compares two chosen development options to accommodate the growth levels and expresses clear preference for one, the Transport and Regeneration Led Option. The reasons given are:

- The prospect of enhancing the attractiveness of the area for inward investment as a result of improved accessibility brought about by constructing new public transport infrastructure.
 - The option spreads the potential regeneration benefits around the study area.
- 3.2 No preference can be expressed for either Development Option as both these assumptions can be questioned on the evidence provided. A public transport link from Epping to Harlow would not overcome the problem of the A414 passing through the town and the impact that has on attractiveness to invest. A new public transport route from Hoddesdon to Harlow west may have benefits but the level of likely patronage (revenue cost) is not assessed and is thought by Hertfordshire to be unlikely to warrant expenditure of £12.9 million.
- 3.3 Neither such a route nor housing sites along the A10 are likely to usefully address regeneration problems in Broxbourne or in Harlow. The housing sites are most likely to be car orientated and have no relevance to either a public transport or a regeneration option. No evidence is provided to warrant greenbelt development in this area.
- 3.4 The Evaluation of Alternative Spatial Patterns, Table 3.4, seems overly biased to the Transport Led solution. Many of the advantages could be attained in the alternative Sub Regional Urban Focus Options.

4. **Evaluation**

- 4.1 The Harlow Study has to be viewed as a housing (and employment land) capacity study to see what level of development could, if required, be accommodated with what implications. This does not require the detail of a Local Plan but the initial evaluation of the chosen sites in environmental and landscape terms is presently lacking. The justification for the chosen sites and the exclusion of others is not clear.
- 4.2 Paragraph 4.15 does make clear that it is for more detailed (i.e. local planning) studies to determine whether sites should be allocated for development. However it has to be recognised that once a Development Option and Growth Scenario are chosen in the Regional Plan a District will have limited choice regarding sites. This makes it essential that any findings of this Study are clearly based on reliable evidence.
- 4.3 At present this does not appear to be the case. The relative merits of for instance the various sites proposed along the A10, in terms of general environmental impact, contribution to congestion, buildability (i.e. need for expensive infrastructure) and role in the preferred spatial option, are not available. Similarly major development areas such as north of Harlow cannot be compared with alternatives, such as North Weald Airfield, or with those areas not considered for development, such as to the north of North Weald Airfield.

5. The Sub Regional Urban Focus Options

- 5.1 At the Low Intermediate level this option concentrates on Harlow with a southern bypass to relieve the town, open a new employment site to the west and new housing sites to the south and west. Such an option would have clear benefits in removing the A414 from the town reducing congestion.
- 5.2 The main existing employment area in north Harlow would see its access improved with less traffic on the A414 but the opportunity for employment sites near to the M11, referred to in an early Issues Report, is not taken. That proposed on the Eastwick Roundabout looks out of place and difficult to access from the M11 but would provide a rural business park setting (which is said to lacking in this option).
- 5.3 In the High Intermediate scenario there is major development, 9,000 dwellings and further employment land, north of Harlow. The required A414-M11 link appears to be under costed at £24.1 million (estimates by HCC in the early 1990s were about £50 million). The Highways Agency would also have to agree to a new junction on the M11, which is only likely if it were to be seen as a major east-west route.
- 5.4 The question as to whether such development would look to Harlow and therefore contribute to the regeneration of the Town or whether it would act as a commuter settlement looking further than Harlow for its employment, retail and social needs is not addressed.
- 5.5 There is also the issue of whether 9,000 dwellings can be constructed at one albeit large site in the 5-year period 2016-2021 as suggested. Even with a substantial element of affordable housing such a rate would be difficult for the private sector to realise.

