

Respondent List for Local Development Plan Pre-Submission Publication

B.K. & J.T. Drabble [8611]
Barker Parry Town Planning Ltd. (Ms Elizabeth Fitzgerald) [8451]
BOC (Glen Jenkins) [8571]
Canal & River Trust (Ms Tessa Craig) [8612]
Chelmsford City Council (Ms Jenny Robinson) [8636]
De Merke Estates (Ms Emma Gladwin) [8643] represented by Barton Willmore (Miss Emma Gladwin) [8399]
Deanery of Harlow (Anglican) (Revd Martin Harris) [8586]
East Herts District Council (Mr George Pavey) [8616]
Environment Agency (Miss Lisa Mills) [8443]
Epping Forest District Council (Ms Alison Blom-Cooper) [8637]
Essex Bridleways Association (Mrs Sue Dobson) [7887]
Essex County Council (Mr Rich Cooke) [8452]
Forestry Commission (England) (Ms Corinne Meakins) [8617]
Gillian Atkins [8577]
GLADMAN (Mr Phill Bamford) [8618]
Hallam Land Management & Commercial Estates Group (Mike Newton) [7646]
Harlow Alliance Party (Mr Nicholas Taylor) [8621]
Harlow Civic Society (Mr John Curry) [5318]
Hertfordshire County Council (Mr Martin Wells) [8622]
Highways England (Mr Mark Norman) [7939]
Historic England (Ms Debbie Mack) [8623]
Home Builders Federation (Mr Mark Behrendt) [8450]
Indigo Planning Limited (Mr Diogo Duraes) [8632]
Jean Wright [5878]
Lawson Planning Partnership (Miss Kathryn Oelman) [8532]
Little Hadham Parish Council (Mr Neil Wardrop) [8624]
Miller Strategic Land [5769] represented by Andrew Martin - Planning (Mr Olivier Spencer) [5533]
Miss Aimee Turvill [8607]
Miss Erin Rose BALDRY [8560]
Miss Mary Wiltshire [6026]
Morley Grove Residents Association (Sheila Sullivan) [5043]
Mr David Naylor [8579]
Mr Danny McCaughey [8578]
Mr David Beavis [8615]
Mr Dean Burns [8552]
Mr Ethan Baldry [8559]
Mr James Humphreys [8561]
Mr John Graham [8542]
Mr MASOUD ESKANDARIAN [8625]
Mr Mike Stokes [8551]
Mr Nigel Bangert [8638]
Mr Ray Goodey [8580]
Mr Ricky Goldblatt [8631]
Mrs Karen Garrod [8596]
Mrs Samantha Baldry [8554]
Mrs Sarah Gibbins [8582]
Ms Angela Parish [8550]
Ms Christina Webb [8613]
Ms Jennifer Bedford [8557]
Ms Nikki Kellman [8629]
National Federation of Gypsy Liaison Groups (A. Yarwood) [8627]

Respondent List for Local Development Plan Pre-Submission Publication

Natural England (Ms Sarah Fraser) [8628]

NHS West Essex CCG (Mrs Jolene Truman) [8584]

Persimmon Homes (Mr David Moseley) [8437]

Quod Planning (Mr Philip Murphy) [7958]

Redrow Homes (Ms Kate Holland) [8640] represented by Redrow Homes (Ms Kate Holland) [8640]

Roydon Parish Council (Janet Ballard) [5434]

Sandra Beavis [5035]

STOP Harlow North [8588] represented by Mr Jed Griffiths [8576]

Tetlow King Planning (MEGHAN ROSSITER) [8630]

Thames Water (Savills) (Mr Chris Colloff) [8433]

The Roydon Society (S.N. Wilkinson) [8634]

The Theatres Trust (Tom Clarke) [216]

Weston Homes Plc (Mr David Poole) [8590]

May 2018

Pre-Submission Publication

24th May 2018 to 6th July 2018

Local Development Plan and Policies Map

Available to view at:

- Civic Centre
- Latton Bush Centre
- Harlow libraries

All the documents including supporting technical studies are available to view at: www.harlow.gov.uk/local-plan-publication



@HarlowCouncil



Reference:

Date:

Representation Form

Please note that it is not possible for representations to be considered anonymously. You must include your name and address on any comment in order for it to be accepted and complete the data consent form.

For more information on how Harlow Council collect, use and protect personal information generally, please visit <http://www.harlow.gov.uk/privacy-notice> or write to Data Protection Officer, Harlow Council, Civic Centre, The Water Gardens, Harlow, Essex CM20 1WG.

Personal Details

Please tick as appropriate:

Responding as an individual

Responding on behalf of an organisation

Agent responding on behalf of client

Please complete in block capitals

Agent Details (if applicable)

First Name	<input type="text"/>
Last Name	<input type="text"/>
Job Tittle/Dept	<input type="text"/>
Organisation	<input type="text"/>
Email	<input type="text"/>
Address Line 1	<input type="text"/>
Line 2	<input type="text"/>
Line 3	<input type="text"/>
Line 4	<input type="text"/>
Postcode	<input type="text"/>
Tel.No	<input type="text"/>
Mobile	<input type="text"/>

First Name	<input type="text"/>
Last Name	<input type="text"/>
Job Tittle/Dept	<input type="text"/>
Organisation	<input type="text"/>
Email	<input type="text"/>
Address Line 1	<input type="text"/>
Line 2	<input type="text"/>
Line 3	<input type="text"/>
Line 4	<input type="text"/>
Postcode	<input type="text"/>
Tel.No	<input type="text"/>
Mobile	<input type="text"/>

HARLOW COUNCIL – FORWARD PLANNING PRIVACY

This is an editable form – please return by email to myharlow@harlow.gov.uk once complete.

In accordance with the General Data Protection Regulation, please complete below:

- **Section 1** if you are making comments (a representation) on the Local Plan
- **Section 2** if you want to receive Planning Policy updates (even if you already receive them)
- **Section 3** to provide your details

1. USE OF PRIVATE DATA WHEN MAKING COMMENTS

If you do not provide consent, we cannot process your comments and you may not be able to participate in the Local Plan examination.

Please tick this box to provide your consent to allow an external supplier (JDi Solutions) to process your data* on behalf of Harlow Council, in accordance with the General Data Protection Regulation and the Data Protection Act, so your comments on the Local Plan can be processed.

**Your name and comments will be made public, but any address, telephone and email details will remain confidential.*

2. RECEIVING UPDATES

Even if you already receive updates, you must provide consent to continue receiving them.

Please tick this box to provide your consent to allow an external supplier (JDi Solutions) to process your data on behalf of Harlow Council, in accordance with the General Data Protection Regulation and the Data Protection Act, so Harlow Council can contact you using the details you provide to send you updates on the Local Plan and other Planning Policy matters.

3. YOUR DETAILS

Please confirm below your name and email **or** postal address. If you consent to receive updates, you will receive them via email or post depending on whether you supply your email or postal address. You are not obliged to provide your details; however we will be unable to process your any comments you make, or send you updates if you want them.

Contact name

Email

or Postal Address

We will keep a record of your consent for two years, after which time we will contact you to see if you still wish to receive this information. If you no longer wish to receive the above service, you may opt out at any time by contacting data.protection@harlow.gov.uk A record of your decision to opt out will be kept for six months. For more information on how we collect, use and protect personal information generally, please visit <http://www.harlow.gov.uk/privacy-notice>

Representation

Do you consider the proposed Pre-Submission Harlow Local Development Plan to be:

- | | | |
|--|-----|----|
| ➤ Legally Compliant | Yes | No |
| ➤ Sound | Yes | No |
| ➤ Compliant with the Duty to Co-operate | Yes | No |

Please indicate which part of the Local Development this comment relates to

Page	<input type="text"/>	<input type="text"/>	<input type="text"/>
Paragraph	<input type="text"/>	<input type="text"/>	<input type="text"/>
Policy	<input type="text"/>	<input type="text"/>	<input type="text"/>

Comment

e.g. whether you feel the Pre-Submission Local Development Plan is legally compliant, compliant with the duty to co-operate and sound.

Suggestion of the modification(s)

e.g. If anything you consider necessary to change in order to make the Local Development Plan legally compliant or sound.

A large, empty rounded rectangular box with a black border, intended for writing suggestions for modifications to the Local Development Plan. The box is vertically oriented and occupies most of the lower half of the page.

Examination

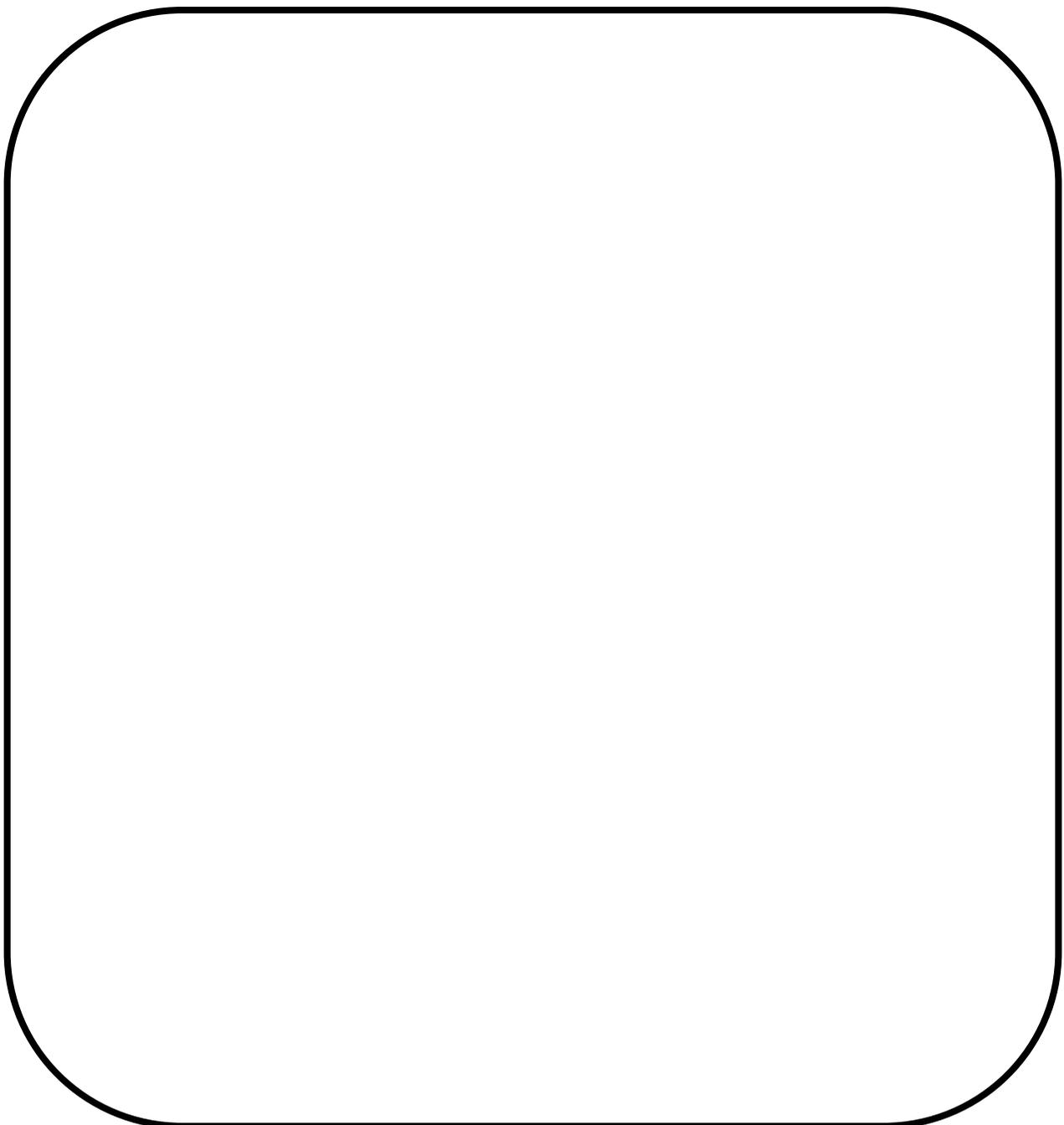
Please note that written and oral comments are equally weighted and will be given equal consideration by the inspector.

Please indicate your preference to participate at the oral examination

Yes, I Think it is necessary to participate at the oral examination

No. I do not wish to participate at the oral examination

If you consider it necessary to speak at the examination, please outline below why you consider it to be necessary. Please note that the Inspector will determine the most appropriate process to adopt to hear those who have indicated that they wish to participate at the examination.

A large, empty rounded rectangular box with a thick black border, intended for the respondent to provide reasons for oral examination participation.

Do you wish to be notified of any of the following?

The submission of the Harlow Local Development Plan for examination	Yes	No
The publication of the Inspectors Report on the Harlow Local Development Plan	Yes	No
The adoption of the Harlow Local Development Plan	Yes	No

Please return form to the Forward Planning Team:

By Email: myharlow@harlow.gov.uk

By Post **Forward Planning, Harlow Council, Civic Centre, The Water Gardens, Harlow, Essex, CM20 1WG**

or

Go to the Harlow Council website at www.harlow.gov.uk/local-plan , and follow the link to view and comment on the document online

Please note that it is not possible for representations to be considered anonymously. You must include your name and address on any comment in order for it to be accepted and complete the data consent form.

Comment must be submitted no later than 4pm on Friday 6th July, 2018
(Comments received after this time may not be considered.)

This information is available in Accessible communication formats upon request

Signature

Date

Property

Private: 03448 475026

Accommodation To Let

PITTMANS FIELD HARLOW

Single Room in Town House, 2 Bathrooms
Communal areas cleaned Saturdays
Wi fi
No DSS
£100 inc bills pw
EPC Rating: N/A
Tel: 07838791688

Room to let

Exceptionally large double room. For single person. All bills inclusive / wifi. NO DSS. Just redecorated. Nice quiet house. Over 255 only. £110 per week. Harlow.

07580 251590

ROOM TO RENT IN STANSTED USE of all facilities. £90 pw EPC Rating: N/A Tel: 01279 813571

Park & Caravan Homes

MOBILE HOME TO RENT

Fully furnished, very clean. Available straight away. No children/pets
EPC Rating: Awaiting

01279 813344 or 07437 467641

Property To Let

DOUBLE ROOM HARLOW Fully furnished, clean, tidy, non-smokers. 400pcm bills/cleaning included EPC Rating: Awaiting Tel: 07980 383072

SAWBRIDGEWORTH

Purpose built, immaculately maintained, 2 bed flat in town center (Bell Street), 10 mins walk from station (40 mins Liverpool Street), 5 mins walk to buses, 25 mins to Stansted Airport. Call anytime.

£850 pcm

EPC Rating: Awaiting

01279 723308

TO LET UNIT STAPLE TYE

Unit to let in Staple Tye shopping mews, Harlow. 2 storey units, total 563 sq ft. Various uses considered.

For further details or to view please call numbers below.

EPC Rating: N/A
Tel: 07918 603898 or 07812 340336

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Public Notices

24/7 Advertising for private and trade

Lost

SEEKING TO LOCATE

Whiskers LLP are urgently trying to track down a retired police officer by the name of Harry Knight in relation to one of our current clients. Would you please contact us urgently on this number: 01279 439439 quoting AC.

Andrew Clowser - Whiskers LLP

Public Notices

JOHN ALLBUTT (Deceased)

Pursuant to the Trustee Act 1925 any persons having a claim against or an interest in the Estate of the aforementioned deceased, late of 44 Copshall Close Harlow Essex CM18 7LJ, who died on 11/02/2018, are required to send particulars thereof in writing to the undersigned Solicitors on or before 27/07/2018, after which date the Estate will be distributed having regard only to claims and interests of which they have had notice. WHISKERS LLP
6 Mire Buildings Kitson Way Harlow Essex. CM20 1DR 7530390

WHY NOT? Self-serve

STATEMENT OF AVAILABILITY FOR INSPECTION UNDER THE TOWN AND COUNTRY PLANNING (LOCAL PLANNING) (ENGLAND) REGULATIONS 2012 (REGULATIONS 19)

The submission version of the Harlow Local Development Plan and other supporting documents will be available for public inspection during the Regulation 19 Publication period at the Harlow Civic Centre, Latton Bush Centre and Harlow libraries during normal opening hours.

Regulation 19 Publication period from **Thursday 24th May 2018 until Friday 6th July 2018**

All the documents including supporting technical studies are available to view on Harlow Council Website at: <http://www.harlow.gov.uk/local-plan>

For any further enquiries, please email myharlow@harlow.gov.uk or contact the Forward Planning team on 01279446897

This information is available in Accessible communication formats upon request



GOODS VEHICLE OPERATOR'S LICENCE

Courtlands Waste Management (UK) Ltd of North Place, Edinburgh Way, Harlow Essex CM20 2SL is applying to change an existing licence as follows:
To keep an extra 5 goods vehicles at North Place, Edinburgh Way, Harlow Essex CM20 2SL.

Owners or occupiers of land (including buildings) near the operating centre(s) who believe that their use or enjoyment of that land would be affected, should make written representations to the Traffic Commissioner at Hill Crest House, 386 Harehills Lane, Leeds, LS9 6NF stating their reasons, within 21 days of this notice. Representors must at the same time send a copy of their representations to the applicant at the address given at the top of this notice. A guide to making representations is available from the Traffic Commissioner's Office.

Self-serve and save time

GOODS VEHICLE OPERATOR'S LICENCE

Gary Bone trading as Rightway Scaffolding Ltd of 8 Longwood Court, Upminster, Essex, RM14 2BX is applying for a licence to use Foster Street Farm, Foster Street, Harlow Common, Essex, CM17 9HS as an operating centre for 2 goods vehicles and 0 trailers

Owners or occupiers of land (including buildings) near the operating centre(s) who believe that their use or enjoyment of that land would be affected, should make written representations to the Traffic Commissioner at Hill Crest House, 386 Harehills Lane, Leeds, LS9 6NF stating their reasons, within 21 days of this notice. Representors must at the same time send a copy of their representations to the applicant at the address given at the top of this notice. A guide to making representations is available from the Traffic Commissioner's Office.

Public Notices

STATEMENT OF REPRESENTATIONS PROCEDURE AND ARRANGEMENTS FOR INSPECTION OF THE HARLOW LOCAL DEVELOPMENT PLAN

(Proposed Submission "Publication Draft" Version)

Notice is hereby given, in accordance with regulations 19 and 35 of the Town and Country Planning (Local Planning) (England) Regulations 2012, that Harlow Council is publishing the Harlow Local Development Plan. This notice gives details for inspection and public involvement.

Harlow Local Development Plan Pre-Submission Publication May 2018

Subject matter and area covered by the Local Development Plan
Harlow Council has prepared the Pre-Submission Publication version of the Harlow Local Development Plan together with a Policies Map which it proposes to submit to the Secretary of State for Housing, Communities and Local Government. The Harlow Local Development Plan provides a spatial planning framework to shape and guide development in the town until 2033. The plan sets out a spatial vision together with a number of strategic objectives that are supported by a suite of strategic and development management policies. The accompanying Policies Map identifies sites for housing employment and other forms of development, as well as those areas which are subject to a range of policy and environmental constraints. A separate Area Action Plan is, however, being prepared for Harlow Town Centre. The inset on the Policies Map indicates the area covered by separate Area Action Plan.

Representations

The period for submission of representations to the Council will run for six weeks from **Thursday 24th May 2018 until 16:00 on Friday 6th July 2018**.

There are various ways that you can send the Council your representation:

- Go to the Harlow Council website at www.harlow.gov.uk/local-plan, and follow the link to view and comment on the document online; or
 - Complete the representation form and post it to **Forward Planning, Harlow Council, Civic Centre, The Water Gardens, Harlow, Essex, CM20 1WG** or email to the myharlow@harlow.gov.uk. Copies of the representation form can be found on the website at www.harlow.gov.uk/local-plan-publication, and hard copies in the Civic Centre reception upon request; or
 - Send an email or letter to the Council with the data consent form.
- For any further enquiries, please email myharlow@harlow.gov.uk or contact the Forward Planning team on 01279446897

Harlow Council 24th May 2018

This information is available in Accessible communication formats upon request



Public Notices

TOWN AND COUNTRY PLANNING ACT 1990 PLANNING (LISTED BUILDINGS AND CONSERVATION AREAS) ACT 1990 Planning (Listed Buildings and Conservation Areas) Regulations 1990 Town and Country Planning (Development Plans and Consultation) Directions 1992

PUBLIC NOTICE OF APPLICATIONS

The following applications have been received by Harlow District Council. These applications and others received can be inspected online at www.harlow.gov.uk or at Harlow Council Planning Services, Civic Centre, The Water Gardens, Harlow, Essex CM20 1WG on Monday-Friday, 9am-4.45pm. If you are unable to view the plans during these times, please telephone Planning Services on 01279 446856 where a suitable appointment can be made with the relevant case officer.

Anyone who wishes to make representations about these applications should write to the Council at the above address within 21 days of the date of this notice.

Application No	Application Type	Location	Ward
HW/FUL/18/00205	Full Application	Proposed Residential Development, 62 Glebelands, Harlow, Essex	Mark Hall
Proposal		Detached new residential build in land to rear of no. 62 Glebelands.	
Reason for Advert		Conservation Area	
Application No	HW/HSE/18/00198	Householder Application	Old Harlow
Application Type	Round House, Bunting Street, Newhall, Harlow		
Location	Demolition of existing garage, greenhouse and coal store, and construction of new cart lodge garage with office over.		
Proposal			
Reason for Advert	Listed Building		
Application No	HW/LBC/18/00199	Listed Building Consent	Old Harlow
Application Type	Round House, Bunting Street, Newhall, Harlow		
Location	Demolition of existing garage, greenhouse and coal store, and construction of new cart lodge garage with office over.		
Proposal			
Reason for Advert	Listed Building		
Application No	HW/FUL/18/00226	Full Application	Old Harlow
Application Type	Former NatWest Bank, Station Road, Harlow, Essex		
Location	First-floor extension over restaurant to form one residential flat unit.		
Proposal			
Reason for Advert	Conservation Area		
Application No	HW/HSE/18/00219	Householder Application	Old Harlow
Application Type	25 Fore Street, Harlow, Essex CM17 0AB		
Location	Demolish single-storey extension and conservatory, construct two-storey extension and single-storey lean-to.		
Proposal			
Reason for Advert	Listed Building in a Conservation Area		
Application No	HW/LBC/18/00220	Listed Building Consent	Old Harlow
Application Type	25 Fore Street, Harlow, Essex CM17 0AB		
Location	Removal of existing cement render from the external face of the west wall and replacement with lime render. Installation of two cast iron ventilation grills and insect mesh to the west wall and below the level of the floor.		
Proposal			
Reason for Advert	Listed Building in a Conservation Area		

Harlow Council
Harlow Star Publication 24 May 2018

Self-serve it INSTANTLY



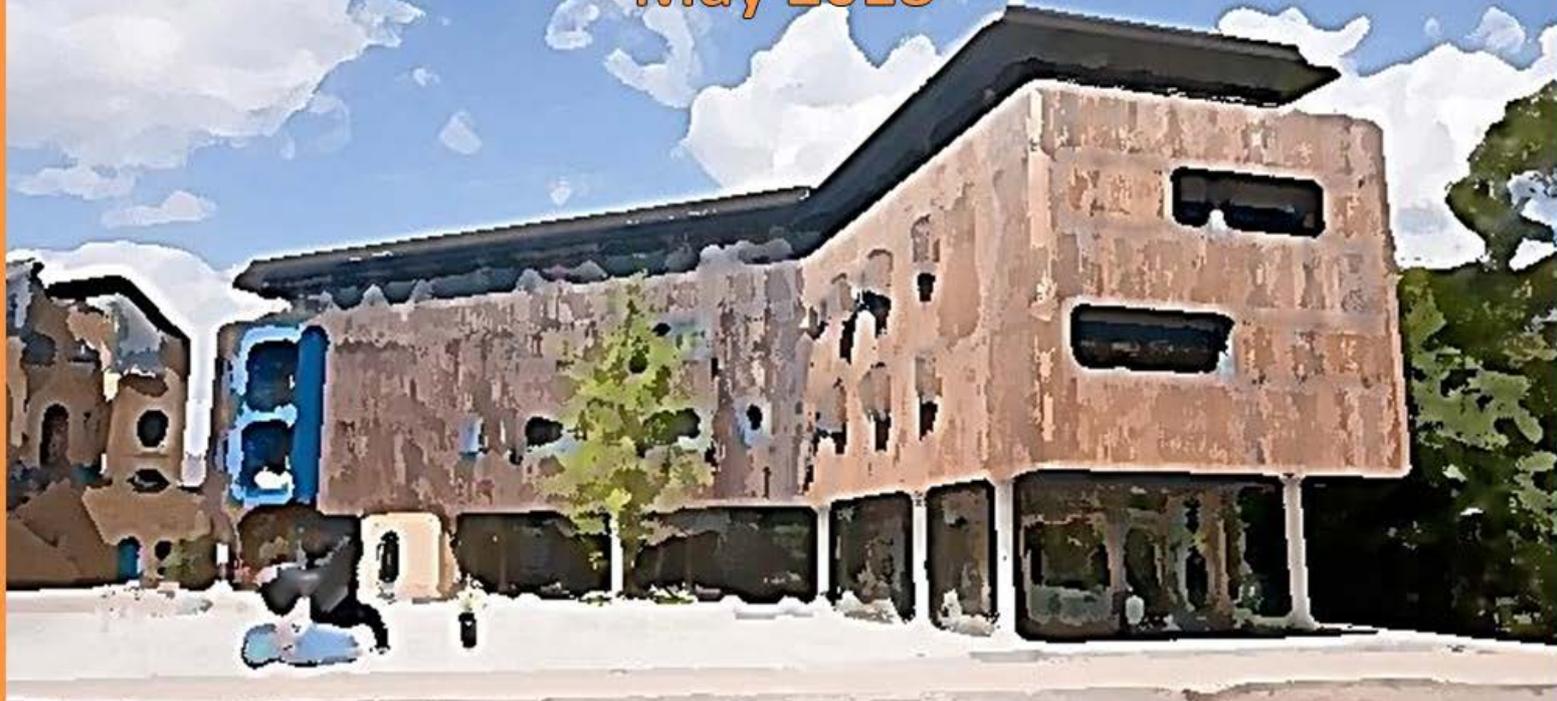
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Harlow Local Development Plan

May 2018



Pre-Submission Publication

24th May 2018 to 6th July 2018

Frequently Asked Questions



@HarlowCouncil



Harlow Local Development Plan Pre-Submission Publication May 2018

Frequently Asked Questions

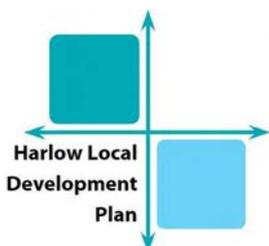
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1. What does the Local Development Plan say?

The Local Development Plan sets out a long-term vision for Harlow, identifying land where development will be acceptable and where it will be unacceptable. It contains policies that ensure future development is sustainable by meeting the needs of residents, businesses and visitors, while providing the required infrastructure and protecting environmental assets. Planning applications will be decided against the Local Plan policies.

The Policies Map, which maps the planning policies and proposals across Harlow, accompanies the Local Plan, along with other documents such as the Sustainability Appraisal and Infrastructure Delivery Plan. The policies in the Local Plan are justified by an Evidence Base, which includes studies such as the Strategic Housing Market Assessment (SHMA) and the Green Belt Review.



2. What is the Pre-Submission Publication?

The latest stage of the production of the new Harlow Local Plan is known as the Regulation 19 Pre-Submission Publication, which is the final public consultation stage before the Local Plan is submitted to the Planning Inspectorate for Examination.

3. How long is the Publication period?

The Pre-Submission Local Plan will be available for comments for a period of six-weeks from **Thursday 24th May to 4 pm on Friday 6th July 2018.**

Comments submitted after 4 pm on 6th July may not be considered.

4. Do I need to submit my comments if I have already done so previously?

Yes, because in order to comply with plan-making legislation, the Council cannot carry

forward previous comments into the Pre-Submission Publication.

5. What should I comment on?

At the Pre-Submission Publication stage, the Council is seeking views on whether the Local Plan is sound and meets the tests set out in the National Planning policy Framework (NPPF). In order for the Local Plan to be found sound at the Examination and be adopted by the Council, it has to meet a number of tests:

- The Plan must plan for the housing, employment and infrastructure needs;
- The Plan must be based on sound evidence;
- The development proposals identified within the Plan can be delivered by 2033; and

- The Plan is consistent with national policy, and enables sustainable development.

Comments will be passed to the Examination Inspector and it is recommended that comments should be clear, concise and targeted. In order to have the greatest influence at this stage it is advisable that comments should relate to the soundness of the Local Plan or its compliance with legal requirements.

Soundness

Plan-making regulations state that a local planning authority should submit a Local Plan for examination which it considers to be ‘sound’ – namely that it is:

- **Positively prepared** – the Plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet

requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;

- **Justified** – the Plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;
- **Effective** – the Plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and
- **Consistent with national policies** – the Plan should enable the delivery of sustainable development in accordance with the policies in the National Planning Policy Framework.

It is advisable that comments made at this stage should therefore focus on whether the



Local Plan meets the tests listed above. This is because these are the broad areas that the Inspector will focus on in examining the Local Plan.

Legal Requirements

When considering if the Local Plan meets the legal requirements, the Inspector will consider a number of issues including:

- **Local Development Scheme** – has the Plan been prepared in accordance with the timetable set out in the Local Development Scheme?
- **Statement of Community Involvement and relevant regulations** – has consultation on the Plan been in accordance with the Council’s Statement of Community Involvement and have the appropriate bodies been consulted?
- **Duty to Co-operate** – has the Plan been prepared in co-operation with other local planning authorities and statutory

bodies, such as the Environment Agency and the Local Enterprise Partnership, to identify and address any issues?

- **Sustainability Appraisal** – has an adequate Sustainability Appraisal been carried out?
- **Habitats Regulation Appropriate Assessment** – has an adequate Appropriate Assessment under the Habitats Regulations been carried out?
- **National Policy and Legislation** – does the Plan comply with national policy and legislation, for example, the National Planning Policy Framework?

6. What is the best way to submit comments?

- Go to the Harlow Council website at www.harlow.gov.uk/local-plan, and follow the link to view and comment on

the document online; or

- Complete the representation form and send it to myharlow@harlow.gov.uk or post it to **Forward Planning, Harlow Council, Civic Centre, The Water Gardens, Harlow, Essex, CM20 1WG**

7. Where can I find the representation form?

Copies of the representation form can be found on the website at [**www.harlow.gov.uk/local-plan-publication**](http://www.harlow.gov.uk/local-plan-publication), and hard copies at the Civic Centre reception upon request.

8. Where can I find the Local Plan?

The Harlow Local Plan and supporting documents are available on the website at [**www.harlow.gov.uk/local-plan**](http://www.harlow.gov.uk/local-plan)

The Policies Map and key evidence base documents are also available to view at the Harlow Civic Centre, Latton Bush

Centre, and Harlow libraries during normal opening hours.

9. How Harlow Council collect, use and protect my personal information?

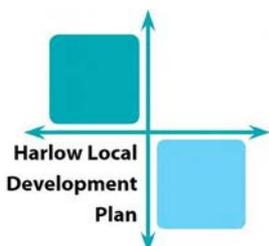
For more information on how Harlow Council collect, use and protect personal information generally, please visit

www.harlow.gov.uk/privacy-notice or write to Data Protection Officer, Harlow Council, Civic Centre, The Water Gardens, Harlow, Essex CM20 1WG

10. More Questions

If you have any other questions about the Local Development Plan, please contact a member of the Forward Planning Team on 01279446897 or email

Myharlow@harlow.gov.uk



Designed and produced by



Visit www.harlow.gov.uk/local-plan



@ HarlowCouncil



@ Harlow Council



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May 2018

Consultation has started on town's 15-year development

Residents are given the opportunity to comment on new homes, shops, etc

By Charlotte Page

charlotte.page@harrow.gov.uk

HARLOW residents are invited to share their views on how the town will develop over the next 15 years in a series of consultations held over the next six weeks.

The consultation period has been branded as a "once-in-a-lifetime opportunity" as Harlow Council welcomes residents to have their say on the Local Development Plan. Now before it is submitted for final examination by the Government.

The aim of the plan is to create the perfect mix of houses, shops, education, health facilities and more in response to what will be the regeneration of the town until as late as 2033.

This is the last formal consultation on the plan before it is submitted to the Secretary of State for Housing, Communities and Local Government later this year for examination.

The five themes of the plan are: growing, housing, prospering, improving, and infrastructure.

WHAT DOES THE LOCAL DEVELOPMENT PLAN INCLUDE?

The plan will guide development in the town, including identifying where developments are both acceptable and unacceptable.

as well as providing a strategy to help grow and regenerate the town up to 2033.

It includes proposals to build on Harlow's Garden Town status. Public Health England's mission, Enterprise Zone developments and the new M11 junction 25.

The aim is to ensure the right infrastructure is in place at the right time to support new housing and business development opportunities. However, a key focus is to provide a mix of for-estate housing covering the town and ensuring community facilities and services match Harlow's needs and ambitions for the future.

Previous consultations have highlighted a number of impact and issues which now form part of the plan. These include what new infrastructure is required, where and how much new housing there will be and how green spaces will be protected.

According to an assessment of housing need, the plan will allow a 3,200 houses within the Harlow boundary to be built up to 2033, with at least 30 per cent affordable housing.

Additionally, it sets out a strategy to assist in the provision of the Harlow and Olden Garden Community with East Harlow aims and Living Power District Council.

Once adopted, the Harlow Local Development Plan will replace the 2006 Harlow Local Plan.



See more about the plans and supporting documents, visit harlow.gov.uk or contact the planning team. Documents are also available to view during office hours at Harlow Civic Centre, Letchford Centre and at Harlow Libraries. The consultation period begins on Thursday, May 24, and will run through until Friday, July 6.

To submit your comments go online or alternatively by post to: The Harlow Planning Team, Harlow Council, Wake Gardens, Harlow, Essex, CM20 1WQ, or email planning@harlow.gov.uk

County Hall urges people to get behind Option D for new, improved A120 to secure Government funding

ESSEX County Council has urged people to "vote behind a shared vision" after announcing their favoured route for a new and improved A120.

Local MP and Councillor Kevin Lewis, deputy leader at Essex County Council and cabinet member for infrastructure, announced option D as the council's preferred option for a new dual carriageway between Braintree and the A12.

The decision comes following a public consultation where 62 per cent of respondents agreed that this section of the A120 needed to be completely replaced to a dual carriageway in order to reduce congestion.

The proposed route would see Goddons Curve effectively aligned and it would link north a dual carriageway road joining the A12 at junction 23 south of Colchester.

"I truly believe that route option D offers the best solution to the problems of the current A120 between Braintree and the A12," said Cllr Bentley, of the event of Braintree Golf Club.

"Our study work has demonstrated that the new £1 million scheme on improving the A120, residents, road users and businesses will see £2.756-6m in benefits. Route D also delivers 60 in minutes in journey time savings.

The current single carriageway road is not fit for purpose and is often

heavily congested, causing major issues, but only for drivers and local means in Essex, but also those helping to fuel the UK economy through our country's international ports and airports.

"Now is when the real work begins. This scheme is competing with others across the country for Government funding so it is vital that everyone united behind a shared vision for an improved A120."

"Please make your voice heard and make sure the Government know just how important this road improvement is to the future of Essex, East Anglia and the economic future of the country."

The work currently undertaken by the county council is only advisory at this stage and a preferred route announcement for the A120 can only be made by the Highways England in consultation with the Department for Transport.



The preferred route for the A120 from Braintree to the A12

The favoured route announcement will soon be made to Highways England and the Department for Transport for funding within the Road Investment Strategy 2 - a funding period lasting between 2019 and 2025.

An announcement on whether the scheme has been successful is expected to be made in 2019.

If it is to be funded, the newly upgraded A120 between Braintree and the A12 could open as early as 2023.

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Local Development Plan Pre-Submission Publication

CHAPTER: BACKGROUND

BACKGROUND

6650 Object

Respondent: Harlow Alliance Party (Mr Nicholas Taylor) [8621]

Agent: N/A

Summary: lack of consultation that has taken place with residents.

Back in the 1990's Harlow Council produced a document called "Consultation, Guide to good practice" which set out how it would engage with residents. A copy of this is attached to this submission. It is clear from what it has done in respect of the Local Plan has not adhered to its own commitment to consult. The way that residents have (or indeed have not) been involved in any form of consultation is very clear, simply from the fact that members of our party have spoken to hundreds of residents whilst out canvassing leading up to the recent local elections, hardly anyone has been aware of what has been proposed in respect of this plan. Harlow Council has almost exclusively consulted only with other statutory bodies, those with a vested interest in seeing Harlow expand and neighbouring Local Authorities. In doing so, it has failed to engage with the most important people of all, the residents of Harlow. We would make the following points:

The Council has primarily used its website during this entire process, but we know that many older people, those on low incomes and homeless households do not have access to a computer.

The most up-to-date information available shows that 21 % of Harlow's residents were not born in the UK and therefore a considerable number of residents may not have English as their first language. Harlow Council has failed to engage with such residents.

The Council publishes a document called Harlow Times four times a year which is delivered to every home in Harlow. This should have been used to tell residents what was going on, but Harlow Council chose not to do so.

Whilst Harlow Council engages with its tenants and leaseholders using various forums, it has none which includes residents. Harlow Council could and should have set up neighbourhood forums to specifically consult and inform on this plan.

Evidence of this lack of resident involvement can clearly be seen by the fact that supposed consultation earlier in this process only saw 136 submissions being made in response, something Harlow Council should have taken steps to be more inclusive at later stages in the process.

Change To Plan:

Full Reference: O - 6650 - 8621 - BACKGROUND - None

6846 Object

Respondent: Miss Mary Wiltshire [6026]

Agent: N/A

Summary: Object to the whole document. As it is a wish-list rather than set of plan for discussion. It is not much of consultation.

Change To Plan:

Full Reference: O - 6846 - 6026 - BACKGROUND - None

6603 Support

Respondent: East Herts District Council (Mr George Pavey) [8616]

Agent: N/A

Summary: East Herts Council supports the Local Plan's intention to meet its objectively assessed housing needs, including the positive approach taken to reviewing the Green Belt to identify land for such development purposes. East Herts Council further supports Harlow Council's commitment to joint working to address the collective needs of the housing market area in terms of key infrastructure, employment and housing needs.

Change To Plan:

Full Reference: S - 6603 - 8616 - BACKGROUND - None

6761 Support **Respondent: Quod Planning (Mr Philip Murphy) [7958]** **Agent: N/A**
Summary: PfP are strongly supportive of Harlow's ambition, and pro-activity strategy for growth over the Local Plan period. PfP welcome the opportunity to continue to engage with HDC on the evolution of Harlow's Local Development Plan, whether regarding the above points, or more generally, particularly as the detail on the proposals for the GPE, and Central and Eastern Stort Crossings, continues to progress.

Change To Plan:

Full Reference: S - 6761 - 7958 - BACKGROUND - None

6807 Support **Respondent: Chelmsford City Council (Ms Jenny Robinson) [8636]** **Agent: N/A**
Summary: Officers have reviewed the Local Development Plan Pre-Submission Publication, and consider that the identified housing, employment and infrastructure needs for development in Harlow to 2033 will be met through delivery of the Plan. Officers are satisfied that the duty to co-operate has been met, and consider the plan to be sound.

Change To Plan:

Full Reference: S - 6807 - 8636 - BACKGROUND - None

6582 Comment **Respondent: Barker Parry Town Planning Ltd. (Ms Elizabeth Fitzgerald) [8451]** **Agent: N/A**
Summary: we reiterate concerns that the evidence base, is largely significantly dated and in many instances pre-dates the National Planning Policy Framework (NPPF), such that the position established lacks any clarity or weight to enable a developer to reasonably establish the policy requirements prior to the submission of a planning application, whilst also not having regard to significant changes in the local environment as a result of subsequent planning permissions.

Change To Plan:

Full Reference: C - 6582 - 8451 - BACKGROUND - None

6620 Comment **Respondent: Forestry Commission (England) (Ms Corinne Meakins) [8617]** **Agent: N/A**
Summary: Thank you for consulting the Forestry Commission on the pre-submission publication. We do not have any comment on the soundness or legal compliance. We would like to draw your attention to the standing advice on Ancient Woodland <https://www.gov.uk/guidance/ancient-woodlandand-veteran-trees-protection-surveys-licences> should you need to assess any sites near to Ancient Woodland when delivering the plan.

Change To Plan:

Full Reference: C - 6620 - 8617 - BACKGROUND - None

6652 Comment **Respondent: Harlow Alliance Party (Mr Nicholas Taylor) [8621]** **Agent: N/A**
Summary: This is evidenced by the fact that residents have already been consulted about detailed plans for two of the sites (Lister House and St Andrews Meadow) when the Plan has not been agreed. In addition, running alongside this Local Plan process, is what seems a parallel process involving other sites, such as at Bushey Croft, where Harlow Council has a Planning Application for homes on a playing field site, which is not included in the Local Plan.

Change To Plan:

Full Reference: C - 6652 - 8621 - BACKGROUND - None

6712 Comment**Respondent: Mr James Humphreys [8561]****Agent: N/A**

Summary: Firstly, can I say that the secretive approach to this has been incredibly alarming. When PHE plans were announced there was a full public consultation, and looking at other neighbouring councils, it seems they take a more open and consultative approach. This plan has seemingly been hidden from residents in the hope that nobody notices so that you can continue with the plans. While there is the opportunity to view the plans online and in libraries, it is hard to find and there has been no publication of these to people who actually work 9-5 and the publication period is Thursday 24 May 2018 to Friday 6 July 2018. I hope this is only a publication period and not a consultation period as this less than two weeks nowhere near long enough to invite consultation on something that hasn't even been made public and is hundreds of pages long including evidence base. It looks like it has been rushed and public comment is not actually welcome. At the very least this should be 30 days.

Change To Plan: I believe these plans have serious flaws and should be paused immediately and public consultation should be invited, rather than hoped nobody finds it. In addition, a lot of the evidence based used is over 10 years old, which renders it either out of date or at worst inaccurate, including infrastructure and health. Other more recent reports aren't localised enough or provide the right information needed, such as wildlife and other environmental factor reports seem to have been simply ignored. More worryingly, your link to sign up to be kept informed about developments doesn't work despite numerous attempts to create a log on, I have still not received a registration email so there doesn't seem to be a way to be kept informed even if I am trying to be so.

Full Reference: C - 6712 - 8561 - BACKGROUND - None

6718 Comment**Respondent: Jean Wright [5878]****Agent: N/A**

Summary: This document is an idealistic wish list but trying to achieve quality of life with meeting government required housing numbers is not easy. Nor is the type of housing required necessarily that which will be built. Harlow desperately needs more social housing. There will always be people who cannot afford to buy, cannot afford deposits and rents required by private landlords.

Unless Harlow's assets of green space are seriously protected people moving here for jobs may well not live in Harlow but commute in from villages offering serenity if nothing else. This has been the choice of many professionals working in Harlow.

Change To Plan:

Full Reference: C - 6718 - 5878 - BACKGROUND - None

6721 Comment**Respondent: Mrs Karen Garrod [8596]****Agent: N/A**

Summary: Uncertainty
Throughout the report, there seems to be "significant levels of uncertainty" in key areas which undermines the subject matter.

