

EAST HERTFORDSHIRE DISTRICT PLAN (2011 – 2033)

PUBLIC EXAMINATION

HEARING STATEMENT BY JED GRIFFITHS MA DipTP FRPPI

ON BEHALF OF STOP HARLOW NORTH (SHN)

Matter 4: The Development Strategy – Infrastructure

Question 1...Would the distribution of development in the Plan have proper regard to the quality and capacity of the road network, the quality and capacity of public transport and wider aims to promote sustainable development?

The question of infrastructure provision in the Plan relates not only to highways and transport, but also to drainage capacity, water supply, health provision, as well as other services. Policy DPS4 lists the elements of strategic infrastructure which will be required, but the Infrastructure Development Plan provides few details as to how these elements will be delivered.

In terms of roads infrastructure, the key issue is how to improve east-west communications across the District. Upgrading of the A414 route is critical, a point which has been acknowledged in the County Council's recent consultation on Hertfordshire 2050. For the implementation of the Gilston Area, the extension of the A414 to a new junction 7a on the M11 is critical and is included in the proposals set out in Chapter. SHN notes that Essex County Council supports this proposal, but there appears to be no clear commitment from Highways England to the proposed new interchange, and no funding for the project.

As the Plan and the Concept Development Framework (CDF) clearly indicate, the bulk of the traffic generated by the Gilston area developments will run onto the A414. This will seriously affect the capacity of the road, which is already congested at peak times. In July 2017, East Herts Council consulted on an EIA Scoping Report for the Gilston area CDF, which was produced by consultants for the promoters. In its response to the consultation, SHN noted the effects on the A414, which had been referred to in the Scoping Report.

The possible wider effects of the proposed development had been noted, not only in the Harlow area, but also to the west at the Amwell roundabout and the A10 beyond. In the view of SHN, the problems on the A414 would also be exacerbated further to the west, particularly on Gascoyne Way in Hertford. As yet, the County Council has yet to publish a review of the Local Transport Plan which would address these issues. There are no funds available for the necessary improvements to the A414, in particular for a northern bypass to Harlow.

Further to the north, the principal east-west route across the District is the A120, which runs from the M11 to the A10 at Puckeridge. The County Council's current road programme includes the Little Hadham bypass, but there are no proposals to develop a bypass to Standon and Puckeridge. The implications of this for traffic generation in the Gilston area have not been investigated.

In terms of public transport infrastructure, the Plan refers to the proximity of the railway station at Harlow, which would support the development of the Gilston area. Recent proposals by the Department for Transport for investment in rail infrastructure make no mention of improvement to the route between London Liverpool Street and Cambridge. In its submissions SHN has referred to the current lack of capacity on this route, which is only double-tracked along the Lee and Stort valleys.

Drainage is a major issue for the Plan, particularly in the delivery of the proposals for the Gilston area. The lack of sufficient infrastructure for sewage treatment was a major issue at the Examination in Public of the East of England Plan. It remains so. The Rye Meads Waste Water Treatments Works has little spare capacity, and is expected to serve not only East Herts but also parts of Welwyn Hatfield, Broxbourne, and Stevenage.

For the Gilston area, the promoters propose to overcome this problem by treating foul water on site, and discharging the waste water into River Stort. As yet, this solution has been fully addressed in an EIA. To proceed, it would need a permit from the Environment Agency. Concerns have been expressed, however, by the Agency about this form of treatment for such a large area. The effects of the amount and the quality of the water discharged have not been fully assessed.

If the on-site solution cannot be delivered, then the alternative would be the expansion and upgrading of the works at Rye Meads. The environmental implications of such a solution were investigated in a Habitats Regulations Assessment (HRA) prepared by Levett-Therivel consultants, which informed the East of England Examination. The HRA concluded that there would be considerable environmental effects resulting from any expansion at the works. Nothing has changed.

In addition, a technical assessment would have to be as to how the connecting infrastructure would need to be delivered from the proposed development area across the Stort Valley to an expanded trunk sewer. The Plan is committed, however, to the on-site treatment of waste, and has rejected the off-site (Rye Meads) solution. There is no certainty and therefore the Plan is unsound.

In its submissions, SHN has referred to the problems of maintaining water supply in this part of the East of England region. Earlier this summer Affinity Water, following a dry spring time, issued leaflets to all households, emphasising the need to reduce water use. The Plan refers to the need to achieve a “satisfactory water supply” – there is no statement as to how would be delivered.

Health capacity is a major issue for the Plan. For the Gilston area, paragraph 11.2.5 and policy GA1 state that “consideration will be given” to the potential of the site to facilitate the re-location of the Princess Alexandra Hospital at Harlow. It is recognised that the hospital cannot cope with current demand, let alone the needs of any substantial new development. There are no specific proposals, however, for the funding of the re-location of the hospital or its expansion.

In terms of general health provision, the Harlow infrastructure Study Stage 2 – Final Report (March 2010) identified the need for 17 new GP surgeries in and around Harlow. There are no specific proposals in the District Plan about the delivery of these services.

Section 11.3 of the Plan and policy refer to the Stort Crossings. SHN will respond in more detail to these elements at the next Stage of these Examination Hearings. At this stage, however, it should be noted that there is no funding allocated for any new crossing and no possibility of delivery in the plan period.

Question 2 *What are the principal transport improvements and projects that are required for the implementation of the Plan?*

The principal elements required have been set out in the response above to Question1. For the Gilston area, it would appear that these are:

- improvements to the highways network, including the northern bypass to Harlow, a new junction 7a on the M11, further improvement to the A414 route, SHN would Also highlight the need to consider improvements to the A120 corridor.
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- upgrading of the rail route in the Lee and Stort Valleys.

Question 3...How has the Council assessed the effect of possible delay/failure of key infrastructure coming forward within the desired timescale? How would this affect the housing land supply and the overall housing targets? What measures are in place to cope with delays?

In the view of SHN, too much of the proposed housing development is dependent on the provision of key infrastructure. This casts considerable doubt as to whether the District Plan can be delivered. The Gilston area is a clearly a key element of the strategy, but it clear that many of the outstanding issues relating to its delivery have not yet been resolved.

In the East Herts Strategic Sites Delivery Study Final Report produced by Peter Brett Associates (September 2015), the challenges for the Gilston area were very clearly outlined. As indicated above, many of these issues have not been resolved, which cast severe doubts about the delivery of the proposals.

The Infrastructure Development Plan submitted with the District Plan includes very few firm proposals. Without commitment, many of the allocations will not be delivered and the housing land supply will be curtailed. The Plan is therefore unsound, because it cannot guarantee the delivery of key infrastructure projects.