

## ***Outer London Commission Questions to inform the full review of the London Plan***

For written submissions, please note that the deadline is **Friday 11<sup>th</sup> September**.

### ***Growth Options***

The Commission are interested in hearing your answers to the following in the context of within London and/ or an approach which looks at options outside London.

#### ***G1 How important is it to maintain a balance between housing and employment in a growing post-industrial city? What do you think the right balance is?***

In order to meet current and projected housing needs and to ensure sustained economic growth, it is essential that a balance is maintained between housing and employment, not just in London, but in the surrounding districts. This reflects the important synergies that exist between London, as a major employment centre of world importance, and the need to provide homes for the requisite workforce, not just in London itself, but at sustainable locations on its periphery and within established transport corridors.

In accordance with the National Planning Policy Framework and the obligations of the Duty to Cooperate, Harlow Council, in conjunction with Epping Forest, East Hertfordshire and Uttlesford Council's, have worked together to produce a joint SHMA. This establishes the Objectively Assessed Housing Need across the area and considers how to ensure a balance between future jobs and workers.

Supporting technical work also examined the relationship between Housing and Functional Economic Market Areas. This confirms that out commuting from the wider Harlow area to London is a major component of employment and as the number of working residents in the HMA area has increased over time so has the number of out commuters.

Based on the technical evidence to support the emerging Local Plans across the wider Harlow area approximately 46,000 new dwellings will be required by 2033 supported by the creation of around 42,000 new jobs. This took into account the Planning Practice Guidance requirements to consider the need to reduce unsustainable commuting patterns and to underpin the resilience of local businesses.

In order, therefore, to secure more sustainable patterns of development the opportunity should be taken to consider and promote long term solutions that address London's needs and that of adjoining districts at locations with strong connectivity by road and rail to London and beyond.

#### ***G2 If London continues to expand the housing pipeline/ allocations, will that distort the balance between housing and employment? What significant effects might that have within different parts of outer London?***

Whilst it is clearly appropriate and desirable for London to maintain and strengthen its role as a global city and to seek to expand to meet its housing needs this has to be balanced against the availability of employment land. The pressure to redevelop brownfield and the changes by Government to planning legislation allowing the conversion of offices to residential whilst adding to the housing stock, could undermine the supply of employment land and the Capital's future as a business destination. Although the impact of this has yet to be fully quantified this has implications that could distort the balance between housing and employment.

Historically it is clear there has been significant out commuting from adjoining districts into London that serve as dormitories for its workforce. It is understood that whilst this pattern is generally reflected in outer London Borough's too, it is subject to more distortion arising from cross borough commuting patterns as residents have travel further to their places of work.

***G3 What type of workspace/ employment land will be required in the future relative to trends in the existing stock? Does this require a policy approach which extends beyond London?***

It is difficult to comment on the trends in respect to the existing employment land stock in London. However, as acknowledged above, there are issues arising from the loss of office space and other employment land to residential use, in order to meet the severe housing need in London and the South East. The consequences of this have yet to be fully established across the wider area.

In this respect, one of the challenges in developing an appropriate planning policy response to meet future employment needs, is the changing nature of the job market with the decline of traditional sectors, especially manifest in Harlow in recent years. In response to this Harlow Council has promoted a number of initiatives, in conjunction with partners in the SELEP, LSCC and the West Essex Alliance, to diversify the employment base of the town. This has included the promotion of IT, Advanced Manufacturing and the Health Sectors that is the focus of the Harlow Enterprise Zone. Further work, however, is being undertaken locally to ascertain future needs through a revision to the Employment Land Review. What is clear however is that Harlow has experienced significant growth in starter units and 'move on' space and demand grows for such sized units (1,000 – 3,000 sq ft range). It is also important that the future development of business space is done so with a flexible design, making building conversions easier. With rapidly changing technology it is difficult to predict what business space may be required therefore it is imperative that business space is adaptable.