Change To Plan:

Full Reference: C - 6721 - 8596 - BACKGROUND - None

6726 Comment **Respondent: Little Hadham Parish Council (Mr Neil Wardrop) [8624]** **Agent: N/A**

Summary: The plan appears deliverable and sufficiently meets development needs. The Harlow A&E hospital is the local A&E for Little Hadham residents, please consider this when deciding on a suitable location for the new hospital as part of this plan so that it continues to be accessible. Please provide more details on how/where water is likely to be drawn from to provide water supplies to all the new homes.

Change To Plan:

Full Reference: C - 6726 - 8624 - BACKGROUND - None

6762 Comment **Respondent: Lawson Planning Partnership (Miss Kathryn Oelman) [8532]** **Agent: N/A**

Summary: The current Adopted Replacement Harlow Local Plan (2006) makes reference to the need to facilitate the improvement of PAH's local health services, guided by a Master Plan as follows:
"Saved Policy CP4: The future development of Princess Alexandra Hospital will be granted planning permission subject to it according with their approved Master Plan."

The previous Master Plan was developed having regard for the constraints of the site; these include a group Tree Preservation Order covering the whole site (TPO/10/92), two Scheduled Monument designations (bowl barrows in the north and east of the site), a Grade II listed building (Parndon Hall) and land designated as a Green Wedge. A strip of land in the south east of the site also contains two central water mains serving the wider Harlow area.

Whilst the draft Local Plan acknowledges the redevelopment of the existing Hospital site is a credible possibility, the Trust would like to see a similar masterplanning policy in this document which supports the redevelopment of the site for hospital uses, should this be identified as the preferred option in the future.

Without this supportive policy basis, the longer-term strategic aims of the Trust in redeveloping and expanding the site would not be acknowledged, and thus in the process, applications for short-term development necessary to achieve this could encounter a lack of planning policy certainty and support.

Change To Plan: The Trust therefore requests that the existing support for a masterplanned approach to redevelopment of the existing site is replicated in the draft Local Plan. The policy could also be flexibly worded to allow this approach to be adjusted in the event that the outcome of the Outline Business Case / Site Selection process identifies a hospital relocation as the preferred option instead.

Full Reference: C - 6762 - 8532 - BACKGROUND - None

6767 Comment**Respondent: Tetlow King Planning (MEGHAN ROSSITER) [8630]****Agent: N/A**

Summary: The Government consulted on proposed changes to the NPPF, and aims to publish the "NPPF2" this month. The proposed changes include a new definition of affordable housing with a number of new categories aimed at widening the scope of the definition to include a wider array of tenures to assist people into homes that meet their needs, including rent to buy under 'other affordable routes to home ownership'. While Rentplus has sought a minor amendment to that definition, we do not anticipate significant changes to be made to the document prior to publication.

The significant level of need for affordable housing in Harlow points clearly to a need for a step change in delivery to meet those needs. The Local Plan Spatial Vision clearly captures this need and sets the right tone for an ambitious approach to maximising delivery of affordable housing over the Plan period. Access to a deposit remains one of the most challenging blockers on accessing home ownership, which even intermediate affordable housing does not resolve; the Council should take a proactive approach to welcoming the delivery of the wider range of affordable tenures set out in the draft NPPF to encourage a more diverse housing stock and to improve the ability of all developers, particularly those bringing forward the new Garden Communities, to deliver an appropriate and higher quantum of affordable housing.

Change To Plan: The definition sought by Rentplus is set out below:
 "d) Other affordable routes to home ownership: is housing provided for sale that provides a route to ownership for those who could not achieve home ownership through the market. It includes shared ownership, relevant equity loans, other low cost homes for sale and rent to buy (which includes a period of affordable or intermediate rent). Where public grant funding is provided, there should be provisions for the homes to remain at an affordable price for future eligible households, or for any receipts to be recycled for alternative affordable housing provision, or refunded to Government or the relevant authority specified in the funding agreement."

Full Reference: C - 6767 - 8630 - BACKGROUND - None

6781 Comment**Respondent: The Roydon Society (S.N. Wilkinson) [8634]****Agent: N/A**

Summary: The Roydon Society supports the comments made by Roydon Parish Council and sent under separate cover recently.

Change To Plan:

Full Reference: C - 6781 - 8634 - BACKGROUND - None

6849 Comment**Respondent: Miss Mary Wiltshire [6026]****Agent: N/A**

Summary: typographical error has been found.

Change To Plan:

Full Reference: C - 6849 - 6026 - BACKGROUND - None

6870 Comment**Respondent: Essex County Council (Mr Rich Cooke) [8452]****Agent: N/A**

Summary: ECC has worked to ensure as far as possible through its ongoing engagement and representations with HC throughout plan preparation that this Draft Plan addresses ECC's areas of responsibility consistent with national policy to enable sustainable development. The ECC response to the Draft Plan recommends several areas for clarification to enable effective delivery and amendments to improve policy and explanatory text. ECC will work cooperatively with HC to ensure issues can be positively addressed prior to HC submitting the Draft Plan for examination. It is likely that Statement(s) of Common Ground will be needed to be prepared at that time to address any outstanding issues or ahead of the examination hearings. The approach will be confirmed with HC closer to the time.

ECC has identified a limited number of issues arising through the Draft Plan relating to consistency with national (planning) policy. These are set out in Appendix 1 and most are considered capable of being readily addressed relatively easily, through policy revisions, rewording etc. The main area where ECC recommends a change to ensure consistency with NPPF is in relation to health and well-being matters. It is accordingly recommended that ECC urges the inclusion of an embracing health and well-being policy and sets out requirements for HIAs, to reflect NPPF requirements and the profile of health and well-being within the NPPF. Some basic elements of well-being considerations are evident but these are not deemed sufficiently clear explicit and their scope is too limited. This point was made by ECC at the previous Plan-making stage.

Change To Plan:

Full Reference: C - 6870 - 8452 - BACKGROUND - None

6871 Comment**Respondent: Essex County Council (Mr Rich Cooke) [8452]****Agent: N/A**

Summary: The Local Plan includes only basic reference to well-being matters. Accordingly, ECC Public Health recommends that an over-arching health and well-being policy and/or a specific Health Impact Assessment (HIA) policy is included in the Local Plan. It is accordingly unclear as to how this specifically supports the NPPF 'Promoting Healthy Communities' sections. This matter was raised by ECC in its representations at the Development Management Policies (Local Plan) consultation stage in 2017. This also means absence of an appropriate policy basis for assessing development proposals (the Plan being largely silent on these matters)

Change To Plan: ECC Public Health recommends adding an over-arching health and well-being policy and a specific Health Impact Assessment (HIA) policy to ensure conformity with the NPPF.

ECC recommends collaborative working prior to Local Plan submission between ECC (Public Health) and HC to set the form of wording.

Full Reference: C - 6871 - 8452 - BACKGROUND - None

6621 Comment

Respondent: GLADMAN (Mr Phill Bamford) [8618]

Agent: N/A

Summary: It is welcomed that the HDLP recognises the need to regenerate the town. However, as set out in Section 4 above, it is considered that the housing requirement across the HMA does not reflect the full level of housing need.

Concern is also expressed over the identification of a number of large scale garden communities in Harlow, Epping Forest and East Hertfordshire in order to deliver substantial housing growth in these areas across the plan period.

New Garden Communities are complex and difficult to deliver. Lead-in times are significant and the infrastructure which is required, often before development is commenced, has a considerable impact on viability.

Great care should therefore be exercised when considering the allocation of large scale strategic sites, especially when several are being proposed in a limited geographical area. This has proven to be the case in North Essex where the examining Inspector for the North Essex Plan has expressed considerable concerns with the Councils' approach to the delivery of Garden Communities.

Change To Plan:

Full Reference: C - 6621 - 8618 - CONTEXT, VISION AND OBJECTIVES - None

6659 Comment

Respondent: Hertfordshire County Council (Mr Martin Wells) [8622]

Agent: N/A

Summary: The transport vision and objectives set out within the Local Plan are progressive and are a clear step change from the traditional private vehicle focused measures. Of key importance is the aspiration for a modal shift outlined in paragraph 2.34 ... There are also aspirations for a modal shift in travel, meaning 60% of travel would be by sustainable modes of transport...

For the level of growth proposed, the impact on the transport network would be acceptable if this 60% modal split is achieved. This is also recognised within paragraph 5.16 of the Pre-Submission Local Plan.

If the Local Plan is to deliver such a significant mode shift, the sustainable travel policies should be extensive and robust. The local Plan contains appropriate support for these policies, and outlines them within the objectives 13 and 14.

Change To Plan:

Full Reference: C - 6659 - 8622 - CONTEXT, VISION AND OBJECTIVES - None

6872 Comment

Respondent: Essex County Council (Mr Rich Cooke) [8452]

Agent: N/A

Summary: ECC has identified that there is very little evidence base coverage of Harlow health portrait and key issues / challenges in early Plan sections, other than at paragraph 2.12:

'The population of Harlow, in comparison to the rest of Essex, is relatively young with 21% of its residents aged between 0-15 years, and the percentage of older persons living in Harlow is lower than Essex and England averages. The district has a higher than average number of lone parent households and higher overcrowding levels compared to the rest of Essex and England. Smoking and obesity levels in Harlow are higher than average, with physical activity rates lower than average' Harlow Health and Wellbeing Strategy (2018-2028):

Change To Plan: ECC (Public Health) recommends adding content in Chapter 2 to outline key health and well-being challenges for Harlow (drawing from the Harlow health profile) This section would also benefit significantly from inclusion of references to the up-to-date Harlow Health and Wellbeing Strategy (2018-2028).

This would not only help frame and inform an Local Plan policy response but that response would also help to implement the aims of the strategy and compliance and delivery of the NPPF.

Full Reference: C - 6872 - 8452 - CONTEXT, VISION AND OBJECTIVES - None

6426 Object **Respondent: STOP Harlow North [8588]**

Agent: Mr Jed Griffiths [8576]

Summary: The Local Plan has not fully complied with the Regulations on public consultation, with a lack of meaningful engagement on the overall strategy for the HMA as a whole.

Change To Plan: Put the submission on hold. All three LPAs should consult on the overall strategy for the wider sub-region.

Full Reference: O - 6426 - 8588 - The Preparation of the Harlow Local Development Plan - i, ii, iii, iv

6654 Comment **Respondent: Harlow Alliance Party (Mr Nicholas Taylor) [8621]**

Agent: N/A

Summary: We are sure the Council would like to be transparent with its Citizens, but it appears that they have submitted the local plan without giving the details of the additional infrastructure needed in health, education, wellbeing or transport. We therefore feel that the Council should have started the consultation period only when the plan is complete with the infrastructure expectations. It is not acceptable to state in the Sustainability Assessment dated May 201 8 that a Sustainability Transport Corridor Study for Harlow and Gilston Garden Development is currently being prepared.

The council are quite aware that infrastructure was agreed that affects Harlow's population as part of the LA working group and the Infrastructure Assessment dated December 201 7 submitted as part of the Epping Local Plan clearly defines these matters within and on the borders of Harlow.

The council therefore, should be clearly showing its citizens these matters rather than people having to hunt for them in adjoining authorities' plans.

Change To Plan:

Full Reference: C - 6654 - 8621 - The Preparation of the Harlow Local Development Plan - None

6716 Comment **Respondent: Jean Wright [5878]**

Agent: N/A

Summary: The map used in the pack does not show Gildea Park or the land being developed as a designated building site. This is misleading as anyone looking at it, unfamiliar with the now building site on Gildea Way, would think it was still an open space. It now resembles an industrial site more than a building site with what looks like houses which could be found anywhere in Britain and large heaps of what looks like subsoil which appear to be constantly on the move or being increased in size.

Change To Plan:

Full Reference: C - 6716 - 5878 - The Preparation of the Harlow Local Development Plan - None

6809 Comment **Respondent: Chelmsford City Council (Ms Jenny Robinson) [8636]**

Agent: N/A

Summary: Overall, CCC believes the Plan provides a coherent strategy for future growth of Harlow district, and seeks to meet the identified objectively assessed development needs for housing and employment, as supported by its evidence base. The Plan is therefore considered to be sound.

Change To Plan:

Full Reference: C - 6809 - 8636 - The Preparation of the Harlow Local Development Plan - None

6685 Object **Respondent: Historic England (Ms Debbie Mack) [8623]**

Agent: N/A

Summary: Registered Parks and Gardens should also be included in the list of heritage assets.

Change To Plan: Registered Parks and Gardens should also be included in the list of heritage assets.

Full Reference: O - 6685 - 8623 - Next Steps - None

6469 Object

Respondent: Miller Strategic Land [5769]

Agent: Andrew Martin - Planning (Mr Olivier Spencer) [5533]

Summary: Our client is broadly supportive of the Policies Map referred to at paragraph 1.19, but would like to raise a specific objection in respect of:

- (i) the new east-west Green Wedge shown permeating through the East Harlow site;
- (ii) the New Allotment provision in the same location; and
- (iii) the Indicative East-West Sustainable Transport Corridor, as it passes through New Hall.

Change To Plan: Our client respectfully requests that the Policies Map is amended to show the following:

- an "Indicative Green Wedge" rather than a "Green Wedge" on-site at East Harlow;
- "Indicative New Allotments" rather than "New Allotment" on-site at East Harlow; and
- the "Approved East-West Sustainable Transport Corridor" rather than an "Indicative East-West Sustainable Transport Corridor" where it passes through the New Hall site.

Full Reference: O - 6469 - 5769 - The Policies Map - ii

6848 Object

Respondent: Miss Mary Wiltshire [6026]

Agent: N/A

Summary: Policies Map does not shows the detail of Gilden way. indicated green wedge and green finger lands not generally open for public access.

Change To Plan:

Full Reference: O - 6848 - 6026 - The Policies Map - None

6780 Comment

Respondent: Thames Water (Savills) (Mr Chris Colloff) [8433]

Agent: N/A

Summary: As set out above a high quality hydraulic sewer model has been created and we are currently reviewing the sites specified in the Local Plan to assess the whether it is likely that any network reinforcement works will be required to support their delivery. The outputs from this work will feed into the Water Cycle Study being prepared by the Council and we will provide comments on the sites as soon as they are available.

Notwithstanding the above, Thames Water will work with developers and local authorities to ensure that any necessary infrastructure reinforcement is delivered ahead of occupation.

Thames Water will deliver any necessary upgrades required to support growth and these will be funded through the Infrastructure Charge.

In some circumstances Thames Water may seek the inclusion of phasing conditions in order to avoid adverse amenity impacts for existing or future users such as internal and external sewer flooding and pollution of land and water courses. To minimise the likelihood of requiring such conditions developers are advised to contact Thames Water as early as possible to discuss their development proposals and intended delivery programme. This is important as the potential impacts on the network can be affected by factors including the scale of development, timing of delivery, point of connection and development elsewhere in the catchment.

Change To Plan:

Full Reference: C - 6780 - 8433 - Evidence Base - None

6789 Comment

Respondent: Hallam Land Management & Commercial Estates Group (Mike Newton) [7646]

Agent: N/A

Summary: Further justification is required as to why the full OAN for the West Essex and East Hertfordshire HMA is not proposed to be met, particularly given that an updated MoU has not been prepared to reflect the latest SHMA Update and that additional capacity is available at sustainable allocations, such as Latton Priory

Change To Plan:

Full Reference: C - 6789 - 7646 - Evidence Base - None

6833 Comment

Respondent: Sandra Beavis [5035]

Agent: N/A

Summary: There maybe a slight growth to the local Hatches from building extra dwellings, but the Hatches are not used for 'the weekly shop', but as a back-up to those items that have been forgotten on the weekly shop.
Online food shopping is a growth industry and therefore reliance on buses and private vehicles has already reduced.
Owners of private vehicles will always prefer to do their shopping at supermarkets in their cars as their 'travel choice', than the alternative of public transport, consequently it is certain that there will not be a 'modal shift'.

Options B or C, in Table 5.3 for the HS2-5 site remains at 36 dwellings, however, paragraphs 1-3 are pertinent to the effects of what could be built on the land, the infrastructure, transport, existing built-up areas within close proximity of homes, the landscape of Harlow and countryside and the impact of design to the layout of existing streets, is contrary to the original Master Plan of Sir Frederick Gibberd.

In my opinion this is going to be detrimental to the quality of life for all the existing residents of Harlow. This could lead to working people leaving Harlow to find more pleasant areas of the country to live in. This in turn would increase the proportion of very young and old people, thus increasing the demand on Harlow council for social spending, whilst the tax paying base has decreased.

Change To Plan:

Full Reference: C - 6833 - 5035 - Sustainability Appraisal and other supporting documents - None

6834 Comment

Respondent: Sandra Beavis [5035]

Agent: N/A

Summary: 'Air pollution in Harlow is considered generally low and the air quality is improving in the District' I do not see how creating more homes and consequently more vehicles can keep the pollution and air quality in Harlow low. Creating 'sustainable transport corridors' in the belief that owners of vehicles will shift to public transport, is from my personal observation, something that will just not happen. (Consider this, if you needed to bring home the weekly shopping and you had a choice of using your car or a bus, which would you choose?) Furthermore, the consequential increase in commercial vehicles that will come into Harlow to sustain its increased population will have a detrimental effect to the infrastructure, in particular the roads in air quality.

Change To Plan:

Full Reference: C - 6834 - 5035 - Sustainability Appraisal and other supporting documents - None

6835 Comment

Respondent: Sandra Beavis [5035]

Agent: N/A

Summary: By focusing housing and employment in the east, even with good public transport and infrastructure, does not equate to reducing dependency on the car. The Gibberd Master Plan was not to have housing too near to the industrial estates and cycling and public transport was the preferred mode of transport at that time.
Commuters cannot rely on bus companies to provide sustainable and reliable public transport to their places of employment. Furthermore, buses do not always provide a service that goes to the required destination nor run at the times required. The cost of fares can also be off-putting to workers. The overall consequences of this, will be to increase pressure on key transport corridors, exacerbating congestion problems where they exist and possibly creating new areas of congestion where they don't currently exist.

Change To Plan:

Full Reference: C - 6835 - 5035 - Sustainability Appraisal and other supporting documents - None

6836 Comment**Respondent: Sandra Beavis [5035]****Agent: N/A**

Summary: In my opinion, the design of every new-dwelling that Harlow Council commissions, should have suitable facilities* for the occupiers to install charging points when they make the transition from petrol/diesel to electric vehicles . .

* e.g. garages or hard standings close to the dwellings and close to high power electric cables that can carry power to the occupier's charging point.

There is a 'chicken and egg' situation where people are reluctant to change to electric vehicles if they consider there is inadequate facilities for charging, whilst councils and businesses seem to be reluctant to invest in charging points whilst there are so few electric vehicles on the road.

In my opinion, Harlow Council should become a leader in the provision of charging points for electric vehicles by providing them in all new builds and public car parks. In addition it should create an incentive for local businesses with parking facilities to provide charging points for its employees and customers.

Change To Plan:

Full Reference: C - 6836 - 5035 - Sustainability Appraisal and other supporting documents - None

6837 Comment**Respondent: Sandra Beavis [5035]****Agent: N/A**

Summary: From the above Policy IN3 I assume that any new builds will have parking provided near the residents home for 'accessibility and promoting their travel choice'. It does not automatically follow that Policy IN3 will reduce reliance to travel in any particular vehicle 'while ensuring that on-street parking issues are not created'.

There are already on-street parking issues for existing residents, as the vehicle requirements outweigh the available space, and consequently 'hardstands' on residents homes are becoming the norm, which could have future long-term drainage issues (this is not just a problem in Harlow, but countrywide).

Change To Plan:

Full Reference: C - 6837 - 5035 - Sustainability Appraisal and other supporting documents - None

6838 Comment**Respondent: Sandra Beavis [5035]****Agent: N/A**

Summary: In my opinion it is not appropriate to conclude these plans will have a neutral effect for all the reasons I have previously stated. I am alarmed to read that the mitigation measures will be an 'iterative process'. To me, this sounds like 'let the people of Harlow suck it and see', which is not the way I would expect a Report of this kind to conclude.

Change To Plan:

Full Reference: C - 6838 - 5035 - Sustainability Appraisal and other supporting documents - None

6839 Comment**Respondent: Sandra Beavis [5035]****Agent: N/A**

Summary: I agree with the first sentence of 9.40, that the loss of greenfield land has the potential for a cumulative negative effect on biodiversity through habitat loss and fragmentation. For this reason I object to building dwellings on the playing field labelled HS2-5 site. This playing field is surrounded by trees and hedgerows in a built-up area.

Please remember the Gibberd Master Plan included 'green wedges and green fingers as an infrastructure to provide ecological corridors for wildlife', which need to be protected, 'which are key physical features of Harlow that have shaped its subsequent growth'.

Change To Plan:

Full Reference: C - 6839 - 5035 - Sustainability Appraisal and other supporting documents - None

6840 Comment**Respondent: Sandra Beavis [5035]****Agent: N/A**

Summary: I note that the report acknowledges that site specific policies will be required and despite this, its concluded that uncertain minor negative effects will be inflicted on the residents of Harlow. For the reasons and objections I have stated, I do not believe the negative effects will be minor- they are more likely to be major negative effects.

Change To Plan:

Full Reference: C - 6840 - 5035 - Sustainability Appraisal and other supporting documents - None

6841 Comment**Respondent: Sandra Beavis [5035]****Agent: N/A**

Summary: In my opinion building more dwellings throughout Harlow will increase the number of vehicles in Harlow and this will inevitably lead to greater emissions of pollutants. If you've seen some of the thick black smoke emitted by some of the buses in Harlow, you would probably agree with me that quoting the 7 use of public transport is not necessarily going to reduce obnoxious emissions.

Change To Plan:

Full Reference: C - 6841 - 5035 - Sustainability Appraisal and other supporting documents - None

6842 Comment**Respondent: Sandra Beavis [5035]****Agent: N/A**

Summary: HS2-5 is a playing field, with trees, bushes and hedgerows and a source of drainage for lower-lying homes. It is constantly used by Radburn Close residents for a variety of purposes that includes viewing as a source of relaxation and enjoyment, a cycle track, playing football, golf etc.

Change To Plan:

Full Reference: C - 6842 - 5035 - Sustainability Appraisal and other supporting documents - None

6843 Comment**Respondent: Sandra Beavis [5035]****Agent: N/A**

Summary: I agree with the sentiments expressed in the above paragraph provided all new dwellings are on brown-field sites and green sites are left undeveloped as was envisaged in the Sir Frederick Gibberd's original plans. If Harlow is made into a concrete jungle, all the laudable sentiments expressed in the above paragraph will be in serious jeopardy.

Change To Plan:

Full Reference: C - 6843 - 5035 - Sustainability Appraisal and other supporting documents - None

6844 Comment**Respondent: Sandra Beavis [5035]****Agent: N/A**

Summary: (1). Disagree that the long-term negative effects will only be minor.
(2). The report author acknowledges uncertainty on the subject of negative effects, thereby strengthening our arguments that the effects will be major, not minor.
(3). We cannot understand the logic of saying that a 'no plan' scenario will necessarily result in greenfield loss. Naturally there should be a plan, but this should not take away greenfield sites within Harlow. If housing pressure demands the use of greenfield sites, these should be on the outskirts of Harlow, not within Harlow.

Change To Plan: The significance of effects will be mainly caused by the developments within Harlow and only to a lesser extent by those developments surrounding Harlow.

Full Reference: C - 6844 - 5035 - Sustainability Appraisal and other supporting documents - None

6854 Comment**Respondent: Redrow Homes (Ms Kate Holland) [8640]****Agent: Redrow Homes (Ms Kate Holland) [8640]**

Summary: HARLOW GREEN BELT REVIEW (2016)

The Council subsequently subdivided those eight areas which scored averagely or poorly in the Stage 1 Assessment to allow them to be further assessed against purposes 3 (safeguarding the countryside from encroachment) and purpose 4 (preserving the setting and special character of historic towns). The Site at Moor Hall Road was located within sub-area 8.1 which was assessed as having a minor contribution to purpose 3 and no contribution to purpose 4. The Council therefore determined that this sub-area is not functioning Green Belt as assessed against Paragraph 80 of the NPPF.

At present, the Green Belt boundary at Parcel 8.1 is defined by the rear gardens of properties on Windmill Fields and surrounding residential roads. The varied garden depths and boundary features forms a weak boundary with the Green Belt. The location of area 8.1 adjacent to the existing built up area of Churchway Green to the west and positioned between the urban area and the M11 motorway to the east, provides an opportunity to strengthen the Green Belt boundary to the east of Harlow using a significant existing permanent physical feature of the M11 motorway. This would reinforce the Green Belt boundary in perpetuity in accordance with NPPF paragraph 85.

Change To Plan: The Site south of Moor Hall Road falls within parcel 8.1, located directly adjacent to the existing built up area. The Site sits within an area of land which is considered by the Council as not functioning as Green Belt when assessed against the five purposes as defined at Paragraph 80 of the NPPF and it is therefore considered that this land should be released from the Green Belt in accordance with the recommendations of the Council's Green Belt Review.

Full Reference: C - 6854 - 8640 - Sustainability Appraisal and other supporting documents - None

6427 Object

Respondent: STOP Harlow North [8588]

Agent: Mr Jed Griffiths [8576]

Summary: As noted in response to paragraphs 1.9 - 1.19 above, SHN notes the efforts made by Harlow District Council to fulfill the Duty to Co-operate. The overall strategy for Harlow and the surrounding area, however, has not been subjected to any meaningful engagement with local communities. There is a democratic deficit which should be addressed.

Change To Plan: Put the submission on hold. The three LPAs should jointly prepare a strategy for Harlow and the sub-region, which should be published for public consultation.

Full Reference: O - 6427 - 8588 - Duty to Co-operate - i, ii, iii

6810 Support

Respondent: Chelmsford City Council (Ms Jenny Robinson) [8636]

Agent: N/A

Summary: Duty to Co-operate has been met through the ongoing engagement via the West Essex authorities forming Harlow's Housing Market Area. The Plan's allocations are unlikely to have any adverse cross-boundary impacts on Chelmsford.

Change To Plan:

Full Reference: S - 6810 - 8636 - Duty to Co-operate - None

6699 Comment

Respondent: Home Builders Federation (Mr Mark Behrendt) [8450]

Agent: N/A

Summary: There has clearly been a significant level of co-operation between Epping Forest and those other authorities in the East Herts and West Essex Housing Market Area (HMA). The four authorities forming this HMA have worked together to identify the housing needs for the area and then agreed a distribution between each authority. This distribution places significant emphasis on growth in and around the Harlow area, a similar approach to that identified in the East of England Regional Spatial Strategy. Whilst we welcome the level of co-operation that has been achieved between the four authorities in the HMA, we remain concerned regarding the approach taken in assessing the level of housing needs for the HMA and the subsequent approach taken to distributing needs across each LPA. In summary we consider that there the Council's within the HMA have underestimated their housing needs by unjustifiably reducing the demographic starting point and taking insufficient account of market signals. We consider that there is a need to allocate further sites across the HMA in order to meet needs. However, in relation to Harlow we recognise the limited ability to increase delivery given the tightly bounded nature of the Council's boundary. A brief appraisal of the Council's assessment of housing needs is set out below.

Change To Plan:

Full Reference: C - 6699 - 8450 - Duty to Co-operate - None

6826 Comment

Respondent: Epping Forest District Council (Ms Alison Blom-Cooper) [8637]

Agent: N/A

Summary: EFDC are pleased to note the Plan's reference to the Duty to Cooperate and to the agreed MoUs to which EFDC is a signatory. Further detail could be given on the Duty to Cooperate working that has taken place such as through the Cooperation for Sustainable Development Board. This would further emphasise the productive and collaborative working between the Essex, Hertfordshire and Greater London authorities that has taken place since the creation of the Board in 2014.

Change To Plan:

Full Reference: C - 6826 - 8637 - Duty to Co-operate - None

6831 Comment **Respondent: Epping Forest District Council (Ms Alison Blom-Cooper) [8637]** **Agent: N/A**

Summary: Paragraph 1.31 makes reference to the MoU with respect to the management of growth from development on the Epping Forest SAC. It would be helpful, for the sake of completeness, to provide further commentary which explains that this is in relation to the potential effects of recreational pressure and air pollution on the integrity of the SAC.

EFDC recognises that there are no European designated nature conservation sites within the Harlow District Council administrative area. However, it is suggested that again, for completeness, and in order to reflect the MoU, that reference is made to the Epping Forest SAC site (and it is suggested the Lee Valley SPA/Ramsar site) as being located to the south and south east of Harlow within the supporting text to Policy WE3 Biodiversity and Geodiversity, particularly bearing in mind the statutory 'in combination' test applicable under Habitats Regulations. It would also be helpful to include the Plan's Habitats Regulations Assessment (HRA) findings with regard to these two European sites and in particular to those findings in relation to the Epping Forest SAC.

Change To Plan:

Full Reference: C - 6831 - 8637 - Duty to Co-operate - None

CHAPTER: CONTEXT, VISION AND OBJECTIVES Harlow and Gilston Garden Town

6446 Support **Respondent: Deanery of Harlow (Anglican) (Revd Martin Harris) [8586]** **Agent: N/A**

Summary: I welcome the development of Gilston Garden Town. It is good to see the focus on infrastructure development generally.

Change To Plan:

Full Reference: S - 6446 - 8586 - Harlow and Gilston Garden Town - None

6428 Comment **Respondent: STOP Harlow North [8588]** **Agent: Mr Jed Griffiths [8576]**

Summary: Paragraphs 1.34 and 1.35 acknowledge the key assumption underlying the Local Plan - the delivery of the Harlow and Gilston Garden Town. In the view of SHN this is a fundamental weakness of the Plan, which is over-ambitious and too dependent on external circumstances. Proposals for the Gilston Area, to the north of Harlow, have been set out in a Concept Framework, which shows that development would be delivered in seven garden villages. From the evidence of the Concept Framework, it would appear that these elements would develop independently from Harlow and would contribute little to its regeneration.

Change To Plan:

Full Reference: C - 6428 - 8588 - Harlow and Gilston Garden Town - None

6666 Comment **Respondent: Hertfordshire County Council (Mr Martin Wells) [8622]** **Agent: N/A**

Summary: Paragraph 1.34 should be amended to include Hertfordshire County Council (HCC), as it is both a service provider and Highway Authority.

Change To Plan:

Full Reference: C - 6666 - 8622 - Harlow and Gilston Garden Town - None

CHAPTER: CONTEXT, VISION AND OBJECTIVES

Applying the policies in the assessment of planning applications

6580 Comment

Respondent: Canal & River Trust (Ms Tessa Craig) [8612]

Agent: N/A

Summary: We would request that page 7 'Applying the policies in the assessment of planning applications' point 1.36-1.42 include a section encouraging developers to seek pre-application advice. Where their proposal is adjacent to our waterway, they should consult the Trust, we provide free pre-application advice. We would also advise developers to consult our Code of Practice for practical advice:

Change To Plan:

Full Reference: C - 6580 - 8612 - Applying the policies in the assessment of planning applications - None

CHAPTER: CONTEXT, VISION AND OBJECTIVES

Population Profile

6850 Object

Respondent: Mr John Graham [8542]

Agent: N/A

Summary: The population growth forecast is questionable.

As the former partner of Frederick Gibberd, I worked with him for more 30 years from 1952, from key buildings in Harlow to the design of the eastern side of the market square. I am a fellow of the R.I.B.A.

Change To Plan:

Full Reference: O - 6850 - 8542 - Population Profile - None

6701 Comment

Respondent: Home Builders Federation (Mr Mark Behrendt) [8450]

Agent: N/A

Summary: We would agree with the Council that the 2014 based Sub National Population Projections and Household Projections, published by ONS and DCLG respectively, are the starting point for assessing housing needs. However, the Council considers the five-year migration trend used in the preparation of both these datasets to overestimate the level of migration in future. The Council deems that a 10-year trend better reflects future trends and that the five-year migration trend is an "unprecedented" representation of migration when considered against the context of the last 25 years.

Change To Plan: We would therefore suggest that there is sufficient evidence to support the migratory patterns set out in the DCLG official projections and given that these are favoured by Government and considered to be robust they should form the demographic starting point for considering OAN. However, the Council have not looked to justify their position other than to state that it is their favoured approach. At present the Government supports the use of the official projections, which uses a five-year trend, and without further and compelling evidence as to why a different trend should be used the official projections should be considered robust.

Full Reference: C - 6701 - 8450 - Population Profile - None

CHAPTER: CONTEXT, VISION AND OBJECTIVES

Housing and Affordability

6448 Comment

Respondent: Deanery of Harlow (Anglican) (Revd Martin Harris) [8586]

Agent: N/A

Summary: Affordable housing is a local issue eg when I spoke to a couple looking too get married recently. Though this is acknowledged (30% desirable), can more be done to make sure that developers include significant affordable housing? ie that this is more than an aspiration. Developers tend to want to build more expensive homes and this wants to be resisted wherever possible (hopefully resulting in something suitably balanced.)

Change To Plan:

Full Reference: C - 6448 - 8586 - Housing and Affordability - None

6449 Comment **Respondent: Deanery of Harlow (Anglican) (Revd Martin Harris) [8586]** **Agent: N/A**

Summary: I welcome the proposed new M11 junction for reasons of developing the local economy. This needs simply to be done; virtually any additional junction within reason is better than no new one.

Change To Plan:

Full Reference: C - 6449 - 8586 - Transport and Accessibility - None

6660 Comment **Respondent: Hertfordshire County Council (Mr Martin Wells) [8622]** **Agent: N/A**

Summary: Whilst the Local Plan has an overarching theme of a significant increase of sustainable travel, HCC are concerned that the transport related policies are not supportive enough and the policy wording lacking in crucial areas to achieve the modal shift to 60% sustainable travel. A primary area of concern is the lack of a clearly defined modal hierarchy. Whilst it is referred to throughout, it is not presented definitively. Another key concern is the lack of linkage with the parking policy. In order to encourage a switch to sustainable transport modes, there is a need to limit the amount of parking provision, particularly at locations served by the proposed sustainable transport corridors. Whilst Essex County Council's parking strategy allows some flexibility, there is concern it is not in line with the ambition of the sustainable travel target.

Change To Plan:

Full Reference: C - 6660 - 8622 - Transport and Accessibility - None

6679 Comment **Respondent: Highways England (Mr Mark Norman) [7939]** **Agent: N/A**

Summary: Highways England interest with the proposal is with the potential impact on the Strategic Road Network (SRN) and its ability to be able to operate safely and efficiently with the proposals in place. In particular, our interest relates to the M11, Junction 7 being the nearest access point of the proposed development to the SRN. It is noted that planning permission has been sought and design is progressing for a new M11 Junction 7a, and this will need to be in place when the development in the plan commences construction if problems at M11 J7 are to be avoided. This applies more so to site HS 3 than any of the other sites, which individually are likely to have relatively little impact upon M11 J7.

Change To Plan:

Full Reference: C - 6679 - 7939 - Transport and Accessibility - None

6722 Comment **Respondent: Mrs Karen Garrod [8596]** **Agent: N/A**

Summary: For the purposes of sustainable travel plans, the report justifies sustainable travel methods with the inclusion of cycling, walking and public transport. A high emphasis is placed on residents cycling, walking and using public transport. However, most working people are 'time poor' and these methods are time consuming.

Change To Plan:

Full Reference: C - 6722 - 8596 - Transport and Accessibility - None

CHAPTER: CONTEXT, VISION AND
OBJECTIVES

Green Infrastructure and the Natural Environment

6664 Comment

Respondent: Hertfordshire County Council (Mr Martin Wells) [8622]

Agent: N/A

Summary: The reference to Green Infrastructure (GI) is fully supported. However, there is no mention of the River Stort as a key strategic GI asset. There is also no mention of local distinctiveness or wording to promote the conservation and enhancement of landscape character and visual amenity. These demonstrate an ambition to create places that are not only high quality, but attractive too, and provide vital hooks to local landscape/townscape character assessment that are an important tool to help guide positive change (see comment under local distinctiveness).

The reference to GI and a strong network of green wedges and fingers is well embedded throughout the plan. There is concern however that it should be clearer that the definition of GI includes both green and blue assets, in particular the Stort River Valley that is an important regional asset that runs along the boundary between Hertfordshire and Essex.

It is the view of HCC that the Stort River Valley could be brought into public use, as a way of integrating the new communities in the Gilston Area with the expansion of Harlow to the south. This area is identified as a rural green link in the Hertfordshire Green Infrastructure Plan, where the connectivity of the GI network could be strengthened, in order to encourage public access within this area.

There is no reference to the Hertfordshire Strategic Green Infrastructure Plan (Incorporating the Green Arc area) which also covers Harlow and the wider area. This document should be a key aspect of the evidence base, and recognises key GI proposals/projects for the river valley of the Stort, the woodland arc and strategic connections.

Change To Plan:

Full Reference: C - 6664 - 8622 - Green Infrastructure and the Natural Environment - None

CHAPTER: CONTEXT, VISION AND
OBJECTIVES

Historic Environment

6686 Object

Respondent: Historic England (Ms Debbie Mack) [8623]

Agent: N/A

Summary: Include Registered Parks and Gardens.

Change To Plan: Include Registered Parks and Gardens.

Full Reference: O - 6686 - 8623 - Historic Environment - None

6429 Comment **Respondent: STOP Harlow North [8588]**

Agent: Mr Jed Griffiths [8576]

Summary: Harlow should address its economic problems within the District Council boundary. There is no guarantee that the provision of large-scale housing would solve the problem.

Change To Plan:

Full Reference: C - 6429 - 8588 - Issues and Challenges - None

6875 Comment **Respondent: Essex County Council (Mr Rich Cooke) [8452]**

Agent: N/A

Summary: Wording revisions recommended to reflect the context of future travel requirements more fully, beyond public transport (although the first extra word suggested is descriptive in nature, the latter wording addition is necessary to describe the full extent of transport investments required).

Change To Plan: ECC (Highways) recommends the following suggested amendment:

"Residential growth, located, managed and phased appropriately, will help to provide the investment needed to deliver infrastructure requirements including improvements to sustainable and public transport, the local and strategic road network and social infrastructure such as education and health, including the future requirements of the Princess Alexandra Hospital."

Full Reference: C - 6875 - 8452 - Issues and Challenges - None

6876 Comment **Respondent: Essex County Council (Mr Rich Cooke) [8452]**

Agent: N/A

Summary: It is unclear what is meant by this paragraph in the context of delivering major infrastructure through its current wording. Amendments are recommended to provide clarity

Change To Plan: ECC (Highways) suggests an amendment of this paragraph to:

"Significant behavioural change..." And: "... ensure Harlow is an attractive, sustainable and healthy town ..."

NB wording 'attractive' is meant in context of the town's ability to attract visitors, investors, etc.

Full Reference: C - 6876 - 8452 - Issues and Challenges - None

6447 Support

Respondent: Deanery of Harlow (Anglican) (Revd Martin Harris) [8586]

Agent: N/A

Summary: I welcome the development of Gilston Garden Town; the work for the relocation or replacement of Princess Alexandra Hospital; the focus on the Town Centre (PR5) and the focus on regeneration generally. It is good to see the focus on infrastructure development generally.

Change To Plan:

Full Reference: S - 6447 - 8586 - 3. SPATIAL VISIONS AND LOCAL PLAN STRATEGIC OBJECTIVES - None

6460 Support

Respondent: The Theatres Trust (Tom Clarke) [216]

Agent: N/A

Summary: The Trust welcomes that Harlow's vision contains reference to its residents having excellent sporting, leisure and cultural facilities.

Change To Plan:

Full Reference: S - 6460 - 216 - 3. SPATIAL VISIONS AND LOCAL PLAN STRATEGIC OBJECTIVES - None

6461 Support

Respondent: The Theatres Trust (Tom Clarke) [216]

Agent: N/A

Summary: We also welcome that the provision and enhancement of Harlow's sports, leisure, recreational facilities and cultural opportunities are included as a strategic objective.

Change To Plan:

Full Reference: S - 6461 - 216 - 3. SPATIAL VISIONS AND LOCAL PLAN STRATEGIC OBJECTIVES - None

6687 Support

Respondent: Historic England (Ms Debbie Mack) [8623]

Agent: N/A

Summary: Welcome reference to delivering high quality design through new development whilst protecting and enhancing the districts historic environment.

Change To Plan:

Full Reference: S - 6687 - 8623 - 3. SPATIAL VISIONS AND LOCAL PLAN STRATEGIC OBJECTIVES - None

6729 Support

Respondent: Natural England (Ms Sarah Fraser) [8628]

Agent: N/A

Summary: Natural England supports the spatial vision's recognition of the value of Green Infrastructure and the ambition to retain and supplement existing green wedges. We note that Local Plan Strategic Objective mentions 'revitalised green spaces', however we would advise that these should be strengthened to include objectives specifically relating to the safeguarding, creation and enhancement of green infrastructure and environmental designations under the 'Placeshaping (Enhancing the quality of the built environment) theme.

We are pleased to see the positive approach to the environment supported in the Local Plan Vision for the LSCC Core Area and commend the recognition of the economic value of green assets.

Change To Plan:

Full Reference: S - 6729 - 8628 - 3. SPATIAL VISIONS AND LOCAL PLAN STRATEGIC OBJECTIVES - None

6411 Comment **Respondent: Essex Bridleways Association (Mrs Sue Dobson) [7887]** **Agent: N/A**

Summary: Page 22 Local Plan Strategic Objectives: Objective 1 is to 'Create and enhance high quality built environments which are well connected to revitalised green spaces'. This we do not object to, but we feel that recreational access to all green spaces for all user groups is important and should be reflected within Harlow's key objectives.

To make this Plan sound, we suggest that the wording should be amended to read 'Create and enhance high quality built environments which are well connected to revitalised fully accessible green spaces'.

Change To Plan:

Full Reference: C - 6411 - 7887 - 3. SPATIAL VISIONS AND LOCAL PLAN STRATEGIC OBJECTIVES - None

6430 Comment **Respondent: STOP Harlow North [8588]** **Agent: Mr Jed Griffiths [8576]**

Summary: The spatial vision set out in this section of the Local Plan is heavily dependent on the delivery of the Harlow and Gilston Garden Town, which is opposed by STOP Harlow North (SHN). From the summary of infrastructure projects, it would appear that the only real certainty is the provision of the additional interchange on the M11 (Junction 7A). Government commitment to Cross Rail 2 has not been finalised. The four tracking of the West Anglia main line is also in doubt, because of costs and construction difficulties.

Change To Plan:

Full Reference: C - 6430 - 8588 - 3. SPATIAL VISIONS AND LOCAL PLAN STRATEGIC OBJECTIVES - None

6568 Comment **Respondent: Canal & River Trust (Ms Tessa Craig) [8612]** **Agent: N/A**

Summary: Strategic Objective 1 promotes built environments well connected to green spaces. The Trust sees the River Stort as a key green space for Harlow providing connectivity for sustainable travel and open space for recreation and wellbeing. Along sections of the River Stort are areas identified in the Policies Map as employment land. Links from the proposed 3,000 new homes at Gilston Garden Town to the north of the employment land can be made via the towpath, which feeds into Strategic Objectives 13 and 14.

