

Harlow Local Development Plan

Regulation 19 Summary of Responses Schedule

The attached schedule supplements Appendix V (g) of the Regulation 22 Consultation Statement (August 2018), which was submitted with the suite of documents that accompanied the submission of the Harlow Local Development Plan Pre-submission Publication May 2018. The Regulation 22 Consultation Statement was prepared in order to meet the requirements of Regulations 18, 19 and 22 (1) Part (c) of the Town and Country Planning (Local Planning) (England) Regulations 2012. This explained the various stages and processes the Council undertook during the preparation of the Local Plan.

Appendix V (g) set out a summary of the representations received in respect of the Publication of the Harlow Local Development Plan in May 2018 (Regulation 19). The Regulation 19 Publication period ran from 24 May 2018 to 6 July 2018. This stage was not a consultation, per se, but enabled any interested persons to make representations, to the duly appointed Inspector, about the soundness and legal compliance of the Plan and whether it has been prepared in accordance with the Duty to Co-operate under section 33A of the 2004 Act.

The Appendix identified the reference number of the representation received, together with the background/policy reference of the chapter/policy the representation related to. The name of the respondent is also identified. The summary section sets out the content of the representation (s) made to the Publication version of the Harlow Local Development Plan, together with any proposed change to Plan the respondent suggested to the Inspector (If any) in order to make the plan sound.

Please note the Representation Number column refers to the Regulation 22 Appendix V (g). Where a row includes the statement "See Full Representation" the full PDF scanned representation should be referred to using the Respondent ID reference.

The attached schedule supplements Appendix V (g) by providing, where appropriate, Council observations on the matters raised, including suggesting some additional minor modifications, should the Inspector consider these would aid the clarity and soundness of the Plan.

Respondent [ID]	Representation Number	Policy/Para/Text	Representation Summary	Officer Comment	Minor/Major amendment required?
Harlow Alliance Party (Mr Nicholas Taylor) [8621]	6650	Background	lack of consultation that has taken place with residents. Back in the 1 990'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. They 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.	The Harlow Local Development Plan had been prepared over a number of stages and has been subject to public consultation in accordance with the adopted Statement of Community Involvement (SCI). The SCI sets out the methodology through which the Council will engage with the community including hard to reach groups during the preparation of planning documents and in the consideration of planning applications.	None
:Miss Mary Wiltshire [6026]	6846	Background	Object to the whole document. As it is a wish-list rather than set of plan for discussion. It is not much of consultation.	The Harlow Local Development Plan had been prepared over a number of stages and had has been subject to public consultation in accordance with the adopted Statement of Community Involvement (SCI). The	None

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				Regulation 19 consultation was required to be undertaken in accordance with the Town and Country Planning (Local Planning) (England) Regulations 2012.	
East Herts District Council (Mr George Pavey) [8616]	6603	Background	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.	Noted.	None
Quod Planning (Mr Philip Murphy) [7958]	6761	Background	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.	Noted.	None
Chelmsford City Council (Ms Jenny Robinson) [8636]	6807	Background	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.	Noted.	None
Barker Parry Town Planning Ltd. (Ms Elizabeth Fitzgerald) [8451]	6582	Background	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	The evidence base is kept under review and has been updated where appropriate. A number of evidence base documents have been prepared jointly in accordance with the Duty to Cooperate and have also been kept under review to inform the preparation of Local Plans in E Hertfordshire, Epping Forest, Uttlesford and Harlow.	None
Forestry Commission (England) (Ms Corinne Meakins) [8617]	6620	Background	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-woodlandandveteran-trees-protection-surveys-licences should you need to assess any sites near to Ancient Woodland when delivering the plan.	Noted.	None

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Harlow Alliance Party (Mr Nicholas Taylor) [8621]	6652	Background	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.	Planning applications that have been submitted to the Council are assessed on their individual merits against the policies of the adopted Local Plan and the guidance set out in the National Planning Policy Framework (NPPF). In addition the emerging policies in the Submitted Local Plan can be taken as a secondary material consideration. However if a site is not allocated as development site does not necessarily mean planning permission will be withheld, and if it accords with policy will be granted planning permission.	None
Mr James Humphreys [8561]	6712	Background	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. 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.	The Harlow Local Development Plan had been prepared over a number of stages and has been subject to public consultation in accordance with the adopted Statement of Community Involvement (SCI). Each stage has been accompanied by technical evidence that has been updated, where appropriate.	None