6. Transport and Regeneration Led Corridors

- 6.1 The basis of this scenario is a new public transport link (suggested as a guided bus system) between Epping (Central Line) and Harlow Town Station supported by development at North Weald Bassett. The proposed development at North Weald however is 'only' 2,300 dwellings and 70 ha employment land which in itself would not warrant the £33 million expenditure on the transport link. No explanation is given as to why this development has been reduced from the potential 11,000 dwellings (with no employment land) shown in an earlier draft and on the area of search.
- 6.2 Ware, Hoddesdon and the Lea Valley would provide 10,000 houses with a public transport link from Harlow to Hoddesdon (costed at £12.9 million) and one from A10, Hoddesdon to Waltham Cross (uncosted). The value of these sites and services and their role in improving the economic performance of the area is not evaluated. It is suggested they will encourage development on the County's key employment sites at Park Plaza and Essex Road but this should prove unnecessary as development on these sites is already programmed.

- 6.3 The southern bypass, and the park and ride facilities, would only be provided in the High Intermediate scenario. The effect of the new bus link with the A414 still passing through Harlow is not evaluated for the Low Intermediate but there would clearly be continued congestion problems which could detract from investment in the town.
- 6.4 It is unclear why the proposed Junction 7 M11 park and ride facility could not be provided in the Urban Focus option if it is of value. If 30,000 park and ride spaces are required for the Transport Led option when presumably more people are visiting Harlow using public transport the implication of providing this level of parking or more in the town in the Urban Focus option needs further consideration. Similarly the park and rides suggested for Harlow West could be provided as part of an Urban Focus option though it is questionable whether such a level of park and ride is required in Harlow.

7. Green Belt and Greenfield

- 7.1 The impact on the Green Belt and the loss of greenfield land particularly at Harlow north and along the A10 needs further consideration. Developing a string of sites on one side of a major dual carriage makes little sense in planning terms in that it is not a transport corridor which is, or would easily be in the future, served by public transport. If such sites are to be considered it should be as part of a considered strategy for Broxbourne potentially including areas west of the A10 and looking at Broxbourne's needs and objectives such as those surrounding Brookfield Farm.
- 7.2 The reason (Table 4.7) Transport Led uses less greenfield land is only because it develops North Weald Airfield, a very active general aviation aerodrome which counts as brownfield land and is to be sacrificed for a relatively small amount of development. Impact on Green Belt land cannot therefore be claimed as a benefit for either option.

8. Water Supply

- 8.1 The provision of water for new development will have major costs and potentially long-term environmental implications. This aspect has not been sufficiently addressed apparently because the Water Company will not discuss the issue. The study therefore relies on initial verbal comments from the water company.
- 8.2 The longer-term implications for water supply, however, such as any future need for a new reservoir or imports from other regions need to be assessed. In addition the reason the report quotes the costs (£35 million) as being the same for both levels of housing growth needs to be explained.

9. Surface Access

- 9.1 The vision for the study area intends there to be minimal road congestion due to the high level of public transport usage. However the impact of the

suggested developments on the road system, the A414 through Harlow and the other roads such as the A10 and A1184 through Sawbridgeworth, is not assessed nor is the increased usage of the rail line through the Lea Valley to London.

- 9.2 Even with improved public transport the A10 sites are likely to be car orientated but will need to use local roads, e.g. the A1170, to access the A10. This will increase local congestion and detract from the public transport service on that road while congestion further south on the A10 itself could be a major problem. These aspects are not considered but would need funding.
- 9.3 There is no single transport strategy put forward to aid the development and regeneration of Harlow. The proposed southern bypass could form a new strategic route to link the M11 and the A414 to bypass Harlow. Such a road would seem essential to reduce congestion in the town but as the bypass is not included in the Low Intermediate Transport Led scenario the report presumably does not see this as being the case.
- 9.4 The southern bypass could unlock potential employment sites but does not improve access from Harlow to Stansted Airport. The report suggests (Section 2) that the expansion of activities at Stansted Airport would be an important driver for Harlow growth in that Harlow can provide both employees and sites for anticipated airport-related industries. Having stated this none of the development options adequately address improving access between Stansted and Harlow.
- 9.5 A transport interchange at Harlow Station would allow improved public transport access but only with the construction of the A414 Mill link in the High Intermediate growth scenario would there be improved road access and accessible employment sites. This solution though is only part forward in the higher growth scenario in the unfavoured development scenario so is presumably not seen as of importance.
- 9.6 It is recognised that detailed consideration cannot be given to proposed transport schemes in a study such as this. Hertfordshire are however concerned that the Harlow proposals, particularly the major schemes (2 public transport and 2 roads), have been insufficiently considered in terms of cost and viability. The total infrastructure costs (and for public transport likely revenue costs) need to be known with some certainty if any development option is to be followed. The cost figures included in the Study report are not thought to be sufficiently accurate for this purpose.