Strategic Objective 13 encourages sustainable modes of transport and objective 14 seeks to improve sustainable transport links to community facilities. Again, the River Stort and its towpath is an important transport route with the potential to link up people with open space and facilities. The Trust supports these strategic objectives.

Strategic Objective 3 relates to climate change. Waterways are able to be used for heating and cooling of buildings, and the Trust have been involved in many successful projects on our network, where developments have found the system to be more efficient than air source pumps. Developers should be encouraged to explore this and other innovative technology where their site is adjacent to the River Stort.

Change To Plan:

Full Reference: C - 6568 - 8612 - 3. SPATIAL VISIONS AND LOCAL PLAN STRATEGIC OBJECTIVES - None

6622 Comment**Respondent: GLADMAN (Mr Phill Bamford) [8618]****Agent: N/A**

Summary: Gladman support the Council's Spatial Vision and particularly the provision of sufficient new homes to meet local need and significantly increase the provision of affordable housing.

This clearly reflects the Council's Corporate Priorities with more and better housing sitting at the top of the Council's stated aims.

This priority is reflected in the Council's Strategic Objectives 4, 5 and 6 which are also supported.

Harlow also is located within the London Stansted Cambridge Corridor (LSCC) and is clearly key to the delivery of substantial growth over the Local Plan period that will support the economic objectives of the LSCC.

Change To Plan:

Full Reference: C - 6622 - 8618 - 3. SPATIAL VISIONS AND LOCAL PLAN STRATEGIC OBJECTIVES - None

6667 Comment**Respondent: Hertfordshire County Council (Mr Martin Wells) [8622]****Agent: N/A**

Summary: Figure 3.1: Spatial vision for Harlow to 2033, based on the Harlow Corporate Plan 2017. Improvements to sustainable modes would not conflict with HCC's Local Transport Plan (LTP). However, the proposed route of a northern bypass or whether it would in fact be in East Herts District is unknown. If this is the case it may need to be considered further.
Figure 3.3: Local Plan Strategic Objectives. Reducing the need to travel by car and improving options for sustainable travel that are outlined in paragraphs 13 and 14, are approaches that are reflected in HCC's LTP.

Change To Plan:

Full Reference: C - 6667 - 8622 - 3. SPATIAL VISIONS AND LOCAL PLAN STRATEGIC OBJECTIVES - None

6751 Comment**Respondent: Quod Planning (Mr Philip Murphy) [7958]****Agent: N/A**

Summary: HDC identifies the pressing need for the urgent economic and social regeneration of Harlow which can only be delivered through a combination of housing and economic development. This is clearly articulated in HDC's evidence base which explains that insufficient land exists within Harlow (given its tight administrative boundaries) to satisfy growth and regeneration requirements. As a result, it is incumbent on surrounding Council's to work collaboratively with HDC to assist in meeting the development requirements that cannot wholly be met within Harlow's administrative boundary.
PfP strongly support the need for regeneration within Harlow which has been a strategic objective of regional and local planning policy and guidance for over a decade. The New local Plan and the initiatives being brought forward under the wider 'Garden Town' banner can help support the long-awaited delivery of these objectives. 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).
Development at GPE will deliver substantial new housing comprising a broad mix of unit types and tenures that can help support the economic stimulus of this part of the M11 corridor, building on relationships with Stansted airport and the Enterprise Zone at Harlow, as well as supporting existing travel to work patterns.
PfP therefore strongly support Harlow's overall ambition set out within the Pre-Submission District Plan, in particular Harlow's role as an employment location and the need for a Skills Strategy (Policies ED1, ED2, and ED3). Harlow's role as a retail centre is also encouraged. A residential led mixed-use development at GPE will help support the economic and social regeneration of Harlow and enable the strategic objectives to be achieved.

Change To Plan:

Full Reference: C - 6751 - 7958 - 3. SPATIAL VISIONS AND LOCAL PLAN STRATEGIC OBJECTIVES - None

6877 Comment**Respondent: Essex County Council (Mr Rich Cooke) [8452]****Agent: N/A**

Summary: In response to the evidence base on Harlow health and well-being issues, the Local Plan vision, Local Plan themes and Local Plan objectives need revising and substantial content added to frame the overall Local Plan approach to Health and Well-being, including the current (brief) references to

* Harlow's residents will be more active, taking advantage of Harlow's excellent

* Sporting, leisure and cultural facilities

* Major progress will have been made to address Harlow's health and wealth inequalities as well as addressing localised deprivation across the district's deprived neighbourhoods

* The current 'Lifestyles' Objective also needs review and revision:

* '11. To provide and enhance sporting, leisure, recreational facilities and cultural opportunities in the district'

Change To Plan: ECC (Public Health) recommends adding content in Figure 3.1 and 3.3 to address these matters in response to the evidence base.

A form of wording is not proposed yet but ECC suggests that it will collate this, review best practice approaches suggested to other authorities and review this collaboratively with HC in order to set out agreed Local Plan content prior to Local Plan submission and in collaboration with HC.

Full Reference: C - 6877 - 8452 - 3. SPATIAL VISIONS AND LOCAL PLAN STRATEGIC OBJECTIVES - None

CHAPTER: CONTEXT, VISION AND OBJECTIVES

London Stansted Cambridge Consortium

6688 Support**Respondent: Historic England (Ms Debbie Mack) [8623]****Agent: N/A**

Summary: Welcome reference to maintaining and enhancing the special character of the area including the locally distinctive historic character of its market towns and rural settlements.

Change To Plan:

Full Reference: S - 6688 - 8623 - London Stansted Cambridge Consortium - None

6431 Comment**Respondent: STOP Harlow North [8588]****Agent: Mr Jed Griffiths [8576]**

Summary: As stated in representation 6428 above, the London-Stansted-Cambridge Corridor vision and strategy has not been subject to any formal public consultation. The Consortium is an unelected association of both public and private sector organisations. Its overall policy for growth, with Harlow as part of a "core" area has not been part of any meaningful public debate, yet it underpins the concept of the Harlow and Gilston Garden Town. This is anti-democratic.

Change To Plan:

Full Reference: C - 6431 - 8588 - London Stansted Cambridge Consortium - None

6878 Comment**Respondent: Essex County Council (Mr Rich Cooke) [8452]****Agent: N/A**

Summary: ECC recommends that wording of objective 13 should be enhanced and clarified, to make clear the form of transport that needs targeting.

Objective 14 needs revision to expand its scope beyond just travel to access 'community facilities'.

Change To Plan: ECC (Highways suggests amending Local Plan objectives as follows:

"13. Reduce the need to travel, in particular by private single occupancy vehicle, and ensure new development is sustainably located and/or accessible by sustainable and innovative modes of transport

Amend objective 14 to read:

'14. Improve transport links, particularly for sustainable modes of transport, to access all facilities, including social, leisure, community, health facilities, education and jobs

Full Reference: C - 6878 - 8452 - London Stansted Cambridge Consortium - None

6465 Support **Respondent: Miller Strategic Land [5769]** **Agent: Andrew Martin - Planning (Mr Olivier Spencer) [5533]**
Summary: Our client, Miller Homes, controls 251 hectares (ha) of agricultural land, bounded by Gilden Way / Sheering Road, the M11, Church Langley and New Hall Farm, to the east of Harlow.
Our client supports the three key aims of the Spatial Development Strategy.
Change To Plan:

Full Reference: S - 6465 - 5769 - 4. SPATIAL DEVELOPMENT STRATEGY - None

6506 Support **Respondent: Miller Strategic Land [5769]** **Agent: Andrew Martin - Planning (Mr Olivier Spencer) [5533]**
Summary: Our client, Miller Homes, controls 251 hectares (ha) of agricultural land, bounded by Gilden Way / Sheering Road, the M11, Church Langley and New Hall Farm, to the east of Harlow.
Our client supports the three key aims of the Spatial Development Strategy.
Change To Plan:

Full Reference: S - 6506 - 5769 - 4. SPATIAL DEVELOPMENT STRATEGY - None

6669 Comment **Respondent: Hertfordshire County Council (Mr Martin Wells) [8622]** **Agent: N/A**
Summary: Paragraphs 4.21 and 4.22. The wording within the paragraphs would not conflict with HCC's LTP. However, there is no wording within the paragraphs as to how connectivity with the new Garden Cities will be achieved or ensured. In addition, paragraph 4.22 mentions the cycle and pedestrian paths that will contribute to leisure and sporting needs. Such options would also contribute to health and wellbeing as well as having environmental (and air quality) benefits, if it enables people to make more journeys via non-car modes.
Change To Plan:

Full Reference: C - 6669 - 8622 - 4. SPATIAL DEVELOPMENT STRATEGY - None

6792 Comment **Respondent: Hallam Land Management & Commercial Estates Group (Mike Newton) [7646]** **Agent: N/A**
Summary: We support the provision of the Strategic Infrastructure required as part of the Latton Priory site and the principle of Key Gateway Locations
Change To Plan:

Full Reference: C - 6792 - 7646 - 4. SPATIAL DEVELOPMENT STRATEGY - None

6689 Object **Respondent: Historic England (Ms Debbie Mack) [8623]** **Agent: N/A**

Summary: Suggest changing managed to enhanced in line with the wording in the NPPF.

Change To Plan: Suggest changing managed to enhanced in line with the wording in the NPPF.

Full Reference: O - 6689 - 8623 - Placeshaping - None

6668 Comment **Respondent: Hertfordshire County Council (Mr Martin Wells) [8622]** **Agent: N/A**

Summary: Paragraph 4.8. The wording within this paragraph would not conflict with HCC's LTP. However, the wording within this paragraph does not mention joint working with neighbouring authorities to ensure connections between future areas such as Gilston that would join up facilitating movement into Harlow particularly by sustainable modes.

Change To Plan:

Full Reference: C - 6668 - 8622 - Placeshaping - None

6879 Comment **Respondent: Essex County Council (Mr Rich Cooke) [8452]** **Agent: N/A**

Summary: This paragraph sets out Gibberd's master plan principles, but does not refer to the (Town & Country Planning Association) Garden City principles, which do not appear to be referenced in the LDP until section 5.14. ECC strongly suggest these should be specifically referenced in the Placeshaping chapter of the Local Plan.

Change To Plan: ECC recommends a revision reflecting the need to set out the Garden City principles early, to avoid any misunderstanding that only the New Town / Gibberd principles apply where new development is to be contemplated and designed.

Amend paragraph 4.6 to also reference the Garden City principles.

Full Reference: C - 6879 - 8452 - Placeshaping - None

6467 Object

Respondent: Miller Strategic Land [5769]

Agent: Andrew Martin - Planning (Mr Olivier Spencer) [5533]

Summary: Although our client is broadly supportive of Garden Town design principles, the Spatial Vision and Design Charter referred to in paragraph 4.13 has not been published for consultation purposes. With this in mind, our client wishes to raise a holding objection to paragraph 4.13 and to reserve the right to raise further comments or objections at Examination in Public, once the final Spatial Vision and Design Charter is available.

Change To Plan: Only a holding objection is raised at this stage.

Full Reference: O - 6467 - 5769 - Housing - iii

6466 Support

Respondent: Miller Strategic Land [5769]

Agent: Andrew Martin - Planning (Mr Olivier Spencer) [5533]

Summary: Our client supports reference in paragraph 4.11 to the need to allocate a strategic housing site on open land in the east of the District.

Change To Plan:

Full Reference: S - 6466 - 5769 - Housing - None

6459 Comment

Respondent: NHS West Essex CCG (Mrs Jolene Truman) [8584]

Agent: N/A

Summary: West Essex CCG anticipate that the additional residents in Latton Priory, Sumners and Katherines, although in the Epping Forest District will register with Harlow GP Practices and therefore support the need for sufficient transport infrastructure to enable patient travel from these sites in Harlow. The specifics of the location, timing and size of the additional facilities needed for the additional growth in Harlow, will be subject of further discussion and planning to support self care and virtual management for patients, support development of larger sites and optimise use of space across health an care services to enable integrated services.

Change To Plan:

Full Reference: C - 6459 - 8584 - Housing - None

6700 Comment

Respondent: Home Builders Federation (Mr Mark Behrendt) [8450]

Agent: N/A

Summary: The Council set out in policy a housing requirement for 9,200 new homes between 2011 and 2033. This requirement is greater than the OAN identified in the SHMA due to the redistribution of housing needs agreed between the four authorities that comprise the HMA. For Harlow the housing requirement has been determined by the duty to co-operate and the fact that it is considered a more appropriate location for development within the HMA. Whilst such joint working is positive it is important to ensure that the additional capacity which has been identified by the Council is based on a sound evidence base. We are concerned that the additional capacity in Harlow for further development is a result of a SHMA that underestimates OAN for Harlow, and indeed across the HMA. This would mean that whilst Harlow would appear to be meeting its housing needs we do not consider the authority to have additional capacity to meet development needs arising in the rest of the HMA. Our two key concerns regarding the SHMA is the use of a ten-year migration trend and the level of uplift being proposed to address market signals.

Change To Plan:

Full Reference: C - 6700 - 8450 - Housing - None

6880 Comment**Respondent: Essex County Council (Mr Rich Cooke) [8452]****Agent: N/A**

Summary: In this section, explicitly stated considerations do not include the word 'Sustainable'. ECC therefore suggests inclusion of this to strengthen the current wording in paragraph 4.13. This would reflect the emphasis in NPPF (section 4 on Promoting sustainable transport); ECC transport modelling and the planned 60:40 sustainable travel modes aim identified for Harlow, together with specific measures such as the sustainable transport corridors.

Change To Plan: ECC (Highways) recommends that wording is added in paragraph 4.13:

"... new communities will be able to have direct sustainable access to jobs ..."

Full Reference: C - 6880 - 8452 - Housing - None

CHAPTER: CONTEXT, VISION AND Prosperity
OBJECTIVES

6412 Comment**Respondent: Essex Bridleways Association (Mrs Sue Dobson) [7887]****Agent: N/A**

Summary: Include provision for equestrians within the new Garden Communities so that the Plan is consistent throughout.

Change To Plan:

Full Reference: C - 6412 - 7887 - Prosperity - None

CHAPTER: CONTEXT, VISION AND Infrastructure
OBJECTIVES

6881 Comment**Respondent: Essex County Council (Mr Rich Cooke) [8452]****Agent: N/A**

Summary: This does not mention the improvements necessary to other transport networks (other than road and public transport networks).

Change To Plan: ECC (Highways) recommends that wording is added to paragraph 4.25 to read:

"Improvements will be made to the local highway network and to the public transport, footway and cycleway networks to improve connections within Harlow and to areas outside the district."

Full Reference: C - 6881 - 8452 - Infrastructure - None

6422 Object

Respondent: Mr Danny McCaughey [8578]

Agent: N/A

Summary: I object to the indicative new sustainable transport corridor linking to the garden communities.

This proposed link would cut a line directly through the green wedge disrupting local communities, businesses and residential areas including cycle tracks from Fern Lane right through to the town centre.

The town already has strong links and an easy route into the town centre .

This green wedge would also not benefit from the creation of new green wedges in other areas of the town.. This would simply destroy the land creating more pollution (including near two schools and cycle/walking tracks).

Change To Plan: Scrap this indicative link and recognise that the current transport links, services and routes are more than suitable for the local and general area. The addition of a new junction on the M11 and the improved roads around Kao Park and the link to the town centre are in excellent working order. It is also worth mentioning the main junction on the entry of the town from the A414 which flows very well.

Full Reference: O - 6422 - 8578 - Key Diagram - i, ii, iii, iv

6468 Object

Respondent: Miller Strategic Land [5769]

Agent: Andrew Martin - Planning (Mr Olivier Spencer) [5533]

Summary: Our client is broadly supportive of the Key Diagram presented at Figure 4.1, but would like to raise a specific objection in respect of:

- (i) the new east-west Green Wedge shown permeating through the East Harlow site;
- (ii) the New Allotment provision in the same location; and
- (iii) lack of any Indicative New Accesses for East Harlow to the north, in Epping Forest District.

Change To Plan: Our client respectfully requests that the Key Diagram is amended to show the following:
- an "Indicative Green Wedge" rather than a "Green Wedge" on-site at East Harlow; "Indicative New Allotments" rather than "New Allotment" on-site at East Harlow; and
- two additional "Indicative New Access for the East of Harlow Strategic Housing Site" on the East Harlow land in Epping Forest District, one near Mayfield Farm and the other from the new link road roundabout leading to M11 J7A.

Full Reference: O - 6468 - 5769 - Key Diagram - ii

6471 Object **Respondent: Miller Strategic Land [5769]** **Agent: Andrew Martin - Planning (Mr Olivier Spencer) [5533]**
Summary: Our client wishes to raise a holding objection to part (a) of Policy PL1 and to reserve the right to raise further comments or objections at Examination in Public, once the final Spatial Vision and Design Charter has been published.
Change To Plan: Only a holding objection is raised at this stage.

Full Reference: O - 6471 - 5769 - 5. HARLOW AND GILSTON GARDEN TOWN - iii

6847 Object **Respondent: Miss Mary Wiltshire [6026]** **Agent: N/A**
Summary: Object garden town concept, as Harlow town already struggling with overloaded infrastructure.
Change To Plan: Any future consultation should show the Harlow residents how the costs would be shared

Full Reference: O - 6847 - 6026 - 5. HARLOW AND GILSTON GARDEN TOWN - None

6657 Support **Respondent: Hertfordshire County Council (Mr Martin Wells) [8622]** **Agent: N/A**
Summary: Housing growth within the Harlow and Gilston area is in excess of 16,000 homes within the plan period. It is recognised that the delivery of the Gilston Garden Town is fundamental to achieving the Harlow Local Plan objectives, notably infrastructure and the regeneration and expansion of sustainable transport infrastructure such as the Sustainable Transport Corridors and green infrastructure proposals.
HCC has been continuously engaged with the Garden Town Group and encourages the continued relationship and engagement in the development process, this is supported by MOU's.
As Highway Authority, HCC support the Garden Town proposal due to the fundamental shift towards the use of sustainable travel, with an ambitious sustainable modal split target. This is reliant on transport infrastructure within Harlow, such as North/South and East/West sustainable transport corridors and increased connectivity for walking and cycling through improved green infrastructure.
HCC support the inclusion of active travel infrastructure within green infrastructure to enable good connections and permeability between Gilston and Harlow along the county border, which is stated in paragraph 10.15.
Change To Plan:

Full Reference: S - 6657 - 8622 - 5. HARLOW AND GILSTON GARDEN TOWN - None

6602 Comment **Respondent: East Herts District Council (Mr George Pavey) [8616]** **Agent: N/A**
Summary: It is noted that the policies in HGT1 are similar to those in the East Herts District Plan (Policy GA1) and reflect a set of values that the Harlow and Gilston Garden Town share. However, East Herts questions the legal basis for including policies that relate to development entirely outside of Harlow's administrative boundary.
Change To Plan:

Full Reference: C - 6602 - 8616 - 5. HARLOW AND GILSTON GARDEN TOWN - None

6623 Comment**Respondent: GLADMAN (Mr Phill Bamford) [8618]****Agent: N/A**

Summary: Concern is also expressed over the identification of a number of new Garden Communities which will provide growth not just for Harlow, but for Epping Forest and East Hertfordshire.

Whilst Gladman do not object in principle to the identification of Garden Communities, considerable care should be exercised when establishing their deliverability and viability, especially in terms of the trajectory of housing delivery.

In addition, any new Garden Communities should form part of a package of sites which provide a wide range of sites, of varying sizes, in a variety of locations that can be delivered in the short to medium term to ensure that a rolling 5-year housing land supply can be maintained in line with Government guidance.

Issues surrounding the identification of large scale Garden Communities have been examined in some detail at the recent North Essex Local Plan Examination. It is suggested that the Council review the Inspector's Advice in relation to this Examination to ensure that the issues raised have been addressed through the HLDP.

The HLDP identifies that delivering an improved Junction 7 and a new Junction 7a on the M11 are critical to the delivery of growth within Harlow District. Significant infrastructure projects such as these should not be under-estimated and it is essential that the timeframes set for the delivery of these projects is realistic and the subsequent implications for housing delivery are appropriate.

Paragraph 5.11 of the HLDP states that the Harlow and Gilston Garden Town represents a major opportunity to deliver approximately 16,000 new dwellings up to 2033. This is a highly ambitious target, especially as the delivery of the scheme requires the delivery of Junction 7a on the M11 and the preparation of a strategic masterplan. These issues will have implications for the speed of housing delivery and this should be fully reflected in the subsequent housing trajectory.

Change To Plan:

Full Reference: C - 6623 - 8618 - 5. HARLOW AND GILSTON GARDEN TOWN - None

6655 Comment**Respondent: Hertfordshire County Council (Mr Martin Wells) [8622]****Agent: N/A**

Summary: Children's Services-Schools Planning

Hertfordshire County Council (HCC) notes the two strategic Garden Town Communities that are planned within the District, along with further communities located to the east in Epping Forest District and the Gilston Area to the north in East Herts District. The Gilston Area includes a total of 10,000 new dwellings within and beyond the current Plan Period. The development area sits solely within East Herts District and HCC would expect a development of this size to provide its own school infrastructure within the development itself. HCC's response to the East Herts District Plan Regulation 19 pre-submission consultation (December 2016) outlines the education requirements for the District, which can be viewed here:

http://consult.eastherts.gov.uk/common/search/advanced_search.jsp?id=482550&sortMode=response_date&lookingFor=representations&tab=list

We are working with both the District and developers on ensuring the delivery of sufficient and appropriate education infrastructure to meet the needs of those new communities. We welcome the design, development and phased delivery principles outlined within the Pre-Submission Local Plan and the need for continued joint working in order to deliver sustainable infrastructure provision.

Change To Plan:

Full Reference: C - 6655 - 8622 - 5. HARLOW AND GILSTON GARDEN TOWN - None

6665 Comment **Respondent: Hertfordshire County Council (Mr Martin Wells) [8622]** **Agent: N/A**

Summary: Minerals & Waste Planning

The Gilston development to the north of Harlow in East Herts District is proposed within the Mineral Safeguarding Areas and Consultation Areas in the Hertfordshire Minerals Local Plan in a location where it has the potential to affect mineral reserves. There is a need to ensure that potential and known mineral reserves are safeguarded from development which may 'sterilise' or prejudice the opportunity to extract them now or in the future. Where a proposed development has the potential to affect mineral reserves, appropriate consultation with the county council must take place and ways to avoid the unnecessary sterilisation of minerals should be demonstrated.

As the sand and gravel belt covers a significant area, the issue of mineral sterilisation could be an important consideration for the other strategic locations proposed in the Pre-submission Harlow Local Plan. However, this would be determined by Essex County Council as mineral planning authority for Essex.

Change To Plan:

Full Reference: C - 6665 - 8622 - 5. HARLOW AND GILSTON GARDEN TOWN - None

6670 Comment **Respondent: Hertfordshire County Council (Mr Martin Wells) [8622]** **Agent: N/A**

Summary: Paragraph 5.2 should be amended to include Hertfordshire County Council (HCC), as it is both a service provider and Highway Authority.

Change To Plan:

Full Reference: C - 6670 - 8622 - 5. HARLOW AND GILSTON GARDEN TOWN - None

6680 Comment **Respondent: Historic England (Ms Debbie Mack) [8623]** **Agent: N/A**

Summary: Reference is made to the Harlow and Gilston Design Charter throughout the Plan. This underpins many of the policies. However, we understand that this document is not yet available to view. Without sight of this document it is not possible to say whether sufficient protection has been given to the historic environment in policy

Change To Plan:

Full Reference: C - 6680 - 8623 - 5. HARLOW AND GILSTON GARDEN TOWN - None

6754 Comment**Respondent: Quod Planning (Mr Philip Murphy) [7958]****Agent: N/A**

Summary: The Pre-Submission Plan outlines that development of the Gilston Area should be "framed by the objectives set out in the Town and Country Planning Association's nine key guiding Garden City principles" (paragraph 5.14), one of which is that "new Garden Cities should aspire to a tenure split of 30% of homes being available for social rent [with] other forms of submarket housing, such as shared-equity and low-cost or discounted ownership forming a further 30% of homes". The term 'frame', suggests consideration of a much greater proportion of affordable homes than that proposed. For consistency, it is suggested that Paragraph 5.14 is updated to include the following:

"...framed by the objectives set out in the Town and Country Planning Association's nine key guiding Garden City principles but having regard to the local specific affordable housing requirements as set out in the Harlow Local Development Plan".

PfP support the principle that the costs of strategic infrastructure should be shared (as proposed by Policy HGT1(2.n). The mechanism for doing so should be specified and it should be noted that the share of the costs of the listed infrastructure to be borne by each development will need to be carefully assessed.

PfP are concerned that the plan refers to the requirement for four-tracking of the West Anglia Mainline. There has been no publication of evidence that supports the necessity of such provision within the plan period, even though it may be desirable. Given the uncertainties over deliverability it would not be appropriate to make such provision a requirement of the plan and PfP suggest this is removed. Supporting text can still refer to the desirability of such provision and that HDC along with others will work with the rail stakeholders to assist its delivery. Reference should also be made to the capacity enhancements that will come about due to new trains being introduced within the current franchise, and a more positive framework should be set for improvements around the station.

PfP will be sponsoring the applications for the Central and Eastern Stort Crossings and will if necessary be providing the funding to ensure their delivery in line with the agreed development triggers for the Gilston Area. However, the Crossings are required to meet existing demand and to accommodate the planned growth of Harlow and the wider area. In particular, the Central Crossing is required to meet existing need, and the Eastern Crossing is required to meet the need of future growth in the Harlow area as a whole. The IDP will need to be clear that the Crossings serve a strategic transport purpose and contributions are required from all new development.

In addition, the emerging EHDC District Plan notes that whilst the Eastern Crossing is the highway authorities preferred option for a new river crossing, a western option remains a possibility, and this should be clearly acknowledged within the HDC plan.

Change To Plan:

Full Reference: C - 6754 - 7958 - 5. HARLOW AND GILSTON GARDEN TOWN - None

6764 Comment**Respondent: Lawson Planning Partnership (Miss Kathryn Oelman) [8532]****Agent: N/A**

Summary: The Trust welcomes the cross-boundary support provided by Harlow, Epping and East Hertfordshire District Councils, pledging to work co-operatively to facilitate the optimum provision of high quality healthcare facilities to serve the wider area (as referenced in paragraphs 5.38 & 5.39 of the draft Local Plan).

As referred to in paragraph 5.38, the Trust shares the aspiration that its future location will maximise use of sustainable transport modes. However, it must be noted that there are myriad of economic, operational and land use considerations which also influence the final outcome and the availability of locations for a new hospital. It would not be right therefore that sustainability alone drives this judgement.

The Trust notes that text relating to its Strategic Outline Business Case (sections 5.38 & 5.39) are contained within Chapter 5: "Harlow & Gilston Garden Town". These references are suitable within this context, but the allocation of the existing site for housing, and absence of reference to support for the redevelopment option within the Development Management Policies, implies the relocation v's redevelopment options are not being given equal standing, which necessarily must be the case at this stage. However, once a firm option has been confirmed, the Trust would welcome a proposed change to the Plan to reflect the up to date position.

Change To Plan: In order to reflect the fact that redevelopment of the existing site is still an option which remains under detailed consideration, the Trust requests the inclusion of a masterplanning policy in the document. This would allow the Trust to be best placed to pursue whatever option would best meet the demand arising in the future, should it be decided that hospital relocation is not the optimal solution.

Full Reference: C - 6764 - 8532 - 5. HARLOW AND GILSTON GARDEN TOWN - None

6771 Comment**Respondent: Roydon Parish Council (Janet Ballard) [5434]****Agent: N/A**

Summary: The Plan acknowledges that highway and transport improvements are required (paragraph 5.32). These are to include "works to the Water Lane roundabout, A1025/Abercrombie Way signals and traffic calming along the A1169".

A large increase in the volume of traffic in the area is inevitable and we believe will mean unsustainable pressures on local roads. There is an assumption that traffic will travel through Harlow for onward journeys - so improvements are being made there and towards the M11 - but this is unrealistic

Change To Plan: We suggest that these minor measures will have minimal effect (and are at a loss to understand how traffic calming is intended to improve the situation)

inevitable that 'back roads' will be used. This in turn will result in congestion, not just along the B181 but on other roads through Roydon Parish particularly Epping Road (through Roydon Village), Tylers Cross/Hamlet Hill/Sedge Green and Dobbs Weir (towards Hertfordshire) as well as Common Road (towards Nazeing).

Full Reference: C - 6771 - 5434 - 5. HARLOW AND GILSTON GARDEN TOWN - None

6772 Comment**Respondent: Roydon Parish Council (Janet Ballard) [5434]****Agent: N/A**

Summary: Paragraph 5.16 states that the Councils' aspirations for sustainable transport include a "modal travel shift towards 60% by sustainable modes of transport". This a laudable aim but in our view is currently completely unrealistic. The 60% figure is an aspiration but should not be a serious basis for planning unless there is evidence that this is achievable. Alternative transport has not happened at other new developments in Harlow, to our knowledge, and the trend seems to be towards decreasing, rather than increasing, local bus services. We believe the Plan to be unsound in this respect.

Change To Plan:

Full Reference: C - 6772 - 5434 - 5. HARLOW AND GILSTON GARDEN TOWN - None

6851 Comment**Respondent: Redrow Homes (Ms Kate Holland) [8640]****Agent: Redrow Homes (Ms Kate Holland) [8640]**

Summary: It is understood that the Design Charter and Spatial Vision are being developed by a design consultancy on behalf of the three authorities but is unlikely to undergo any public consultation. Policies HTG1 and HS3 require compliance with the strategic documents, however, it is understood these documents will not be published in advance of adoption of the Local Plan. It therefore is not possible to consider the potential implications of compliance with these documents upon viability of the development. Further, Paragraph 174 of the NPPF seeks the cumulative impacts of local standards to be assessed as part of the Council's evidence base to ensure the implementation of the plan is not at serious risk. No such evidence has been prepared.

Change To Plan: Policies HGT1 and HS3 are amended to remove reference to the need for development solely to reflect the overarching design principles of the Spatial Vision of Design Charter and instead include for flexibility for development to be brought forwards in advance or absence of the documents.

Full Reference: C - 6851 - 8640 - 5. HARLOW AND GILSTON GARDEN TOWN - None

6884 Comment**Respondent: Essex County Council (Mr Rich Cooke) [8452]****Agent: N/A**

Summary: Paragraph 5.27

ECC recommends removing reference in this paragraph to the number of FE. Plans should not refer to specific numbers of forms of entry as the precise need will depend on the, as yet unknown, unit mix of the development. The number of pupils using the schools will also change over time, with the need for bulge groups common in relation to new developments.

Change To Plan: ECC (Education) recommends that
Each allocation should specify:

- a) the area(s) of D1 use land included in it for school use to avoid the whole allocation being attributed residential land value and
- b) that the land given over for schools must meet the criteria set out in Essex County Council's 'Developer's Guide to Infrastructure Contributions'.

Full Reference: C - 6884 - 8452 - 5. HARLOW AND GILSTON GARDEN TOWN - None

6885 Comment**Respondent: Essex County Council (Mr Rich Cooke) [8452]****Agent: N/A**

Summary: Paragraph 5.27

This currently states:

'The Strategic Housing Site East of Harlow extends across the administrative boundary between Harlow District Council and Epping Forest District Council. The land within Harlow will provide 2,600 dwellings and land within Epping Forest will provide 750 dwellings. The development is required to provide community facilities including Early Years facilities, a two-form entry primary school and appropriate contributions (including the provision of land) towards a new secondary school.'

The Plan needs to instead reference:

Two primary schools will be required to serve 3,350 homes. Sites of 2.1ha & 2.9ha should be allocated.

The secondary school will require around 9ha of land.

ECC also wishes to highlight the need for further joint working and a statement of common ground to address cross-boundary education matters, applying in particular to this development but also more widely across Harlow, with regard to cross-boundary growth and new education provision for the Garden Town. Whilst it is important to ensure adequate and timely education provision, an element of flexibility in approach is also considered necessary around this.

Change To Plan: ECC (Education) recommends that (since the proposed wording appears to apply to the entire development across both local authorities) the wording of paragraph 5.27 is revised to reflect the full primary education requirement, as follows:

.....The development is required to provide community facilities including Early Years facilities, two primary schools and appropriate contributions (including the provision of land) towards a new secondary school.'

Provision of two sites of 2.1ha. and a site of approximately 9ha. will accordingly be allocated, all within use class D1

The latter point does not dictate any particular Local Plan content response but a reference in this paragraph may prove helpful for completeness of information and to ensure other interests are aware of this.

Full Reference: C - 6885 - 8452 - 5. HARLOW AND GILSTON GARDEN TOWN - None

6886 Comment Respondent: Essex County Council (Mr Rich Cooke) [8452]

Agent: N/A

Summary: Paragraph 5.28

The Plan needs to instead reference:

Highway and transport improvements for the East of Harlow strategic site should include direct bus/walk/cycle access and linkage to/through Newhall site as part of Sustainable Transport Corridor improvements.

Paragraph 5.29

South of Harlow (Latton Priory)

This currently states:

Harlow South will provide around 1,050 dwellings, community facilities including Early Years facilities, a new two-form entry primary school and appropriate contributions towards a secondary school to serve new development.....

The plan needs instead to refer to a 2.1ha primary school site and not to specify 2 forms of entry.

A new secondary school site is to be included in this allocation, as well as contributions, Around 9ha of land should be allocated.

Change To Plan: ECC (Highways) recommends that wording is added in paragraph 5.28 to include direct bus/walk/cycle access and linkage to/through Newhall site - as part of Sustainable Transport Corridor improvements.

ECC (Education) recommends that paragraph 5.29 is revised as follows:

Harlow South will provide around 1,050 dwellings, community facilities including Early Years facilities, a new site (of 2.1 ha. in area) for a primary school, a site of approximately 9ha. of D1 land for a secondary school and appropriate contributions towards the secondary school to serve new development.....

Full Reference: C - 6886 - 8452 - 5. HARLOW AND GILSTON GARDEN TOWN - None

6887 Comment Respondent: Essex County Council (Mr Rich Cooke) [8452]

Agent: N/A

Summary: ECC has identified an apparent inconsistency between the Harlow and EFDC Local Plans

Regarding employment land associated with Latton Priory, EFDC Local Plan (Submission Version) states at paragraph 5.169: "There is also an existing employment site that is allocated for a further 5,120sqm of B2/B8 class use (general industrial/storage and warehousing): RUR.E19 - Dorrington Farm, Rye Hill Road (1.85ha)"

This is at odds with both EFDC Local Plan table 3.1, and the HDC Local Plan text, which both state 1ha of B1a/B1b employment land will be provided at Dorrington Farm.

Change To Plan: ECC recommends checking to assess which position is most accurate and if necessary, revise the Local Plan text (at paragraph 5.30) accordingly.

Full Reference: C - 6887 - 8452 - 5. HARLOW AND GILSTON GARDEN TOWN - None

6888 Comment Respondent: Essex County Council (Mr Rich Cooke) [8452]

Agent: N/A

Summary: The text does not mention where Latton Priory would gain access to the highway network. The stated preference of EFDC and site promoters is access onto Rye Hill Road (and other unsuitable local residential roads), which would result in impact on Southern Way. ECC recommends instead that the main site access should be off B1393 London Rd, with a link road through to Rye Hill Road, and with Rye Hill Road closed to general traffic south of the western access.

Change To Plan: This matter indicates the need for a constructive dialogue between ECC (Highways), HC, EFDC and the site promoters / developers. Depending on the outcome of that, this might require a revision adding to the current Local Plan text (paragraphs 5.29 - 5.31) and addressing through the Latton Priory masterplan process.

Full Reference: C - 6888 - 8452 - 5. HARLOW AND GILSTON GARDEN TOWN - None

6889 Comment Respondent: Essex County Council (Mr Rich Cooke) [8452]

Agent: N/A

Summary: Although the Latton Priory development is located within EFDC district and addressed chiefly by that Local Plan, ECC advises that highway and transport improvements required for Latton Priory site should include direct linkage with north-south sustainable transport corridor.

Change To Plan: Revise (descriptive text of) paragraph 5.31 to state requirement for Latton Priory development to include direct linkage to the north-south sustainable transport corridor

Full Reference: C - 6889 - 8452 - 5. HARLOW AND GILSTON GARDEN TOWN - None

6890 Comment**Respondent: Essex County Council (Mr Rich Cooke) [8452]****Agent: N/A**

Summary: This currently states:

Harlow West will provide around 2,100 dwellings, community facilities including Early Years facilities, a new two-form entry primary school and appropriate contributions towards a secondary school to serve new development.

The plan needs instead to refer to a 2.1ha primary school site and not to specify 2 forms of entry.

Change To Plan: ECC (Education) recommends that paragraph 5.29 is revised as follows:

Harlow West will provide around 2,100 dwellings, community facilities including Early Years facilities, a new site (of 2.1 ha. in area) for a primary school and appropriate contributions towards a secondary school to serve new development.

Full Reference: C - 6890 - 8452 - 5. HARLOW AND GILSTON GARDEN TOWN - None

6432 Object

Respondent: STOP Harlow North [8588]

Agent: Mr Jed Griffiths [8576]

Summary: Policy HGT1 includes a number of projects and sites which are beyond the administrative boundaries of Harlow. In upper case policy terms, a Local Plan can only contain references to land use proposals which are within the area covered by the document. Any other elements should be included in lower case supporting text.

Change To Plan: The policy should be reduced in its coverage, to refer only to spatial policies and land use proposals which are within the administrative area of Harlow District.

Full Reference: O - 6432 - 8588 - HGT1 Development and Delivery of Garden Town Communities in the Harlow and Gilston Garden Town - i, iii

6470 Object

Respondent: Miller Strategic Land [5769]

Agent: Andrew Martin - Planning (Mr Olivier Spencer) [5533]

Summary: Our client is broadly supportive of Policy HGT1 and particularly part 1(c) which seeks to deliver approximately 3,350 dwellings at East of Harlow. However, our client objects to the following criteria in Policy HGT1: 2(c) in relation to the timing of a supporting statement setting out long-term governance and stewardship arrangements for the community assets on-site; 2(d) pending publication and review of the completed Spatial Vision and Design Charter; 2(k) regarding the need for Garden Town-wide parking standards; and, 2(m) in relation to addressing climate change through construction methods.

Change To Plan: Our client respectfully requests that Policy HGT1 is amended as follows:

- Part 2(c) to be revised to read "Prior to the commencement of development, developers must submit a supporting statement..." instead of "Prior to the submission of outline planning applications, developers must submit a supporting statement..."
- Part 2(d) is subject to a holding objection, pending publication and review of the completed Spatial Vision and Design Charter.
- Part 2(k) to be revised to read "Develop specific Garden Town-wide parking standards which recognise that car ownership will need to be accommodated without impacting the quality place whilst making the best use of land and which have been subject to a formal period of public consultation.
- Part 2(m) delete reference to "and construction methods".

Full Reference: O - 6470 - 5769 - HGT1 Development and Delivery of Garden Town Communities in the Harlow and Gilston Garden Town - ii, iii

6691 Object

Respondent: Historic England (Ms Debbie Mack) [8623]

Agent: N/A

Summary: 2c suggest the addition of heritage assets in the list of stewardship arrangements

2d At the present time the Harlow and Gilston Garden Town and Design Charter is not available to view. Without sight of this document it is not possible to assess whether there is sufficient protection for the historic environment in the policy. In the absence of this, we must conclude that the Policy is unsound. We would suggest that an additional bullet point is added to Policy HGT1, part 2 to read 'Conserve and where appropriate enhance the historic environment'.

Change To Plan:

Full Reference: O - 6691 - 8623 - HGT1 Development and Delivery of Garden Town Communities in the Harlow and Gilston Garden Town - None

6770 Object

Respondent: Roydon Parish Council (Janet Ballard) [5434]

Agent: N/A

Summary: Policy HGT1, page 38, sets out proposals for Garden Town Communities. The proposals for West of Harlow (Water Lane Area) will have a major impact on the village of Roydon. This area is predominantly located in Roydon Parish and will result in the Parish having a disproportionate number of new homes (2,100) when compared with other urban extensions, especially considering the area's proximity to the settlements of Roydon and Broadley Common.

Change To Plan:

Full Reference: O - 6770 - 5434 - HGT1 Development and Delivery of Garden Town Communities in the Harlow and Gilston Garden Town - None

6569 Support**Respondent: Canal & River Trust (Ms Tessa Craig) [8612]****Agent: N/A**

Summary: The Trust supports stakeholder involvement in the design and delivery of the Garden Towns and would consider itself to be a key consultee for the Garden Towns, particularly Gilston due to its proximity to the River Stort. The Trust considers towpath improvements (as a Sustainable Transport Corridor) necessary to meet the needs of residents (existing and future) to support sustainable travel.

The development of a significant number of new homes at Gilston Garden Town to the north of the River Stort Navigation and improved access to the River Stort means it is highly likely there will be an increase in the usage of the towpath for recreational and possibly commuting purposes the impact of which we would wish to see mitigated through the appropriate use of planning obligation or other suitable mechanisms. We therefore note and welcome reference in Policy HG1 to a funding mechanism for future stewardship, management, maintenance and renewal of community infrastructure and assets and the need for developers to set out a sustainable long term arrangement for governance and stewardship arrangement for community assets including green infrastructure

Point 5.36 of the policy justification identifies a widened Central Stort Crossing and a Second Stort Crossing. The Trust has provided pre-application advice on these proposed crossings and in that advice, referred to the HS2 Design Principles for Bridge Crossings and the Code of Practice for Works Affecting the Canal & River Trust. Whilst the Trust has no objection in principle to the proposed crossings it has raised a number of concerns in relation to the alignment of the Eastern Crossing and detailed design and would wish to be consulted further in respect of the detailed design of any proposed works

The Trust welcomes policy point HGT1(m) on mitigation from and adaption to climate change through design and construction. Our waterways can play a part in such mitigation through, for example, use for heating and cooling of development and surface water drainage where appropriate.

Change To Plan:

Full Reference: S - 6569 - 8612 - HGT1 Development and Delivery of Garden Town Communities in the Harlow and Gilston Garden Town - None

6690 Support**Respondent: Historic England (Ms Debbie Mack) [8623]****Agent: N/A**

Summary: Welcome strategic Objective 2 and reference to protecting and enhancing the district's historic environment.

Change To Plan:

Full Reference: S - 6690 - 8623 - HGT1 Development and Delivery of Garden Town Communities in the Harlow and Gilston Garden Town - None

6788 Support**Respondent: Hallam Land Management & Commercial Estates Group (Mike Newton) [7646]****Agent: N/A**

Summary: Support the proposed strategic allocations at Harlow in the form of the new Garden Town Communities and in particular the allocation of Latton Priory, although the policies relating to these allocations would benefit from further refinement and clarification to ensure they are effective. We recommend that Harlow District Council aligns its draft policy HGT1 with Epping Forest District Council's draft policy SP4 to maintain consistency in the principles for the Garden Town Communities in the Harlow and Gilston Garden Town.