Given the fact market areas wash over LPA boundaries there is a need to fully understand market conditions and likely future demands over the wider area. It is inevitable that a coordinated joint up policy approach will be required that extends beyond London, investigating opportunities beyond the Capital for areas such as Harlow to accommodate employment development. Activities that have been traditionally provided in London (e.g. manufacturing, back office functions) could easily be provided in Harlow with housing growth and infrastructure to match – with consequent benefits for London and Harlow.

***G4 In the context of meeting London's growth, what contribution should the following mechanisms make to helping to meet the challenge of delivering increased levels of housing?***

- ***Increasing outer London densities, particularly through suburban renewal***

Densification, especially through regeneration, has been a valuable planning tool that has secured the best use of urban land by allowing more people to live close to their place of work and where they spend their leisure time, thereby reducing the need to travel. This, however, appears to be more successful in existing urban areas such as London where much of the resident population has access to a well-established and fully developed public transport network. Opportunities to promote intensification at appropriate transport hubs and nodes should be examined rather than across all sites in suburban areas which could harm their Arcadian character. In this respect Harlow's potential as a growth hub is pre-eminent given its strategic position on the West Anglia Main Line (WAML) and the M11 midway between London and Cambridge. This is however subject to investment in key infrastructure routes and in the case of Harlow this includes four-tracking of the WAML and the provision of Crossrail 2 services through Harlow up to Stansted Airport and to Cambridge and improvements to the M11 through the provision of a new Junction 7a and the provision of an additional third lane on the motorway beyond Bishops Stortford.

- ***More housing at higher densities in town centres and Opportunity Areas/ Intensification Areas with good public transport***

Similarly it would be appropriate to promote intensification at town centres and Opportunity Areas/ Intensification Areas with access to good public transport links. There are opportunities for residential growth in Harlow Town Centre provided this is properly planned with the correct supporting infrastructure and community facilities. The current Permitted Development Rights do not support the delivery of this.

- ***Greater cumulative contribution of small scale sites, such as infill***

Small sites can make a useful contribution to addressing local housing needs. However, the cumulative impact of such sites needs to be considered as they can have an impact on both transport and social infrastructure. This can also have an impact on securing affordable housing provision to meet identified local needs. Harlow is in a unique position in that it has an abundance of small scale Council owned sites which have been identified for housing. However the Council has limited resources to bring these sites forward. Furthermore large strategic sites and urban extensions are more likely to deliver the strategic infrastructure required for an area, particular new schools and major highway schemes.

- ***Selective release of London's greenbelt around public transport nodes for housing (or consolidation of employment)***

Given the socio-economic pressures facing London and the South East, the rigorous application of Green Belt policy, especially against the backdrop of populist campaigns for its retention, has stymied an objective critique of its relevance and justification.

In 2014, in response to the Draft Further Alterations to the London Plan, Harlow Council had expressed concerns that the Plan had failed to set out a clear strategic direction to address housing need, exacerbated by the apparent unilateral decision taken by the GLA not to undertake a Green Belt review.

Consequently, and in conjunction with relevant LPA's, there is a need for the GLA to undertake a comprehensive review of the Metropolitan Green Belt, based on a consistent methodology that not only considers its purpose but also its impact on distorting sustainable patterns of development. A review must extend to the limit of the metropolitan Green Belt where some neighbouring districts, beyond London's boundaries, view those parts of the MGB as very much their own, exercising jealous protection and sovereign claim over any consideration of MGB purpose and/or release. There is clear evidence emerging from some district planning authorities of reluctance to jointly work upon Green Belt reviews and this carries serious implications for the timely and sound production of local plans under the duty to cooperate.

- ***Densification of built up areas beyond London (new towns; garden cities, suburban extensions)***

Densification has been a valuable planning tool that has secured the best use of urban land by allowing more people to live close to their place of work and where they spend their leisure time, thereby reducing the need to travel. This is only successful where there is sufficient critical mass available, in terms of housing and population, to ensure the delivery of essential infrastructure and services.