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Jean Wright [5878]	6718	Background	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.	The Harlow Local Development Plan had been prepared in order to address the housing need for the district that has been informed by the joint Strategic Housing Market Area (SHMA). This provides a robust basis to inform the housing requirement set out in the Local Plan.	None
Mrs Karen Garrod [8596]	6721	Background	Throughout the report, there seems to be "significant levels of uncertainty" in key areas which undermines the subject matter.	The Council is continuing to work with key partners, including through the Duty to Cooperate, to ensure that outstanding matters are resolved in order to deliver the policies and proposals set out in the Local Plan.	None
:Little Hadham Parish Council (Mr Neil Wardrop) [8624]	6726	Background	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.	The potential relocation of the Princess Alexandra Hospital is predicated on an appropriate site being brought forward in the adjoining districts. However, the Council will continue to support the retention of the hospital and the services it provides at its existing site. Thames and Affinity Water are committed to providing water supplies to the development being proposed in Local Plan's across the wider Harlow area.	None
Lawson Planning Partnership (Miss Kathryn Oelman) [8532]	6762	Background	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	The Council has been working with key partners, through the Duty to Cooperate, to support the proposed relocation of the Princess Alexandra Hospital in accordance with the objectives of their strategic outline business case. If the relocation of the does not occur or until such times when this would occur then the existing use of the site as a hospital would prevail as the accepted use and any related planning applications would be considered in this context.	None

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			development necessary to achieve this could encounter a lack of planning policy certainty and support. 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.		
Tetlow King Planning (MEGHAN ROSSITER) [8630]	6767	Background	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. 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 Government does require Councils to have regard to NPPF (July 2018), due to the submission date being before January 24th 2019. It is agreed that the Council requires a significant number of affordable dwellings to meet its needs. Overall the Council would maintain that it has a proactive approach in delivering affordable products, and will be producing an Affordable Housing Strategy to reinforce its importance and to help inform delivery.	None

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			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."		
The Roydon Society (S.N. Wilkinson) [8634]	6781	Background	The Roydon Society supports the comments made by Roydon Parish Council and sent under separate cover recently.	Noted.	None
Miss Mary Wiltshire [6026]	6849	Background	A typographical error has been found on the representation form.	Noted	None
Essex County Council (Mr Rich Cooke) [8452]	6870	Background	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	The Local Plan Strategic Objectives provide a framework to address the Councils Corporate Priorities including wellbeing and has been developed across a number of overarching themes. These objectives reflect the desire to improve the wellbeing and health of the community through improved healthcare provision, leisure and recreation facilities and better housing. However, the Council is continuing to work closely with key partners, including ECC, through the Duty to Cooperate, to ensure that outstanding matters in relation health and wellbeing are resolved. In this respect ECC have been asked for guidance to ensure that these matters are resolved and these discussions are ongoing. Any outstanding matters can be outlined, where appropriate, through a Memorandum of Understanding.	Noted

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			that ECC urges the inclusion of an embracing health and wellbeing 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 wellbeing 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.		
:Essex County Council (Mr Rich Cooke) [8452]	6871	Background	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). 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.	The Council is continuing to work closely with key partners, including ECC, through the Duty to Cooperate, to ensure that outstanding matters in relation health and wellbeing are resolved. In this respect ECC have been asked for guidance to ensure that these matters are resolved and these discussions are ongoing.	Noted
GLADMAN (Mr Phill Bamford) [8618]	6621	Context, vision and objectives	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	The development being brought forward in the Local Plan has been identified through joint technical evidence, including a SHMA, commissioned through the duty to cooperate with East Hertfordshire, Epping Forest, Uttlesford and Harlow Council's. The identified housing need and growth is to be delivered through the Harlow and Gilston Garden Communities and represents a coordinated approach to secure the delivery of the development needs identified across the wider area. This will facilitate a fresh opportunity to stimulate economic growth in new places, and a chance to aspire beyond identikit housing developments. Through the duty to cooperate, therefore, the Council has been working with partners in both the public and	None