Change To Plan:

Full Reference: S - 6788 - 7646 - HGT1 Development and Delivery of Garden Town Communities in the Harlow and Gilston Garden Town - None

6827 Support**Respondent: Epping Forest District Council (Ms Alison Blom-Cooper) [8637]****Agent: N/A**

Summary: Policy HGT1 covers the development and delivery of the Garden Town Communities. EFDC strongly support the identification of Latton Priory, Water Lane Area and East of Harlow sites within Epping Forest District as Garden Town Communities. However, it is suggested that it would be more appropriate to refer to sites that are not within the Harlow District boundary in the supporting text of the policy and therefore focus the policy on the approach to the development and delivery of the Garden Town Communities and sites within Harlow District. Policy HGT1 provides a commitment for Strategic Masterplans to become Supplementary Planning Documents (SPDs). EFDC note that the Epping Forest District Local Plan Submission Version 2017 only requires Strategic Masterplans to be capable of adoption as SPDs in order to ensure flexibility when implementing the most sustainable strategy for the Garden Town Communities in Epping Forest District. It is also suggested that, in the interests of effectiveness, the Plan makes it clear that, notwithstanding the fact that the East of Harlow site as a whole lies within two local authority areas, a single Masterplan (to be agreed by both local authorities) should be produced to ensure the site in its entirety is developed as one community. This would help to ensure that a fully integrated community is delivered. This comment is also relevant to the comments made below on Policy HS3. EFDC welcome reference to the Garden Town Spatial Vision and Design Charter and the independent Quality Review Panel in the policy. EFDC fully supports the ambition of achieving 60% modal shift and the inclusion of subsection k) of Policy HGT1 with regard to the development of specific parking standards and that paragraph 17.5 identifies that parking provision may be reduced in sustainable locations.

Change To Plan:

Full Reference: S - 6827 - 8637 - HGT1 Development and Delivery of Garden Town Communities in the Harlow and Gilston Garden Town - None

6413 Comment**Respondent: Essex Bridleways Association (Mrs Sue Dobson) [7887]****Agent: N/A**

Summary: Page 39 Policy HGT1 point (l): this paragraph relates to Green Infrastructure and it does not include any provision for it being fully accessible by all users. To make this Plan sound, we suggest that this paragraph is reworded thus: 'Create distinctive, fully accessible environments which relate to the surrounding area...'

Change To Plan:

Full Reference: C - 6413 - 7887 - HGT1 Development and Delivery of Garden Town Communities in the Harlow and Gilston Garden Town - None

6453 Comment**Respondent: Deanery of Harlow (Anglican) (Revd Martin Harris) [8586]****Agent: N/A**

Summary: I welcome the requirement under HGT1 that community services and facilities be accessible for all residents (2 (j)). Would this be befitted by spelling out that such access should be available on foot. The Harlow principle of everyone within a few minutes walk of a pint of milk provides a good model.

Change To Plan:

Full Reference: C - 6453 - 8586 - HGT1 Development and Delivery of Garden Town Communities in the Harlow and Gilston Garden Town - None

6671 Comment**Respondent: Hertfordshire County Council (Mr Martin Wells) [8622]****Agent: N/A**

Summary: Development and Delivery of Garden Town Communities in the Harlow and Gilston Garden Town. The wording within paragraph 2(i) in this policy does not conflict with HCC's LTP. As some of the linkages referred to (ie those to the proposed Gilston development) would cross the Essex/Herts county boundary, joined up working would be required to achieve comprehensive and worthwhile links.

Change To Plan:

Full Reference: C - 6671 - 8622 - HGT1 Development and Delivery of Garden Town Communities in the Harlow and Gilston Garden Town - None

6677 Comment**Respondent: Hertfordshire County Council (Mr Martin Wells) [8622]****Agent: N/A**

Summary: The pre-submission local plan proposes an additional 6,500 dwellings within the plan area, along with an additional 750 dwellings allocated within neighbouring Epping Forest District and a total of 10,000 dwellings in the Gilston Area to the north of Harlow in East Herts District. This significant increase in population requires additional capacity to be added to the existing recycling centre network (known as Household Waste Recycling Centres (HWRC) in Hertfordshire) in both Harlow and East Herts District.

The pre-submission plan does not mention the need to increase the current HWRC capacity, which is considered to be an important service provision which should be integrally planned from the outset of these new growth areas coming forward.

Options for delivering the additional capacity required include developing or upgrading two separate facilities that would serve the proposed housing growth in Harlow and the Gilston development in East Herts District, or a combined facility that serves both of these developments. Work is ongoing to consider the appropriateness and suitability of this option.

Whilst it is recognised that Essex County Council is the relevant minerals and waste planning authority, covering the Harlow local plan area, waste management uses should still be reflected in the Pre-Submission Harlow Local Plan. It is therefore considered that in the light of the need to increase HWRC capacity within this area, the following wording should be inserted into Policy HGT1: Development and Delivery of Garden Town Communities in the Harlow and Gilston Garden Town, in order to reflect this:

"Essex County Council and Hertfordshire County Council will work collaboratively to consider and deliver greater capacity, where appropriate, for the local management of household waste which serves the new communities that are planned in Harlow and the Gilston Area. Any facilities should be of a sufficient size and capacity that meets the needs of this growth and situated within an easily accessible location within the catchment area of the new communities."

Change To Plan: the following wording should be inserted into Policy HGT1: Development and Delivery of Garden Town Communities in the Harlow and Gilston Garden Town, in order to reflect this:

"Essex County Council and Hertfordshire County Council will work collaboratively to consider and deliver greater capacity, where appropriate, for the local management of household waste which serves the new communities that are planned in Harlow and the Gilston Area. Any facilities should be of a sufficient size and capacity that meets the needs of this growth and situated within an easily accessible location within the catchment area of the new communities."

Full Reference: C - 6677 - 8622 - HGT1 Development and Delivery of Garden Town Communities in the Harlow and Gilston Garden Town - None

6730 Comment**Respondent: Natural England (Ms Sarah Fraser) [8628]****Agent: N/A**

Summary: This policy sets out the strategic sites allocated in the Local Plan. Whilst there is much we support in the policy, notably references to Green Infrastructure and biodiversity under (c) and (l) Natural England has outstanding concerns relating to the Habitats Regulations Assessment ('HRA'). Since this policy needs to be informed by the conclusions of the updated HRA and may require further amendment we cannot, at this time, advise that this policy is sound. Our concerns will be set out in more detail below. Also we would recommend that given the scale of development proposed there should be a policy commitment to ensuring development deliver net gains for biodiversity and the environment.

Housing allocations should also consider potential impacts on Harlow Woods Site of Special Scientific Interest ('SSSI') which may be impacted in combination with allocations near Harlow from neighbouring Local Plans. A strategic solution is also being prepared for Hatfield Forest SSSI. Initial visitor surveys imply that the catchment is likely to be relatively large and may include parts of Harlow District. The plan needs to ensure that such impacts are considered appropriately through the plan and Sustainability Appraisal ('SA') and that solutions are provided for in policy.

Change To Plan:

Full Reference: C - 6730 - 8628 - HGT1 Development and Delivery of Garden Town Communities in the Harlow and Gilston Garden Town - None

6753 Comment Respondent: Quod Planning (Mr Philip Murphy) [7958]**Agent: N/A**

Summary: Policy HGT1 intends to provide a framework to ensure a consistent approach to the consideration of development proposals in Harlow, as well as those development proposals within the Garden Town in EHDC and EFDC. However, proposals such as GPE that fall in another administrative boundary will not be determined under Policy HGT1 but will be guided by the relevant planning policy within the appropriate district e.g. in respect of GPE Policy GA1 of the EHDC District Plan. Policy HGT1 should therefore be amended to make clear that the requirements of the policy do not apply to all four strategic Garden Town Communities, and instead only apply to proposals that fall within the administrative boundary of Harlow. This is not to say that we do not support these objectives, but that they should instead be delivered through co-operation under the Garden Town governance arrangements, and through planning decisions in each of the three Districts. It is not appropriate to include this in policy HGT1 as it cannot be enforced and will fail to meet the soundness test of 'Effectiveness'.

Policy HGT1 (2i) intends to "Create a step change in modal shift by contributing to the delivery of the Sustainable Transport Corridors and establishing an integrated, accessible and safe transport system which maximises the use of the sustainable high-quality transport modes of walking, cycling and the use of public and community transport to promote healthy lifestyles and provide linkages to and from Harlow and the new Garden Town Communities". In order to do this, Harlow indicates an aspiration of a modal travel shift towards 60% by sustainable transport modes.

PfP supports the aspiration towards more sustainable transport modes and is working with HDC, EFDC, EHDC and ECC on the HIF bid to help enable the early delivery of the crossings which are needed to deliver the Sustainable Transport Corridor (STC). However further detail is needed from Harlow to demonstrate how the STC will be delivered and the 60% modal shift target achieved. For example, how will appropriate contributions to be secured from all new development and what positive measures will HDC put in place to encourage existing residents (as well as residents from future development) to use sustainable transport modes.

The policy should also recognise that the introduction of improved public transport corridors may require a balance to be drawn between the benefits of changing modes of travel and existing green spaces and landscaping.

Change To Plan: This infrastructure is not 'justified' based upon proportionate evidence, nor needed to deliver the draft Plan, and therefore references to the same should be removed.

Full Reference: C - 6753 - 7958 - HGT1 Development and Delivery of Garden Town Communities in the Harlow and Gilston Garden Town - None

6882 Comment Respondent: Essex County Council (Mr Rich Cooke) [8452]**Agent: N/A**

Summary: ECC has concerns that the expression of HGT1 suggests a fragmentation of approach towards the GT. This refers to four 'Garden Communities', instead of one collective and cohesive 'GT' - as was the case previously. This comment is in line with ECC's comments in response to the EFDC Submission Version Local Plan.

Change To Plan: ECC is reviewing the potential for how current wording and approach used for both the HC and EFDC Local Plans might be revised in order to ensure the integrity and cohesion of the GT as a whole is maintained and suggests a discussion with the two district councils accordingly in order to resolve whether an agreed solution is achievable. This discussion is needed before submission stage in order to shape Statement(s) of Common Ground.

Full Reference: C - 6882 - 8452 - HGT1 Development and Delivery of Garden Town Communities in the Harlow and Gilston Garden Town - None

**CHAPTER: STRATEGIC GROWTH HGT1 Justification
STRATEGY FOR THE**
6438 Comment Respondent: STOP Harlow North [8588]**Agent: Mr Jed Griffiths [8576]**

Summary: In paragraph 5.11 and elsewhere in the Local Plan, there is reference to a dwelling total of 16,000 units in the plan period to 2033. There is scant consideration to what happens beyond that point. In East Hertfordshire, in the so-called Gilston Area, the District Plan provides for 3,000 dwellings in the plan period and an additional 7,000 units beyond 2033. The cumulative impact of these developments on the whole area, in particular the transport system, water and drainage capacity, has not been fully considered.

Change To Plan:

Full Reference: C - 6438 - 8588 - HGT1 Justification - None

6692 Object **Respondent: Historic England (Ms Debbie Mack) [8623]** **Agent: N/A**

Summary: We note the reference to the TCPA guiding garden city principles. It is important to highlight that whilst these principles are useful and do embody a number of modern town planning concepts, they do not address the historic environment. It is therefore unclear how the TCPA principles can be reconciled with the NPPF's definition of sustainable development in terms of its environmental strand which requires the conservation and enhancement of the historic environment. Whilst the TCPA Garden Cities Principles are silent on the historic environment, their 2017 publication "The Art of Building a Garden City" does provide a further level of detail, particularly with regards to the siting of new settlements. This publication states that, "locations for new garden cities should not only avoid damaging areas that are protected for their ecological, landscape, historic or climate-resilience value but should actively be located in areas where there can be a positive impact on these assets. Underpinning the consideration of sites for new garden cities or towns should be the extent to which each one . . . will allow for positive impacts on assets of historic value". (Emphasis added, pg 100) In drafting your principles for the development of new garden communities, we would suggest that you ensure that reference is made to the need to conserve and enhance the historic environment in line with the NPPF.

Change To Plan:

Full Reference: O - 6692 - 8623 - HGT1 Implementation - None

6414 Comment **Respondent: Essex Bridleways Association (Mrs Sue Dobson) [7887]** **Agent: N/A**

Summary: Page 41 para 5.18: this paragraph mentions joint working with both public and private stakeholders in the planning and delivery of these new Garden Communities, and we would wish it noted that both Essex Bridleways Association and the British Horse Society are keen to have an input at the masterplanning stage of these new communities. The test of soundness of the Plan will include the provision for such consultation with stakeholders and the inclusion of representatives from all user groups - equestrian, cycling, pedestrians and the disabled - will meet the soundness requirements. Paragraph 5.23 also is relevant here.

Change To Plan:

Full Reference: C - 6414 - 7887 - HGT1 Implementation - None

6415 Comment **Respondent: Essex Bridleways Association (Mrs Sue Dobson) [7887]** **Agent: N/A**

Summary: Page 42 para 5.25: we fully support the aspiration to maintain the connection of Harlow's existing Green Infrastructure, including footpaths, cycleways and bridleways; however, this aspiration needs to be embedded within all sections of the Plan and not just in selected areas. To be sound, this Plan needs to be consistent throughout therefore the need to include all user groups within it is required.

Change To Plan:

Full Reference: C - 6415 - 7887 - HGT1 Implementation - None

6416 Comment **Respondent: Essex Bridleways Association (Mrs Sue Dobson) [7887]** **Agent: N/A**

Summary: Page 44 para 5.28: we note the intention to provide 'linkages into walking and off-road cycle networks'. To make this Plan sound, this paragraph should include provision for equestrians and should be reworded thus: 'linkages into walking and off-road cycle and equestrian networks'.

Change To Plan:

Full Reference: C - 6416 - 7887 - HGT1 Implementation - None

6417 Comment **Respondent: Essex Bridleways Association (Mrs Sue Dobson) [7887]** **Agent: N/A**
Summary: Page 44 para 5.29: we note the intention to include 'open space, walking and cycling routes'.
To make this Plan sound, this paragraph should include provision for equestrians and should be reworded thus: 'open space, walking, cycling and equestrian routes'.
Change To Plan:

Full Reference: C - 6417 - 7887 - HGT1 Implementation - None

6418 Comment **Respondent: Essex Bridleways Association (Mrs Sue Dobson) [7887]** **Agent: N/A**
Summary: Page 44 para 5.32: we note the intention to include 'open space, walking and cycling routes'.
To make this Plan sound, this paragraph should include provision for equestrians and should be reworded thus: 'open space, walking, cycling and equestrian routes'.
Change To Plan:

Full Reference: C - 6418 - 7887 - HGT1 Implementation - None

6419 Comment **Respondent: Essex Bridleways Association (Mrs Sue Dobson) [7887]** **Agent: N/A**
Summary: Page 44 para 5.35: we note the intention to include 'open space, walking and cycling routes'.
To make this Plan sound, this paragraph should include provision for equestrians and should be reworded thus: 'open space, walking, cycling and equestrian routes'.
Change To Plan:

Full Reference: C - 6419 - 7887 - HGT1 Implementation - None

6439 Comment **Respondent: STOP Harlow North [8588]** **Agent: Mr Jed Griffiths [8576]**
Summary: The delivery of the Local Plan is too dependent on external factors and the successful co-operation between the public and private sectors. There are too few certainties in the provision of infrastructure. Long term drainage capacity is too dependent on the Rye Meads Waste Water Treatment Plant, which is adjacent to a designated wildlife site of European importance.
Change To Plan:

Full Reference: C - 6439 - 8588 - HGT1 Implementation - None

6672 Comment **Respondent: Hertfordshire County Council (Mr Martin Wells) [8622]** **Agent: N/A**
Summary: Paragraph 5.22. HCC would welcome inclusion in any consultation on Plans covering areas on, or around the county boundary.
Paragraph 5.36. It is assumed that HCC would be involved in any study, as mentioned within this paragraph.
Change To Plan:

Full Reference: C - 6672 - 8622 - HGT1 Implementation - None

6883 Comment**Respondent: Essex County Council (Mr Rich Cooke) [8452]****Agent: N/A**

Summary: ECC advises the benefits to the Plan of reflecting the TCPA work on Garden Communities, including its Reuniting Planning and Health work and guidance. The Garden Town (long term transformational growth) presents an opportunity to promote healthier populations and lifestyles and embed improved wellbeing, working with GT partners, taking advantage of wider cross boundary growth and the existing assets of the Harlow area (e.g. greenspace provision, off road networks and River Stort valley).

This is also important to ensure that health and well-being issues are taken into account fully when considering the future design and delivery of the Garden Town growth.

Change To Plan: ECC recommends early joint work, prior to Local Plan submission, on a positive and collaborative basis to review the learning from the guidance mentioned and to jointly develop and agree appropriate Plan content and responses to integrate health and well-being fully within the Garden Town part of the Local Plan (and other parts). This could shape any SoCG(s) to resolve this matter.

Full Reference: C - 6883 - 8452 - HGT1 Implementation - None

CHAPTER: STRATEGIC GROWTH SD1 Presumption in Favour of Sustainable Development
STRATEGY FOR HARLOW

6476 Object**Respondent: Miller Strategic Land [5769]****Agent: Andrew Martin - Planning (Mr Olivier Spencer) [5533]**

Summary: In order to be consistent with national policy (particularly paragraph 14 in the National Planning Policy Framework (NPPF)), the second paragraph in Policy SD1 should recognise that development also will normally be supported "where relevant policies are out-of-date".

Change To Plan: The second paragraph in Policy SD1 should be amended to read:
"Where there are no policies specifically relevant to the proposed development or relevant policies are out-of-date, development will normally be supported, unless..."

Full Reference: O - 6476 - 5769 - SD1 Presumption in Favour of Sustainable Development - iv

6624 Support**Respondent: GLADMAN (Mr Phill Bamford) [8618]****Agent: N/A**

Summary: Gladman support Policy SD1 in that it reflects clearly the key aim of the Framework to deliver sustainable development.

Change To Plan:

Full Reference: S - 6624 - 8618 - SD1 Presumption in Favour of Sustainable Development - None

6653 Comment

Respondent: Harlow Alliance Party (Mr Nicholas Taylor) [8621]

Agent: N/A

Summary: There is no doubt that more and new homes are required to meet the needs of Harlow's existing residents and those that will need to live in the town as new employment opportunities arise in the future. There is already enough evidence to show that for many the new homes being constructed are beyond the means of those living locally who are most in need of a home. The Harlow Alliance Party believe that Harlow Council must play a pivotal role in providing homes which local people can afford to live in and not live a life on Housing Benefit. It should give a commitment to provide council homes at council rent levels on any public land used in the future for new housing.

Change To Plan:

Full Reference: C - 6653 - 8621 - 7. HOUSING STRATEGY AND GROWTH LOCATIONS - None

6656 Comment

Respondent: Hertfordshire County Council (Mr Martin Wells) [8622]

Agent: N/A

Summary: HCC as Highway Authority have engaged throughout the Local Plan as demonstrated through the MoU for transport, and support the evidence baseresulting from the joint work. The modelling work conducted by Essex County Council using the VISUM transport model has been shared with HCC. The VISUM transport modelling work has demonstrated that private vehicle trips from both new and existing development in the Harlow area need to be reduced to avoid unacceptable impacts on the M11 junction 7a corridor. Further VISUM testing has been undertaken to identify the levels of mode shift required to enable acceptable network operation and growth beyond 3,000 dwellings at Gilston. The conclusion to this work was that an ambitious target of 60% sustainable mode share from new developments is required to enable development of 10,000 homes at Gilston (along with the provision of associated transport measures such as a 2nd Stort Crossing and other highway upgrades). HCC have a countywide model COMET. A Local plan forecast run (2031) has been developed to look at the implications of Local Plan growth across Hertfordshire (including 3,000 dwellings at Gilston) and also includes local plan growth in the wider Harlow, Epping and Uttlesford areas. The developments have been tested with standard mode share / trip generation assumptions. The modelling work assumes that junction 7a will be in place along with the 2nd Stort Crossing, improvements to the Central Stort crossing and upgrades to the A414 junctions in Harlow and M11 junction 7. It is difficult to identify the specific impact of Local Plan growth in Harlow but the model results indicate the potential for a significant increase in delay (extra 3-5 minutes) at the Eastwick junction and the risk of diversion of traffic onto less suitable routes in the area. We also have concerns over the increases in traffic evident on the A414 corridor through Hertford and the A10 corridor through southern Broxbourne. This evidence supports the need for a significant shift in travel mode from the car to more sustainable modes of travel.

Change To Plan:

Full Reference: C - 6656 - 8622 - 7. HOUSING STRATEGY AND GROWTH LOCATIONS - None

6647 Object

Respondent: Harlow Alliance Party (Mr Nicholas Taylor) [8621]

Agent: N/A

Summary: The Plan is full of assumptions and conclusions without any meaningful evidence, using information which becomes out of date almost as it is written and with little if any widespread consultation with the most important people of all, the residents of Harlow. This Plan, which is clearly only supported by one of the political parties in Harlow, should not be used as a basis for the long-term planning of the future of Harlow. Assumptions about housing need for the Harlow area are made without giving any evidence of this need. Restrictions on who can apply for Council homes in Harlow and neighbouring authorities mean that they cannot give accurate evidence of housing need in the area. The Plan makes assumptions about the number of homes needed to support the regeneration of Harlow's Town Centre. Similar claims were made in the 1980's and 1990's, since when thousands of homes have been built in the area but little or no regeneration has taken place. The rapid increase in the population of London is fuelling the need for building homes locally but this may well not continue in future years, indeed the most recent information available shows a net decline in those living in London and the effect of Brexit is predicted to see this decline continue. Many other assumptions have been made without any actual evidence and the almost total lack of resident involvement in gathering evidence during the process leading to this Plan should be of very great concern.

Change To Plan:

Full Reference: O - 6647 - 8621 - HS1 Housing Delivery - None

6702 Object

Respondent: Home Builders Federation (Mr Mark Behrendt) [8450]

Agent: N/A

Summary: The policy is not sound as it is not justified or consistent with national policy. Paragraph 7.6 states that the Council must ensure that there is sufficient supply to meet Harlow's objectively assessed housing need of 7,400 dwellings. As we have set out above we do not consider this to be based on a sound evidence base and the Council's housing requirement should reflect this position. However it must be recognised that compared to the other Boroughs in the HMA Harlow is constrained by the tight boundary which broadly reflects its urban area. This will inevitably limit its ability to deliver further new development. If the Council is not able to allocate further sites to meet this level of housing need it will be necessary for the other authorities in the HMA, who have sought to rely on Harlow to meet their own needs, to come forward with further development opportunities.

Change To Plan: Given that development opportunities within Harlow are more limited due to its tightly drawn boundary we would suggest that the Council work with its partners in the HMA to identify additional allocations across the other three authorities to ensure that housing needs are met in full.

Full Reference: O - 6702 - 8450 - HS1 Housing Delivery - None

6731 Object

Respondent: Natural England (Ms Sarah Fraser) [8628]

Agent: N/A

Summary: Natural England considers this policy to be unsound - not consistent with national policy. This policy sets out the quanta of housing that will be allocated by the Local Plan. Given that Natural England has outstanding concerns relating to the Habitats Regulations Assessment ('HRA') we cannot, at this time, advise that this policy is sound until the updated HRA has been produced. Our concerns will be set out in more detail below. We also recommend that there should be a policy commitment to ensuring development deliver net gains for biodiversity and the environment.

Change To Plan:

Full Reference: O - 6731 - 8628 - HS1 Housing Delivery - None

6477 Support

Respondent: Miller Strategic Land [5769]

Agent: Andrew Martin - Planning (Mr Olivier Spencer) [5533]

Summary: Our client supports the provision in Policy HS1 of at least 9,200 dwellings in Harlow District during the 2011-2033 plan period (i.e. 418 dwellings per annum).

Change To Plan:

Full Reference: S - 6477 - 5769 - HS1 Housing Delivery - None

6824 Support**Respondent: Epping Forest District Council (Ms Alison Blom-Cooper) [8637]****Agent: N/A**

Summary: The Plan provides for 9,200 dwellings over the plan period with 30% affordable housing equating to 3,400 affordable homes. This is in line with the figures included in the signed MoU on Establishing the OAHN of the Housing Market Area. EFDC therefore welcome the commitment in the Pre-Submission Plan to meet the identified level of housing for Harlow in the Local Plan.

Change To Plan:

Full Reference: S - 6824 - 8637 - HS1 Housing Delivery - None

6625 Comment**Respondent: GLADMAN (Mr Phill Bamford) [8618]****Agent: N/A**

Summary: Gladman has considerable concerns that across the Housing Market Area, fewer dwellings are proposed to be delivered than the latest ONS projections based on highway capacity.

The HMA as a whole has substantial issues with worsening affordability and significant population growth. It should therefore not be considered appropriate to deliver less housing than the ONS projections suggest as this will only exacerbate the problems and will not address the Government's fundamental objective of tackling the housing crisis.

Gladman consider that given the recent deliverability issues faced by the Council, it is entirely appropriate to apply a 20% buffer to the 5-year housing land supply calculation

Change To Plan:

Full Reference: C - 6625 - 8618 - HS1 Housing Delivery - None

6743 Comment**Respondent: Persimmon Homes (Mr David Moseley) [8437]****Agent: N/A**

Summary: We also share the HBF's concerns that by under estimating the housing needs for each local authority the OAN for the HMA will not be met in full as required by paragraph 47 of the NPPF. This should be rectified.

Change To Plan:

Full Reference: C - 6743 - 8437 - HS1 Housing Delivery - None

CHAPTER: STRATEGIC GROWTH
STRATEGY FOR HARLOW

HS1 Justification

6442 Comment**Respondent: STOP Harlow North [8588]****Agent: Mr Jed Griffiths [8576]**

Summary: The assumptions made in the SHMA do not reflect the more recent ONS forecasts of a downturn in in-migration to the UK, which imply that the housing projections will have to be adjusted. SHN has raised its concerns at the East Herts District Plan Examination about the limited capacity of the Harlow area to accept large scale housing development. It is noted that the District Council's consultants have advised (in paragraph 7.22) that the upper limit of development across the HMA would be 51,100 dwellings. A higher level of development would exceed the capacity of the highways network.

Change To Plan:

Full Reference: C - 6442 - 8588 - HS1 Justification - None

6651 Object

Respondent: Harlow Alliance Party (Mr Nicholas Taylor) [8621]

Agent: N/A

Summary: It seems that Harlow Council dismisses the fact that windfall sites have occurred since the last plan was put together and that they will continue to be created in the future. Every new home created means another family wanting to use public services, roads, water, doctor's surgeries etc etc. In the last two years or so some 800 homes have been created by the conversion of offices to flats. Since this Plan was completed a developer has been granted permission to build an extra 30 or so homes on a site where a previous permission had been given and other plans in the pipeline, not mentioned in the plan are likely to see over 500 homes created within the next five years.

Change To Plan:

Full Reference: O - 6651 - 8621 - HS1 Implementation - None

6443 Comment

Respondent: STOP Harlow North [8588]

Agent: Mr Jed Griffiths [8576]

Summary: The Local Plan (in paragraphs 7.28 - 7.30) is dismissive of the role of windfall sites in their contribution to housing supply. Other Local Plans in the HMA do provide for a contribution from windfall sites. It is suggested that an allowance of 5% would be realistic.

Change To Plan:

Full Reference: C - 6443 - 8588 - HS1 Implementation - None

6391 Object **Respondent: Mrs Samantha Baldry [8554]** **Agent: N/A**

Summary: I object to the proposed allocation of the Fennells Field for residential development due to:
Destruction of currently used green space for recreation.
This has been used for over 20 years for recreation and I can support this with photographic evidence. It is essential for the 156 families already living here.
Parking issues. Already beyond capacity!
Increased traffic flow causing danger.
The impediment of my 'Right to Light'
Depreciation of value to my property
Negative impact on the natural environment
Distress during construction works due to proximity to my property

Change To Plan: Site should be removed as a proposed allocation.

Full Reference: O - 6391 - 8554 - HS2 Housing Allocations - i, ii, iii, iv

6396 Object **Respondent: Mr Ethan Baldry [8559]** **Agent: N/A**

Summary: I would like to object to the Fennells Field being an allocated residential site. I have lived at this address since I was born and this green space has been an integral part of my childhood. I have used this along with my family and friends for recreation extensively throughout all seasons. I have enjoyed family games of football and rounders, played nerf guns with my friends, had picnics, birthday celebrations and built snowman and sledged down the hill. This open space should remain for the enjoyment of present and future children in this community.

Change To Plan: The Fennells field should not been an allocated site for residential housing. The green space should remain for the use of the community for recreation as it has been for many years.

Full Reference: O - 6396 - 8559 - HS2 Housing Allocations - i, ii, iii, iv

6397 Object **Respondent: Miss Erin Rose BALDRY [8560]** **Agent: N/A**

Summary: I would like to object to the Fennells Field being allocated as a residential site. I have lived at this address all of my life and the field has been a massive part of my life. I have played with friends, played with pets, made movies and enjoyed learning about the countryside by playing on the field. I have built snowmen, sledged and chased my brother around playing games. I have even had my birthday parties on the field too! I really want you to reconsider taking this away from me and my friends.

Change To Plan: Please remove this proposal from your document. Its not right and should be left for children to play on.

Full Reference: O - 6397 - 8560 - HS2 Housing Allocations - i, ii, iii, iv

6410 Object **Respondent: Mr Mike Stokes [8551]** **Agent: N/A**

Summary: Objection to Land east of 144 - 154 Fennells (Nature Reserve). Main objection is parking, the Fennells most evenings is crammed with cars, at weekends and special occasions the traffic bottle necks with the crematorium and church parking on occasions it is a complete stand still. My second objection is the playing field has been used by my children (154 Fennells) and now my grandchildren (144 Fennells) and by many residents for many years. If these changes have to happen please make sure the roads are right or there will be funerals delayed due to traffic problems.

Change To Plan: Do not build on the land east of the Fennells.

Full Reference: O - 6410 - 8551 - HS2 Housing Allocations - None

6437 Object**Respondent: Mrs Sarah Gibbins [8582]****Agent: N/A**

Summary: We wish to oppose any plans for potential building. As a young family we chose to live here due to the quietness and safeness of this area which we want to bring our children up in. Why do you feel it necessary to ruin a popular space if you talk highly of Gibberds original plan? So many people, including ourselves use the field for different reasons such as dog walking, children playing, family events, children's parties. The negative impact on the natural environment which currently supports wildlife in our area worries us, our little girl amongst many others enjoy this

Change To Plan: We feel it necessary that the council should consider removing the potential plans to build housing particularly in the area marked land east of 144-154 Fennells.

Full Reference: O - 6437 - 8582 - HS2 Housing Allocations - i

6441 Object**Respondent: Mr Dean Burns [8552]****Agent: N/A**

Summary: HS2/9 LAND EAST OF 144 154 FENNELLS
I TOTALLY OBJECT TO THIS SMALL PARCEL OF LAND IN AN AREA OF LOCAL NATURAL BEAUTY BEING DEVELOPED. THIS LAND WOULD NEED TO BE ACCESSED OF OF THE ROAD LEADING INTO THE CREMATORIUM AND NATURE RESERVE CAUSING MAJOR TRAFFIC/PARKING PROBLEMS IN ADDITION TO THOSE ALREADY CREATED. IN ADDITION, EXISTING HEDGEROWS WOULD NEED TO BE REMOVED TO ACCESS THE AREA DISRUPTING LOCAL BIODIVERSITY. AS A RESIDENT, WE HAVE ALREADY HAD THE RIDICULOUS EARTH BUND BUILT CAUSING MAJOR OPPORTUNITY FOR ANTI SOCIAL BEHAVIOUR. WE WOULD SEE OUR PROPERTY VALUES PLUMMET

Change To Plan: TOTALLY REMOVED FROM THE PROPOSAL

Full Reference: O - 6441 - 8552 - HS2 Housing Allocations - ii

6581 Object**Respondent: Ms Christina Webb [8613]****Agent: N/A**

Summary: Object to the proposed site at Radburn Close as a possible proposal for 36 dwellings.
Harlow consists of many unused derelict land areas and this land is used by the community on a daily basis.

the reason I chose this home was to have the pleasure of looking from my windows to cherish and admire the green space

aware of is the potential flood risks will now increase

what about the local infrastructure and the impact here. Parking in the local area is at its highest I have ever seen it. Damage has already been caused to green verge, pavements and fencing by car owners trying to find a space, there is no more room for extra , Radburn is full !

Change To Plan:

Full Reference: O - 6581 - 8613 - HS2 Housing Allocations - None

6600 Object**Respondent: Mr David Beavis [8615]****Agent: N/A**

Summary: OBJECTION TO BUILDING ON SITE HS2-5 (relating to 10.1 & 10.2)
Paragraph 10.1 acknowledges that it's important to retain and enhance the natural environment for the enjoyment of residents and visitors. If building on the Plot HS2-5 is allowed, it would show a complete disregard for paragraph 10.1

In addition it would be completely contrary to the stated aim of Paragraph 10.2 which states that new developments MUST continue to implement the natural environment principles established by Sir Frederick Gibberd.

The Playing Field identified as HS2-5 is at a substantially higher ground level than the houses in Radburn Close that directly adjoin the field. This could have consequences of which I have serious concerns.

(1) FLOOD RISK (2) OVERSHADOWING(3) LOSS OF PRIVACY (4)INFRINGEMENT OF HUMAN RIGHTS

Additionally, Article 8 of the Human Rights Act states that a person has the substantive right to respect for their private and family life. In the case of Britton vs SOS the courts reappraised the purpose of the law and concluded that the protection of the countryside falls within the interests of Article 8. Private and family life therefore encompasses not only the home but also the surroundings.

Change To Plan:

Full Reference: O - 6600 - 8615 - HS2 Housing Allocations - None

Summary: We note the allocations are simply listed in tabular form and marked on the proposals map. Particularly for the larger sites, (sites 1-8) we would expect to see more detail regarding the sites and policy criteria to indicate how the decision maker should react (para 154 and 157 of the NPPF). We suggest that individual policies be included for these sites. We outline below the key heritage assets likely to be affected by development of these sites, any further evidence required and suggested policy wording.

HS2- 1 Princess Alexandra Hospital- This site includes a listed building- Parndon Hall (grade 11) and a scheduled monument (bowl barrow). There are two further bowl barrows close to the site. Development of this site has the potential to impact upon these heritage assets and/or their settings. Any redevelopment of this site will need to conserve and enhance these heritage assets and their settings. This requirement should be included as a criterion in the policy and the supporting text.

HS2- 2 The Stow Service Bays- The Marks Tey Conservation Area lies to the north of this site. Any development of the site may impact upon the setting of the Conservation Area. The policy should indicate that any development of the site will need to preserve or where opportunities arise enhance the setting of the conservation area. This requirement should be included in the policy and the supporting text.

HS2 - 3 Land east of Katherine's Way, west of Deer Park There are no designated heritage assets within or close to the site. Historic England has no comments to make.

HS2 - 4 Lister House, Staple Tye Mews, Staple Tye Depot and The Gateway Nursery- There are no designated heritage assets within or close to the site. Historic England has no comments to make.

HS2- 5 South of Clifton Hatch- Whilst there are no designated heritage assets on site there are two grade II listed buildings to the north east of the site (HUDC Depot and a building to the rear of the Depot). Development of this site has the potential to impact upon the setting of these listed buildings. To that end, the policy should include a criterion to preserve the grade II listed HUDC Depot and adjacent building and their settings. This should also be referenced in the supporting text.

HS2 - 6 Riddings Lane-This site forms part of the wider garden community proposals to the south of Harlow (Latton Priory). Any development in this area will need to give appropriate consideration to the need to protect the scheduled monuments and their settings (Latton Priory and Dorrington Farm Moated Site) and the preserve listed buildings and their settings, Latton Priory listed at grade II* and Latton Priory Farmhouse listed at grade II. This requirement should be included in the policy and the supporting text.

HS2-7 Kingsmoor Recreation Centre- Kingsmoor House (listed at grade II*) and its Lodge and Coach house (both listed at grade II) lie to the east of the site. The allocation lies within the wider setting of these assets and provides a connection between the heritage assets and green wedge beyond. Historic England has concerns that development of this site would change and potentially harm the setting of the listed buildings. A heritage impact assessment should be undertaken, prior to the EiP, to establish the significance of the assets, and the potential impact of development upon that significance in accordance with Historic England's guidance (HE Good Practice Advice in Planning 1-the historic environment in local plans: <https://historicengland.org.uk/imagesbooks/publications/gpa-1-historic-environment-local-plans/>) HE Good Practice Advice in Planning 2- managing significance in decision-taking in the historic environment: <https://content.historicengland.org.uk/images-books/publications/gpa2-managingsignificance-in-decision-taking/gpa2.pdf> HE Good Practice Advice in Planning 3- the setting of heritage assets: (Dec 2017) <https://content.historicengland.org.uk/images-books/publications/gpa3-setting-of-heritageassets/heritageassets/gpa3-setting-heritage-assets.pdf> HE Advice Note 3- site allocations in local plans: <https://historicengland.org.uk/imagesbooks/publications/historic-environment-and-site-allocations-in-local-plans/>) This will help to determine whether this allocation is suitable in terms of the historic environment. If the allocation is found to be acceptable in principle in heritage terms, a criterion should be included in the policy to ensure the protection of these listed buildings and their settings. This should also be included in the supporting text.

HS2 - 8 The Evangelical Lutheran Church, Tawneys Road - The Harlow Tye Green Village

Conservation Area lies to the west of this site .. Any development of the site may impact upon the setting of the Conservation Area. The policy should indicate that any development of the site will need to preserve or where opportunities arise enhance the setting of the conservation area. This requirement should be included in the policy and the supporting text.

We have not reviewed the smaller sites or indeed the employment allocations in ED1 or the hatches identified for mixed use in Figure 9.1. We request that you review these allocations again in a similar way to the above, identifying whether there are any heritage assets (or their settings) that would be affected by the proposed development. Where a potential impact is identified, wording should be included in the policy and supporting text to this effect.

Typical wording might include:

combination of heritage assets - 'Development should conserve and where appropriate enhance heritage assets and their settings.'

This is based on the wording in the Planning Practice Guidance Paragraph: 003 Reference ID: 18a-003-20140306 Revision date: 06 03 2014

listed building 'Development should preserve the listed building and its setting'.

This is based on the wording in Part 1, Chapter 1, paragraph 1 (3) (b) of the Planning (Listed Buildings and Conservation Areas) Act 1990.

conservation area 'Development should preserve or where opportunities arise enhance the character or appearance of the Conservation Area and its setting'.

This is based on the wording in Part 2, paragraph 69 (a) of the Planning (Listed Buildings and Conservation Areas) Act 1990 and para 137 of the NPPF.

Note that if you refer to character ... appearance use the word 'or' not 'and'

registered park and garden- 'Development should protect the registered park and garden and its setting.'

scheduled monument 'Development should protect the scheduled monument and its setting.'

Ideally, the policy should also mention the specific asset and any potential mitigation required.

Change To Plan:

Full Reference: O - 6693 - 8623 - HS2 Housing Allocations - None

6713 Object

Respondent: Mr James Humphreys [8561]

Agent: N/A

Summary: I currently live in Greygoose Park (backing on to the playing fields and Katherines Way) and I am very concerned about the council plans to build 69 homes on this land. While the minor inconvenience of the losing a view and house value decline are understandable, I do have additional concerns that I don't think have been taken into account when the council looked at this area. It is also disappointing that a council that prides Harlow on having green space and puts covenant control on residents and their homes, is actually flying in the face of its own rules and planning to build on every last bit of green land space. We bought our home three years ago so do have a fairly recent environmental report which leads me to ask the following questions.

Change To Plan:

Full Reference: O - 6713 - 8561 - HS2 Housing Allocations - None

6714 Object**Respondent: Mr James Humphreys [8561]****Agent: N/A****Summary: Flooding**

With the brook running parallel to Katherines Way, there is a flood risk. While the flooding at the moment is low risk and is mainly confined to the allotments (as you may be aware some are unusable due to the ground conditions and constant saturation), additional housing on this land which may act as an area for water to be drained into will put extreme pressure on this brook and leave the surrounding land liable to flooding as there will be no run off areas for water to go except for into the brook. This will place enormous pressure on a small stream that will flood repeatedly should this part of the plan go ahead. This flood risk was mentioned in our environmental impact report when buying our home. Your own flood impact report dated 2016 shows an existing flood risk on this area (page 4), so what would happen should houses be built there? This assessment has not been carried out in full.

Wildlife impact

There is a vast array of wildlife in the field next to Katherines Way including mice, shrews, hedgehogs, owls, amphibians, foxes and most importantly bats. As you may be aware bats are an incredibly protected species and any developments or changes to their natural habitat require a licence from Natural England. With the removal of trees and food sources for the bats, I feel that the plans to build housing in this area will severely impact this native and protected species. Your evidence base is from 2010/11. That is eight years old and it is not localised to specific parts of Harlow, meaning you have no idea what is living in the areas that have been earmarked for development. This is quite the assumption to make.

Road access

Currently, road access to Greygoose, Fir and Deer park is very limited and is off Kingsmoor Road at three points. Should additional housing be added to this area, more access points will need to be considered as the current roads are currently very narrow and or congested at peak times. While not a legal requirement it is often advised that large emergency vehicles should be able to pass through roads easily. At the current council access point to this land (for maintenance and mowing) that is not something that is achievable, with residents parking off the pavement and on the road. While residents are perfectly within their rights to do so, it shows that the long term view of putting extra housing in was not considered for this area and would not be able to cope with additional traffic for residents, let alone the large lorries and equipment needed to build additional houses. The road surfaces are not suitable nor are the streets wide for large equipment needed to build new homes. Also, with Public Health England bringing 10,000 jobs to the GSK site, the pressure that will be put on the roads in that area will be extreme already, let alone with the strain of building additional homes. Worryingly, there is no link up to Epping council who will also see some of these problems given their proximity to the area and roads that feed into Harlow, this may put Harlow council on a collision course with another authority. What plans do the council have to either build more roads, improve existing roads or improve public transport do deal with an extra 10,000 people in this small area?

Change To Plan:

Full Reference: O - 6714 - 8561 - HS2 Housing Allocations - None

6715 Object**Respondent: Mr James Humphreys [8561]****Agent: N/A**

Summary: Existing unoccupied housing
There is already unoccupied housing in Harlow, which is not being utilised. Will the council prioritise filling these homes before building new ones? In addition, existing unused offices and brownfield sites are being converted into homes, yet this is not accounted for in the plan. Is this additional housing considered in an earlier plan or has this been overlooked as part of the target for new homes?

Lastly green space

As you will be aware, green spaces have a strong link to happiness and healthcare outcomes. This has been known since Victorian times and has been referenced many times by government - <http://researchbriefings.files.parliament.uk/documents/POST-PN-0538/POST-PN-0538.pdf>. Getting rid of Green space and actual green belt land is a backwards step for Harlow and will add to the problems that currently exist with health deprivation. Your own council planning eludes to protecting environmental assets, not build on them. As a side point, the space in question beside Katerines Way is currently poorly maintained and there has been a noticeable decline in the management in this land. I'm currently having to fend off brambles, bind-weed and small trees starting to grow into my garden from your land.

Change To Plan: I therefore ask that you will consider opening these plans to a full public consultation across Harlow, given the size of the proposed developments. i have no issues with creating more homes in Harlow, but it has to be done in a logical and sustainable way with infrastructure considered hand in hand. This development plan has none of these things.