#### *New Towns*

In respect of new towns Harlow, since its inception, demonstrates the effectiveness of a comprehensive approach to plan making that delivered housing, jobs, infrastructure and services

within an attractive landscape setting, at the right place, at the right time. This was in response to the chronic housing shortage in London following the war and the need to create an urban environment that sought to balance socio-economic and environmental needs.

Harlow clearly fulfilled this aim and won many plaudits in its early years. The original masterplan provided a number of neighbourhood centres containing shops and other community facilities that served adjoining residential areas separated by a network of Green Wedges that provided access to open spaces as well as connectivity to other neighbourhoods and the pedestrian friendly town centre.

Post war new towns provide a template that could be harnessed to address some of the housing challenges currently facing London and the South East, ensuring a holistic approach to delivering infrastructure, jobs and homes, which would also provide certainty for the commercial sector and local communities.

In this context Harlow offers the opportunity to become the focus of additional growth based not only on the housing needs being identified in the joint SHMA for the area, but in economic terms based on its locational advantages and the initiatives encapsulated by the designation of the Enterprise Zone.

#### *Garden Cities*

Garden Cities, on the scale of Milton Keynes, can provide the opportunity and the economies of scale to sustainable development including social housing, zero carbon design, sustainable transport. As acknowledged by the TCPA they “also offer a powerful prospect to put in place new governance structures that put people at the heart of developing new communities and owning community assets.” The challenge is assembling land of a sufficient quantity, at economically viable and sustainable locations that can garner public support. With the possible exception of Ebbsfleet, it is unlikely an appropriate location could be identified in the short term, that would make a significant contribution to the housing needs of London and the South East.

#### *Suburban extensions*

In general terms, suburban extensions are often perceived as an ad hoc approach to urban planning, that fail to provide a satisfactory relationship to the host town, especially if that town exhibits an intrinsically historic character. However, this is not always the case. In the context of Harlow the original masterplan, prepared by Sir Frederick Gibberd, envisaged that the town should be allowed to grow as the needs and expectations of its residents changed. In this respect it was envisaged that Harlow would evolve through urban extensions that would reflect the design principles of the masterplan, characterised by a coherent network of Green Wedges linking distinct neighbourhoods. These Green Wedges are highly valued by the local community which not only provide a network of varied green spaces but which serve as movement corridors.

*For each, where might there be particular opportunities, how could this be supported and what / where are the specific challenges and constraints (e.g. what impact might this have on character and context; land values; balance between housing and employment; access to particular types / lower cost employment space, infrastructure requirement, etc.).*

As a former New Town Harlow provides the opportunity to deliver an expanded new settlement based on the existing network of key infrastructure, including direct access to the road and rail connections in the LSCC, access to health and educational facilities including the Princess Alexandra Hospital and Harlow College and University Centre Harlow, home of an Enterprise Zone and a range of employment areas, set within a network of green spaces linked by Green Wedges. Taking advantage of the existing building blocks the opportunity to expand the town in a sustainable is

predicated on a positive approach being adopted by adjoining districts through the Duty to Cooperate to deliver mutually beneficial growth.

Opportunities to deliver a new garden city in the south east is more limited and is likely to require extended timescales that would not address immediate and forecasted housing in the short and medium term.

Harlow, in accordance with the principles established by the town's original design principles, affords the opportunity to provide potentially sustainable suburban extensions that would meet immediate, medium and long terms needs that could protect important environmental assets elsewhere in the vicinity including Epping Forest and the Stort Valley. Key infrastructure is already in place and there are proposals to increase capacity on the WAML, and we welcome the provision of Crossrail 2 services to Harlow and beyond to support growth, and to junction 7 on the M11, rather than placing pressure on more remote locations.

***G6 Would it be worth considering growth 'corridors' (e.g. as with LSCC and linked to existing / potential public transport) in terms of enabling an integrated housing / employment / cross-boundary strategy...and if so, which corridors could be a focus (e.g. associated with CR2, HS1, HS2, CR1 extensions, C2C improvement, Gatwick)?***

Harlow is a location that is geared towards delivering growth. Strategically located on the M11, between the global economic powerhouses of London and Cambridge, and close to Stansted Airport, Harlow has a strong cluster of life-science businesses and a national Enterprise Zone.