10. Community Infrastructure

- 10.1 The study makes allowance for infrastructure needs in its estimates of land take. The disparate nature of the string of A10 sites, where development will inevitably be on a smaller scale than around Harlow, will raise problems over the provision of the larger elements of infrastructure such as secondary schools. The study could not look at such matters of detail but they will be important locally and will need funding.

11. Aircraft Noise

- 11.1 The report quite correctly points out that no proposed sites fall within the forecast 57 Leq dBA contours for the maximum use of the runway at Stansted. It assumes therefore in line with PPG24 that there is no constraint on major housing development.
- 11.2 The fact remains that Harlow north would be directly under the landing flightpath for Stansted within 10 miles of the runway with aircraft at or below 2000 feet. The County Council is well aware that such locations suffer serious impact from aircraft noise and development there should be resisted.
- 11.3 With a second runway there would be a similar problem for parts of Harlow East and any operational measures to mitigate over flying Harlow itself (or Bishop's Stortford with runway 3) would probably result in more traffic using the present landing route to the existing runway.
- 11.4 It is Hertfordshire County Council's strongly held view that major development should not be permitted in such a location particularly if there are alternative sites available.

12. Delivery Vehicles

- 12.1 The Study considers various special delivery mechanisms (organisational administrations) to help the local authorities achieve the developments. It recommends an urban development corporation.
- 12.2 While some new delivery mechanism may be essential to achieve the regeneration developments in Harlow the need for such an all embracing mechanism to deliver private sector housing sites in Hertfordshire is less clear. Achieving sustainable developments and planning obligation monies for affordable housing, public transport, new roads etc. can be difficult under existing planning legislation but any new delivery mechanism must be very firmly based on existing local democratic authorities.
- 12.3 Until the nature of the development to be achieved is determined for the M11 it would seem unnecessary to choose any particular delivery mechanism as an outcome of this Study. There will obviously be a need to achieve a focus of resources, skills and political commitment to realise a very significant scale of development. However, the most appropriate way forward to achieve the objective of creating sustainable communities is through the involvement of democratically accountable representatives of the local communities affected, and their partners, in any delivery mechanism.

Summary

In summary it is Hertfordshire's view that the Study report does not provide convincing reasons for proposing development for any particular level of growth, for either of the two strategic development options or for the sites

included within them. The technical work provided in both the Draft Final Report and the Key Issues Report is inadequate to provide a firm base for the future planning of the area.

In particular:

- The level of development in terms of housing and employment land and other infrastructure necessary to realise the regeneration of Harlow and make it a successful sub regional centre is not made clear.
- The sustainable regeneration of Harlow and, if relevant, parts of Broxbourne should be at the centre of this study but the requirements, in terms of housing and employment growth and infrastructure, to achieve this regeneration are not apparent.
- The reasons for the choice of sites to meet the different levels of growth, their assessment in terms of environmental impact and the positive role they could play to meet the vision for the area, are inadequate. The sites chosen changed during the study without full explanation.
- The impact of the proposed development on the existing infrastructure, particularly surface access infrastructure, is not considered and the proposed new roads and new public transport access have not been adequately dealt with.
- The public consultation process has been inadequate to give stakeholders confidence in the study's findings.