Full Reference: O - 6715 - 8561 - HS2 Housing Allocations - None

6719 Object**Respondent: Ms Jennifer Bedford [8557]****Agent: N/A**

Summary: I write concerning Jocelyns field and its inclusion in the Harlow local plan (location HS2-15) as a potential building plot. I believe it is an inappropriate site on many counts: it being part of green wedge - a key design feature of Harlow; it acts as a natural buffer to the A414; it is a place for recreation by local residents; and importantly, it is an essential and rich wildlife habitat with mature trees and varied ground cover. I also note that the plan quotes selectively from the historic documentation appertaining to the development of Harlow, taking such statements out of context to provide a validation for your proposals. There are many fundamental principles within the original town vision, both design and philosophical, which run counter to your assertions, and that should not be overlooked.

Change To Plan:

Full Reference: O - 6719 - 8557 - HS2 Housing Allocations - None

6720 Object**Respondent: Mrs Karen Garrod [8596]****Agent: N/A**

Summary: I can't readily see listed the land between the A414 and the M11 roundabout junction. The area beyond the BP garage and up to the roundabout at Hastingwood does not appear to be mentioned. Maybe this land does not fall in the Harlow boundary, but it does look like it is part of Harlow as it is before the junction. If denser and higher rise development is desired as it seems on reading the plan, this would appear to be an ideal site as there is no neighbouring residential area that would be adversely affected by higher rise blocks. This would be ideally situated for many car using commuters without impacting on the local highways in the town. Improved bus services to the train station would be an added benefit. I was dismayed to see valuable playing fields identified for development. Among the many benefits to residents young and old and our wildlife, these areas provide important breathing space and thinking space for contemplation too (open space=open mind).

Change To Plan:

Full Reference: O - 6720 - 8596 - HS2 Housing Allocations - None

6727 Object**Respondent: Mr MASOUD ESKANDARIAN [8625]****Agent: N/A**

Summary: I disagree and do object the proposed development plan and find that the Pre-Submission Local Development Plan is NOT legally compliant and NOT sound

Reference has been also made under page 5 & 6 of AECOM Sustainability Appraisal (SA) for the Harlow Local Development Plan May 2018, which has been announced as the framework of sustainable appraisal with the following criteria.

Change To Plan: I hope my concerns and objections are well received and understood, will be considered by Harlow Council who would decide to avoid proceeding with the development of HS2-5 land. I disagree with the development of HS2-5 greenfield land and suggest, Council should use alternative sites which have been already developed but do not currently perform well. The council should consider the expansion capacity and options of those sites rather than destroying this kind of natural habitats of South of Clifton Hatch neighbours (HS2-5 land) and wildlife. If the need for new housing developments demands the use of greenfield lands, then the outskirts of Harlow should be considered and suggested and not such a natural habitable greenfield land (HS2-5, South of Clifton Hatch) within Harlow.

Full Reference: O - 6727 - 8625 - HS2 Housing Allocations - None

6732 Object**Respondent: Natural England (Ms Sarah Fraser) [8628]****Agent: N/A**

Summary: Natural England considers this policy to be unsound - not consistent with national policy
This policy sets out the specific sites on which housing allocations are to be delivered. This policy sets out the quanta of housing that will be allocated by the Local Plan. Given that Natural England has outstanding concerns relating to the Habitats Regulations Assessment ('HRA') we cannot, at this time, advise that this policy is sound. Our concerns will be set out in more detail below.
Housing allocations should also consider potential impacts on Harlow Woods Site of Special Scientific Interest ('SSSI') which may be impacted in combination with allocations near Harlow from neighbouring Local Plans. A strategic solution is also being prepared for Hatfield Forest SSSI. Initial visitor surveys imply that the catchment is likely to be relatively large and may include parts of Harlow District. The plan needs to ensure that such impacts are considered appropriately through the plan and Sustainability Appraisal ('SA') and that solutions are provided for in policy.

Change To Plan:

Full Reference: O - 6732 - 8628 - HS2 Housing Allocations - None

6742 Object**Respondent: Ms Nikki Kellman [8629]****Agent: N/A**

Summary: Object to proposed Development on Playground west of 93-100 Jocelyns

As a regular visitor to Jocelyns I feel the parking situation needs to be addressed before more properties are developed

As a Harlow resident at present there are other development sites currently on the go eg: Gilden Way, old Rugby Club site, and extension to Newhall why are the council insistent of building on every bit of green land within Harlow, there are other priorities that need to be addressed.

I DO NOT THINK THIS IS A VIABLE AREA TO BUILD ON.

Change To Plan:

Full Reference: O - 6742 - 8629 - HS2 Housing Allocations - None

6766 Object**Respondent: Mr Ray Goodey [8580]****Agent: N/A**

Summary: We, as residents were informed that a land was required in order to prevent flooding in the kingsmoor area

No mention was made that the field would then change statues and form part of land for housing.

the field as a natural green space and as used by many residents, not only feunnells residents. the Loral church use it, dog walkers, joggers , personal trainers/ It would be a real shame to lose it

Change To Plan: the council should be more open and with their information regarding the plans for the field. the council website has these plans well hidden within the site

Full Reference: O - 6766 - 8580 - HS2 Housing Allocations - None

6769 Object**Respondent: Mr Ricky Goldblatt [8631]****Agent: N/A**

Summary: I would like register our objection to proposed Development plan of 12 new houses on Development of playground west of 93 - 100 jocelyns
Every household tends to have at least 2 cars per household now plus any visitors we feel this new plot will makes things worse then it already is as we struggle anyway. We also feel the wildlife will be disturbed and ruined as all the trees and bushes would need to be cut away to gain access on your proposed entrance on the A414, which by the way is a very dangerous road to put an entrance an we feel there will be dangerous accidents imminent.

There has been a massive decrease in parks in harlow and although there isnt one there a nice bit of greenary is just a good for him to play on without venturing to far from the House.

Change To Plan:

Full Reference: O - 6769 - 8631 - HS2 Housing Allocations - None

6775 Object**Respondent: Mrs Samantha Baldry [8554]****Agent: N/A**

Summary: Residents of the Fennells and surrounding areas are serious and passionate to protect this area for those who use and enjoy it now and for future generations.

This green space is widely used by the Fennells residents and surrounding community. It is used by children, their friends and family through out the year for recreation such as games of football, playing Frisbee, picnics, dog walking, large family games of rounders and building snowmen and snowball fights in the winter. It is a space for young children to play and exercise safely and to enjoy the outside environment. Many families bought their properties in this area because of this green space, knowing their children, or children they hope to have, had access to this wonderful space that would allow those that activities that small gardens will not allow.

the building of 26 homes what will cost the loss of this widely used space that is integral to this community, seems unbalanced and unsound.

Change To Plan:

Full Reference: O - 6775 - 8554 - HS2 Housing Allocations - None

6845 Object**Respondent: Mr Nigel Bangert [8638]****Agent: N/A**

Summary: Object HS2-5 South of Clifton Hatch with concern about the flood risk, as during heavy rain, garden has flooded.

I cannot see a way to make this plan or reasonable.

Change To Plan:

Full Reference: O - 6845 - 8638 - HS2 Housing Allocations - None

6862 Object**Respondent: De Merke Estates (Ms Emma Gladwin) [8643]****Agent: Barton Willmore (Miss Emma Gladwin) [8399]**

Summary: HS2-1 Princess Alexandra Hospital

The first allocation is for 650 dwellings on the current Princess Alexandra Hospital Site. However, the LDP continually refers to the 'possible relocation' of the hospital, including at Paragraphs 4.28, 5.17, 5.28 and so on. Paragraph 5.29 states two potential locations are being considered through a Strategic Outline Business Case, one in the Gilston area north of Harlow and one to the east of Harlow within Epping Forest.

No evidence has been published as part of the LDP or its evidence base, including the Infrastructure Delivery Plan, to demonstrate that there is agreement from any other partners or bodies, such as the NHS, to relocate the hospital. There is also no indication of the cost of relocating the hospital and how this is to be funded, or any timescale.

Change To Plan: Given the lack of information as set out above, it has not been demonstrated that the site at Princess Alexandra Hospital is developable as set out in the NPPF. As such, it should not be allocated for housing development within the current LDP as it is contrary to Paragraph 47 and fails to be positively prepared, justified, effective or consistent with national policy.

Full Reference: O - 6862 - 8643 - HS2 Housing Allocations - None

6444 Comment**Respondent: STOP Harlow North [8588]****Agent: Mr Jed Griffiths [8576]**

Summary: Policy HS2 and its delivery is dependent on the release of the Princess Alexandra Hospital site for housing. At the time of drafting, this has not been assured.

Change To Plan:

Full Reference: C - 6444 - 8588 - HS2 Housing Allocations - None

6478 Comment **Respondent: Miller Strategic Land [5769]** **Agent: Andrew Martin - Planning (Mr Olivier Spencer) [5533]**
Summary: It will be important to adopt a flexible approach at East Harlow, so that if for any reason M11 J7A is delayed, a first phase of development can be allowed to commence ahead of the new motorway junction and in turn release land for a new hospital as soon as possible.
Change To Plan:

Full Reference: C - 6478 - 5769 - HS2 Housing Allocations - None

6492 Comment **Respondent: Harlow Civic Society (Mr John Curry) [5318]** **Agent: N/A**
Summary: The table on Page 57 - HS2 Housing Allocations lists 21 sites where development is considered possible within the existing built & green environment. In general we accept the proposals; indeed we consider that all but four of these sites as eminently suitable for re-development. In particular, we suggest that the "hatches" listed could become subjects of architectural competition, thus following in the tradition of appointing up-coming architectural practices to provide interesting locations within the existing townscape.
The four sites that we would not wish to appear on this list are:
Ref 3. Ref 9. Ref 15.
Ref 19.
Change To Plan:

Full Reference: C - 6492 - 5318 - HS2 Housing Allocations - None

6626 Comment **Respondent: GLADMAN (Mr Phill Bamford) [8618]** **Agent: N/A**
Summary: Paragraph 7.32 of the Local Plan suggests that the allocations in the Local Plan provide 105 dwellings over the remaining housing requirement of 3,642 dwellings. This amounts to a total flexibility of almost 3%. This is not considered to be sufficient flexibility to ensure that the minimum housing requirement is met.

Recent research suggests that in order to ensure that the Housing requirement set out in Local Plans is met or surpassed, flexibility of between 10% and 20% should be built into the Plan. It is therefore considered that additional flexibility is required in the HLDP.
Change To Plan:

Full Reference: C - 6626 - 8618 - HS2 Housing Allocations - None

6681 Comment **Respondent: Historic England (Ms Debbie Mack) [8623]** **Agent: N/A**
Summary: There is a lack of a detailed and proportionate historic environment evidencebase underpinning the Plan and the Sustainability Appraisal. This is a particular issue for the strategic site at East Harlow and also site HS2-7 (Kingsmoor). Therefore we have provided more detail on these policies. We suggest that HIAs are prepared for both of these sites in advance of the EiP to test the suitability of these sites in terms of the potential impact on the historic environment. It is important to establish the suitability of the site per se prior to allocation. Paragraph 158 of the NPPF requires a proportionate evidence base for Plans. WE also have suggested the inclusion of a concept diagram for Policy HS3.
Change To Plan:

Full Reference: C - 6681 - 8623 - HS2 Housing Allocations - None

6682 Comment **Respondent: Historic England (Ms Debbie Mack) [8623]** **Agent: N/A**
Summary: The site allocations in Policy HS2 require more detail. At the moment, the site address is simply listed. Paragraph 154 of the NPPF makes it clear that policies should provide a clear indication of how a decision maker should react to a development. The policies (particularly for the larger sites should be re-worded to include criteria for clarity and to provide greater protection for the historic environment and robust policies that provide the decision maker and developers with a clear indication of expectations for the sites.
Change To Plan:

Full Reference: C - 6682 - 8623 - HS2 Housing Allocations - None

6763 Comment Respondent: Lawson Planning Partnership (Miss Kathryn Oelman) [8532] Agent: N/A

Summary: Policy HS2 will need to have regard for the possibility that the Mental Health Trust may not relocate alongside PAH and may therefore remain on site. Furthermore, it should be noted that the constraints listed in paragraph 9 of this letter prevent development in certain areas of the site. Initial estimates undertaken by PAH suggest the site would provide circa 8ha of net developable area once these factors are accounted for.

The site planning exercise concerning disposal of the existing site produced a number of draft layouts (the most relevant of these are included in Appendix 2 to this letter). The study suggests that the site could realise circa 400-450 dwellings at a density of approx. 50dph. PAH wishes to stress that these layouts have not been prepared with a commitment to redeveloping the existing site for housing; thus, their only value is to identify a realistic site capacity from which disposal costs/revenue can be calculated to inform the financial exercise that is being routinely applied to all of the three OBC options.

Change To Plan: In view of the above, PAH requests that the indicative dwelling capacity on the site is reduced to reflect the above constraints to a figure in the region of circa 450 dwellings. Retaining a figure of 650dwellings may result in unrealistic expectations of what can be provided on the site or affect the soundness of this policy when scrutinised by the Inspectorate.

Full Reference: C - 6763 - 8532 - HS2 Housing Allocations - None

6828 Comment Respondent: Epping Forest District Council (Ms Alison Blom-Cooper) [8637] Agent: N/A

Summary: It is noted that the existing Princess Alexandra Hospital (PAH) site has been allocated for housing within Policy HS2 and would make a significant contribution to the delivery of the Local Plan's Housing target. EFDC has sought to support the relocation of the Hospital by way of Policy SP 5 of its Local Plan Submission Version which provides for the potential relocation of PAH within that part of the East of Harlow site within Epping Forest District. However, EFDC has some concerns regarding the deliverability for housing of the existing site within the period of the Local Plan bearing in mind work is still on-going with regard to finalising where or whether PAH would be relocated or indeed refurbished on the current site. It is not clear what the 'fallback' situation would be should the site, or the quantum of development indicated, not be delivered within the period of the Local Plan period.

Change To Plan:

Full Reference: C - 6828 - 8637 - HS2 Housing Allocations - None

6832 Comment Respondent: Sandra Beavis [5035] Agent: N/A

Summary: HS2-5 Land south of Clifton Hatch is one of the locations as a 'Reasonable Alternative'. Whichever Option was considered, building 36 dwellings will substantially increase the levels of traffic and if it is not known if there could be further improvements to transport infrastructure, then this site should not be built on.

Change To Plan:

Full Reference: C - 6832 - 5035 - HS2 Housing Allocations - None

6863 Comment**Respondent: De Merke Estates (Ms Emma Gladwin) [8643]****Agent: Barton Willmore (Miss Emma Gladwin) [8399]**

Summary: The SHLAA itself states that deliverability references the ability of the site to be developed within the next 5-years. To be considered developable, the definition within Footnote 12 of the NPPF was used, as set out above.

A total of 7 No. of the allocations are included in HDC's trajectory as delivering dwellings within the next 5-years. Of these, 4 No. are identified in the SHLAA as not being deliverable. HDC has not published any evidence reconsidering the sites or finding them deliverable, so there is a discrepancy between the LDP and its evidence base with the inclusion of these sites being contrary to Paragraph 47 of the NPPF.

Change To Plan:

Full Reference: C - 6863 - 8643 - HS2 Housing Allocations - None

6390 Object

Respondent: Ms Angela Parish [8550]

Agent: N/A

Summary: I very much object to the proposed housing on the field in front of my house. Firstly, the we will lose the wildlife which is rich in this area. Secondly, the parking around the estate is ridiculous at best especially when we have to put up with the Christian centre encouraging parking on the road up to the Crematorium making it very dangerous for the public to access the Nature Reserve and estate. Thirdly, the building of houses right in front of my house is NOT what I bought my house for. NO CONSULTATION HAS BEEN GIVEN-I'M VERY ANGRY!

Change To Plan: ABOLISH ALL PLANS TO BUILD ON THIS FIELD

Full Reference: O - 6390 - 8550 - HS2 Justification - i

6409 Object

Respondent: Mr Mike Stokes [8551]

Agent: N/A

Summary: This area (HS2-9) is widely used by the local community. we have a lot of children living In the area & building houses on here would remove their recreational area at a time when we are encouraging children to be outdoors & more active. It would also have a negative impact on the local wildlife and the already overcrowded parking. Residents of the Fennells area have in no way been informed of the intention to build additional housing in this land and we have not appropriately advised of our rights to have access to these plans and make comment.

Change To Plan: The plan to build on the site named HS2-9 should be abolished.

Full Reference: O - 6409 - 8551 - HS2 Justification - ii

6421 Object

Respondent: Gillian Atkins [8577]

Agent: N/A

Summary: Object to land between Barn Mead & Five Acres used for housing. Area floods in winter & many cars, several lorries and 2 tow trucks have been stuck in the mud. Risk of flooding being transferred to existing properties. Proposal is against Green Wedge Review 2014. Proposal against Gibbard Principals

Change To Plan: Remove this area from the housing proposal

Full Reference: O - 6421 - 8577 - HS2 Justification - None

6550 Object

Respondent: Miss Aimee Turvill [8607]

Agent: N/A

Summary: object to the above proposed development of 12 new houses on the above plot as we feel very strongly that the infrastructure of the roads and lack of parking as it is cannot accommodate for the additional houses

Change To Plan:

Full Reference: O - 6550 - 8607 - HS2 Justification - None

6551 Object

Respondent: Ms Angela Parish [8550]

Agent: N/A

Summary: never being made aware of any plans or consultation period so this is all rather disappointing to say the least. Also the extra traffic on to the estate would be horrendous. really disappointing that in my area we have the Nature Reserve where the wildlife will really suffer.

Change To Plan:

Full Reference: O - 6551 - 8550 - HS2 Justification - None

6552 Object

Respondent: B.K. & J.T. Drabble [8611]

Agent: N/A

Summary: object to the above proposed development of 12 new houses on the above plot as we feel very strongly that the infrastructure of the roads and lack of parking as it is cannot accommodate for the additional houses.

Change To Plan:

Full Reference: O - 6552 - 8611 - HS2 Justification - None

6479 Object

Respondent: Miller Strategic Land [5769]

Agent: Andrew Martin - Planning (Mr Olivier Spencer) [5533]

Summary: Our client supports the allocation in Policy HS3 for 2,600 dwellings and associated infrastructure at East Harlow (in Harlow District). However, our client objects to the following specific criteria: HS3(a) pending publication and review of the completed Spatial Vision and Design Charter; HS3(b) regarding detailed wording on transport / highway impacts; HS3(c) pending publication of an updated Infrastructure Delivery Plan; HS3(f) regarding revised wording in relation to new neighbourhood centres; HS3(g) again pending publication of an updated Infrastructure Delivery Plan; and, HS3(i) on the basis that public art is not strictly necessary.

Change To Plan: Our client respectfully requests that Policy HS3 is amended as follows:

- Part (a) is subject to a holding objection, pending publication and review of the completed Spatial Vision and Design Charter.
- Part (b) should be reworded to read "provide highway improvements which cost effectively mitigate any significant impacts from development to ensure that there are no severe residual cumulative impacts on the road network;"
- Part (c) should be revised to read "provide necessary infrastructure, including, but not limited to, land and pro rata contributions for new health and education provision, as set out in the latest Infrastructure Delivery Plan (IDP);"
- Part (f) should be revised to read "provide for appropriate local retail, employment and other supporting uses, similar to neighbourhood centres elsewhere in Harlow;"
- Part (i) should be deleted in its entirety.
- The following sentence should be added to the end of the second paragraph: "For the avoidance of doubt, the Master Plan should provide sufficient flexibility to enable development to come forward at East of Harlow, in the event that a decision on the Princess Alexandra Hospital's relocation is delayed or deferred for any significant length of time."

Furthermore, the IDP should be updated prior to Examination in Public (EiP) to include further information on overall infrastructure costs and how those costs will be apportioned across the wider Garden Town.

Full Reference: O - 6479 - 5769 - HS3 Strategic Housing Site East of Harlow - iii, iv

6502 Object

Respondent: Environment Agency (Miss Lisa Mills) [8443]

Agent: N/A

Summary: Buffer zone for the Harlowbury Brook, opportunities for enhancement and reference to WFD.

Change To Plan: We are pleased that this policy gives reference that development must provide sustainable drainage solutions and flood mitigation measures for areas of the site which are identified in the Strategic Flood Risk Assessment. However, this policy should be strengthened to give specific mention the Harlowbury brook that runs through this site. Providing a minimum 8m undeveloped buffer zone river enhancements such as removing or restoration will be strongly encouraged. Opportunities should always be sought to improve waterbodies where possible under the Water Framework Directive (WFD). Actions such as de-culverting, providing minimum eight metre undeveloped buffer zones adjacent to watercourses, removing hard banks and re-naturalising watercourses will all provide benefits and can help to achieve the aims of the WFD.

Full Reference: O - 6502 - 8443 - HS3 Strategic Housing Site East of Harlow - iv

6694 Object **Respondent: Historic England (Ms Debbie Mack) [8623]** **Agent: N/A**

Summary: There are a number of heritage assets adjacent to, or surrounded by or close to the site. These include a number of listed buildings (House 20m NW of Stephen's Cottages, Hatches, Thatched Cottages, Spiers Farm, Pump, Franklins Farmhouse, Hubbards Hall and range of two service buildings and two barns at Sheering Hall all listed at grade 11 as well as Sheering Hall itself to the north of the site which is listed at grade 11 *).

We note that in the Harlow Strategic Sites Assessment AECOM report, the site scores red in terms of the historic environment. Given this sensitivity, as part of the evidence base for the Local Plan, for a site of this size with nearby heritage interest, we would expect a Heritage Impact Assessment prior to allocation to assess the suitability of the site for allocation. Without such evidence in place, the policy is not justified and is not in accordance with the NPPF. This needs to be prepared in advance of the EIP to inform the extent and capacity of the site. Please contact us to discuss the nature and extent of the work required to inform the Local Plan. Please also refer to our advice notes above.

As currently worded the policy includes no protection for the historic environment. Therefore, this does not comply with the NPPF. Whilst the design Charter (criterion) may include reference to the historic environment, at the present time the Harlow and Gilston Garden Town and Design Charter is not available to view. Without sight of this document it is not possible to assess whether there is sufficient protection for the historic environment in the policy. In the absence of this, we must conclude that the Policy is unsound. We would also suggest the addition of a bullet point to provide protection to the historic environment. This might read, "Conserve and where appropriate enhance the historic environment including (list key heritage assets) and their settings through careful design, landscaping heritage buffer zones.

We would also recommend the inclusion of a concept diagram to graphically portray the principles and requirements of the policy. We find this a helpful approach as a picture tells a thousand words.

Change To Plan:

Full Reference: O - 6694 - 8623 - HS3 Strategic Housing Site East of Harlow - None

6673 Comment **Respondent: Hertfordshire County Council (Mr Martin Wells) [8622]** **Agent: N/A**

Summary: Strategic Housing Site East of Harlow. Wording within this policy should be amended to include Hertfordshire County Council (HCC), as it is both a service provider and Highway Authority

Change To Plan:

Full Reference: C - 6673 - 8622 - HS3 Strategic Housing Site East of Harlow - None

6733 Comment **Respondent: Natural England (Ms Sarah Fraser) [8628]** **Agent: N/A**

Summary: We also recommend that there should be a policy commitment to ensuring that masterplanning delivers net gains for biodiversity and the environment.

Change To Plan:

Full Reference: C - 6733 - 8628 - HS3 Strategic Housing Site East of Harlow - None

6829 Comment **Respondent: Epping Forest District Council (Ms Alison Blom-Cooper) [8637]** **Agent: N/A**

Summary: Policy HS3 covers the Strategic Housing Site East of Harlow as providing 2,600 dwellings and associated infrastructure. EFDC is pleased to note that the number of dwellings accords with our understanding of the overall capacity for the East of Harlow site as 3,350 dwellings with 750 dwellings located within Epping Forest District. The policy would benefit from a clear reference to the location of the East of Harlow site as between the administrative boundaries of Epping Forest District and Harlow District, and therefore requiring close joint-working between the two authorities to ensure the coordinated delivery of sustainable development. EFDC would also welcome clarity in the Plan as to how Policy HS3 and Policy HGT1 align, especially with regard to the production of a Strategic Masterplan for the whole East of Harlow site. With regard to infrastructure provision on the East of Harlow site, Paragraph 5.27 of the Plan sets out the key infrastructure required to support housing on the site. EFDC note that it would be useful to include definition on how the need for such infrastructure has been calculated based on both Harlow District and Epping Forest District needs. EFDC look forward to further discussing such matters in partnership with Harlow Council through the Harlow and Gilston Garden Town Infrastructure Delivery Plan.

Change To Plan:

Full Reference: C - 6829 - 8637 - HS3 Strategic Housing Site East of Harlow - None

6853 Comment **Respondent: Redrow Homes (Ms Kate Holland) [8640]** **Agent: Redrow Homes (Ms Kate Holland) [8640]**

Summary: Policies HGT1 and HS3 are amended to remove reference to the need for development solely to reflect the overarching design principles of the Spatial Vision of Design Charter and instead include for flexibility for development to be brought forwards in advance or absence of the documents.

Change To Plan: To allow the Site at Land South of Moor Hall Road to be delivered earlier in the Plan period and before the wider allocation would provide for additional housing within the first 5 years of the Trajectory. This would compensate for issues of deliverability of the smaller sites allocated under Policy HS2. As a consequence, this would assist in making the Plan "Effective", "Consistent with National Policy" and "Positively Prepared" and could therefore be considered "Sound" in accordance with Paragraph 182 of the NPPF.

Full Reference: C - 6853 - 8640 - HS3 Strategic Housing Site East of Harlow - None

6891 Comment **Respondent: Essex County Council (Mr Rich Cooke) [8452]** **Agent: N/A**

Summary: This policy makes no specific reference in policy or supporting text to connections with/delivery of the (East-West) Sustainable Transport Corridor.

ECC work has established that this site must achieve high levels of sustainable mode share or its capacity may be compromised in order to prevent unacceptable impacts on the local road network.

Change To Plan: ECC (Highways) recommends that wording is added to the policy (criterion (b)) to make reference to connections with/delivery of the (East-West) Sustainable Transport Corridor.

Full Reference: C - 6891 - 8452 - HS3 Strategic Housing Site East of Harlow - None

CHAPTER: STRATEGIC GROWTH HS4 Justification
STRATEGY FOR HARLOW

6451 Support **Respondent: Deanery of Harlow (Anglican) (Revd Martin Harris) [8586]** **Agent: N/A**

Summary: I welcome the work to restore pitches for the Travelling Community locally.

Change To Plan:

Full Reference: S - 6451 - 8586 - HS4 Justification - None

CHAPTER: STRATEGIC GROWTH 8. ECONOMIC DEVELOPMENT AND PROSPERITY STRATEGY
STRATEGY FOR HARLOW

6648 Object **Respondent: Harlow Alliance Party (Mr Nicholas Taylor) [8621]** **Agent: N/A**

Summary: Those of us who live in Harlow should know only too well how the present infrastructure and indeed public services are stretched to their limit here. Many of the roads, designed in the 1950's and 1960's, can no longer cope with the amount of traffic on them. Even roads built on estates in the last five years are so clogged up with traffic that they have become unofficial one-way systems. The plans for the odd new road and junction improvements are wholly inadequate for the massive increase in traffic which will be created by this plan, which will see the number of homes in the area increase by some 35%. Added to this are the Local Plans of neighbouring authorities which will see hundreds of new homes in places such as Sawbridgeworth, North Weald, Epping and many others, adding to the problems in Harlow as people from the above areas come into the town for shopping and leisure activities. It should be noted that there are no plans for a new secondary school, which will mean hundreds of children living just outside as well as within Harlow's borders will need to get to schools in Harlow, creating even more congestion.

Change To Plan:

Full Reference: O - 6648 - 8621 - 8. ECONOMIC DEVELOPMENT AND PROSPERITY STRATEGY - None

6734 Object

Respondent: Natural England (Ms Sarah Fraser) [8628]

Agent: N/A

Summary: Natural England considers this policy to be unsound - not consistent with national policy
This policy allocates sites for employment uses. Given that Natural England has outstanding concerns relating to the Habitats Regulations Assessment ('HRA'), particularly in relation to air pollution impacts we cannot therefore, at this time, advise that this policy is sound. Our concerns will be set out in more detail below.

Change To Plan:

Full Reference: O - 6734 - 8628 - ED1 Future Employment Floorspace - None

6787 Object

Respondent: Weston Homes Plc (Mr David Poole) [8590]

Agent: N/A

Summary: Weston Homes Plc object to the proposed extent and protection of the Burnt Mill Employment Area as indicated in the Harlow Local Development Plan Policies Map Pre-Submission Publication (May 2018). As illustrated, this designation washes over land from to the east of Mill Lane, north of Elizabeth Way and bounded by the railway line to the north, extending eastwards towards the roundabout with Fifth Avenue and Edinburgh Way and continuing eastwards, north of Edinburgh Way to include Pearson House and its associated car park. In total the designated land extends to just over approximately 11ha. The area is not identified as suitable to accommodate Future Employment Floor space pursuant to Policy ED1.

The designation fails to take into account the now built out Harlow Gateway Development around the Harlow Town Station (Mill Court) which introduced mixed-use residential, hotel and restaurant floorspace on the site of the former Longman Publishers office HQ building. The designation neither takes into account recent development on the corner of Fifth Avenue/ Elizabeth Way (Ref.No HW/FUL/17/00563) nor the cessation of employment activity at Pearson House and which is subject to change of use from office to residential pursuant to Permitted Development rights (HW/COUOR/17/00295) for 258 dwellings.

The evidence base supporting the continued and unaltered employment land designation fails to adequately consider the up-to-date health, vitality and the current use and activity on the site and, for example, the vacancy rates of offices or the success of other B-Class uses in the vicinity but in particular, to the west of Fifth Avenue.

Change To Plan: As such the proposed extent of the employment allocation should be reviewed and rationalised to exclude land in the vicinity of the station, in particular the former Pearson House car park.

Full Reference: O - 6787 - 8590 - ED1 Future Employment Floorspace - None

6825 Support

Respondent: Epping Forest District Council (Ms Alison Blom-Cooper) [8637]

Agent: N/A

Summary: The Pre-Submission Plan provides for 18-20 hectares of additional employment floorspace as recommended in the HMA Assessment of Employment Needs (2017) evidence base document. This provision is supported by EFDC. EFDC is pleased to note the inclusion of developing a visitor economy as set out in Policy ED4 and expresses support for this not only at the District scale but also recognising the strategic opportunity for the visitor economy, such as through the London Stanstead Cambridge Corridor Core Area. HDC may want to further stress the strategic scale visitor economy in Policy ED4.

Change To Plan:

Full Reference: S - 6825 - 8637 - ED1 Future Employment Floorspace - None

6782 Comment**Respondent: Weston Homes Plc (Mr David Poole) [8590]****Agent: N/A**

Summary: The NPPF clearly states that Councils should avoid the long term protection of sites if there is no reasonable prospect of the site coming forward for employment purposes. The Harlow Employment Land Review (2013) suggests that demand for employment land is set to fall between 2011-31. However, contrary to this the West Essex and East Hertfordshire Assessment of Employment Needs has suggested that demand is going to increase between 2016-33. Although these documents reach different conclusions there is general agreement that B class uses should only be located in suitable areas. There is no evidence or understanding that the site remains suitable any longer for B class employment uses and in any case cannot viably deliver such uses either currently or in the foreseeable future.

More specifically we assert the following conclusions in relation to the land adjacent to Pearson House, in particular as part of the Burnt Mill allocated employment site which should be reviewed and redefined as:

Retaining a site for B class uses does not mean developers or occupiers will be attracted to the site in this location or the site will come forward for such uses. Indeed, for the reasons given there is no reasonable prospect of the site being used for 'B' purposes in the future.

The application site is situated to the north of the town centre, where it has been recognised the vacancy rates remain the highest along with the west of the town centre.

Office rents in Harlow are too low to justify office development and given increasing supply levels in preferred locations (such as London) rents in Harlow will be 'capped' for the foreseeable future.

The Harlow Employment Land Review recognises that it is predicted that there will be a fall in demand for industrial space during the plan period and Harlow is not a recognised office location. Therefore the site should be released as there will still be sufficient B class space available in the market area.

The application site is not of high quality, particularly given the granting of consent for Pearson House to be converted to residential use. This will cause a number of issues for B class users including noise and hours of use restrictions.

It is demonstrated that there is a sufficient supply of both vacant B class units and vacant employment land. Additionally, many of these sites are superior to the subject site and as a result, are more likely to come forward should there be an increase in demand for B class development. We have demonstrated through the marketing of other units that there is a demonstrable lack of demand for office units..

The application site is not suitable for large scale B8 use given the adjacent residential occupiers.

Through our viability assessment we have demonstrated that it is not viable to develop the site for B class uses. The negative figures are so apparent that this position (of a lack of viability) will remain indefinitely. As a result if the site is retained for such uses this will be contrary to national planning policy as set out within the NPPF.

Change To Plan: we have demonstrated that there is no reasonable prospect of the site being developed for employment purposes. Paragraph 22 of the NPPF states that "planning policies should avoid the long term protection of sites allocated for employment uses where there is no reasonable prospect of the site being used for that purpose". The application site should therefore be released for the proposed scheme otherwise it will remain vacant and unused. Alongside the designation of the potential extent of employment land in the locality of Burnt Mill the wording of other policies including ED2 and PR1 should also be reviewed, latterly to ensure that any policy remains compatible with the NPPF with regard to release for other uses, not only employment generating purposes.

Full Reference: C - 6782 - 8590 - ED1 Future Employment Floorspace - None

6790 Comment**Respondent: Hallam Land Management & Commercial Estates Group (Mike Newton) [7646]****Agent: N/A**

Summary: The potential to provide strategic employment land at the Garden Town Communities and at Latton Priory in particular which is close to junction 7 of the M11, warrants further examination to maximise the sustainability benefits of the development and make a major contribution to the delivery of new jobs in an accessible and marketable employment location. The employment land opportunities at Latton Priory should be reconsidered by both Harlow and Epping Forest in particular, given that Harlow has not specified in the pre-submission local plan how it intends on meeting its significant B2/B8 employment need over the plan period. The pre-submission plan also does not specify how the unallocated employment need across the FEMA (as identified in the Employment Needs Assessment 2017) is going to be accommodated

We consider Latton Priory to be the least constrained of the strategic site allocations, the site that is most capable of early delivery and that it has potential to accommodate housing additional to the current allocation.

Change To Plan:

Full Reference: C - 6790 - 7646 - ED1 Future Employment Floorspace - None

CHAPTER: STRATEGIC GROWTH ED2 Protecting Existing Employment Floorspace
STRATEGY FOR HARLOW

6892 Comment **Respondent: Essex County Council (Mr Rich Cooke) [8452]** **Agent: N/A**

Summary: ECC is supportive of Harlow DC's aspirations of protecting Neighbourhood Service Areas and encouraging the provision of smaller start-up units, shared spaces and workhubs in these areas. (Policy ED2). However, it is considered necessary to also ensure that any resulting B1 class uses that are developed in these locations are adequately served by suitable broadband infrastructure (with consideration given to a minimum speed requirement)

Change To Plan: ECC (Economic Growth) recommends adding text to Policy ED2 to ensure that as a minimum, adequate broadband provision is ensured to meet modern business needs
ECC will work collaboratively with HC to discuss and agree appropriate detailed wording.

Full Reference: C - 6892 - 8452 - ED2 Protecting Existing Employment Floorspace - None

CHAPTER: STRATEGIC GROWTH ED3 Developing a Skills Strategy for Harlow
STRATEGY FOR HARLOW

6725 Comment **Respondent: Mrs Karen Garrod [8596]** **Agent: N/A**

Summary: Harlow is lacking in quality employment opportunities which will affect sustainability.

Change To Plan:

Full Reference: C - 6725 - 8596 - ED3 Developing a Skills Strategy for Harlow - None

CHAPTER: STRATEGIC GROWTH ED4 Developing a Visitor Economy
STRATEGY FOR HARLOW

6570 Support **Respondent: Canal & River Trust (Ms Tessa Craig) [8612]** **Agent: N/A**

Summary: The Trust welcomes the recognition given to the importance of the River Stort to the visitor economy of Harlow and to the need for improvements to Green Infrastructure links to connect the river with other attractions. People come from near and far to visit our waterways. They can have a beneficial impact on the local economy by providing sustainable active travel routes and attractive settings for waterside and on-water
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Patron: H.R.H. The Prince of Wales. Canal & River Trust, a charitable company limited by guarantee registered in England and Wales with company number 7807276 and registered charity number 1146792, registered office address First Floor North, Station House, 500 Elder Gate, Milton Keynes MK9 1BB canalrivertrust.org.uk
businesses. By encouraging these uses in appropriate locations, development plans can help the waterway attract more people and support the local economy.

Change To Plan:

Full Reference: S - 6570 - 8612 - ED4 Developing a Visitor Economy - None

CHAPTER: STRATEGIC GROWTH ED4 Implementation
STRATEGY FOR HARLOW

6462 Support Respondent: **The Theatres Trust (Tom Clarke) [216]** Agent: **N/A**

Summary: The Trust supports the protection of existing cultural, community and sporting facilities which bring people into the town, as we would consider this to include the town's theatres.

Change To Plan:

Full Reference: S - 6462 - 216 - ED4 Implementation - None

6420 Comment Respondent: **Essex Bridleways Association (Mrs Sue Dobson) [7887]** Agent: **N/A**

Summary: Page 69 para 8.28: we note the aspiration to improve Green Infrastructure links and connectivity, especially with Lea Valley and Hatfield Forest. We would like to see this aspiration extended to include access for ALL user groups, including equestrians, where possible - especially as Hatfield Forest is already open to equestrian use and further connectivity will enhance the network open to those users.

Change To Plan:

Full Reference: C - 6420 - 7887 - ED4 Implementation - None

6433 Comment Respondent: **Mr David Naylor [8579]** Agent: **N/A**

Summary: The visitor economy in Harlow would benefit for a comprehensive mapping of footpaths and pedestrian routes within Harlow and to recreation and green assests. The sculpture trail provides an example of how such a mapping could raise the profile of harlow as a town friendly to walkers

Change To Plan:

Full Reference: C - 6433 - 8579 - ED4 Implementation - None

CHAPTER: STRATEGIC GROWTH 10. LINKING DEVELOPMENT SITES TO THE WIDER ENVIRONMENT
STRATEGY FOR HARLOW

6456 Comment Respondent: **STOP Harlow North [8588]** Agent: **Mr Jed Griffiths [8576]**

Summary: This chapter of the Local Plan claims to have embodied a network of Green Wedges and Green Fingers, respecting the principles of Sir Frederick Gibberd's Master Plan. As far as the internal structure of the town may be concerned, these principles seem to hold. Beyond the boundaries, however, there is a direct conflict with the Master Plan. An essential part of the design was the linking of the network of green spaces with "the Hertfordshire Hills beyond". This principle has been breached with the proposal to develop the area to the north of Harlow with housing.

Change To Plan:

Full Reference: C - 6456 - 8588 - 10. LINKING DEVELOPMENT SITES TO THE WIDER ENVIRONMENT - None

6398 Object **Respondent: Miss Erin Rose BALDRY [8560]** **Agent: N/A**

Summary: The proposal to include the Fennells field appears to take away a beautiful green space within the town. This field is part of my childhood and is used by lots of people including dog walkers and the church. I also do not want to be scared walking to school because of lots of additional cars using the roads near me. It is already dangerous crossing the roads now.

Change To Plan: Please remove the fennells field from your plans.

Full Reference: O - 6398 - 8560 - WE1 Strategic Green Infrastructure - i, ii, iii, iv

6571 Support **Respondent: Canal & River Trust (Ms Tessa Craig) [8612]** **Agent: N/A**

Summary: The Trust generally supports the protection and enhancement of green infrastructure in Harlow. Towpaths make excellent places for people to walk and cycle considerably. Not only is this great for recreation, it can be an attractive way for people to commute, reducing congestion, carbon emissions and poor air quality in the wider area and supporting people to lead healthier lives.

The Trust is supportive of connecting key locations with other infrastructure and recognises individual waterways and water spaces need to be viewed as an integral part of a wider network, and not in isolation. New development often brings new people onto the waterways, particularly the towpaths. Improvements to signage and wayfinding is therefore also seen as a positive enhancement to help with connectivity of networks.

The policy describes a new linear 'Stort Riverpark'. As the owner and navigation authority of the river, the Trust would expect to be engaged in this proposal from an early stage and should be identified as a partner at point 10.15. The Trust is already working with other local authorities and partners to improve the River Stort environment elsewhere and is able to provide a strategic link between the Harlow area and surrounding areas.

Change To Plan:

Full Reference: S - 6571 - 8612 - WE1 Strategic Green Infrastructure - None

6735 Comment **Respondent: Natural England (Ms Sarah Fraser) [8628]** **Agent: N/A**

Summary: Natural England is encouraged to see the plan taking a positive, strategic approach to Green Infrastructure. We commend the commitment to protection and enhancement of green fingers and wedges and to the delivery of a new linear 'Stort Riverpark.'

Change To Plan:

Full Reference: C - 6735 - 8628 - WE1 Strategic Green Infrastructure - None

6755 Comment **Respondent: Quod Planning (Mr Philip Murphy) [7958]** **Agent: N/A**

Summary: Policy WE1 states "...Green Fingers which are identified on the Policies Map... will be protected and enhanced". It is suggested that this policy acknowledges that this does not apply in areas with Strategic Infrastructure Requirements, identified within policies SIR1-3.

Policy WE1 also references that "The new linear 'Stort Riverpark' connecting the Lee Valley Regional Park to Bishop's Stortford through Harlow, will be delivered by contributions from new development." PfP consider it sensible to include this on the Plan's associated Proposals Map in order to define this strategic green infrastructure.

Change To Plan: This infrastructure is not 'justified' based upon proportionate evidence, nor needed to deliver the draft Plan, and therefore references to the same should be removed.

Full Reference: C - 6755 - 7958 - WE1 Strategic Green Infrastructure - None

6783 Comment**Respondent: Weston Homes Plc (Mr David Poole) [8590]****Agent: N/A**

Summary: In respect of protecting Green Belt land, the NPPF states at paragraph 83 that "once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan."

The Council's current approach fails to identify how it is demonstrated that very special circumstances are determined. At this stage, the evidence base for the Council has not established or set out any selective criteria to set out how, it will provide a site by site justification for any Green Belt release by way of "very special circumstances" to support the Pre-Submission District Local Plan. This approach is not currently considered sound, and it should undertake a further full review of the Green Belt functions in light of other sites put forward or now know to be available within the town and which might also deliver other regeneration benefits, making better use of previously developed land within the settlement boundary as a priority.

Change To Plan:

Full Reference: C - 6783 - 8590 - WE1 Strategic Green Infrastructure - None

CHAPTER: STRATEGIC GROWTH WE1 Implementation
STRATEGY FOR HARLOW

6494 Comment**Respondent: Environment Agency (Miss Lisa Mills) [8443]****Agent: N/A**

Summary: We welcome the inclusion of the "new linear 'Stort Riverpark'" in this policy. However, we would like to highlight that the Water Framework Directive has set out a number of actions and measures which, if implemented, will improve the Ecological Status/Potential of these environments. It is recommended that these be used as an identified tool to help shape the opportunities for development of the Stort Riverpark.