Growth is in Harlow's DNA. It saw rapid expansion of both homes and employment in the 1950s and 60s and then again in the early 2000s. Unlike many parts of the south east, Harlow's council, businesses, and most importantly, its residents, are 'tuned in' and receptive to the growth agenda.

The London Stansted Cambridge Corridor Consortium is a partnership of public and private organisations formed to organise and promote the economic development of the area, unlocking the economic potential without compromising the existing quality of life. It is a functional economic area, with exiting strong inter-connectivity; including commuting to work patterns, clusters of industries and supply chains.

Underpinning this is the West Essex Alliance which is seeking to promote the M11 corridor as an unparalleled opportunity, in close proximity to London and Cambridge, to deliver sustainable economic and housing growth. With the M11 providing an economic 'artery' for the West of Essex and beyond, and Harlow at its sub-regional centre, the locations affords an unparalleled strategic opportunity for economic growth. Fast road and rail connections to London, Cambridge, and Stansted Airport provide access to national, European and global markets. Central Government and the Hertfordshire Local Enterprise Partnership have also agreed to co-invest in the M11/A10 growth corridor in order to accelerate housing delivery in this important growth corridor.

In recognising the role of Harlow in meeting housing and economic need that can't be accommodated within London, targeted infrastructure investment (e.g. four tracking of the WAML and Crossrail 2 services to Harlow and beyond; M11 junction 7a and a new northern link between the M11 – M1) would yield significant potential for growth and economic development to the mutual benefit of London and the London-Stansted-Cambridge corridor.

In this context the building blocks are in place to exploit the opportunity to promote growth within an established corridor. This must be taken into account in the full review of the London Plan in

order to ensure a long term and sustainable spatial approach is put in place to meet future socio-economic needs.

***G7 How can we maximise the benefits of growth regionally, sub-regionally and locally; and mitigate concerns? (e.g. provision of supporting social and community infrastructure; greater focus on place-making; re-provision in the new development of social housing)***

As outlined above there are locations that have a key functional relationship with London that should be seen as a catalyst for economic and supporting housing growth. Some of this needs to be unlocked through the provision of additional infrastructure underpinned by a positive approach from Local Authorities to demonstrate they are committed to the growth agenda being promoted by Government. This means consolidating existing collaborative working arrangements but it must not rule out intervention by Government where clear interests and opportunities of regional significance arise but are thwarted by a local inability to see the 'bigger picture'.

In the Harlow context, very slow progress is being made through the Duty to Co-operate. It is becoming clear from this process that 'larger than local' issues are not being afforded due consideration given that the political imperative is driven by 'local' priorities. Achieving political consensus, on what are essentially sub-regional issues, across four districts and two county councils is challenging and showing little sign of progress. In the absence of any steer at the sub regional level there is no guarantee this can be quickly achieved.

There also needs to be more consideration given to long-term strategic planning between local authorities and key statutory bodies/agencies in order to deliver future growth. These key bodies which include but are not inclusive of local highway authorities and Highways England, Network Rail and utility providers must support local authority plan making by providing concise and viable solutions and providing supporting information and evidence as quickly as possible.

***G8 Does the London Plan density matrix need to be reviewed (e.g. PTAL splits, characterisation, the ranges themselves), or is it better to keep it as a benchmark and use it to bargain for higher quality / more social infrastructure / more affordable housing?***

The character of urban areas can vary across cities and towns, reflecting a range of densities, house types etc. Harlow does not implement a density matrix, as set out in the London Plan and instead relies on guidance contained in the Harlow Design Guide SPD. This provides more nuanced guidance that reflects the character and design principles of the New Town. In this context it is considered appropriate to keep the matrix in place as a benchmark to secure higher quality design, more social infrastructure and affordable housing. The outcome of this would, however, need to be reviewed as part of the plan, monitor, and manage approach.

