

## Harlow Council

### Response to Draft London Plan and Draft HRA Report March 2018

#### Introduction

- 1.1 Harlow Council is pleased to have the opportunity to respond to the draft London Plan. We, along with our partners in the London Stansted Cambridge Consortium (LSCC), recognise the importance of the Plan. The Council, with its partners, sees the London Plan as an important tool towards achieving the long term vision for the sustainable growth of the Corridor and of the district. The aims and objectives within the Draft Harlow Local Plan seek to bring about the renewal and transformation of Harlow as one of the Mark One New Towns. The Local Plan also seeks to ensure the highest standards of place making for new communities within Harlow and the surrounding area.
- 1.2 Our response focuses specifically upon Harlow's strategic position at the heart of the London to Cambridge Innovation Corridor and its central role within the Harlow Gilston Garden Town. To this end, we have responded to the chapters of the London Plan which are most relevant to our vision for the long term sustainable development of the district and of the Garden Town:

Planning London's Future (Good Growth Policies)

Spatial Development Patterns

Housing

London's Green Belt and

Sustainable Infrastructure

#### Context

- 2.1 Harlow was designated as a New Town in 1947. It is acknowledged with the UK Government's Industrial Strategy White Paper as a key centre at the heart of the London Stansted Corridor. It has excellent transport links to these major centres. It has been selected by the Government as Public Health England's new science hub. Harlow College has also been working with the Government to open a new training facility at Stansted Airport for advanced manufacturing which will be key in improving local business prospects and the earning potential of residents.
- 2.2 Harlow District Council has been working closely with Uttlesford DC, Epping Forest DC, East Hertfordshire DC, Essex CC and Hertfordshire CC to plan and deliver transformational strategic proposals for Harlow and the surrounding area. The Government awarded a grant in January 2017 to fund specialist support for the development of the Harlow Gilston Garden Town proposals and to ensure that local communities are fully engaged in the master planning of new communities.
- 2.3 The district councils are preparing individual local plans and are at the same time working with other stakeholders on infrastructure planning and delivery.

## **Response to thematic policies**

### Planning London's Future (Good Growth Policies)

Harlow is generally supportive of the six good growth policies set out in the London Plan. However, the authority considers that some of the policies contradict the aims and objectives of other policies in the Plan. There is concern that the propensity to deliver higher density residential uses is likely to compromise the quality of life of existing residents. Whilst it is acknowledged that this is partly driven by current land constraints and restrictions on Green Belt and strategic industrial land, it is considered that specific text relating to the quality of place making could be referenced in Chapter One and again in Chapter 3, "Design", especially Policies D1 and D2.

### Spatial Development Patterns

#### Growth Corridors and Opportunity Areas (SD1)

Harlow Council support the Plan's approach to spatial planning through the introduction of the Crossrail 2 North Growth Corridor, the revision of Opportunity Areas and the identification of 'Strategic Infrastructure Priorities' to better connect London into the wider South East.

Reference to the LSCC, the Innovation Corridor and Harlow specifically in the plan would help to further develop these relationships and subsequent actions.

#### Collaboration in the Wider South East (SD2)

The Council welcome the Mayor's commitment to work with wider South-East partners to find solutions to shared strategic concerns.

The Council acknowledges the Plan's reference to the mutual benefits for authorities across the wider South East in working together to tackle regionally important matters, such the effects of London's housing and labour markets and their related multiplier effects. However, clearer guidance is required to set out strategic plans and the role of authorities outside of London in supporting delivery. This is crucial to maintaining an adequate supply of suitable housing and employment sites in centres outside of London where affordable housing is also in short supply. Nine office to residential conversion schemes in Harlow are currently being implemented, some of which are for the benefit of London residents.

### Housing

#### Increasing Housing Supply (H1)

The Council acknowledges the need to increase housing targets relative to the previous plan (i.e. Enfield, Redbridge and Waltham Forest). However, there are concerns around whether the targets are achievable given the restrictions related to Green Belt, Metropolitan Open Land (Policy G3) and SIL land. Further clarity is required on how the targets were calculated, the necessary steps needed for

delivery and the scale and degree of dependence upon surrounding centres should London Boroughs be unable to meet the annual shortfall identified in the SHLAA.

### Green Belt

#### London's Green Belt (G2 and G3)

Harlow Council also acknowledges the desire to protect London's Green Belt and Metropolitan Open Land in accordance with the NPPF. However, in light of high housing and employment targets a more open discussion around the Green Belt and greater flexibility to adopt tailored approaches where locations are of poor quality, have low environmental importance and are not accessible for leisure use should be discussed.

### Sustainable Infrastructure

Policy SI7 Reducing waste and supporting the circular economy.

Harlow Council considers a specific reference to the Waste Hierarchy would enhance the aims and objectives of the policy. All planning authorities have a role in implementing Articles 4 and 13 of the Waste Framework Directive (2008/98/EC) in England. Movement of waste up the Waste Hierarchy (App A of the National planning policy for waste) is a shared responsibility for waste planning authorities and other planning authorities.