Change To Plan:

Full Reference: C - 6494 - 8443 - WE1 Implementation - None

6392 Object **Respondent: Mrs Samantha Baldry [8554]**

Agent: N/A

Summary: The proposed allocation of the Fennells field for residential housing is in complete contradiction of the proposal to protect green wedges and fingers. This green space has been extensively used for recreation by members of the Fennells estate and surrounding areas for well over 20 years. It has been used for dog walking, football, kite flying, family games of rounders, picnics, snow man building and general exercise and enjoyment. It is an essential part of this community used by all ages and provides a safe place for children to be active and play. Do not remove!

Change To Plan: Remove the Fennells Field as a proposed site for residential housing.

Full Reference: O - 6392 - 8554 - WE2 Green Wedges and Green Fingers - i, ii, iii, iv

6399 Object **Respondent: Mr Ethan Baldry [8559]**

Agent: N/A

Summary: The Fennells Field as shown in HS2 needs be removed from this document as it proposes to take away an integral green wedge within the town. This document talks about protecting Harlow's green spaces yet you intend to remove them. I consider this the **** of the natural environment.

Change To Plan: This site needs to be removed from the local plan and the green space be protected. Harlow has proposed significant housing growth and i question why this site needs to be included considering the impact is minimal. I beg that you consider protecting the green wedge that has been an integral part of my childhood.

Full Reference: O - 6399 - 8559 - WE2 Green Wedges and Green Fingers - i, ii, iii, iv

6401 Object **Respondent: Miss Erin Rose BALDRY [8560]**

Agent: N/A

Summary: The proposed allocation of the Fennells field is not acceptable and does not protect the wonderful bio-diversity I have near my home. I have seen so many animals here and the thought that this will be taken away is horrible. As we are near the nature reserve the proposed allocation does not take into account that nature will be impacted. Houses on this land will ruin a wonderful environment and must not be allowed to happen.

Change To Plan: This site needs to be removed from the local plan and the green space be protected. Harlow has proposed significant housing growth and i question why this site needs to be included considering the impact is minimal. I beg that you consider protecting the green wedge that has been an integral part of my childhood.

Full Reference: O - 6401 - 8560 - WE2 Green Wedges and Green Fingers - i, ii, iii, iv

6649 Object **Respondent: Harlow Alliance Party (Mr Nicholas Taylor) [8621]**

Agent: N/A

Summary: The Plan involves building on green belt land and land that was left as open spaces by the town's designer Sir Frederick Gibberd. In respect to the former, land is being taken out of Green Belt status for reasons which cannot be justified. In respect of the latter, seven play areas and or large open green spaces are being designated for future housing use. The loss of many of these areas (site numbers 3, 5, 9, 10, 11, 15 and 20) will mean the end of safe play or recreational activities on sites which have been enjoyed by residents for decades. In recent times Harlow Council have deliberately left many of them off their maintenance schedules making it difficult for residents to use these areas, in the hope that less objections to the proposals would be made. The proposal for a busway cutting through the very large open space from The Leisurezone to Fernhill Lane is completely at odds with Harlow's Masterplan, changing the whole area forever. It would need new junctions crossing Commonsidge Road and Southern Way, adding yet more congestion on these roads whilst at the same time taking away other recreational space in its path. At the heart of this matter is how Harlow Council has identified the list of 21 sites for future housing development from the list of many dozens of parcels of land it listed in an earlier document. The Harlow Alliance Party believe that areas other than those used for play and recreation (site numbers above) should be reclassified for future housing use.

Change To Plan:

Full Reference: O - 6649 - 8621 - WE2 Green Wedges and Green Fingers - None

6736 Support **Respondent: Natural England (Ms Sarah Fraser) [8628]** **Agent: N/A**

Summary: Natural England generally supports this policy.

Change To Plan:

Full Reference: S - 6736 - 8628 - WE2 Green Wedges and Green Fingers - None

6756 Support **Respondent: Quod Planning (Mr Philip Murphy) [7958]** **Agent: N/A**

Summary: In support of Policy WE2, it would be appropriate for the policy's supporting text, to include further detail on the future Green Wedge within the Stort Valley.

Change To Plan:

Full Reference: S - 6756 - 7958 - WE2 Green Wedges and Green Fingers - None

6793 Support **Respondent: Hallam Land Management & Commercial Estates Group (Mike Newton) [7646]** **Agent: N/A**

Summary: We support the provision designation of the Green Wedges, and will work with the Council and the other authorities involved to deliver Strategic Green Infrastructure which will connect with the Green Wedge adjoining the Latton Priory site.

Change To Plan:

Full Reference: S - 6793 - 7646 - WE2 Green Wedges and Green Fingers - None

6627 Comment **Respondent: GLADMAN (Mr Phill Bamford) [8618]** **Agent: N/A**

Summary: Whilst it is appreciated that these designations have played a role in defining the form of Harlow as a settlement, the Council must ensure that they do not act as a constraint to development which prevents the district from meeting its overall housing requirement.

Change To Plan:

Full Reference: C - 6627 - 8618 - WE2 Green Wedges and Green Fingers - None

6717 Comment **Respondent: Jean Wright [5878]** **Agent: N/A**

Summary: To add insult to injury the main footpath across the site has been closed which was a great recreational source for people in Old Harlow. We have some open spaces here but in the main use of these is restricted to sport use. We will be very lacking now in green space. When the footpath reopens we will not be able to enjoy our once green area.

Change To Plan:

Full Reference: C - 6717 - 5878 - WE2 Green Wedges and Green Fingers - None

6830 Comment**Respondent: Epping Forest District Council (Ms Alison Blom-Cooper) [8637]****Agent: N/A**

Summary: Policy WE2 on the Role of Green Wedges and Fingers provides a strong commitment to the provision of high quality open spaces in Harlow. EFDC note that for the purposes of clarity it would be useful to align this policy's approach with the aspirations to introduce new varied uses to these as part of the Sustainable Transport Corridors associated with the Garden Town Communities. Policy PL4 permits small-scale development on Green Wedges and Fingers while ensuring that the roles and functions of the Green Wedges and Fingers and wider landscape setting are preserved. It would therefore be beneficial for the Plan to provide further clarification on how these policy requirements align, particularly in the context of Sustainable Transport Corridors.

Change To Plan:

Full Reference: C - 6830 - 8637 - WE2 Green Wedges and Green Fingers - None

CHAPTER: STRATEGIC GROWTH WE2 Implementation
STRATEGY FOR HARLOW**6434 Comment****Respondent: Mr David Naylor [8579]****Agent: N/A**

Summary: Currently the footpaths and pedestrian access route to and through green wedges and fingers are signposted inconsistently for example the walkway from the junction of Elizabeth Way and Parndon Mill Lane to the town centre has no signposts. Access to the green wedge in the north east of Harlow (including the Golf Club) is difficult. The footpaths are not signposted and so the benefit for local residents is limited. These footpaths are PRow and Harlow DC must be more assertive when dealing with Essex CC Highways to ensure that the county does not compromise the aspirations for walking in Harlow.

Change To Plan:

Full Reference: C - 6434 - 8579 - WE2 Implementation - None

6436 Comment**Respondent: Mr David Naylor [8579]****Agent: N/A**

Summary: I do not think the monitoring section of the LDP is clear on how to review and judge the quality of footpaths and pedestrian ways in Harlow. There appears to be no specific criteria for judging such things as amenity value, access value, nor is the guidance on judging possible diversions of footpaths clear. The aspiration expressed in the LDP for footpaths is to be applauded but the implementation would be helped by creating an overseeing group of interested parties perhaps as a subcommittee of the SIT environmental group.

Change To Plan:

Full Reference: C - 6436 - 8579 - WE2 Implementation - None

6395 Object

Respondent: Mrs Samantha Baldry [8554]

Agent: N/A

Summary: The Fennells Field needs to be removed as a proposed allocated site for residential development as the biodiversity of the area is threatened by this proposal. We have many visiting birds, snakes, newts, deer, frogs, toads, voles, bees and a variety of beautiful wild flowers and the nesting hedgerows that are under threat from this proposal.

Change To Plan: Site needs to be removed from the local plan proposals

Full Reference: O - 6395 - 8554 - WE3 Biodiversity and Geodiversity - i, ii, iii, iv

6400 Object

Respondent: Mr Ethan Baldry [8559]

Agent: N/A

Summary: The proposed allocation of the Fennells field is not acceptable and does not protect the wonderful bio-diversity I have near my home. I have seen so many species including newts, badgers, deer, toads, birds of prey, hare, rabbits and voles in my time and the thought that this will be taken away is simply unacceptable. As we are located near to a SSSI site the proposal clearly does not take into account that nature will ultimately find a way to spread. Houses on this land will detrimentally affect such a wonderful environment and must not be allowed to happen.

Change To Plan:

This site needs to be removed and kept to support the natural and bio-diverse environment. In addition the potential pollution from cars entering this environment will have an irreversible impact on the wider environment which I don't believe has been considered.

Full Reference: O - 6400 - 8559 - WE3 Biodiversity and Geodiversity - i, ii, iii, iv

6402 Object

Respondent: Miss Erin Rose BALDRY [8560]

Agent: N/A

Summary: The proposed allocation of the Fennells field is does not protect the wonderful bio-diversity I have near my home. Houses on the field will ruin affect such a wonderful environment and must not be allowed to happen. I am also worried that the increase in traffic will cause damage that will not be reversible as pollution from increased traffic will harm the natural environment

Change To Plan:

This site needs to be removed and kept to support the natural and bio-diverse environment.

Full Reference: O - 6402 - 8560 - WE3 Biodiversity and Geodiversity - i, ii, iii, iv

6737 Object

Respondent: Natural England (Ms Sarah Fraser) [8628]

Agent: N/A

Summary: Natural England considers this policy to be unsound - not consistent with national policy (paragraphs 113, 17 and 118 of the NPPF)
This policy does not reflect the hierarchy of the different levels of protection afforded to international protected sites, national protected sites and local sites as required by paragraph 113 of the NPPF. Paragraph 113 of the NPPF requires that 'distinctions should be made between the hierarchy of international, national and locally designated sites, so that protection is commensurate with their status. Currently no distinctions are made.
In addition the policy doesn't reflect the Avoid, Mitigate Hierarchy as required by paragraph 118 of the NPPF. The policy also doesn't include any reference to the need to "promote the preservation, restoration and re-creation of priority habitats ,ecological networks and the protection and recovery of priority species populations, linked to national and local targets, and identify suitable indicators for monitoring biodiversity in the plan".
Natural England considers this policy therefore requires significant rewording and strengthening to address these issues. It also requires reference to international sites (specifically Epping Forest SAC), priority habitats and priority species. With regards to Epping Forest policy wording should be influence by the updated HRA. Depending on the conclusions of the updated HRA this policy may also need to be strengthened to ensure there is a policy commitment to the delivery of any required Mitigation Strategy and that this is in place by the time the local plan is adopted. This will ensure the local plan and its proposals are compliant with the Habitats Regulations
We would also recommend that there is a policy commitment to ensuring that biodiversity net gain is delivered as required by paragraph 109 of the NPPF.

Change To Plan:

Full Reference: O - 6737 - 8628 - WE3 Biodiversity and Geodiversity - None

6628 Comment**Respondent: GLADMAN (Mr Phill Bamford) [8618]****Agent: N/A**

Summary: Gladman object to Policy WE3 as it acts as a complete embargo on any development which has an impact on biodiversity and geodiversity assets. This Policy is therefore contrary to the Framework as biodiversity and geodiversity issues are considerations which should be should be taken into account by the decision maker in the planning balance.

Change To Plan:

Full Reference: C - 6628 - 8618 - WE3 Biodiversity and Geodiversity - None

6757 Comment**Respondent: Quod Planning (Mr Philip Murphy) [7958]****Agent: N/A**

Summary: It would appear that there is a contradiction between Policy WE3 and Policy PL8. WE3 Biodiversity and Geodiversity requires all biodiversity and geodiversity assets in the district to be preserved and enhanced in contrast to PL8 Biodiversity and Geodiversity Assets which allows for the impacts on the assets providing negative effects are mitigated. Clarification on this contradiction is required.

Clarification is also sought on what is meant by Biodiversity and Geodiversity Assets. Policy WE3 explains that the most important assets have designations, however does not provide any detail on how other biodiversity assets are to be defined.

Change To Plan:

Full Reference: C - 6757 - 7958 - WE3 Biodiversity and Geodiversity - None

- 6393 Object** **Respondent: Mrs Samantha Baldry [8554]** **Agent: N/A**
Summary: The proposal for the residential allocation of housing on the Fennells field goes against Harlow's Heritage and Sir Frederick Gibberds design principals! His vision was for communities within hatches that was made up of housing, shops and green space. With the proposed removal of this green space it appears that it completely ignores this principle, goes against Harlow's history and is simply a land grab for development.
Change To Plan: The Fennells Field site allocation needs to be removed.
Full Reference: O - 6393 - 8554 - WE4 Heritage - i, ii, iii, iv
- 6695 Object** **Respondent: Historic England (Ms Debbie Mack) [8623]** **Agent: N/A**
Summary: Change preserved to conserve to better reflect the NPPF ..
Refer to Registered Parks and Gardens (rather than just historic parks and gardens)
There are other non-designated heritage assets apart from Locally Listed buildings. These should be included.
Change To Plan:
Full Reference: O - 6695 - 8623 - WE4 Heritage - None
- 6629 Comment** **Respondent: GLADMAN (Mr Phill Bamford) [8618]** **Agent: N/A**
Summary: Paragraphs 132 to 134 of the Framework relate specifically to designated heritage assets and highlight that the more important the asset, the greater the weight that should be attached to it. The policies in the Local Plan therefore need to make such a distinction so as to ensure they are consistent with the Framework. The Framework states that if the harm to a heritage asset is deemed to be substantial then the proposal needs to achieve substantial public benefits to outweigh that harm. If the harm is less than substantial, then the harm should be weighed against the public benefits of the proposal including securing its optimum viable use. The policies in the Local Plan should therefore make a distinction between the two tests included in the Framework for designated heritage assets to ensure they are sound. Paragraph 135 of the Framework relates specifically to non-designated heritage assets and the policy test that should be applied in these cases is that a balanced judgment should be reached having regard to the scale of any harm and the significance of the heritage asset. Once again, policies in the Local Plan need to reflect this guidance.
Change To Plan: Consequently, Policies WE4 and PL11 should be redrafted to better follow the guidance set out in the Framework as set out above.
Full Reference: C - 6629 - 8618 - WE4 Heritage - None
- 6663 Comment** **Respondent: Hertfordshire County Council (Mr Martin Wells) [8622]** **Agent: N/A**
Summary: It is considered that the text within Policy WE4: Heritage should be clarified to reflect the fact that archaeological remains are also non-designated heritage assets. In addition, development proposals may have an impact on archaeological remains (heritage assets), and therefore these cannot always be preserved or enhanced. It is suggested that the text should be amended to read:
"Heritage assets and their settings found within the district will be preserved or enhanced, or will otherwise be subject to adequate archaeological investigation and recording."
Change To Plan: It is suggested that the text should be amended to read:
"Heritage assets and their settings found within the district will be preserved or enhanced, or will otherwise be subject to adequate archaeological investigation and recording."
Full Reference: C - 6663 - 8622 - WE4 Heritage - None

6394 Object

Respondent: Mrs Samantha Baldry [8554]

Agent: N/A

Summary: The Fennells Field needs to be removed as a proposed allocated site for Housing. The field is next door to the conservation area of Parndon Wood and should not be taken away from the community. The wildlife that visit this natural habitat appears to be under threat from yet more inappropriate housing development in Harlow.

Change To Plan: Proposed Fennells field housing allocation site to be removed.

Full Reference: O - 6394 - 8554 - WE4 Implementation - i, ii, iii, iv

6435 Comment

Respondent: Mr David Naylor [8579]

Agent: N/A

Summary: The access to heritage sites in Harlow by using footpaths is inconsistent, a extension to the sculpture trail map to include all heritage sites would benefit local residents and visitors

Change To Plan:

Full Reference: C - 6435 - 8579 - WE4 Implementation - None

6445 Object

Respondent: STOP Harlow North [8588]

Agent: Mr Jed Griffiths [8576]

Summary: Many of the strategic infrastructure requirements are not deliverable. In particular, there is doubt over the Second River Stort Crossing, and the connection in East Hertfordshire District. There are long term concerns over drainage capacity at Rye Meads WWTP, exacerbated by its proximity to wildlife sites of European importance.

Change To Plan: Delete SIR1-3 from policy SIR1 and item 4 of policy SIR2.
Augment paragraphs 11.29 and 11.30 with reference to long term issues at Rye Meads WWTP.

Full Reference: O - 6445 - 8588 - 11. STRATEGIC INFRASTRUCTURE REQUIREMENTS - iii

6493 Comment

Respondent: Harlow Civic Society (Mr John Curry) [5318]

Agent: N/A

Summary: The Policies Map and Para 11.9(e) shows an STC that goes from N - S through the centre of the town. South of this, the indicative route passes through the N- S Green Wedge from the town centre to the southern boundary. At present the routes along this Green Wedge are reserved for walking, cycling and equestrian traffic. We are therefore extremely concerned that the indicative STC might in fact be a vehicular highway. If our concerns are correct then this policy is wrong. The N - S Green Wedge would never be suitable for a road of any description.

Change To Plan:

Full Reference: C - 6493 - 5318 - 11. STRATEGIC INFRASTRUCTURE REQUIREMENTS - None

6658 Comment

Respondent: Hertfordshire County Council (Mr Martin Wells) [8622]

Agent: N/A

Summary: HCC as Highway Authority has concern that the wording regarding the widening of the Central Stort Crossing (as referred to in paragraph 11.9(c)) does not contain relevant measures to ensure adequate sustainable travel priority at this access point. The concern is raised due to the impact this may have on delivering a successful sustainable transport corridor between Gilston and Harlow.
Prior to the inception of a full north/south sustainable transport corridor, this concern was also raised by HCC during the emerging strategy consultation (2014) in relation to access to Harlow Town Station.
"In terms of access to Harlow Town Station, and indeed to Harlow town centre, transport links from the north are hampered by the station's proximity to the A414 and the lack of routes over the River Stort. Even if a second Stort crossing was provided, both routes would be heavily trafficked. Bus services from the north are therefore likely to be constrained by slow journey times and unreliability unless some sort of segregated busway can be created. High quality attractive public transport measures would therefore be required between any development allocations on the north and east side of Harlow, including the East Herts proposal for 5,000 to 10,000 homes in the Gilston area. This might include dedicated bus lanes or trams, and is likely to involve significant rail station enhancements potentially including a new point of access on the northern side and the provision of new bus routes. If sustainable transport connections are not of sufficient quality, the impact on the road network would be greater."
The Highway Authority has no objection to sustainable transport measures proposed that support Gilston and are committed to supporting a 60% sustainable mode share for the development.
HCC feel that if suitable policy is not in place for the provision of the sustainable transport corridor, it could impact on the deliverability of the North/South sustainable transport corridor, which is considered an 'essential priority' within the (Infrastructure Delivery Plan) IDP and by HCC to achieving the required uptake of sustainable travel. With regards to the A414, HCC are currently undertaking a detailed study of movement on the A414 including the impact of Harlow/Gilston, and intend to develop an A414 strategy, the current infrastructure provision for sustainable transport is included within that study.

Change To Plan:

Full Reference: C - 6658 - 8622 - 11. STRATEGIC INFRASTRUCTURE REQUIREMENTS - None

- 6480 Object** **Respondent: Miller Strategic Land [5769]** **Agent: Andrew Martin - Planning (Mr Olivier Spencer) [5533]**
Summary: In order for Policy SIR1 to be based on proportionate and robust evidence - i.e. to be "justified" - there is a need to revise the IDP prior to the EIP to address several shortcomings.
Change To Plan: The IDP should be updated prior to EIP to include further information on: (i) overall infrastructure costs; (ii) how those costs will be apportioned across the wider Garden Town; and, (iii) why specific developments are being expected to contribute towards those specific infrastructure costs.
Full Reference: O - 6480 - 5769 - SIR1 Infrastructure Requirements - ii
- 6601 Support** **Respondent: East Herts District Council (Mr George Pavey) [8616]** **Agent: N/A**
Summary: East Herts welcomes Policy SIR1 Infrastructure Requirements which identifies land that will have future infrastructure uses and includes the Second River Stort Crossing.
Change To Plan:
Full Reference: S - 6601 - 8616 - SIR1 Infrastructure Requirements - None
- 6776 Support** **Respondent: Thames Water (Savills) (Mr Chris Colloff) [8433]** **Agent: N/A**
Summary: Thames Water support Policy SIR1 which relates to infrastructure requirements and Policy IN6 which refers to the use of planning conditions to secure requirements. However, it is considered that the policy and supporting text should be amended to make it effective in relation to the delivery of wastewater infrastructure which could require the use of phasing conditions to ensure that any necessary wastewater infrastructure is delivered ahead of development being occupied. Since the 1st April 2018 all off site wastewater network reinforcement works necessary as a result of new development will be delivered by the relevant statutory undertaker. Local reinforcement works will be funded by the Infrastructure Charge which is a fixed charge for each new property connected. Wastewater treatment works infrastructure upgrades will be funded through water companies' investment programmes which are based on a 5 year cycle known as the Asset Management Plan process. Thames Water will work with developers and local authorities to ensure that any necessary infrastructure reinforcement is delivered ahead of occupation. In some circumstances Thames Water may seek the inclusion of phasing conditions in order to avoid adverse amenity impacts for existing or future users such as internal and external sewer flooding, pollution of land and water courses and / or issues with water supply in the form of no or low water pressure. To minimise the likelihood of requiring such conditions developers are advised to contact Thames Water as early as possible to discuss their development proposals and intended delivery programme.
Change To Plan: In order to ensure that the policy is effective in relation to the co-ordination of wastewater infrastructure requirements and new development it is considered that the following or similar text should be added to Policy SIR1:
Where appropriate planning permission for developments which result in the need for off-site upgrades will be subject to conditions to ensure the occupation does not outpace the delivery of necessary infrastructure upgrades.

In addition it is considered that the following supporting text should be added for Policy SIR1 The Local Planning Authority will seek to ensure that there is adequate wastewater infrastructure to serve all new developments. Developers are encouraged to contact Thames Water as early as possible to discuss their development proposals and intended delivery programme to assist with identifying any potential water and wastewater network reinforcement requirements. Where there is a capacity constraint the Local Planning Authority will, where appropriate, apply phasing conditions to any approval to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of the relevant phase of development.
Full Reference: S - 6776 - 8433 - SIR1 Infrastructure Requirements - None
- 6808 Support** **Respondent: Chelmsford City Council (Ms Jenny Robinson) [8636]** **Agent: N/A**
Summary: infrastructure required to support development has been identified, particularly in relation to highway improvements including a new junction 7a on the M11, and welcomes the ongoing close collaboration with the relevant authorities to deliver these.
Change To Plan:
Full Reference: S - 6808 - 8636 - SIR1 Infrastructure Requirements - None

6501 Comment **Respondent: Environment Agency (Miss Lisa Mills) [8443]** **Agent: N/A**
Summary: Infrastructure requirements involving crossing of the Stort should give reference to the TRBMP and policy PL10 Water Quality.
Change To Plan:

Full Reference: C - 6501 - 8443 - SIR1 Infrastructure Requirements - None

6572 Comment **Respondent: Canal & River Trust (Ms Tessa Craig) [8612]** **Agent: N/A**
Summary: Policy SIR1 identifies the Central River Stort Crossing and the Second River Stort Crossing at River Way (SIR1-3), as infrastructure projects with land use implications. Whilst the Trust has no objection in principle to such proposals, any works would need to be carefully designed in terms of their impact on our waterway and we would wish to be consulted further in respect of their detailed design.

The Trust has previously provided comments in respect of proposals for the Central Crossing Bridge at which time concern was expressed about its proposed alignment and design which we would wish to see addressed in any future proposal.

Change To Plan:

Full Reference: C - 6572 - 8612 - SIR1 Infrastructure Requirements - None

6765 Comment **Respondent: Lawson Planning Partnership (Miss Kathryn Oelman) [8532]** **Agent: N/A**
Summary: Draft Policy SIR1 - Infrastructure Requirements describes how the Council will work with statutory bodies and neighbouring local authorities to deliver the timely provision of infrastructure necessary to support development in the Harlow & Gilston Garden Town. An Infrastructure Delivery Plan (IDP) will be the primary means to achieve this and Policy SIR1 seeks to define the infrastructure items which have a land use implication that are initially identified for such funding.

Change To Plan: In view of the stated objectives of the plan, PAH requests an addition to Draft Policy SIR1 to include a hospital redevelopment (or relocation) within the list of Infrastructure developments necessary to make the impacts of the Strategic Growth Agenda acceptable in planning terms.

Full Reference: C - 6765 - 8532 - SIR1 Infrastructure Requirements - None

6893 Comment **Respondent: Essex County Council (Mr Rich Cooke) [8452]** **Agent: N/A**
Summary: The text (in sixth paragraph) states:
The Policies Map identifies infrastructure items which have a land use implication.

Schools also have a land use implication and should accordingly be listed.

Change To Plan: ECC (Education) recommends that Policy SIR1 is revised as follows by adding a further entry to the current table of infrastructure items:

Ref. Infrastructure Item
SIR1-1 North-South Sustainable Transport Corridor and River Stort Crossing to Eastwick Roundabout
.....
SIR1-7 New schools provision

Full Reference: C - 6893 - 8452 - SIR1 Infrastructure Requirements - None

6894 Comment**Respondent: Essex County Council (Mr Rich Cooke) [8452]****Agent: N/A**

Summary: Policy IN1 - this policy states: "All development should have regard to the modal hierarchy as set out in the Strategic policies."

ECC identifies that no such modal hierarchy is set out anywhere in the current Draft Local Plan.

This needs to be added to the Strategic Policies list/section.

Change To Plan: ECC (Highways) recommends adding content to Plan (in paragraphs 11.7 - 11.11) to set out explicitly and clearly (and to explain) the transport modal hierarchy that is alluded to elsewhere in the Plan (in Policy IN1)

Full Reference: C - 6894 - 8452 - SIR1 Infrastructure Requirements - None

6895 Comment**Respondent: Essex County Council (Mr Rich Cooke) [8452]****Agent: N/A**

Summary: ECC advises the following in response to paragraph 11.13:

(1) ECC seeks to ensure that the stated 11.1 FE 'need' refers to the demand generated by housing included in the September 2017 scenario test plus Epping Forest DC's 750 homes east of Harlow

(2) In addition, it is recommended not to refer to a precise number of forms of entry due to the limitations of scenario testing. The text should instead refer to the additional infrastructure requirement to meet this level of growth.

(3) The Water Lane and Latton Priory allocation figures are not included in the above figure and will be served by a further secondary school required within Epping Forest district.

(4) It should be clarified that, the new 'Sir Fredrick Gibberd Academy' planned for Harlow, although contributing some capacity to meet housing growth, is being established to serve existing (Harlow) population cohort growth

Change To Plan: ECC (Education) recommends that subject to clarification on the first point raised (on validity / currency of the stated need), paragraph 11.13 is revised as follows:

In Harlow there is an overall need to provide additional secondary school places . A new secondary school will be provided in the Epping Forest District, in the new Garden Community to the east of Harlow, and a new 8FE secondary school is being opened in Harlow (the new 'Sir Fredrick Gibberd Academy'). While this contributes some capacity to meet housing growth, this is being established to serve existing population (cohort) growth. There is also additional capacity in some of the existing secondary schools in Harlow.

NB This is an initial suggested form of wording, subject to review and subsequent refinement between ECC and HC.

Full Reference: C - 6895 - 8452 - SIR1 Infrastructure Requirements - None

6896 Comment**Respondent: Essex County Council (Mr Rich Cooke) [8452]****Agent: N/A**

Summary: As above, ECC recommends not to refer to precise forms of entry being required. It is also not clear to the reader the number of homes covered by this figure or the additional infrastructure that is required. Reference to the IDP could be helpful in this respect.

Change To Plan: ECC (Education) recommends that paragraph 11.14 is revised to delete the reference to a specific number of additional FE primary school places and to add reference to the IDP.

Full Reference: C - 6896 - 8452 - SIR1 Infrastructure Requirements - None

6897 Comment Respondent: **Essex County Council (Mr Rich Cooke) [8452]**

Agent: **N/A**

Summary: This refers to 'Specific infrastructure items that are required to deliver growth locations and development sites will mostly be funded by Section 106 Agreements between the Council and the developer.'

S106 Agreements (where applicable) must include ECC - not just Harlow Council and the developer. This is critical to achieve delivery of education and highway infrastructure in particular and needs to be made clear for clarity, completeness and for the benefit of Plan users / developers, landowners, etc.

Change To Plan: ECC (Education) (Highways) recommends that paragraph 11.14 is revised to add reference to ECC being included within S106 agreements, where applicable.

Full Reference: C - 6897 - 8452 - SIR1 Infrastructure Requirements - None

CHAPTER: STRATEGIC GROWTH SIR1 Justification
STRATEGY FOR HARLOW

6458 Comment Respondent: **NHS West Essex CCG (Mrs Jolene Truman) [8584]**

Agent: **N/A**

Summary: Under Healthcare section 11.17 we have amended the statement slightly: The Council and Harlow Health Centres Trust are working together to expand health facilities for existing population growth and will work with the Clinical Commissioning Groups (West and East and North Hertfordshire) and NHS England to deliver new health facilities as part of planned growth. New healthcare facilities will be delivered, where necessary, as part of new settlements ideally located in accessible locations, situated in a local centre with a range of other community facilities. Increasing capacity within current infrastructure is also an option.

Change To Plan:

Full Reference: C - 6458 - 8584 - SIR1 Justification - None

6777 Comment Respondent: **Thames Water (Savills) (Mr Chris Colloff) [8433]**

Agent: **N/A**

Summary: In relation to the comment that further network modelling is being undertaken to understand sewer capacity in the area we can update with the progress as follows. The study where our delivery partner is assessing the impact of proposed development in and around Harlow has been terminated. We have received a high quality hydraulic sewer model and some assessment of the effect of the proposed development on the sewer network back from the project team. We intend to complete the work with internal staff ensuring that we assess those sites specified by the Planning Authority for the full extent of the plan period (and beyond in the case of Gilston Park). We are keen to work collaboratively with the relevant Planning Authorities to ensure that development is aligned with any necessary infrastructure upgrades required to support it.

It is stated that "it is anticipated that solutions to improving the network will be jointly funded by the utility providers and developers". In relation to sewerage network reinforcement works required to support any growth, these will be delivered by Thames Water and funded through the Infrastructure Charge.

Change To Plan:

Full Reference: C - 6777 - 8433 - SIR1 Justification - None

6678 Comment

Respondent: Hertfordshire County Council (Mr Martin Wells) [8622]

Agent: N/A

Summary: It is also considered that paragraph 11.32 is amended to include both Essex and Hertfordshire County Councils' role as service providers in terms of waste disposal, youth services and fire and rescue: "The Council will need to work closely with a number of partners and organisations to bring forward both strategic and local infrastructure schemes in the district and the Harlow and Gilston Garden Town. This includes Essex County Council and Hertfordshire County Council who are responsible for the local highway networks, education provision, fire & rescue, youth services, waste disposal, particular health and social care needs and other community facilities such as libraries. The Council will also liaise with other statutory bodies and site developers to bring forward other supporting infrastructure and ensure the delivery of development sites."

Change To Plan:

Full Reference: C - 6678 - 8622 - SIR1 Implementation - None

6573 Comment **Respondent: Canal & River Trust (Ms Tessa Craig) [8612]** **Agent: N/A**

Summary: Whilst the Trust has no objection in principle to such a proposal works would need to be carefully designed in terms of their impact on our waterway and we would wish to be consulted in respect of their detailed design.
The Trust has previously provided comments in respect of works relating to the Eastern Stort Crossing which enters Templefields Employment Area at River Way (number 4). at which time concerns were expressed about the proposed alignment and design of the bridge. We would wish to be consulted further in respect of the detailed design of any proposed works.
Canal & River Trust Fradley Junction Alrewas Burton-upon-Trent Staffordshire DE13 7DN
T 0303 040 4040 E
enquiries.westmidlands@canalrivertrust.org.uk
Patron: H.R.H. The Prince of Wales. Canal & River Trust, a charitable company limited by guarantee registered in England and Wales with company number 7807276 and registered charity number 1146792, registered office address First Floor North, Station House, 500 Elder Gate, Milton Keynes MK9 1BB canalrivertrust.org.uk
We would also request that paragraph 11.36 should be amended to refer to discussion with landowners and statutory consultees for completeness.

Change To Plan:

Full Reference: C - 6573 - 8612 - SIR2 Enhancing Key Gateway Locations - None

6784 Comment **Respondent: Weston Homes Plc (Mr David Poole) [8590]** **Agent: N/A**

Summary: In this regard the context of Policy SIR2 (Enhancing Key Gateway Locations) also fails to reference the train station or the sustainable transport links albeit that elsewhere the improvement of the railway infrastructure, or extension of Crossrail 2 to the site appears to be supported including with the with Spatial Vision and Strategic Objectives which also notes the need to make best use of underutilised land. This would include land on the former Pearson House site. This approach would identify and prioritise more sustainable, highly accessible sites in the vicinity of the train station and which would otherwise accord with the provisions of the NPPF, notably, the presumption of sustainable development.

Change To Plan:

Full Reference: C - 6784 - 8590 - SIR2 Enhancing Key Gateway Locations - None

6898 Comment **Respondent: Essex County Council (Mr Rich Cooke) [8452]** **Agent: N/A**

Summary: In referring to key gateway locations to be enhanced, the policy is not clear whether '4 Eastern Stort Crossing' refers to (existing) A1184 Cambridge Rd crossing, or the proposed additional (new) Stort Crossing from Gilston to River Way. This needs clarification for Plan users, although ECC suggest that both are included thus and listed.

Change To Plan: ECC (Highways) recommends that Policy SIR2 is reviewed and revised to clarify this ambiguity to prevent misunderstanding.

ECC recommends that this could be done by both revising the existing wording and adding further wording to ensure both crossings are included (as Key Gateway Locations).

Full Reference: C - 6898 - 8452 - SIR2 Enhancing Key Gateway Locations - None

- 6481 Object** **Respondent: Miller Strategic Land [5769]** **Agent: Andrew Martin - Planning (Mr Olivier Spencer) [5533]**
Summary: Our client wishes to raise a holding objection to part (a) of Policy PL1 and to reserve the right to raise further comments or objections at Examination in Public, once the final Spatial Vision and Design Charter has been published.
Change To Plan: Only a holding objection is raised at this stage.

Full Reference: O - 6481 - 5769 - PL1 Design Principles for Development - iii
- 6574 Comment** **Respondent: Canal & River Trust (Ms Tessa Craig) [8612]** **Agent: N/A**
Summary: Part (b) should include protection, enhancement and improvement of the River Stort as a distinctive environmental feature, natural asset and leisure and recreation attraction of Harlow. The Trust would expect development alongside the River Stort to be of a high standard of urban and architectural design.
Change To Plan:

Full Reference: C - 6574 - 8612 - PL1 Design Principles for Development - None
- 6696 Comment** **Respondent: Historic England (Ms Debbie Mack) [8623]** **Agent: N/A**
Summary: Again, at the present time the Harlow and Gilston Garden Town and Design Charter is not available to view. Without sight of this document it is not possible to assess whether there is sufficient protection for the historic environment in the policy.
We welcome criterion b.
Harlow New Town is based upon the Gibberd masterplan. It is important that new development respects this masterplan and protects the distinctive townscape which in itself is part of the historic environment
Change To Plan:

Full Reference: C - 6696 - 8623 - PL1 Design Principles for Development - None
- 6855 Comment** **Respondent: Redrow Homes (Ms Kate Holland) [8640]** **Agent: Redrow Homes (Ms Kate Holland) [8640]**
Summary: The Policy refers to design rationale being required to take into consideration the Adopted Harlow Local Design Guide SPD, the Harlow and Gilston Garden Town Spatial Vision and Design Charter and relevant national guidance.

As highlighted earlier in these Representations, the Harlow and Gilston Design Charter and the Spatial Vision have not yet been produced or published. It is also understood from discussions with the Council that it is unlikely there will be direct public consultation in respect of either document.
It is therefore not possible at this point to assess whether compliance with these documents would place overly onerous requirements upon developers which may affect overall viability of a scheme.
Change To Plan: if reference to the Design Charter and Spatial Vision is removed we would be supportive of the Policy as a whole.

Full Reference: C - 6855 - 8640 - PL1 Design Principles for Development - None

6899 Comment**Respondent: Essex County Council (Mr Rich Cooke) [8452]****Agent: N/A**

Summary: ECC acknowledges that the policy references several key (locally focused) good design guides. In order to ensure that all the new elements of the Essex Design Guide are publicised for the benefit of designers (including increased emphasis on public health & well-being; digital design factors; etc.) ECC would wish to see a reference included to the new EDG

Change To Plan: Add reference to the newly updated Essex Design Guide, preferably within text of Policy PL1

Full Reference: C - 6899 - 8452 - PL1 Design Principles for Development - None

CHAPTER: DEVELOPMENT
MANAGEMENT

PL2 Amenity Principles for Development

6403 Object**Respondent: Miss Erin Rose BALDRY [8560]****Agent: N/A**

Summary: The proposed allocation of the Fennells field does not reflect this proposal. My privacy and my home are being impacted by this proposal and i am fearful of being overlooked and losing daylight and sunlight. These proposals detrimentally impact my aspect and outlook and i dont believe that any consideration has been given to the properties affected by this proposal.

Change To Plan: The proposed allocated site needs to be removed.

Full Reference: O - 6403 - 8560 - PL2 Amenity Principles for Development - i, ii, iii, iv

6703 Object

Respondent: Home Builders Federation (Mr Mark Behrendt) [8450]

Agent: N/A

Summary: The policy is unsound as it is not consistent with national policy

It is not clear what this policy is trying to achieve. Our reading of the policy is that the Council will support applications that meet existing standards required by building regulations in relation to energy efficiency. However, whether or not a building meets existing building regulations is not a planning matter and as such cannot be considered as part of an application for planning permission. Our concern is that the policy could be used erroneously to refuse planning permissions that the Council determines are insufficiently sustainable. We therefore consider that this policy is not consistent with the principles, established in paragraphs 17 and 154 of the NPPF, that any policy within the plan should ensure that decision making is predictable and provide a clear indication as to how the decision maker should react to a development proposal.

Change To Plan: The policy PL3 and its associated paragraph 13.13 to 13.19 are deleted.

Full Reference: O - 6703 - 8450 - PL3 Sustainable Design, Construction and Energy Usage - None

6744 Object

Respondent: Persimmon Homes (Mr David Moseley) [8437]

Agent: N/A

Summary: The policy is unsound as it is not consistent with national policy

It is not necessary to stipulate adherence to Building Regulations. Furthermore, the policy lacks precision or measure when referring to 'high standards' of sustainable design and efficient energy usage. The supporting text refers to developers providing evidence of carbon dioxide reduction but does not detail any standard. Furthermore, the Local Plan does not have regard to the cost of meeting a (unspecified) standard over and above meeting Building Regulations.

This policy is not precise or consistent with the principles, established in paragraphs 17 and 154 of the NPPF, that any policy within the plan should ensure that decision making is predictable and provide a clear indication as to how the decision maker should react to a development proposal.

Change To Plan: The policy should be deleted or adapted to state that; 'Design should have regards to a range of measures to reduce energy consumption'.

Full Reference: O - 6744 - 8437 - PL3 Sustainable Design, Construction and Energy Usage - None

6575 Comment

Respondent: Canal & River Trust (Ms Tessa Craig) [8612]

Agent: N/A

Summary: We note the reference to onsite low carbon/ renewable energy technology in the justification to policy PL3 and would advise that our waterways provide readily available opportunities for developments to incorporate innovative technologies to make use of its water such as hydropower and the abstraction of water for the heating and cooling of buildings, and we have been involved in many successful projects on our network, where developments have found the system to be more efficient than air source pumps.

Change To Plan:

Full Reference: C - 6575 - 8612 - PL3 Sustainable Design, Construction and Energy Usage - None

6404 Object **Respondent: Miss Erin Rose BALDRY [8560]** **Agent: N/A**
Summary: This proposal talks about small scale development yet 23 properties are being proposed on the allocation of the Fennells field. HOW IS THIS SMALL SCALE!!!! 23 homes will equate to 46 parking spaces increasing traffic on an estate road that is full to capacity with the existing 152 homes on the estate. I fear for my safety now let alone with additional homes added!

Change To Plan: The proposed allocation of the Fennells field for housing needs to be removed.

Full Reference: O - 6404 - 8560 - PL4 Green Wedges and Green Fingers - i, ii, iii, iv

6482 Object **Respondent: Miller Strategic Land [5769]** **Agent: Andrew Martin - Planning (Mr Olivier Spencer) [5533]**
Summary: To be consistent with national policy and the most appropriate strategy when considered against the reasonable alternatives (i.e. justified), Policy PL4 should be amended to allow a wider range of uses in the Town's Green Wedges and Green Fingers.

Change To Plan: Our client respectfully requests that Policy PL4 is amended to include a new bullet point after (a) stating:
- "it is for social club, sports club, education or allotment related development, or public open space;"

Full Reference: O - 6482 - 5769 - PL4 Green Wedges and Green Fingers - ii, iv

6576 Comment **Respondent: Canal & River Trust (Ms Tessa Craig) [8612]** **Agent: N/A**
Summary: Small-scale development referred to in point 13.23 should include facilities and services associated with an existing use including moorings and other waterway uses as required.

Change To Plan:

Full Reference: C - 6576 - 8612 - PL4 Green Wedges and Green Fingers - None

6631 Comment **Respondent: GLADMAN (Mr Phill Bamford) [8618]** **Agent: N/A**
Summary: Whilst it is appreciated that these designations have played a role in defining the form of Harlow as a settlement, the Council must ensure that they do not act as a constraint to development which prevents the district from meeting its overall housing requirement.

Change To Plan:

Full Reference: C - 6631 - 8618 - PL4 Green Wedges and Green Fingers - None

6864 Comment **Respondent: De Merke Estates (Ms Emma Gladwin) [8643]** **Agent: Barton Willmore (Miss Emma Gladwin) [8399]**
Summary: HDC is proposing the release of over 110 ha of land from the Green Belt for the strategic housing site east of Harlow, being a substantial amount of Green Belt release. HDC is amenable to releasing Green Belt land despite the high national test to do so but is restricting development on Green Wedges with no justification or allowing a site-by-site analysis. Such an approach is not consistent with national policy and HDC should amend Policy PL4 to allow this site-by-site approach.

Change To Plan: The current wording of Policy PL4 is overly restrictive and does not allow for any consideration of whether a site contributes towards the roles and functions of the Green Wedge on a site-by-site basis, unduly giving a high level of protection to all land contained within the Green Wedge.

Full Reference: C - 6864 - 8643 - PL4 Green Wedges and Green Fingers - None

6900 Comment **Respondent: Essex County Council (Mr Rich Cooke) [8452]** **Agent: N/A**

Summary: In order to recognise the wider importance of the green wedges / green fingers a relatively minor wording improvement is recommended

Change To Plan: ECC recommends a revision in wording of Policy PL4 (e) as follows:

"It demonstrates that the roles, functions and historic significance of the Green Wedges and Green Fingers are preserved...."