***G9 Have you any suggestions for new Opportunity/Intensification Areas; or medium sized town centres suitable for higher density, housing led renewal/redevelopment?***

Areas of opportunity and intensification should be focused in areas with good public transport connectivity, access to community facilities and jobs. This means reviewing existing locations as well as examining the potential to create new neighbourhood hubs on large brownfield sites that have development potential and are deliverable in the plan period. Exploitation of the recent changes to the General Permitted Development Order (i.e. offices to residential) has led to increased housing in Harlow town centre. However, the tenure and mix is of concern given that the vast majority of incoming residents are, allegedly, homeless and displaced from north London boroughs. Notwithstanding the remedy to housing need that such dwellings provide, it is questionable, given

the specific need being addressed, that the increase in population adds anything to the economic vitality of the town centre. Indeed, it robs the town centre of potential employment floorspace.

## **New Approaches to Regional Co-ordination Function**

### **R1 Should London and the wider south east be viewed as one area for managing growth? What are the planning implications of this for housing and jobs growth and strategic infrastructure provision?**

Whether it should be viewed as one area (or more) is a difficult issue. What is becoming increasingly clear is the need for a forum or 'place' to facilitate the 'larger than local' discussions and debates that must be had to tease out the regional and sub-regional issues and opportunities that are singularly being ignored at the local level. Within the LSSC these discussions are being enabled but any consensus about the need for and the delivery of sub-regional growth falters at the local planning level. The planning void created by the abolition of the Regional Spatial Strategies has not been addressed by the Duty to Cooperate.

### **R2 Which strategic policy issues affecting this part of London would benefit from being considered through some co-ordination of planning with authorities across the wider south east as a whole, or with representative of adjoining sub -regions?**

Strategic housing site allocations with supporting and aligned strategic infrastructure investment must, by definition, be dealt with at a strategic level – i.e. above the scope of district local plans.

Harlow has a tightly drawn administrative boundary, and the majority of feasible locations for expansion of the town involve development that expands into the neighbouring areas of Epping Forest (EFDC) and East Hertfordshire (EHDC) and requires development value to be captured from across all three local Council areas to meet infrastructure needs, including a new M11 junction.

Within its borders, Harlow has the capacity to deliver just 7,600 new homes. Through its own Local Plan, Harlow is able to deliver just a fraction of its ambition and long term strategy for sustaining the District's services, which amounts to some 20,000 dwellings over twenty years. And until it knows what its neighbouring councils are seeking to do, it cannot conclude upon its growth strategy.

For Harlow, the failure to achieve its growth strategy would be a huge lost opportunity:

- 12,500 fewer homes than the 20,000+ it could achieve;
- 15,000 fewer jobs
- An annual GVA gap of £0.8bn
- £0.6bn less household spending on shops and services each year
- No new junction on the M11 and completion of the A414 connection;
- An Enterprise Zone that does not deliver;
- A town centre that does not secure the revitalisation it needs to compete

The Harlow opportunity requires a strategy that looks properly at the town's potential and sets out how to unlock it, unfettered by administrative boundaries. This strategy could focus upon:

- Putting in place a framework for a 10,000 dwelling Garden Town/suburb to the north of Harlow in East Hertfordshire
- Allowing for selection of the right urban extensions to the east, south and west of Harlow some of which extend into Epping

## Forest

- Delivering and financing cross-boundary infrastructure between Essex and Hertfordshire, including extending the A414 to link with a new M11 Junction and supporting improvements to the WAML and provision of Crossrail 2 services beyond Broxbourne in Hertfordshire.

Ultimately, changes to local government boundaries would help unlock many of the problems outlined but Harlow Council fully acknowledges the practical barriers to such changes, particularly in the short term.

Harlow would welcome the opportunity to work further with the OLC on exploring ways to improve collaborative working and to that end looks forward to discussing any pertinent issue with the OLC.