

## **East Herts District Plan Examination**

### **Matter 2 – Development Strategy: Housing**

#### **Issue 10**

**What evidence is there to show that the allocations proposed to Stevenage and Welwyn Garden City, which are outside the joint housing market area, would meet the housing needs of East Herts? What evidence is there to demonstrate that the extension to Harlow is the best option for meeting the housing needs of Harlow and East Herts? What evidence informed these decisions?**

1. This submission addresses the questions relating to the Gilston Area, the way in which that meets the housing needs of Harlow and East Hertfordshire, and the evidence base that supports the proposed allocation.

#### **The Context of the Gilston Area Proposal**

2. The Gilston Area development is not designed to be an "*extension*" of Harlow. It is a proposal to deliver homes across 7 distinct, individual, villages separated by green space. The approach for the Gilston Area, as set out in the Concept Framework, seeks to create a new community that is separate from Harlow, but benefits from its proximity to services and facilities, as well as supporting Harlow's economic regeneration.

#### **East Herts Housing Needs**

3. The Gilston Area is strategically located immediately north of Harlow, on the border of East Herts and Harlow Districts. The Gilston Area has a central role to play in assisting East Herts meet its objectively assessed market and affordable housing needs. In light of the substantial and growing housing need identified in the overlapping Housing Market Areas within which East Herts operates, there is a need for development outside of current settlement boundaries, on greenfield and/or Green Belt land. The Gilston Area is, compared to other locations, the best and most sustainable location outside existing settlements to accommodate the proposed growth, partly due to its proximity to existing employment opportunities (and future employment opportunities within the Harlow Enterprise Zone), public transport facilities (including Harlow Train Station and bus services), as well as other services and facilities within Harlow.
4. A comprehensively planned development in this sustainable location enables infrastructure needs and impacts to be managed more effectively than through a dispersal strategy.
5. During the preparation of the District Plan, all development strategy options were reviewed by EHDC. Following careful analysis of the evidence available it was concluded that the Gilston Area was one of the most sustainable locations to accommodate growth.

#### **Harlow Housing and Regeneration Needs**

6. Harlow District Council has identified a large housing need, and furthermore has a pressing need for urgent economic and social regeneration which can only be delivered through a

combination of housing and economic development. This is clearly articulated in HDC's evidence base to its emerging Local Plan, and it is clear that insufficient land exists within Harlow (given its tight administrative boundaries) to satisfy these growth and regeneration requirements.

7. The need to deliver the successful regeneration of Harlow has been a strategic objective of regional and local planning policy and guidance for over a decade. More recently the Hertfordshire Local Enterprise Partnership ("LEP") published its Strategic Economic Plan ("SEP"), 'Perfectly Placed for Business' (March 2014), which explains that Hertfordshire's economy is performing well but identifies that it is beginning to slip relative to other locations. The strategy sets out objectives to address this relative decline, which emphasises growth based on knowledge and innovation and the provision of adequate housing and infrastructure to support growth.
8. The Hertfordshire Growth Deal focuses on the A10/M11 area as being one of three transport corridors with significant potential for growth. This A10/M11 area includes the Gilston Area, and has been prioritised due to its strong links to London in the south, Cambridge in the north, neighbouring Harlow and its close proximity to Stansted.
9. As part of this corridor, Harlow lies in the middle of one of the most important economic sub-regions in the UK. Cambridge and London are both cities with high skills, productivity and wages, but both face constraints with high and rising costs of housing and workers. Stansted Airport, just 20 minutes on the train from Harlow, is a key component of the M11 sub-region's international links and growth potential. It is one of the fastest growing airports in the EU, adding an additional two million passengers last year.
10. The London-Stansted-Cambridge Consortium lists Harlow as an integral economic location and labour market needed to support the prosperity of the corridor (LSCC, An Agenda for Jobs, Growth and Improved Liveability, 2014). The corridor has three nationally designated Enterprise Zones – the central link of which is Harlow Enterprise Zone. The Harlow Enterprise Zone (set over two sites) has a target of 5,000 jobs over the next 25 years. Public Health England has announced a £350million investment moving their operations into Harlow bringing a further 3,250 jobs to the town. Together, these sites will reinforce the LEP's vision of building a nationally significant life science and medical technology cluster in Harlow and make the M11 sub-region "Europe's most dynamic growth corridor." (LSCC, 2014).
11. The Gilston Area site promoters will be supporting East Hertfordshire and Harlow Councils' ambition to deliver a new junction 7a on the M11 to support the area's economic growth over the coming decades. Although investment has been made in the Enterprise Zone, for the full benefits of this to be achieved, housing growth and Harlow's regeneration are key. The LEP has identified the Gilston Area as a strategic housing site and Harlow/Gilston as a "priority place".
12. Good quality homes need to be delivered close to new jobs, and these homes need to be in the right place and provide the right offer to correct decades of Harlow's unsustainable commuting patterns, encouraging more of Harlow's workers to live close to their jobs.

13. Since its establishment, the Hertfordshire LEP has identified “accelerating delivery of housing sites” as one of its top priorities and a “game changer” for the Hertfordshire economy. The Gilston Area was identified as one of these strategic housing sites in the LEPs original strategy (HLEP Economic Strategy, 2014). Housing was seen as a foundation for long term growth and the LEP committed to working with local authorities and developers to ensure that the proposals for 10,000 homes at Gilston were deliverable. The LEP acknowledged that delivering real change would involve a significant increase in the delivery of homes, 4,500-5,000 homes every year.
14. The Hertfordshire LEP published its refreshed Economic Strategy in July 2017. This re-states the LEPs commitment to accelerate housing delivery, whilst safeguarding employment land supply. It continues to specifically identify Gilston as an area that can help deliver this supply as part of the Harlow and Gilston Garden Town and of the wider A10/M11 economic corridor at the east of the County.
15. East Herts, Harlow and Epping Forest Councils applied to Government for support for a Garden Town, The Harlow and Gilston Garden Town, covering the wider Harlow Area in October 2016. The Government confirmed the bid had been successful in January 2017. The Garden Town initiative intends to deliver approximately 16,500 homes by 2033, including approximately 3,000 homes in the Gilston Area.
16. Harlow Town station has been subject to some improvements in the recent past with enhanced passenger waiting facilities introduced on the bridge deck over the tracks. Initial proposals have been developed for a northern station access from Burnt Mill Lane/Burnt Mill Close, which would be used by pedestrians, cyclists and a possible shuttle bus. A new station entrance would reduce travel distances from areas to the north of Harlow, including the Gilston Area. Support for these proposals has been indicated by the Train Operating Company, and Network Rail.
17. Development in the Gilston Area will deliver substantial new housing that can help support the economic stimulus of this part of the M11 corridor, building on relationships with Stansted airport, and supporting existing travel to work patterns. This will directly support the objectives of the LEP.
18. There is a clear and long-standing recognition that Harlow requires investment and regeneration in order for it to make a strong contribution to the sub-region as a whole, a need that has become more pressing over time. Harlow's growth is constrained on all sides by Green Belt and not only to the north.
19. The proximity of the Gilston Area to Harlow and its railway stations, will provide residents of the development with access to substantial employment opportunities both within Harlow itself, as well as further afield. Therefore, as well as assisting to address East Herts housing need, the Gilston Area development will support the regeneration of Harlow by helping to draw investment to the town and enhance its economic performance.
20. Further details are set out in the Case for Growth document submitted by Places for People and City & Provincial Properties to the EHDC Pre-Submission consultation in December 2016.