Full Reference: C - 6900 - 8452 - PL4 Green Wedges and Green Fingers - None

CHAPTER: DEVELOPMENT PL4 Justification
MANAGEMENT

6498 Comment **Respondent: Environment Agency (Miss Lisa Mills) [8443]** **Agent: N/A**

Summary: We strongly recommend the inclusion of rivers and canals to be recognised as green infrastructure, and this policy to be cross-referenced with PL10 'Water quality', specifically WFD.

Change To Plan:

Full Reference: C - 6498 - 8443 - PL4 Justification - None

CHAPTER: DEVELOPMENT PL5 Justification
MANAGEMENT

6499 Comment **Respondent: Environment Agency (Miss Lisa Mills) [8443]** **Agent: N/A**

Summary: We strongly recommend the inclusion of rivers and canals to be recognised as green infrastructure, and this policy to be cross-referenced with PL10 'Water quality', specifically WFD.

Change To Plan:

Full Reference: C - 6499 - 8443 - PL5 Justification - None

CHAPTER: DEVELOPMENT PL5 Implementation
MANAGEMENT

6405 Object **Respondent: Miss Erin Rose BALDRY [8560]** **Agent: N/A**

Summary: This proposal talks about supporting the Gibberd principles and the protection of informal recreation areas. The proposed allocation of the Fennells field for housing does not promote this principle and i am appalled by this. This proposal needs to be reconsidered as i do not understand that how this proposal is compliant with this proposal.

Change To Plan: The proposed allocation of the Fennells field needs to be removed.

Full Reference: O - 6405 - 8560 - PL5 Implementation - i, ii, iii, iv

CHAPTER: DEVELOPMENT
MANAGEMENT

PL6 Trees and Hedgerows

6406 Object

Respondent: Miss Erin Rose BALDRY [8560]

Agent: N/A

Summary: The proposed allocation of the Fennells Field will ultimately remove the historic hedgerows. This proposal is therefore ridiculous and the site needs to be removed. The thought that development will be permitted to remove the historic hedgerows is unacceptable.

Change To Plan: The proposed residential allocation of the Fennells Field needs to be removed from this proposal.

Full Reference: O - 6406 - 8560 - PL6 Trees and Hedgerows - i, ii, iii, iv

CHAPTER: DEVELOPMENT
MANAGEMENT

PL7 Green Infrastructure and Landscaping

6738 Support

Respondent: Natural England (Ms Sarah Fraser) [8628]

Agent: N/A

Summary: Natural England supports the inclusion of a policy relating to Green Infrastructure and the content therein but advises that environmental enhancement and biodiversity net gain should be added as an additional criteria.

Change To Plan:

Full Reference: S - 6738 - 8628 - PL7 Green Infrastructure and Landscaping - None

CHAPTER: DEVELOPMENT
MANAGEMENT

PL7 Justification

6500 Comment

Respondent: Environment Agency (Miss Lisa Mills) [8443]

Agent: N/A

Summary: We strongly recommend the inclusion of rivers and canals to be recognised as green infrastructure, and this policy to be cross-referenced with PL10 'Water quality', specifically WFD.

Change To Plan:

Full Reference: C - 6500 - 8443 - PL7 Justification - None

6739 Support

Respondent: Natural England (Ms Sarah Fraser) [8628]

Agent: N/A

Summary: Natural England supports the inclusion of a policy relating to Biodiversity and Geodiversity. The policy should be enhanced by reference to 'net gain' in keeping with paragraph 109 of the NPPF. This policy is likely to require alteration depending on the outcomes of the HRA to ensure the deliverability of any agreed mitigation strategy.

Change To Plan:

Full Reference: S - 6739 - 8628 - PL8 Biodiversity and Geodiversity Assets - None

6901 Comment

Respondent: Essex County Council (Mr Rich Cooke) [8452]

Agent: N/A

Summary: ECC recommends revising Policy PL8 to follow the mitigation hierarchy and Government's Natural Environment White Paper

Change To Plan: ECC recommends that this policy is re-structured:

- a) Conserve and enhance existing biodiversity and geodiversity assets
- b) Where the above is not possible, appropriate and effective measures must mitigate the negative effects on these assets
- c) Where there is a residual impact, compensatory measures will need to be secured offsite.
- d) Creates new biodiversity and creates links to existing biodiversity and geodiversity assets to deliver net gain for biodiversity.

Full Reference: C - 6901 - 8452 - PL8 Biodiversity and Geodiversity Assets - None

6407 Object

Respondent: Miss Erin Rose BALDRY [8560]

Agent: N/A

Summary: The proposed allocation of the Fennells field for housing does not in any way protect the the existing bio-diversity. The proposal to build 23 homes on this land and enhance the environment does not add up and this proposal is not fit for purpose.

Change To Plan: The proposed allocation of the Fennells field needs to be removed.

Full Reference: O - 6407 - 8560 - PL8 Justification - i, ii, iii, iv

6902 Comment

Respondent: Essex County Council (Mr Rich Cooke) [8452]

Agent: N/A

Summary: ECC advises that the Government supports "Net Gain for biodiversity" rather than "halting decline" Para 111 NPPF which is necessary to add compensatory measures in the requirements for sustainable development.

Change To Plan: ECC recommends revising paragraph 13.46 to replace the existing aims described as "halting decline" with the words "to achieve a net gain for biodiversity"

Full Reference: C - 6902 - 8452 - PL8 Justification - None

CHAPTER: DEVELOPMENT
MANAGEMENT

PL8 Implementation

6503 Support

Respondent: Environment Agency (Miss Lisa Mills) [8443]

Agent: N/A

Summary: We welcome the inclusion of reference to invasive non-native species and their management, including biosecurity measures. Development sites should be checked for invasive species and measures should be put in place to follow biosecurity and eradicate the invasive species on site.

Change To Plan:

Full Reference: S - 6503 - 8443 - PL8 Implementation - None

6903 Comment

Respondent: Essex County Council (Mr Rich Cooke) [8452]

Agent: N/A

Summary: ECC advises that a reference to locally designated sites eg Local Wildlife Sites (LoWS) and Local Nature Reserves (LNRs) would be appreciated and a commitment to declaration of LNRs to provide opportunities for people to enjoy nature.

Change To Plan: ECC recommends adding reference to LoWS and LNRs, together with a commitment to declaration of LNRs to provide opportunities for people to enjoy nature. These improvements would help deliver the previously stated aim of helping to achieve a net gain in biodiversity, in line with NPPF objectives.

Full Reference: C - 6903 - 8452 - PL8 Implementation - None

6904 Comment

Respondent: Essex County Council (Mr Rich Cooke) [8452]

Agent: N/A

Summary: Best practice for implementation of Policy PL8 would include a validation checklist for developments likely to affect biodiversity and geodiversity. Reference to the Essex Biodiversity Validation Checklist in Para 13.49 would enable biodiversity to be considered at the earliest stage in planning a development which de-risks it and avoids delays.

Change To Plan: ECC recommends adding a reference to the Essex Biodiversity Validation Checklist in Paragraph 13.49

Full Reference: C - 6904 - 8452 - PL8 Implementation - None

CHAPTER: DEVELOPMENT
MANAGEMENT

PL9 Pollution and Contamination

6740 Comment

Respondent: Natural England (Ms Sarah Fraser) [8628]

Agent: N/A

Summary: This policy is likely to require alteration depending on the outcomes of the HRA to ensure the deliverability of any agreed mitigation strategy for air quality.

Change To Plan:

Full Reference: C - 6740 - 8628 - PL9 Pollution and Contamination - None

6504 Object

Respondent: Environment Agency (Miss Lisa Mills) [8443]

Agent: N/A

Summary: More weight should be given to groundwater to ensure the implementation of groundwater protection eg: including PRA's and steering development away from SPZ's

Change To Plan: Whilst we strongly support the inclusion of this policy, we believe that the justification and implementation could give more weight to groundwater. This is to ensure the risks to groundwater are minimised as much as possible, where contaminated sites have the potential to mobilise contaminants and consequently cause pollution.

Specific mention should be made that all land which is considered to be contaminated will require a Preliminary Risk Assessment (PRA) to be submitted as part of the planning application, and that where necessary further site investigations, detailed risk assessments, remediation strategies, long term maintenance regimes, and validation reports may be required if contamination is found. It should be explicit that planning permission will not be granted for development that poses a threat to the quality of surface and/ or groundwater, and should specifically reference the importance for all development to not detrimentally impact upon Source Protection Zones (SPZ) in particular, which are areas designated for the abstraction of clean drinking water. This should be cross referenced with PL10 (water quality). It should also mention avoiding high risk development proposals within vulnerable groundwater areas, specifically petrol stations and cemeteries.

Full Reference: O - 6504 - 8443 - PL9 Implementation - iv

6495 Object

Respondent: Environment Agency (Miss Lisa Mills) [8443]

Agent: N/A

Summary: This policy should be strengthened through reference to the RMBP. It should include non-residential development to adopt the housing standard of number of litres per day, and reference evidence from your recent WCS. SUD's implementation needs to be made stronger. Minor wording additions to strengthen the policy.

Change To Plan: Water Quality

We recommend that the sentence 'Must not adversely affect water quality' should be reworded to 'Development should not cause deterioration to water quality and aim to improve it in line with Thames River Basin Management Plan (TRMBP) objectives.'

We welcome the policy reference to deculverting. This policy should be strengthened further by specifically stating that where deculverting or other river enhancements are shown to be unfeasible, the council will seek a financial contribution to restore another section of the same watercourse.

Whilst it is mentioned that 'development adjacent to water courses should seek to include restoration', this policy should be strengthened to include the requirement for all new development adjacent to designated main rivers to provide and maintain a minimum undeveloped 8 metre buffer zone to the watercourse. This is to enhance and protect local biodiversity and wildlife corridors, provide space for flood waters, and provide access for maintenance works. This distance is in line with our Flood Risk Activity Permit, which is legally required for certain works within 8 metres of a main river. The buffer zone will provide a naturalised buffer free of built development, be designed for the benefit of biodiversity (including the planting of locally appropriate, UK native species) and be 'undisturbed' by development (i.e. no fencing, footpaths, lighting or other development). Such proposals must also include a long term scheme put in place to protect and enhance the conservation value of the watercourse, in line with the requirements of the WFD and the TRBMP.

Water Management

Whilst it is positive to see Harlow adopt the Optional Technical Housing Standard of no more than 110litres per person per day, this only relates to residential buildings. As a result, it is noted that there is no reference to water efficient measures within non-residential buildings. It is expected that the growth planned for Harlow will include non-residential buildings. As a result, we would strongly encourage the requirement of a BREEAM 'Excellent' rating for water efficiency of non-residential buildings. This is referenced and evidenced in your recent WCS.

Additionally, there may be opportunities to regenerate existing properties through development. As older buildings are the least efficient with resource use, where regeneration does occur, we would strongly encourage retrofitting these buildings to increase their water efficiency. It is suggested that Harlow develop this policy to include these aspects.

Foul sewage is not referenced in this policy. Your WCS recommends 'early developer engagement with water companies is essential to ensure that sewerage capacity can be provided without delaying development.' This should also be addressed to relevant policy text for strategic site allocations.

Flooding

We are pleased with the amendments of this policy to include reference to Flood Risk Assessments (FRA's) and the increased emphasis on climate change and safe access and egress. However, we would still like to see mention of no inappropriate development will be permitted within Flood Zone 3b, as defined by your own Strategic Flood Risk Assessment (SFRA). The only development types that are considered compatible with Flood Zone 3b are 'water compatible' and 'essential' development, as defined within Tables 2 and 3 of the Planning Practice Guidance Flood Risk and Coastal Change section. The policy should also state that the functional floodplain should be restored wherever possible through a reduction of footprint within Flood Zone 3b as a result of development proposals.

Reference to WFD should be moved up to the Water Quality section of this policy. Specific reference to the legislative requirements of the WFD and the actions required by the TRBMP need to be included within the outline of PL10.

After the sentence 'it must not increase the risk of flooding elsewhere', its should be added 'and aim to reduce flood risk overall'.

'c) flood levels' should be replaced with 'finished floor levels'.

SUD's

This policy could be more robust by also including Natural Flood Management techniques. This could be very effective for developments near ordinary watercourses or smaller main river tributaries to slow the flow in low-order events, and provide habitat and multiple benefits.

6704 Object**Respondent: Home Builders Federation (Mr Mark Behrendt) [8450]****Agent: N/A**

Summary: Part 4(c) of this policy is unsound as it is not consistent with national policy.

Part 4(c) of this policy states that post development run off rates should be the equivalent of greenfield run off rates. On many brownfield sites it may be impossible to achieve this level of run off. Guidance by Defra5 on this matter also suggests that brownfield development must achieve close as is practicable to greenfield run off rates. This recognises that in some situations a development will not be able to deliver green field run off rates but that it should seek an improvement over the current site. Given the Government's focus on delivering more development on brownfield sites we would suggest it is essential that greater flexibility is provided in this policy.

Change To Plan: That the policy is amended to read:
"(c) Post-development run off rates should be reduced as far as practicable below existing run off rates for that site."

Full Reference: O - 6704 - 8450 - PL10 Water Quality, Water Management, Flooding and Sustainable Drainage Systems - None

6577 Comment**Respondent: Canal & River Trust (Ms Tessa Craig) [8612]****Agent: N/A**

Summary: The quality of water in canals and rivers can affect how attractive they are as spaces for people to be on, in or alongside and impact on the plants and wildlife that rely on it. It is therefore important that new developments are appropriately located, designed to minimise risk and do not adversely affect our assets. We therefore welcome reference in Policy PL10 to development not adversely affecting the water quality of waterways. We note reference to surface water discharge to surface water bodies in para 13.68. and advise that our waterways present a number of opportunities to support and enhance urban development, with particular reference to water management. With careful design and assessment, our waterways may be able to receive runoff from future development sites, providing sustainable options for site drainage (although mitigation works to the canal infrastructure may be necessary to cope with this.) The Trust is not however a land drainage authority and any such discharge would be subject to an agreement with the Trust's Utilities Team and appropriate controls to protect water quality.

Change To Plan:

Full Reference: C - 6577 - 8612 - PL10 Water Quality, Water Management, Flooding and Sustainable Drainage Systems - None

6723 Comment**Respondent: Mrs Karen Garrod [8596]****Agent: N/A**

Summary: The report acknowledges that Harlow is at severe risk of water shortage being in the driest region in the country. The proposed number of new homes appears too high in the circumstances for this region. Other regions of the UK do not have such a high demand for water supplies.

On the flipside of this, with the number of green spaces having been identified for potential development, there is also a high risk of flash flooding during heavy downpours which seem to be on the increase. Would measures be taken on new housing developments to mitigate this risk? Would new homes be required to have water butts to collect rainwater, particularly during heavy rainfall to prevent it flowing into the drainage system causing the drainage system to be overwhelmed?

When designing new flats which have landscaped areas and gardens, could it be a requirement that rainwater collection/re-distribution equipment be installed? For instance, industrial sized water butts connected to agricultural watering hoses that trail around the landscaped/planted beds so that excess water filters into these areas rather than into the drainage system?

Maybe, new plumbing systems could provide for rainwater to be harnessed and stored for water to fill WC cisterns?

Change To Plan:

Full Reference: C - 6723 - 8596 - PL10 Water Quality, Water Management, Flooding and Sustainable Drainage Systems - None

6778 Comment**Respondent: Thames Water (Savills) (Mr Chris Colloff) [8433]****Agent: N/A**

Summary: Policy PL10 makes reference to SuDs and that where they are required they will provide the most sustainable option from the SuDs hierarchy. Thames Water support the use of SuDs and it is suggested that the policy should be expanded to encourage their use even where not required by national policy. In addition the retrospective use of SuDs should also be supported by policy as such practices could help remove surface water from existing sewers freeing up capacity.

Change To Plan: It is therefore suggested that Policy PL10 should be amended to include the following text at the end of Section 4:
"The council encourage the use of SuDS on all development proposals due to the environmental benefits they can deliver. In addition, the Council will support the retrofitting of SuDS."

Full Reference: C - 6778 - 8433 - PL10 Water Quality, Water Management, Flooding and Sustainable Drainage Systems - None

6905 Comment**Respondent: Essex County Council (Mr Rich Cooke) [8452]****Agent: N/A**

Summary: ECC (as LLFA) advises that a number of changes to this policy would be beneficial and assist in its use.

(1) Re-order so that current part 1. Water Quality is dealt with further down the policy sequence, since this area is considered to be less capable of effective regulation and enforcement than other subject areas of the policy.

The policy (or text) currently does not mention Critical Drainage Areas (in respect of surface water flood risk) and thus does not signpost the valuable work that the LLFA has produced for the Harlow urban area and its development implications

(3) revise wording of part 3 (c)

(4) revise wording of part 3 (g)

(5) revise wording of part 3 (h)

(4) revise wording of part 4 (c)

Change To Plan: ECC (LLFA) recommends revising Policy PL10 in the interests of improved wording, clarity and policy implementation, as follows:

Re-order the policy so that current part 1 (Water Quality) is dealt with later on in the policy. ,This could be achieved conveniently if this part becomes the new final part (at new part 4)

Add reference to Critical Drainage Areas (to support the policy) - this could be done at paragraph 13.61, which already mentions surface water flooding.

Revise part 3 (c) as follows:

development in Flood Zones 2 and 3 should be situated above the 1% (1 in 100 years) plus climate change predicted maximum water level, plus a minimum finished floor level of 300mm above the predicted water level;

Revise part 3 (g) as follows:

flood flow routes should be configured to enable surface water to drain;

Revise part 3 (h) as follows:

where necessary, planning permission will be conditional upon the submission and approval of a drainage management strategy that addresses all forms of flood risk.

Revise wording of part 4 (c) as follows:

achieve runoff rates in line with the guidance of the non-statutory technical standards for sustainable drainage;

Full Reference: C - 6905 - 8452 - PL10 Water Quality, Water Management, Flooding and Sustainable Drainage Systems - None

CHAPTER: DEVELOPMENT
MANAGEMENT

PL10 Justification

6497 Comment **Respondent: Environment Agency (Miss Lisa Mills) [8443]** **Agent: N/A**

Summary: Specific mention for WFD. SUD's policy should be strengthened using evidence from WCS.

Change To Plan:

Full Reference: C - 6497 - 8443 - PL10 Justification - None

CHAPTER: DEVELOPMENT
MANAGEMENT

PL10 Implementation

6496 Comment **Respondent: Environment Agency (Miss Lisa Mills) [8443]** **Agent: N/A**

Summary: Specific mention needed for TRBMP. Inclusion of floodplain compensation and strengthening of SUD's policy.

Change To Plan:

Full Reference: C - 6496 - 8443 - PL10 Implementation - None

6779 Comment **Respondent: Thames Water (Savills) (Mr Chris Colloff) [8433]** **Agent: N/A**

Summary: Section 13.68 sets out the drainage hierarchy. It is considered that discharge of rainwater to a combined sewer should only ever be done as an absolute last resort once it has been demonstrated that all other options are not possible. With regard to the hierarchy set out in this section it is considered that the hierarchy should be expanded to include other options such as storage of rainwater for later use and attenuation of rainwater. This approach is adopted in Policy 5.13 of the London Plan.

Change To Plan: It is therefore suggested that the hierarchy set out in Section 13.68 is revised to read as follows:
"1. store rainwater for later use
2. use infiltration techniques, such as porous surfaces in non-clay areas
3. attenuate rainwater in ponds or open water features for gradual release
4. attenuate rainwater by storing in tanks or sealed water features for gradual release
5. discharge rainwater direct to a watercourse
6. discharge rainwater to a surface water sewer/drain
7. discharge rainwater to the combined sewer."

Full Reference: C - 6779 - 8433 - PL10 Implementation - None

6450 Support **Respondent: Deanery of Harlow (Anglican) (Revd Martin Harris) [8586]** **Agent: N/A**

Summary: Thank you for the inclusion of Public Benefit as regard Heritage Assets (PL11)

Change To Plan:

Full Reference: S - 6450 - 8586 - PL11 Heritage Assets and their Settings - None

6683 Comment **Respondent: Historic England (Ms Debbie Mack) [8623]** **Agent: N/A**

Summary: Reference to enabling development in Policy PL11 should be deleted.

Change To Plan: Reference to enabling development in Policy PL11 should be deleted.

Full Reference: C - 6683 - 8623 - PL11 Heritage Assets and their Settings - None

6697 Comment **Respondent: Historic England (Ms Debbie Mack) [8623]** **Agent: N/A**

Summary: We welcome the changes made to the policy since the previous consultation.

We continue to suggest that the policy should include a requirement for a desk based assessment or field evaluation to be submitted where proposals affect sites or are within or adjacent to sites of known archaeological interest or sites where there is reason to suggest there is archaeological interest Whilst this is mentioned in paragraph 13.88, it should also be included in policy.

We suggest the deletion of the final paragraph in the policy. By definition within the NPPF, enabling development is development that is not otherwise in accordance with adopted policy.

We are therefore of the view that a policy on enabling development is not a necessary component of a local plan document A local plan should adequately set out a positive strategy for the historic environment without the need to include such a policy.

Paragraph 140 of the NPPF and Historic England's suggested framework for enabling development contained within Enabling Development and conservation of the significant places, revised 2012 consider this matter. The Historic England advice predates the adoption of the NPPF and should be considered in the context of Paragraph 140 of the NPPF which states the following:

Local planning authorities should assess whether the benefits of a proposal for enabling development, which would otherwise conflict with planning policies but which would secure the future conservation of a heritage asset, outweigh the disbenefits of departing from those policies.

We appreciate that the final paragraph of your policy is an attempt to have a policy to address Heritage at Risk. However, as we previously commented a policy effectively on enabling

development is not the best way to achieve this. We continue to advise that a policy on heritage at risk rather than enabling development would better achieve the desired outcome.

Change To Plan:

Full Reference: C - 6697 - 8623 - PL11 Heritage Assets and their Settings - None

6906 Comment**Respondent: Essex County Council (Mr Rich Cooke) [8452]****Agent: N/A**

Summary: ECC advises that in respect of Policy PL11 (a) 'setting' is not an asset itself upon which harm can be caused but rather development within an asset's setting can cause harm to the asset's significance if the setting contributes to its historic/architectural interest of aesthetic/historic/evidential/communal value.

On part (b) ECC advises that It would be advantageous to use a word other than 'harmonises' as this can be seen to inhibit modern design / architecture. Instead, 'respond to' or 'reflect' would likely be more engaging.

On part (c) ECC advises that this element could reference the Harlow New Town Master Plan, in effect testing development to see if it respects the fundamental principles of the New Town. For example the green wedges, neighbourhoods, connectivity, grain etc. This could be integrated into the bracket of examples.

ECC also suggests a further consideration by which to assess these proposals (in terms of revealing an asset better)

Change To Plan: ECC recommends that Policy PL11 (a) is revised as follows:

"the impact of development upon the character, appearance, setting, or any other aspect of the significance of the asset'

Revise part (b) replacing the current word 'harmonises' with either 'respond to' 'or otherwise 'reflect'.

ECC also advises the consideration of including reference to Harlow New Town Master Plan within this criterion, where it could sit within the bracketed text that provides examples of relevant considerations

Revise part (d) as follows:

"The extent to which the development would enhance, or better reveal, the significance of a heritage asset".

Full Reference: C - 6906 - 8452 - PL11 Heritage Assets and their Settings - None

6907 Comment**Respondent: Essex County Council (Mr Rich Cooke) [8452]****Agent: N/A**

Summary:

ECC advises that It is not clear what the third paragraph is requesting or the reasoning behind it - it appears to be slightly confused about the difference between a Heritage Statement and a Management Plan and of the correct time to request these.

Change To Plan: ECC recommends two relatively minor amendments to the third and fourth paragraphs respectively, as follows:

"Where development has the potential to affect a heritage asset..."

And, revise the final paragraph as follows:

"...it must be demonstrated that the development presents the asset's optimum viable use and is necessary...."

Full Reference: C - 6907 - 8452 - PL11 Heritage Assets and their Settings - None

**CHAPTER: DEVELOPMENT
MANAGEMENT**

PL11 Implementation

6908 Comment**Respondent: Essex County Council (Mr Rich Cooke) [8452]****Agent: N/A**

Summary: ECC suggests additional wording for completeness of this paragraph, in respect of locally listed assets.

Change To Plan: ECC recommends adding additional content to paragraph 13.78, as follows:

Designated heritage assets can include listed buildings, curtilages of listed buildings, conservation areas, archaeological remains, Scheduled Monuments and historic parks and gardens. Locally listed buildings and those archaeological sites that are not Scheduled are known as non-designated assets and also contribute to the overall significance of the historic environment of Harlow. Historic England administers national designations which include all designated heritage assets apart from conservation areas'.

Full Reference: C - 6908 - 8452 - PL11 Implementation - None

6724 Comment

Respondent: Mrs Karen Garrod [8596]

Agent: N/A

Summary: Developers- housing quality
It would be pleasing to see some new high quality housing developments in Harlow. Some housing developments in other areas have not been without their problems resulting in great inconvenience to the owners to resolve the issues. Does Harlow Council consult with other Local Authorities and Housing Associations in neighbouring counties to seek recommendations and reviews and share experiences?

Planning specifications and considerations

There are many specifications and factors specified in the reports to be considered when housing is planned. Many of these are specific to the Town in local historical and traditional planning context. These are very important and should be respected when considering development plans that have been submitted. However, if decisions can be appealed and referred to central bodies and overturned, then these specifications would not amount to much and could become irrelevant. Would this happen?

Proportionate development

Is there any requirement for the size of buildings to be proportionate to the land proposed to build them on? For instance, will sufficient green spaces, verges and gardens be provided for? As acknowledged, green wedges and fingers are intrinsic to Harlow's character. Will new flats and houses be situated far enough away from the roadside to retain this character?

Flat developments

Rather than building flats in square or rectangle blocks with 4 or 6 flats on each floor opposite each other, why not set them out in crescent or horseshoe shape in rows of single flats sited side by side? Communal gardens could be included with flats being designed around the garden areas (like the mews style houses in Bishopscote). If this style were mirrored for flats, it would lessen the impact of the block on the area as it would only be one flat deep .

Would new trees be planted around new flat developments to minimise the impact and provide screening? Drought resistant types could be used with finer root systems so that

when the trees mature, they do not interfere with the structure.

It has been noted that families prefer houses over flats. If there were high quality apartments with 2-3 bedrooms and a large communal garden and garages, they may have wider appeal. Many people desire a garden especially families. If there were a large communal garden this would be a big benefit to bring residents together and for the children to enjoy.

Change To Plan:

Full Reference: C - 6724 - 8596 - 14. HOUSING - None

6483 Object

Respondent: Miller Strategic Land [5769]

Agent: Andrew Martin - Planning (Mr Olivier Spencer) [5533]

Summary: Our client wishes to raise a holding objection to the third paragraph in Policy H1 and to reserve the right to raise further comments or objections at Examination in Public, once the final Spatial Vision and Design Charter has been published.

Change To Plan: Only a holding objection is raised at this stage.

Full Reference: O - 6483 - 5769 - H1 Housing Allocations - iii

6856 Comment

Respondent: Redrow Homes (Ms Kate Holland) [8640]

Agent: Redrow Homes (Ms Kate Holland) [8640]

Summary: We are supportive of the principle of Policy H1 in its assertion that development of the strategic housing Site East of Harlow will be supported. However, the Policy also requires the provision of a Masterplan to be submitted and development must accord with the Harlow and Gilston Garden Town Spatial Vision and Design Charter. As within the comments on Policy PL1, the Design Charter and Spatial Vision are at an early stage and have not yet been produced.

The Policy is therefore not 'Justified' as it is not based upon any supporting viability evidence to demonstrate that these requirements will not affect deliverability of the Plan and cannot be found to be 'Sound' as it is currently worded.

Change To Plan: reference to the Master Plan, Design Charter and Spatial Vision should be removed

Full Reference: C - 6856 - 8640 - H1 Housing Allocations - None

6408 Object

Respondent: Miss Erin Rose BALDRY [8560]

Agent: N/A

Summary: The proposed allocation of Fennells Field does not meet this proposal. Any development will have an unacceptable adverse effect on the character of the locality, the appearance of the street scene and the amenities enjoyed by the occupiers of neighbouring dwellings. THIS PROPOSAL IS OUTSIDE MY FRONT WINDOWS! As for parking the proposal to add in another potential 46 spaces off-street parking as well as impacting on existing access arrangements is fundamentally flawed!

Change To Plan: The Fennells field needs to be removed as a proposed housing site in this document.

Full Reference: O - 6408 - 8560 - H2 Residential Development - i, ii, iii, iv

6865 Comment

Respondent: De Merke Estates (Ms Emma Gladwin) [8643]

Agent: Barton Willmore (Miss Emma Gladwin) [8399]

Summary: Policy H2 recognises that there has been a small but constant supply of new housing on infill sites and garden plots, which can contribute to meeting local housing need, supporting such development subject to various criteria being met.

Policy H2 recognises the constraints of the District and seeks to support residential development where it would be appropriate, in accordance with the NPPF. As such we support the aims of Policy H2 in encouraging residential development on suitable infill sites, garden plots, minor residential schemes and vacant plots.

Change To Plan:

Full Reference: C - 6865 - 8643 - H2 Residential Development - None

6909 Comment

Respondent: Essex County Council (Mr Rich Cooke) [8452]

Agent: N/A

Summary: Policy H1 (Housing Allocations) mentions the requirement for development of allocated sites to meet specified design requirements. This stipulation also needs to apply to any other (unidentified / unallocated) sites that come forward by adding this requirement under Policy H2.

Change To Plan: ECC recommends adding a further criterion to Policy H2:

'(e) Development of all housing sites must accord with the principles of the Harlow and Gilston Garden Town Spatial Vision and Design Charter'

Full Reference: C - 6909 - 8452 - H2 Residential Development - None

6440 Object

Respondent: Morley Grove Residents Association (Sheila Sullivan) [5043]

Agent: N/A

Summary: I object to H3.1 because the threshold for number of HMOs in a row should be 1 in 10 (10%) and not 1 in 5 as proposed. Nationally the 1 in 10 threshold is the one most commonly adopted by local authorities. Greater density of HMOs adversely affects community cohesion. It is important for the town that an Article 4 Direction is established to remove permitted development rights for conversion of Use class C3 (single dwelling-house) to C4 (small HMO). This would ensure all such conversions needed prior planning consent.

Change To Plan: Article 4 Direction removing permitted development rights for conversion from C3 to C4 to be included to ensure prior planning consent is required and both neighbours and developers have access to an independent appeals procedure through the Planning Inspector. The threshold for HMOs would not exceed 1 in 10 out of a row or area of units.

Full Reference: O - 6440 - 5043 - H3 Justification - None

6484 Object **Respondent: Miller Strategic Land [5769]** **Agent: Andrew Martin - Planning (Mr Olivier Spencer) [5533]**

Summary: Our client recommends that Policy H5 is amended to limit Part M4(2) to the affordable element only and Part M4(3) to 10% of the affordable element.

Change To Plan: Our client respectfully requests that the first two paragraphs in Policy H5 are amended to read:
"All new affordable dwellings must be at least Building Control Part M4(2) standard for accessible and adaptable homes to meet the occupiers' future needs.
In addition, for major residential development, 10% of new affordable dwellings must be Building Control Part M4(3) standard (i.e. wheelchair user dwellings)."

Full Reference: O - 6484 - 5769 - H5 Accessible and Adaptable Housing - iv

6588 Object **Respondent: Barker Parry Town Planning Ltd. (Ms Elizabeth Fitzgerald) [8451]** **Agent: N/A**

Summary: The emerging policy takes this extant policy position much further stating that all new dwellings must be accessible and adaptable dwellings, in accordance with Part M4(2) of the Building Regulations.

There is a requirement under Building Regulations for all properties to meet Part M4(1), with Part M4(2) being an optional requirement. The policy requirement for all dwellings to comply with an optional Building Regulation requirement is not therefore justified and is considered to be unsound.

Change To Plan: This policy is considered to be flawed and therefore unsound, it is recommended that it be deleted to ensure housing development can be readily delivered and the five year housing land supply not brought into question.

Full Reference: O - 6588 - 8451 - H5 Accessible and Adaptable Housing - None

6705 Object **Respondent: Home Builders Federation (Mr Mark Behrendt) [8450]** **Agent: N/A**

Summary: This policy is unsound as it has not been justified

In considering whether to implement the optional technical standards on accessibility PPG sets out in paragraph 56-007 that local planning authorities must take into account the likely future needs for such homes, the type of homes needed to meet evidenced need, the accessibility of existing stock, how needs vary and the overall impact on viability. With regard to need it cannot be considered an appropriate interpretation of Government policy that all new homes should be built to their higher optional standard. Had this been the case then the Government would have made these standards mandatory. The Council's limited evidence solely reflects national concerns regarding an ageing population and as such provides no unique circumstances that warrant all new homes to be built to Part M4(2). It must also be remembered that the majority of the existing elderly and disabled population will already live in the Borough and are unlikely to want to move home. As such to require all new homes to be built to such standards would be inappropriate and largely ineffective in addressing the needs of those requiring a more accessible home. Whilst we recognise that there may be a need for some new homes to be built to M4(2) the evidence does not show that there is a need for all the new homes to be built to this standard. With regard to Part M4(3) the Council indicates within the policy that a proportion of all homes on major development sites should be built to part M4(3) on the basis of the proportion set out in the latest SHMA. This proportion is then set out in paragraph 14.25 of the Local Plan. Firstly, we would disagree that the proportion will be based on the latest SHMA. The impact of this standard on the cost of delivering new homes is significant and cannot be varied on the basis of a new SHMA. The proportion of new homes built to this standard must be set out in policy and if they need to be amended should only be through a review of the local plan and subject to the correct process and scrutiny. Secondly, paragraph 14.25 states that 10% of market housing should be built to M4(3). This is inconsistent with PPG which states at paragraph 56-009: "Local Plan policies for wheelchair accessible homes should be applied only to those dwellings where the local authority is responsible for allocating or nominating a person to live in that dwelling."

Change To Plan: The requirement for all homes to be built to part M4(2) be substantially reduced
 The requirement for market homes to be built to part M4(3) be deleted from paragraph 14.24
 Any requirement for affordable homes to be built for part M4(3) be included within the policy and the final sentence of the second paragraph of policy H5 be deleted.

Full Reference: O - 6705 - 8450 - H5 Accessible and Adaptable Housing - None

6745 Object**Respondent: Persimmon Homes (Mr David Moseley) [8437]****Agent: N/A**

Summary: In considering whether to implement the optional technical standards on accessibility PPG sets out in paragraph 56-007 that local planning authorities must take into account the likely future needs for such homes, the type of homes needed to meet evidenced need, the accessibility of existing stock, how needs vary and the overall impact on viability.

It is not an appropriate interpretation of Government policy that all new homes should be built to their higher optional standard. If this was the Government's intention, it would have made these standards mandatory.

We agree with the HBF that the Council's limited evidence solely reflects national concerns regarding an ageing population and as such provides no unique or local circumstances that warrant all new homes to be built to Part M4(2). Whilst there may be a need for some new homes to be built to M4(2) the evidence does not show that there is a need for all the new homes to be built to this standard.

With regard to Part M4(3) the Council indicates within the policy that a proportion of all homes on major development sites should be built to part M4(3) on the basis of the proportion set out in the latest SHMA. We agree with the HBF that the impact of this standard on the cost of delivering new homes is significant and cannot be varied on the basis of a new SHMA. The proportion of new homes built to this standard must be set out in policy and if they need to be amended should only be through a review of the local plan and subject to the correct process and scrutiny.

Paragraph 14.25 states that 10% of market housing should be built to M4(3). This is inconsistent with PPG which states at paragraph 56-009:

"Local Plan policies for wheelchair accessible homes should be applied only to those dwellings where the local authority is responsible for allocating or nominating a person to live in that dwelling."

Change To Plan: The requirement for all homes to be built to part M4(2) be substantially reduced

* The requirement for market homes to be built to part M4(3) be deleted from paragraph 14.24

* Any requirement for affordable homes to be built for part M4(3) be included within the policy and the final sentence of the second paragraph of policy H5 be deleted.

Full Reference: O - 6745 - 8437 - H5 Accessible and Adaptable Housing - None

6857 Object**Respondent: Redrow Homes (Ms Kate Holland) [8640]****Agent: Redrow Homes (Ms Kate Holland) [8640]**

Summary: The Policy should be supported by sufficient evidence to justify each of the standards, with adequate flexibility to take account of site specific circumstances, viability and in particular the need for all apartment buildings to comply with the accessibility standards. We object to these prescriptive requirements as it constitutes an unreasonable and inflexible approach which would not be 'Justified', 'Effective', or 'Consistent with National Policy' and is therefore not 'Sound'.

Change To Plan: Policy H5 implies that a quantum of market housing is also required to comply with Part M4(3). This would not be 'Consistent with National Policy' and therefore the requirement should be removed.

Full Reference: O - 6857 - 8640 - H5 Accessible and Adaptable Housing - None

6866 Object**Respondent: De Merke Estates (Ms Emma Gladwin) [8643]****Agent: Barton Willmore (Miss Emma Gladwin) [8399]**

Summary: HDC has not published any evidence relating to these requirements, which place considerable requirements and restrictions on developers, including the requirement to have level thresholds which is not always achievable.

As the definition of major developments includes the provision of 10 or more dwellings, these requirements could have significant implications for small to medium sized sites and could restrict delivery of smaller sites.

Change To Plan: HDC does not appear to have considered the implications of such standards, which could have a detrimental impact on delivery rates and viability. As such, Policy H5 is not currently justified.

Full Reference: O - 6866 - 8643 - H5 Accessible and Adaptable Housing - None

6632 Comment**Respondent: GLADMAN (Mr Phill Bamford) [8618]****Agent: N/A**

Summary: Policy H5 sets out that all new housing developments should meet Building Regulations Standard M4(2). The Written Ministerial Statement of 25th March 2015 confirms that the optional new national technical standards should only be required through Local Plans if they address a clearly evidenced need and where the impact on viability has been considered. It is therefore important that the Council has undertaken a local assessment which evidences the need for the adoption of Building Regulation Standard M4(2). The Council do not seem to have undertaken such an assessment.

Change To Plan:

Full Reference: C - 6632 - 8618 - H5 Accessible and Adaptable Housing - None

6910 Comment**Respondent: Essex County Council (Mr Rich Cooke) [8452]****Agent: N/A**

Summary: ECC notes and supports in principle that the policy states that:
'The provision of specialist housing developments will be supported on appropriate sites that will meet the needs of older people and other groups.'

However, this makes no reference to the scale of the need involved or any specific means to address this. The evidence position is that ECC assessed a need for 2,825 Independent Living units (available as rental or ownership units) to be delivered by 2020 in the County. In September 2016 ECC assessed a need with Harlow for 150 units to be provided by 2020. The ECC Independent Living programme has been developed by ECC to increase the supply of Independent Living units across Essex.

Change To Plan: ECC recommends addition of reference to this evidential position on scale of need to provide for local needs

This would ideally be referenced within the policy itself (as part of its requirements) and the supporting text (paragraphs 14.23 - 14.27).

Full Reference: C - 6910 - 8452 - H5 Accessible and Adaptable Housing - None

6594 Object **Respondent: Barker Parry Town Planning Ltd. (Ms Elizabeth Fitzgerald) [8451]** **Agent: N/A**

Summary: This proposed policy also sets out the preferred Market Housing mix, again drawn from the SHMA 2015. Unlike the Affordable Housing requirement, this mix has not been re-visited and is now considered to be out of date.

Developers are invariably best placed to understand the most up to date position in the housing market, particularly on larger schemes, where careful consideration has to be given to sales rates to ensure the delivery of the site is viable. The need to be up to date is essential and will always be reflective of the market at the time of the application, as opposed to the SHMA, which is already three years out of date.

Change To Plan: It is strongly recommended that housing mix be left to the developer to ascertain what is required locally and will therefore sell. Dictating, particularly market housing mix, will deter developers from the District as they will not wish to invest and develop sites that they will then struggle to sell. This is likely to impact on the Local Planning Authority's ability to deliver their five-year housing land supply.

Full Reference: O - 6594 - 8451 - H6 Housing Mix - None

6706 Object **Respondent: Home Builders Federation (Mr Mark Behrendt) [8450]** **Agent: N/A**

Summary: Whilst we recognise that the Council will require a range of different types and tenures of housing to be provided within the Borough, it is essential that any policy allows for sufficient flexibility on the basis of both the viability of delivering the Council's required mix of housing. At present the Council will require a very specific mix of development on the basis of figure 14.1 in the local plan. Whilst the viability study concludes that the local plan is broadly viable it does recognise that for more mixed developments viability is not as strong. Whilst this largely relates to the impacts of flatted developments it does show that housing mix can impact significantly on the viability of a development. The NPPF is clear that plans should be viable (paragraph 173) and flexible (paragraph 14) and at present we do not consider this policy to be consistent with these two aims. In order to ensure that this policy is sound it needs to be less rigid in the housing mix required and made more flexible and allow for viability concerns to be considered when agreeing the appropriate mix of housing on any site.

Change To Plan: The policy be amended to read:
"The Council will seek a range of housing types and sizes, across a range of tenures, on all major residential sites that will reflect the needs of the Borough any site specific concerns regarding viability and feasibility."

Full Reference: O - 6706 - 8450 - H6 Housing Mix - None

6746 Object **Respondent: Persimmon Homes (Mr David Moseley) [8437]** **Agent: N/A**

Summary: We share the HBF's concerns regarding the overly prescriptive nature of Policy H6. The NPPF is clear that plans should be viable (paragraph 173) and flexible (paragraph 14) and at present we do not consider this policy to be consistent with these two aims. In order to ensure that this policy is sound it needs to be less rigid in the housing mix required and made more flexible and allow for viability to be considered when agreeing the appropriate mix of housing on any site.

Change To Plan: The policy be amended to read:

"The Council will seek a range of housing types and sizes, across a range of tenures, on all major residential sites that will reflect the needs of the Borough any site specific concerns regarding viability and feasibility."

Full Reference: O - 6746 - 8437 - H6 Housing Mix - None

6485 Comment **Respondent: Miller Strategic Land [5769]** **Agent: Andrew Martin - Planning (Mr Olivier Spencer) [5533]**

Summary: Policy H6 seeks a range of housing types and sizes, across a range of tenures. Below the policy, Figure 14.1 sets out specific percentages for 1-5 bedroom properties, in both market and affordable tenures, based on the SHMA. However, it should be noted that the residential-led development at East Harlow is likely to involve a 10+ year delivery programme. As a result, housing needs will inevitably vary during this period and HDC will need to offer some flexibility in how it applies the housing mix presented at Figure 14.1, based on the latest evidence at the time.

Change To Plan:

Full Reference: C - 6485 - 5769 - H6 Housing Mix - None

6758 Comment **Respondent: Quod Planning (Mr Philip Murphy) [7958]** **Agent: N/A**

Summary: Paragraph 14.30 states with regard to housing type and mix that "The range of housing types, sizes and tenures is based on the current SHMA (see Fig. 14.1) or successor studies". It is however noted that subsequent to this, paragraph 14.41 includes some flexibility for Garden Towns, "The new Garden Communities in the Harlow and Gilston Garden Town also have an important role in diversifying the existing housing market and supporting economic aims. These sites could provide a wide range of types and tenures of homes, informed by site-specific evidence and ensuring that there is a balanced mix of sustainable and high-quality homes across the West Essex and Hertfordshire HMA."

Change To Plan: For clarity, it is suggested that Paragraph 14.30 is updated to include the following: "...or successor studies, taking account of the latest Strategic Housing Market Assessment and any additional up-to-date evidence, local demographic context and trends; local housing need and demand; and site issues and design considerations."

Full Reference: C - 6758 - 7958 - H6 Housing Mix - None

6858 Comment **Respondent: Redrow Homes (Ms Kate Holland) [8640]** **Agent: Redrow Homes (Ms Kate Holland) [8640]**

Summary: The 2015 SHMA identifies a housing mix at Figure 76; however, at paragraph 5.94 the SHMA states that the spatial distribution, appropriate locations for market and affordable housing, type and size of properties to be provided in different areas will be determined through the planning process. The standardised approach to applying the prescriptive mix across all sites fails to address more localised needs and demands, which may not align with the District wide mix and reduce the ability for the Plan to respond to changing circumstances and market conditions.

Change To Plan: The requirement to provide a housing mix compliant with the 2015 SHMA should therefore be removed because it is not 'Consistent with National Policy', as it fails to respond flexibly to changing circumstances (NPPF, Para 153).

Full Reference: C - 6858 - 8640 - H6 Housing Mix - None

6486 Object **Respondent: Miller Strategic Land [5769]** **Agent: Andrew Martin - Planning (Mr Olivier Spencer) [5533]**
Summary: Our client wishes to raise a holding objection to Policy H8 on the basis that the requirement for 30% affordable housing is not yet based on proportionate evidence (i.e. it is not "justified").
Change To Plan: Only a holding objection is raised at this stage.

Full Reference: O - 6486 - 5769 - H8 Affordable Housing - ii

6707 Object **Respondent: Home Builders Federation (Mr Mark Behrendt) [8450]** **Agent: N/A**
Summary: The affordable housing policy is unsound on the basis that it is ineffective and not consistent with national policy. We consider the policy H8 to be unsound as it sets out a minimum level of affordable housing that the Council expects and as such does not provide a clear statement as required by both Paragraph 17 and 154 of the NPPF. In setting out this target as a minimum the Council are creating unnecessary uncertainty for the house building industry. Developers should be able to cost schemes with a high degree of predictability and this policy does not support this position. At present this policy could be considered to be the starting point of a negotiation and that the Council will seek higher contributions.
Change To Plan: In order to make this policy sound we would recommend that the words "at least" be removed from the policy.

Full Reference: O - 6707 - 8450 - H8 Affordable Housing - None

6597 Comment **Respondent: Barker Parry Town Planning Ltd. (Ms Elizabeth Fitzgerald) [8451]** **Agent: N/A**
Summary: The need for 30% affordable housing to be provided on all major residential sites is however contrary to National Planning Policy Guidance. For the purposes of affordable housing provision, there is a distinct difference drawn between the Town and Country Planning (Development Management Procedure)(England) Order 2015 definition of major development and Government guidance on the 10-unit threshold, which requires affordable housing only to be provided on schemes of 11 units or more. The policy should be amended to reflect the NPPG.
Change To Plan: The policy should be amended to reflect all potential affordable housing types as set out within the draft NPPF and allow for flexibility should the definition be again varied in the future, thus ensuring the plan policy has longevity and remains sustainable. In its current form this policy is considered to be unsound.

Full Reference: C - 6597 - 8451 - H8 Affordable Housing - None

6747 Comment **Respondent: Persimmon Homes (Mr David Moseley) [8437]** **Agent: N/A**
Summary: We agree with the HBF that Policy H8 is unsound as it sets out a minimum level of affordable housing that the Council expects and as such does not provide a clear statement as required by both Paragraph 17 and 154 of the NPPF. The development industry needs to be able to consider the cost schemes with a high degree of predictability and this policy does not enable this to happen.
Change To Plan: In order to make this policy sound we would recommend that the words "at least" be removed from the policy.

Full Reference: C - 6747 - 8437 - H8 Affordable Housing - None

6768 Comment**Respondent: Tetlow King Planning (MEGHAN ROSSITER) [8630]****Agent: N/A**

Summary: Policy H8 is a very succinct policy on affordable housing, providing little direction on the Council's tenure or type mix expectations. While the minimum figure of 30% affordable housing on all major residential development provides a strong indication of the Council's requirement, it does not address the potential for higher levels to be delivered in the new Garden Communities, nor for lower levels on smaller developments. Setting zone-specific targets helps to increase the overall level of affordable housing, as well as targeting those areas where a different mix of affordable housing tenures can be delivered. We suggest, in light of the proposed NPPF2 definition of affordable housing, that the policy make explicit reference to the need for a diverse range of affordable housing to be delivered across Harlow, including social and affordable rent, intermediate affordable and affordable rent to buy. We recommend the policy be reworked to include more specific targets for the allocated housing sites, with a paragraph setting out the expectation that developments deliver a range of affordable housing tenures, including those aimed at assisting people into home ownership.

By wording the policy in this way, developments will be encouraged to come forward with a greater diversity of tenures that reflect not only priority needs, but those needs not currently met by the delivery of social, affordable rent, and intermediate affordable tenures. Leaving this expectation for the implementation paragraphs following the policy fails to reflect the Council's ambitions to meet affordable housing needs, and to properly target areas with the greatest scope for high delivery.

Change To Plan: As the Council is a landowner with interest in bringing forward some of the allocated development sites, this Plan should be as ambitious as possible to maximise affordable housing delivery.

Full Reference: C - 6768 - 8630 - H8 Affordable Housing - None

6487 Object **Respondent: Miller Strategic Land [5769]** **Agent: Andrew Martin - Planning (Mr Olivier Spencer) [5533]**

Summary: Our client recommends that HDC adopts a similar approach to that used by its neighbours at EHDC, who agreed at EiP to reduce the proportion of plots dedicated to self-build from 5% to 1%.

Change To Plan: Our client respectfully requests that the first paragraph in Policy H9 is amended to read:
"Development of housing sites greater than 50 dwellings must include 1% of serviced plots for self-build..."

Full Reference: O - 6487 - 5769 - H9 Self-build and Custom-build Housing - ii

6708 Object **Respondent: Home Builders Federation (Mr Mark Behrendt) [8450]** **Agent: N/A**

Summary: This policy is unsound as it has not been justified and is inconsistent with national policy
Whilst we support the encouragement of self-build housing through the local plan we do not consider the requirement for sites of over 50 to provide up to 5% service plots for self and custom house building to be justified or consistent with national policy.
Firstly, we could find no analysis as to how many homes are likely to be required based on the self-build register in order to justify the proportions set out in the policy. Based on the allocations to be made in the plan this would deliver around 170 self-build plots however, it is not clear whether this will meet needs or be a significant over provision. Secondly, whilst we recognise that Local Planning Authorities now have a duty to promote self-build housing we do not consider the Council to have looked at sufficient options with regard to how it can provide plots to support self-builders. Paragraph 57-024 of the PPG sets out a variety of approaches that need to be considered - including the use of their own land. This is reiterated in para 57-14 of the PPG which sets out the need for Council's to consider how they can support the delivery of self-build plots through their housing strategy, land disposal and regeneration functions. We cannot find any evidence as to the Council's consideration of other reasonable approaches to delivery as suggested in PPG. Without such consideration it would appear that the Council is seeking to place the burden for delivery of self-build plots on larger sites without looking sufficiently at other delivery mechanisms as set out in national guidance. We also consider the policy to be inconsistent with the third bullet point of paragraph 57-025 of PPG. This outlines that the Council should engage with landowners and encourage them to consider self-build and custom house building. The approach taken by the Council moves beyond encouragement and requires land owners to bring forward plots.

Change To Plan: That the policy be deleted and replaced with a policy that seeks to encourage the provision of self-build plots.

Full Reference: O - 6708 - 8450 - H9 Self-build and Custom-build Housing - None

6748 Object **Respondent: Persimmon Homes (Mr David Moseley) [8437]** **Agent: N/A**

Summary: The requirement for sites of over 50 to provide up to 5% service plots for self and custom house building is not justified or consistent with national policy.

The Council's evidence base does not contain an analysis as to how many homes are required based on the self-build register in order to justify the proportions set out in the policy.

We agree with the HBF that the Council needs to examine the options with regard to how it can provide plots to support self-builders. Paragraph 57-024 of the PPG sets out a variety of approaches that need to be considered - including the use of their own land. This is reiterated in para 57-14 of the PPG which sets out the need for Council's to consider how they can support the delivery of self-build plots through their housing strategy, land disposal and regeneration functions. As detailed by the HBF, the Council does not appear to have provided evidence of the consideration of other reasonable approaches to delivery as suggested in PPG.

Change To Plan: That the policy be deleted and replaced with a policy that seeks to encourage the provision of self-build plots.

Full Reference: O - 6748 - 8437 - H9 Self-build and Custom-build Housing - None

6759 Object**Respondent: Quod Planning (Mr Philip Murphy) [7958]****Agent: N/A**

Summary: Policy H9 Self-build and Custom-build Housing sets out that "Development of housing sites greater than 50 dwellings must include 5% of serviced plots for self-build, as evidenced by the Self-Build Register, unless such inclusion would render the development unviable". The Plan also makes provision for conversion of the serviced plots to other forms of tenure in the event that uptake by the market is subdued.
There is a significant variance between this and the emerging East Herts District Plan Policy HOU8 Self-Build and Custom Build Housing, which only requires one percent of dwelling plots on sites of more than 200 dwellings.

Change To Plan: It would be appropriate for a reduction to 1% on sites over 200 dwellings which would still generate a significant and deliverable quantum of self/custom build plots.

Full Reference: O - 6759 - 7958 - H9 Self-build and Custom-build Housing - None

6633 Comment**Respondent: GLADMAN (Mr Phill Bamford) [8618]****Agent: N/A**

Summary: Policy H9 requires housing developments providing 10 dwellings or more to provide land for self-build and custom build dwellings to help meet identified local demand. Whilst the concept of Self Build and Custom Build Housing is supported, Gladman has concerns regarding Policy H9 as it is written. The inclusion of plots on large scale sites does not add to the supply of houses overall (it merely changes the housing mix from one product to another). It is also difficult to assess how it will be implemented given issues around working hours, site access, health and safety etc. that are associated with large scale development sites. The percentage of provision on sites should also be determined on detailed evidence of need which the Council appears not to have produced and the provision of these plots should also be subject to viability testing.

Change To Plan:

Full Reference: C - 6633 - 8618 - H9 Self-build and Custom-build Housing - None

6859 Comment**Respondent: Redrow Homes (Ms Kate Holland) [8640]****Agent: Redrow Homes (Ms Kate Holland) [8640]**

Summary: The Council has published its SHMA (2015) as part of its evidence base to support the Local Plan consultation. Paragraph 6.43 states that a survey to ascertain levels of demand for self-build could be undertaken in the future. As such, the Council has not produced any robust evidence of the need for self-build and this requirement has not been assessed as part of the Council's SHMA. The Council has also not published any information about the number of people on the Council's Self Build Register.

As a consequence, the Council has not provided any evidence in respect of the specific need for self-build housing in Harlow over the Plan Period to justify the 5% requirement. Policy H9 has therefore not been 'Positively Prepared', 'Justified' or 'Consistent with National Policy'.

Change To Plan: The policy should be deleted.

Full Reference: C - 6859 - 8640 - H9 Self-build and Custom-build Housing - None

**CHAPTER: DEVELOPMENT
MANAGEMENT****H10 Travellers' Pitches and Plots****6728 Comment****Respondent: National Federation of Gypsy Liaison Groups (A. Yarwood) [8627]****Agent: N/A**

Summary: The requirement that evidence of need is a pre-requirement is unacceptable and renders the policy non-compliant with the guidance set out in DCLG's Planning Policy for Traveller Sites (PPTS). Paragraph 10 of PPTS requires that Local Plans set out criteria for dealing with applications even where no need has been identified. Thus the Plan is unsound and the reference to evidence of need should be deleted. Furthermore criteria (i) is incompatible with the statement supporting policy HS4 which recognises that provision needs to be made for Gypsies who do not meet the definition.

Change To Plan:

Full Reference: C - 6728 - 8627 - H10 Travellers' Pitches and Plots - None

CHAPTER: DEVELOPMENT
MANAGEMENT

H10 Implementation

6505 Comment Respondent: Environment Agency (Miss Lisa Mills) [8443]

Agent: N/A

Summary: We welcome the inclusion of the policy that new pitches and plots must not pose risk of land contamination or flooding. This policy could be strengthened further in the implementation section by referring to the sequential test for site allocations and cross referencing with policy PL10.

Change To Plan:

Full Reference: C - 6505 - 8443 - H10 Implementation - None

CHAPTER: DEVELOPMENT
MANAGEMENT

PR1 Development within Employment Areas

6560 Comment Respondent: BOC (Glen Jenkins) [8571]

Agent: N/A

Summary: (c) the development provides a complementary benefit to the employment area or an ancillary benefit to an existing business, and would not have an adverse effect on the overall provision of employment land for example by the introduction of a noise sensitive occupier;

Change To Plan: (c) the development provides a complementary benefit to the employment area or an ancillary benefit to an existing business, and would not have an adverse effect on the overall provision of employment land for example by the introduction of a noise sensitive occupier;

Full Reference: C - 6560 - 8571 - PR1 Development within Employment Areas - None

CHAPTER: DEVELOPMENT
MANAGEMENT

PR3 Employment Development Outside Employment Areas and Neighbourhood Service Areas

6564 Comment Respondent: BOC (Glen Jenkins) [8571]

Agent: N/A

Summary: Add the following to PR3

(d) the proposed use would not have an adverse effect on the overall provision of employment land, for example by the introduction of a noise sensitive occupier

Change To Plan: Add the following to PR3

(d) the proposed use would not have an adverse effect on the overall provision of employment land, for example by the introduction of a noise sensitive occupier

Full Reference: C - 6564 - 8571 - PR3 Employment Development Outside Employment Areas and Neighbourhood Service Areas - None

CHAPTER: DEVELOPMENT
MANAGEMENT

PR4 Improving Job Access and Training

6488 Object Respondent: Miller Strategic Land [5769]

Agent: Andrew Martin - Planning (Mr Olivier Spencer) [5533]

Summary: Although our client supports the principle behind this policy, i.e. to get local residents back into work and to improve their skills level, additional information is required: to explain how these obligations could work in reality; to set out the level of obligation likely to be sought; and, to assess the viability implications of these requirements.

Change To Plan: Our client respectfully requests that part (1) in Policy PR4 is deleted and further evidence is presented to justify the inclusion of parts (2) to (4)

Full Reference: O - 6488 - 5769 - PR4 Improving Job Access and Training - ii

CHAPTER: DEVELOPMENT
MANAGEMENT

PR5 The Sequential Test and Principles for Main Town Centre Uses

6773 Comment **Respondent: Indigo Planning Limited (Mr Diogo Duraes) [8632]** **Agent: N/A**

Summary: Proposed Policy PR5 suggests the requirement for an impact assessment to be submitted with proposals of more than 500 sq m on sites outside town centres. We consider that the threshold should be increased to bring it in line with the NPPF threshold (paragraph 26).

Change To Plan:

Full Reference: C - 6773 - 8632 - PR5 The Sequential Test and Principles for Main Town Centre Uses - None

CHAPTER: DEVELOPMENT
MANAGEMENT

PR7 Sub-division and Internal Alteration of Town Centre Units

6774 Object **Respondent: Indigo Planning Limited (Mr Diogo Duraes) [8632]** **Agent: N/A**

Summary: Proposed Policy PR7 states that the sub-division of retail units in the town centre must (for units of 2,500 sqm or more) provide two years' worth of marketing evidence. Two years' worth of evidence is an unreasonable requirement and could result in a unit being vacant for up to two years whilst the evidence is gathered thus harming the vitality and viability of the town centre. This requirement will put businesses under more pressure, preventing them from using their retail floorspace flexibly and ensuring it can be occupied.

Change To Plan: this policy requirement should be removed.

Full Reference: O - 6774 - 8632 - PR7 Sub-division and Internal Alteration of Town Centre Units - None

CHAPTER: DEVELOPMENT
MANAGEMENT

16. LIFESTYLES

6452 Comment **Respondent: Deanery of Harlow (Anglican) (Revd Martin Harris) [8586]** **Agent: N/A**

Summary: Does Lifestyle need a section on green issues eg efficient energy use? Sustainable development refers to a clean and green environment. Does more work need to be done so as to ensure that there is a real focus on this, one which combines with a priority for local development. Though there is the presumption, unless this is fleshed out there is danger that this would easily be ignored.

Change To Plan:

Full Reference: C - 6452 - 8586 - 16. LIFESTYLES - None

6911 Comment **Respondent: Essex County Council (Mr Rich Cooke) [8452]** **Agent: N/A**

Summary: This chapter on Lifestyles addresses provision / access to open space, recreation and sports facilities - but does not reference broader healthy / active lifestyles and behaviours and the need to enable and promote these. This needs to make clear how the Plan strategy and actions will address the needs of current and future local populations.

These things mean that the NPPF requirements around Health and Wellbeing (NPPF, paragraphs 70 and 171) are not currently met.

Change To Plan: ECC (Public Health) recommends that this section is reviewed comprehensively to build upon its existing content that provides a useful, initial basis for the active lifestyles element of health and wellbeing.

ECC will review appropriate Local Plan content and suggestions used elsewhere and recommends early joint working with HC to agree the form of content and new approaches to include

Full Reference: C - 6911 - 8452 - 16. LIFESTYLES - None

6599 Object **Respondent: Barker Parry Town Planning Ltd. (Ms Elizabeth Fitzgerald) [8451]** **Agent: N/A**

Summary: It is considered that this policy lacks a robust evidence base to ensure developments deliver facilities that meet a demonstrable need. The content of the policy should be revisited to enable a more appropriate and flexible approach to be taken to provision of open space and sports facilities etc, to enable improved facilities to be provided, as well as meeting a demonstrable need.

Change To Plan:

Full Reference: O - 6599 - 8451 - L1 Open Spaces, Play Areas and Sporting Provision and Facilities in Major Development - None

6867 Comment **Respondent: De Merke Estates (Ms Emma Gladwin) [8643]** **Agent: Barton Willmore (Miss Emma Gladwin) [8399]**

Summary: Policy L1 states that in major development public open space and play space are required, with allotments and sporting provision and facilities required where appropriate. This is not always achievable in smaller sites, particularly if a scheme just falls within the definition of major development.

Change To Plan: Policy L1 should be amended to require public open space and play space where appropriate. This is further pertinent given that HDC is proposing the loss of public open space and play space for housing allocations. These sites are all owned by HDC, with HDC potentially significantly profiting from the loss of open space with developers currently required to subsequently make up the shortfall.

Full Reference: C - 6867 - 8643 - L1 Open Spaces, Play Areas and Sporting Provision and Facilities in Major Development - None

6463 Support **Respondent: The Theatres Trust (Tom Clarke) [216]** **Agent: N/A**

Summary: As set out in our representation at the previous stage, the Trust welcomes this policy and the protection it will afford to Harlow's valued local facilities.

Change To Plan:

Full Reference: S - 6463 - 216 - L2 The Provision and Loss of Recreational, Sporting, Cultural and Community Facilities - None

6454 Comment **Respondent: Deanery of Harlow (Anglican) (Revd Martin Harris) [8586]** **Agent: N/A**

Summary: I welcome the reference to places of worship under L2 (Lifestyle Implementation). Could there be a specific reference somewhere to s106 monies being available for local including adjoining community etc activities. Could there also be a reference to places of worship under 4.20? Thus would reflect the original vision of the Master Plan for Harlow.

Change To Plan:

Full Reference: C - 6454 - 8586 - L2 The Provision and Loss of Recreational, Sporting, Cultural and Community Facilities - None

6464 Comment

Respondent: The Theatres Trust (Tom Clarke) [216]

Agent: N/A

Summary: Although we support the policy, we consider it could be strengthened by setting out criteria by which proposals for the loss of facilities will be assessed. We would recommend this to include evidence of marketing for an appropriate period (at least one year) at a rent/sale price appropriate to the condition and existing use of the facility, and that it has been marketed through appropriate channels relevant to the nature of the facility.

Change To Plan:

Full Reference: C - 6464 - 216 - L2 Implementation - None

6489 Object **Respondent: Miller Strategic Land [5769]** **Agent: Andrew Martin - Planning (Mr Olivier Spencer) [5533]**
Summary: If HDC is minded to retain Policy L3 in the Local Plan, it should prepare and present evidence to demonstrate where there are public art deficiencies in the Town, how those deficiencies should be addressed and the level of contribution / obligation likely to be necessary to do so.
Change To Plan: Our client respectfully requests that part (1) in Policy L3 is deleted.

Full Reference: O - 6489 - 5769 - L3 Development Involving the Provision or Relocation or Loss of Public Art - ii, iv

6709 Object **Respondent: Home Builders Federation (Mr Mark Behrendt) [8450]** **Agent: N/A**
Summary: Part 1 of this policy is unsound as it is unjustified and inconsistent with national policy
Planning Practice Guidance sets out the situation with regard to existing legislation on planning obligations. In particular it states that:
"Planning obligations assist in mitigating the impact of unacceptable development to make it acceptable in planning terms. Planning obligations may only constitute a reason for granting planning permission if they meet the tests that they are necessary to make development acceptable in planning terms, directly related to the development and fairly and reasonably related in scale and kind" (Ref: 23b-001-20161116).
The Council have not established within the plan or the supporting evidence base how it considers public art to meet any of these tests. Whilst we recognise that public art can play a role in making interesting and exciting public spaces if the Council is to require all major developments to have public art it must have evidence to show how this policy meets the required tests in relation to all such sites.
Change To Plan: Part of this policy should be deleted

Full Reference: O - 6709 - 8450 - L3 Development Involving the Provision or Relocation or Loss of Public Art - None

6868 Object **Respondent: De Merke Estates (Ms Emma Gladwin) [8643]** **Agent: Barton Willmore (Miss Emma Gladwin) [8399]**
Summary: The justification for this is to continue the legacy of Harlow as a town of public art and sculpture. However, there is no consideration regarding the viability impact that this may have, particularly on smaller sites.
Policy L3 is not currently justified or consistent with national policy, with Paragraph 174 of the NPPF stating Councils should assess the likely cumulative impacts of proposed local standards on new developments. HDC has not done this
Change To Plan: Policy L3 should be amended to require public art where appropriate to be meet the tests of 'soundness'.

Full Reference: O - 6868 - 8643 - L3 Development Involving the Provision or Relocation or Loss of Public Art - None

6455 Support **Respondent: Deanery of Harlow (Anglican) (Revd Martin Harris) [8586]** **Agent: N/A**
Summary: I welcome the focus on the provision of local art.
Change To Plan:

Full Reference: S - 6455 - 8586 - L3 Development Involving the Provision or Relocation or Loss of Public Art - None

6912 Comment **Respondent: Essex County Council (Mr Rich Cooke) [8452]** **Agent: N/A**
Summary: ECC notes that Public Art is an important part of Harlow's historic environment and not all of it is protected by national designation. As such a clause should be added stating that the loss of public art will only be permitted where it can be demonstrated that the loss will not cause harm to the historic significance of the art work or its setting.
Change To Plan: Revise and strengthen Policy L3 (2) by adding a clause stating that the loss of public art will only be permitted where it can be demonstrated that the loss will not cause harm to the historic significance of the art work or its setting.

Full Reference: C - 6912 - 8452 - L3 Development Involving the Provision or Relocation or Loss of Public Art - None

6674 Comment

Respondent: Hertfordshire County Council (Mr Martin Wells) [8622]

Agent: N/A

Summary: Paragraph 17.4. HCC has the equivalent documentation that is listed within this paragraph. This applies to the development within Herts (ie Gilston) and therefore its plan should also be considered where relevant.

Paragraph 17.10 should be amended, as shown below, to reflect both HCC and Essex County Council (ECC) as Local Highway Authorities, as the developments within Harlow are linked to the proposed Gilston Area in East Herts District.

Change To Plan:

Full Reference: C - 6674 - 8622 - 17. INFRASTRUCTURE - None

6749 Object

Respondent: Persimmon Homes (Mr David Moseley) [8437]

Agent: N/A

Summary: The Policy states; 'Development must provide electric vehicle charging points (EVCPs) in accordance with the latest government guidance'. It is not clear what government guidance is being referred to. Policy IN1 is unsound as it refers to an unspecified standard that could be amended and as such does not provide a clear statement as required by both Paragraph 17 and 154 of the NPPF.

The impact of a (unspecified) standard on the cost of delivering new homes could be significant and should not be varied on the basis of unspecified future guidance. If necessary, the standard must be set out in policy and if they need to be amended should only be done so through a review of the local plan.

Change To Plan: That the policy be deleted and replaced with a policy that specifies a standard that has been fully accounted for within viability assessments and that should only be sought where practicable.

Full Reference: O - 6749 - 8437 - IN1 Development and Sustainable Modes of Travel - None

6869 Object

Respondent: De Merke Estates (Ms Emma Gladwin) [8643]

Agent: Barton Willmore (Miss Emma Gladwin) [8399]

Summary: there is no Government guidance that sets standards or requirements for such charging points

Change To Plan: Policy IN1 is therefore not justified and should be removed.

Full Reference: O - 6869 - 8643 - IN1 Development and Sustainable Modes of Travel - None

6578 Comment

Respondent: Canal & River Trust (Ms Tessa Craig) [8612]

Agent: N/A

Summary: Waterway corridors provide an ideal environment for sustainable active travel and we welcome reference in Policy IN1 to new development being required to link with and where appropriate improve the existing network of cycleways and paths. The list of routes identified in Policy IN1 could however usefully be expanded to include reference to towpaths to provide clarity on this matter.

The River Stort provides a flat, direct and easy to access route for walking and cycling and close links with the rail network in the Harlow area mean that the towpath can easily be used for the first/last mile of journeys and have a positive impact on congestion as well as the health and wellbeing of local people.

Improved access and relatively simple improvements to the towpath can have a big impact on people's propensity to use it as part of their daily routine.

Whilst Policy IN1 refers to new development contributing to the improvement and development of routes, such reference is missing within the justification of the policy.

The Trusts therefore consider that more emphasis could be placed on the benefits of upgrading existing infrastructure and access to it to support active travel within the policy justification

Change To Plan:

Full Reference: C - 6578 - 8612 - IN1 Development and Sustainable Modes of Travel - None

6661 Comment **Respondent: Hertfordshire County Council (Mr Martin Wells) [8622]** **Agent: N/A**

Summary: 1. Sustainable Accessibility is lacking in public transport requirements or links to sustainable transport corridors and does not go far enough to enable real mode shift. The justification of this policy appears lacking and outdated in providing an understanding of how crucial a significant increase to sustainable transport is required within Harlow. Whilst some sections of the justification are encouraging, this does not seem to have been followed through into the policy wording, the result is a poor policy. It is also considered that this policy would not go far enough in supporting policy HGT1 nor the wider objectives set out within the plan. Policy HGT1, Section i states: "Create a step change in modal shift by contributing to the delivery of the Sustainable Transport Corridors and establishing an integrated, accessible and safe transport system which maximises the use of the sustainable high quality transport modes of walking, cycling and the use of public and community transport to promote healthy lifestyles and provide linkages to and from Harlow and the new Garden Town Communities."
HCC fully support the intention of the Local Plan to enable significant mode shift, However, the Highway Authority is concerned with the strength and depth of part 1 of Policy IN1.

Change To Plan:

Full Reference: C - 6661 - 8622 - IN1 Development and Sustainable Modes of Travel - None

6860 Comment **Respondent: Redrow Homes (Ms Kate Holland) [8640]** **Agent: Redrow Homes (Ms Kate Holland) [8640]**

Summary: Policy IN1 relates to the need to incorporate sustainable methods of travel within all development proposals. In particular, Part 2 of the Policy requires the provision of Electric Vehicle Charging Points in accordance with latest government guidance. The consultation draft of the NPPF refers to the planning system being required to support the transition to a low carbon future and support renewable and low carbon energy and associated infrastructure (Paragraph 147). However, the NPPF (2018) makes no direct reference to electric vehicle charging points nor does it set a required standard. Further, the Council has not undertaken an assessment of viability to consider the impact of the imposition of any standards upon development viability.

Paragraphs 157 and 177 of the NPPF (2012) require Local Plans to plan positively for infrastructure needs throughout the Plan Period. The Council has not undertaken any form of assessment as to the need for infrastructure upgrades (which may be wider than the Site) associated with additional demand upon the National Grid.

Change To Plan: It is our experience that the installation of such infrastructure may require reinforcement of the existing electrical network to accommodate additional demand. National Grid require sufficient supply to be made for all households to return home at the same time and plug in their vehicles. In circumstances where there is insufficient supply, developers are required to pay to reinforce electricity supplies which is an extremely costly exercise and can lead to delays in the delivery of housing.

Policy IN1 has therefore not been 'positively prepared' and is not 'justified' or 'consistent with National Policy' and is therefore not 'Sound'. The Policy should therefore be deleted.

Full Reference: C - 6860 - 8640 - IN1 Development and Sustainable Modes of Travel - None

6913 Comment **Respondent: Essex County Council (Mr Rich Cooke) [8452]** **Agent: N/A**

Summary: Policy IN1 Sustainable Accessibility does not mention any requirements to link to or provide public transport services. Suggest amendments are made to include this, particularly as the following supporting text refers to trains and buses and public transport.

Change To Plan: ECC (Highways) recommends that a requirement is added to Policy SIR1 to cover this gap:

'New developments including redevelopments, changes of use and Town Centre and transport interchange improvements will be required to link to (or provide) public transport services, the existing cycleway, footway, public right of way and bridleway network, and, where appropriate.'

Full Reference: C - 6913 - 8452 - IN1 Development and Sustainable Modes of Travel - None

6914 Comment

Respondent: Essex County Council (Mr Rich Cooke) [8452]

Agent: N/A

Summary: The thrust of this section is welcomed but this could usefully go further in scope and coverage.

Travel Plans are referred to, but it is recommended that the potential for wider Travel Planning co-ordination is referenced to enable more effective encouragement of mode shift of existing and new residents and workers.

The Local Plan does not mention the need for behavioural change in order to achieve sustainable travel/step-change. This is considered very important in order to influence travel choices and achieve more sustainable travel

Change To Plan: ECC (Highways) recommends that a reference is added to the potential for wider Travel Planning co-ordination.

Also add a reference to the need for behavioural change (reason: in order to achieve sustainable travel/step-change).

The latter reference could be in the preceding 'Justification' section at paragraphs 17.9 - 17.11.

Full Reference: C - 6914 - 8452 - IN1 Implementation - None

6490 Object

Respondent: Miller Strategic Land [5769]

Agent: Andrew Martin - Planning (Mr Olivier Spencer) [5533]

Summary: Policy IN2 confirms that development will be supported where it meets a number of highway network related criteria, including that it should not cause a "significant" detrimental impact on highway congestion and movement.

However, the corresponding test at paragraph 32 of the NPPF states that development should only be refused on transport grounds where the residual cumulative impacts of development are "severe".

Therefore to be consistent with national policy, part (a) in Policy IN2 should be amended to refer to "severe" impacts.

Change To Plan: Our client respectfully requests that part (a) of Policy IN2 is amended to read: "it would not cause a severe detrimental impact on highway congestion and movement;".

Full Reference: O - 6490 - 5769 - IN2 Impact of Development on the Highways Network including Access and Servicing - iv

6861 Comment

Respondent: Redrow Homes (Ms Kate Holland) [8640]

Agent: Redrow Homes (Ms Kate Holland) [8640]

Summary: Paragraph 32 of the NPPF requires all developments that generate significant amounts of vehicular movements to be supported by a Transport Statement or Assessment. Plans and decisions should

take account of whether safe and suitable access to the site can be achieved by all people (bullet 2). Further, bullet point 3 states that development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe.

The policy requirement contained within Policy IN2 is therefore a much higher test than that set out within the NPPF Paragraph 32 which sets a severity test. The Policy is therefore not 'consistent with National Policy' and therefore cannot be considered 'Sound'.

Change To Plan:

Full Reference: C - 6861 - 8640 - IN2 Impact of Development on the Highways Network including Access and Servicing - None

6710 Object

Respondent: Home Builders Federation (Mr Mark Behrendt) [8450]

Agent: N/A

Summary: The policy is unsound as it is not consistent with national policy

The Council does not set out in this policy, or elsewhere in the local plan, what is required by an applicant with regard to the actual parking standards. The approach taken by the Council is therefore unsound for two reasons. Firstly it does not comply with legislation that prevents the Council from setting policy in supplementary planning documents, or any other guidance document, which cannot be challenged through an Examination in Public. This principal was most recently tackled in William Davis Ltd & Ors v Charnwood Borough Council [2017] EWHC 3006 (Admin) (23 November 2017) where supplementary planning document strayed into an area that should be considered by a development plan document. This decision quashed an SPD that contained policies that clearly encouraged and imposed development management policies against which a development could be refused. Policy can only be established through the Local Plan.

Change To Plan: Parking standards should be included within the local plan and reference to the Essex Vehicle Parking Standards should be removed.

Full Reference: O - 6710 - 8450 - IN3 Parking Standards - None

6662 Comment

Respondent: Hertfordshire County Council (Mr Martin Wells) [8622]

Agent: N/A

Summary: As commented on, HCC are concerned that the wording of Policy IN3: Parking Standards would not enable the Local Plan to restrict parking in favour of sustainable transport provision. There is also concern that the policy is incongruent with Objective 13.

There is concern that this approach to parking would be open to be interpretation, and would not enable effective parking restriction at sustainable locations as proposed within supporting text of the local plan.

Moving Forward

HCC as Highway Authority does not consider the plan to be unsound. However, modifications could be made to ensure that the deliverability of the required mode shift is achievable and supported by policy, as there is concern that failure to deliver this will have wider impacts on HCC's transport network.

The Highway Authority remains committed to a close working relationship supporting the delivery of the Harlow Local Plan and the Harlow and Gilston Garden Towns.

Change To Plan:

Full Reference: C - 6662 - 8622 - IN3 Parking Standards - None

6675 Comment

Respondent: Hertfordshire County Council (Mr Martin Wells) [8622]

Agent: N/A

Summary: Parking Standards. It should be noted that Essex vehicle parking standards would not apply to development in Hertfordshire ie the Gilston Area.

Change To Plan:

Full Reference: C - 6675 - 8622 - IN3 Parking Standards - None

6711 Object

Respondent: Home Builders Federation (Mr Mark Behrendt) [8450]

Agent: N/A

Summary: The policy is unsound because they are unjustified and contrary to national policy.

Following the Government's Housing Standards Review, the Written Ministerial Statement of 25 March 2015 announced that local planning authorities preparing Local Plans "should not set any additional standards or requirements relating to the construction, internal layout or performance of new dwellings". In terms of the construction, internal layout and performance of new dwellings local planning authorities are only allowed to adopt the three optional technical standards, subject to evidence of need and viability. Council's should not seek higher standards than Building Regulations on any other technical standard - including Part R1 Physical infrastructure for high speed electronic communications networks.

Change To Plan: The policy should be deleted.

Full Reference: O - 6711 - 8450 - IN4 Broadband and Development - None

6750 Object

Respondent: Persimmon Homes (Mr David Moseley) [8437]

Agent: N/A

Summary: We agree with the HBF that following the Government's Housing Standards Review, the Written Ministerial Statement of 25 March 2015 announced that local planning authorities preparing Local Plans "should not set any additional standards or requirements relating to the construction, internal layout or performance of new dwellings".

In terms of the construction, internal layout and performance of new dwellings local planning authorities are only allowed to adopt the three optional technical standards, subject to evidence of need and viability. Council's should not seek higher standards than Building Regulations on any other technical standard - including Part R1 Physical infrastructure for high speed electronic communications networks.

Change To Plan: The policy should be deleted.

Full Reference: O - 6750 - 8437 - IN4 Broadband and Development - None

6491 Comment

Respondent: Miller Strategic Land [5769]

Agent: Andrew Martin - Planning (Mr Olivier Spencer) [5533]

Summary: Our client supports the objective in Policy IN4 to provide infrastructure suitable to enable the delivery of high-speed broadband services in all major development across the Harlow area.

However, for the avoidance of doubt, it is only the master developer's role to facilitate delivery by providing conduits and other infrastructure - not to provide or ensure that all new dwellings actively take up such a service.

Change To Plan:

Full Reference: C - 6491 - 5769 - IN4 Broadband and Development - None

6579 Support

Respondent: Canal & River Trust (Ms Tessa Craig) [8612]

Agent: N/A

Summary: The Trust notes and welcomes policy IN6 which recognises the impact new development can have on local infrastructure and the need to mitigate any adverse impacts. Development in the vicinity of our waterways can increase the number of users which, whilst generally welcomed, may require existing towpaths to be upgraded or significantly increase on going liabilities for the Trust. We note that the council is intending to produce a Planning Obligations SPD and would welcome the opportunity to comment further on this.

Change To Plan:

Full Reference: S - 6579 - 8612 - IN6 Planning Obligations - None

6741 Comment

Respondent: Natural England (Ms Sarah Fraser) [8628]

Agent: N/A

Summary: This policy is likely to require alteration depending on the outcomes of the HRA to ensure the deliverability of any agreed mitigation strategy. We note that this policy sets out the requirement to provide for 'environmental protection' but advises that 'net gains' for the environment should also be provided by this policy. We note from paragraph that Green Infrastructure, Biodiversity and Wildlife Habitats are considered to fall under the bracket of 'Infrastructure' but feel the policy would benefit from explicit inclusion of environmental enhancement alongside 'protection'.

Change To Plan:

Full Reference: C - 6741 - 8628 - IN6 Planning Obligations - None

6760 Comment

Respondent: Quod Planning (Mr Philip Murphy) [7958]

Agent: N/A

Summary: Policy IN6 explains that "where a planning application extends beyond the district boundary, prior agreement for the provision and location of any necessary obligations will need to be obtained from relevant parties". The justification for this is that 'New development can have wider impacts, such as development generating additional traffic movements outside the district or a larger application straddling the administrative boundary. In these cases, agreement may also be required with the adjoining Council and also Essex and/or Hertfordshire County Councils, as the Highway Authorities, as part of a Section 106 agreement.'
In accordance with the aspirations set out in Policy HGT1 criteria 2n, P&P consider that Harlow requires a robust mechanism for securing planning obligations from new developments coming forward in and around Harlow. It is suggested that pro rata contributions be sought from all developments forming the 16,100 dwellings within the Harlow and Gilston Garden Town that are not currently committed or that consideration be given to the introduction of the Community Infrastructure Levy to more fairly secure contributions from all new development that will benefit from the infrastructure identified in the IDP.
At Paragraph 17.40 there is generic referencing to planning obligations capturing contributions towards transport improvements, and to impacts across border. Harlow should be more explicit about how this will be achieved and make clear that the contributions are to be used to deliver the infrastructure identified in the IDP.

Change To Plan:

Full Reference: C - 6760 - 7958 - IN6 Planning Obligations - None

6915 Comment

Respondent: Essex County Council (Mr Rich Cooke) [8452]

Agent: N/A

Summary: ECC advises that it has concerns that adequate policies are not currently included in the plan to govern the full range of required infrastructure contributions. Further content is considered necessary to ensure that the policy approach is sufficiently comprehensive in its scope and its requirements.
Accordingly, ECC recommends (as previously through the Development Management Policies consultation) that proposed Policy IN6 is replaced with ECC's recommended policy.

Change To Plan: ECC recommends replacing Policy IN6 with ECC's recommended policy - see Appendix 1A for the full text of this.

Reference to ECC's Developers' Guide to Infrastructure Contributions should also be included as part of the supporting text (paragraphs 17.34 - 17.40 refer) to assist in implementation.

Full Reference: C - 6915 - 8452 - IN6 Planning Obligations - None

6676 Comment

Respondent: Hertfordshire County Council (Mr Martin Wells) [8622]

Agent: N/A

Summary: New transport infrastructure/provision (including that for sustainable modes) should also be listed within this paragraph, in addition to that of transport improvements, which is already listed.

Paragraph 17.37. It is suggested that the following wording is added at the end of this paragraph, as development may extend beyond the district boundary:
"...or relevant authority for the land on which the site is situated"

Change To Plan:

Full Reference: C - 6676 - 8622 - IN6 Implementation - None

6916 Comment

Respondent: Essex County Council (Mr Rich Cooke) [8452]

Agent: N/A

Summary: No indicators or targets have been set with regard to sustainable travel / modal shift, or sustainable travel corridor provision/success. This is a key element, as a step-change in travel mode is required in order to deliver a sustainable garden town and to minimise impact on the highway network.

Change To Plan: ECC (Highways) recommends that, as part of wider transport joint working and support for HC, a constructive dialogue is continued on transport matters to support the Local Plan. This would include joint consideration and development of appropriate transport indicators that meet 'SMART' requirements. It is suggested that the necessary Plan content should be agreed prior to Local Plan submission, whilst some of the more detailed strategy and implementation work will need to continue beyond that point.

Full Reference: C - 6916 - 8452 - 18. MONITORING - None

6917 Comment

Respondent: Essex County Council (Mr Rich Cooke) [8452]

Agent: N/A

Summary:

ECC advises that Monitoring of change in number of biodiversity and geodiversity designated assets in the district is not a sufficient indicator. Single Data List 160-00 return to Government requires monitoring of the number of Local Sites in Positive Conservation Management.

Change To Plan: ECC recommends revising the existing (biodiversity and geology) indicator stating:

'Change in number of biodiversity and geodiversity designated assets in the district' to

'the number of Local Sites in Positive Conservation Management.'

Full Reference: C - 6917 - 8452 - 18. MONITORING - None

6752 Comment **Respondent: Quod Planning (Mr Philip Murphy) [7958]**

Agent: N/A

Summary: Paragraph 19.4 refers to the Council using CPO powers to assist with delivering development sites and regeneration. This should be extended to refer explicitly to delivery of the strategic infrastructure identified in the IDP, notably the Eastern Stort Crossing as this infrastructure serves a strategic transport purpose and will be needed to facilitate employment and housing growth in and around Harlow. There are various references in the plan and IDP to there being support for the 'northern bypass', beyond the plan period, as a potential long-term transport solution. However, the evidence base prepared to support the draft Plan does not appear to include any transport modelling, assessment of feasibility, or evidence concerning land availability for this strategic piece of infrastructure.

Change To Plan: This infrastructure is not 'justified' based upon proportionate evidence, nor needed to deliver the draft Plan, and therefore references to the same should be removed.

Full Reference: C - 6752 - 7958 - 19. IMPLEMENTATION - None

6698 Comment **Respondent: Historic England (Ms Debbie Mack) [8623]**

Agent: N/A

Summary: Please also mention designated and non-designated assets, locally listed buildings, registered park and garden.

Change To Plan:

Full Reference: C - 6698 - 8623 - GLOSSARY - None

6918 Comment **Respondent: Essex County Council (Mr Rich Cooke) [8452]**

Agent: N/A

Summary: For completeness of information / evidence base sources, this needs to refer to the Essex Historic Environment Record.

Change To Plan: ECC recommends adding reference to the Glossary to read as follows:

Heritage Asset A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. Heritage asset includes designated heritage assets and assets identified by the Local Planning authority (including local listing) or on the Essex Historic Environment Record.

Full Reference: C - 6918 - 8452 - GLOSSARY - None