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			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.	private sectors, together with support from Government, to develop a blueprint to build communities with local character, good employment opportunities, strong services, integrated and accessible transport, innovative uses of technology and attractive green spaces.	
Hertfordshire County Council (Mr Martin Wells) [8622]	6659	Context, vision and objectives	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.	Noted.	None
Essex County Council (Mr Rich Cooke) [8452]	6872	Context, vision and objectives	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): 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	The Council has been working closely with key stakeholders, including ECC and health providers to ensure that health related issues have been considered during the preparation of the Local Plan and, where reasonable, an appropriate policy approach developed. Since its adoption the Harlow Health and Wellbeing Strategy (2018-2028) has become an important corporate document.	None

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			compliance and delivery of the NPPF.		
STOP Harlow North [8588) Mr Jed Griffiths [8576]	6426	Context, vision and objectives	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. Put the submission on hold. All three LPAs should consult on the overall strategy for the wider sub-region.	The Harlow Local Development Plan had been prepared over a number of stages and had has been subject to public consultation in accordance with the adopted Statement of Community Involvement (SCI).	None
Harlow Alliance Party (Mr Nicholas Taylor) [8621]	6654	Context, vision and objectives	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 2018 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 2017 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.	The Harlow Local Development Plan identifies the key infrastructure requirements in policies HGT1 and SIR1 and supported by the IDP. These policies have been developed as part of the ongoing joint working, in accordance with the Duty to Cooperate, with ECC, HCC, Epping Forest DC and Epping Forest DC's. The provision, nature and, where appropriate, the location of key infrastructure will be developed further through the preparation of masterplans and considered through the development management process.	
Jean Wright [5878]	6716	Context, vision and objectives	The map used in the pack does not show Gilden 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 Gilden 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.	The residential development currently underway at Gilden Way has arisen following an appeal decision. It is inevitable that the character of the site will change, however, open space and associated landscaping is to be provided. The Policies Map illustrates geographically the application of policies in the Local Plan. The baseline Ordnance Survey data that would show of development currently underway is only updated by the OS when such development is completed.	None

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Chelmsford City Council (Ms Jenny Robinson) [8636]	6809	Context, vision and objectives	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.	Noted.	None
Historic England (Ms Debbie Mack) [8623]	6685	Context, vision and objectives	Registered Parks and Gardens should also be included in the list of heritage assets.	It is recommended that a minor amendment is made to the text to reflect this in the Schedule of Minor Modifications.	Amend wording accordingly.
Miller Strategic Land [5769]	6469	Context, vision and objectives	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. 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.	It is important that the Green Wedge network which has been, and will continue to be, an important element in place shaping and protecting key environmental characteristics in Harlow, is maintained and reinforced. It is important, therefore, that the masterplans being prepared to provide a development framework to guide the strategic site in land East of Harlow, has regard to the extent of the Green Wedges.	None
Miss Mary Wiltshire [6026]	6848	Context, vision and objectives	Policies Map does not shows the detail of Gilden way. indicated green wedge and green finger lands not generally open for public access.	The Policies Map illustrates geographically the application of policies in the Local Plan. The baseline Ordnance Survey data that would show of development currently underway is only updated by the OS when such development is completed.	None
Thames Water (Savills) (Mr Chris Colloff) [8433]	6780	Context, vision and objectives	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	Noted.	None

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			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.		
Hallam Land Management & Commercial Estates Group (Mike Newton) [7646]	6789	Context, vision and objectives	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	The development being proposed at Latton Priory falls within the jurisdiction of Epping Forest District Council. However, through the Duty to Cooperate the Council has worked closely with its partners to ensure that sustainable levels of growth are brought forward to reflect that what has been identified in the SHMA.	None
Sandra Beavis [5035]	6833	Context, vision and objectives	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.	Whilst there has been some change in retailing trends the Plan has been informed by a range of evidence base documents, advice from ECC the highway authority and Government Guidance, that highlight the objective to reduce the need to travel by car in order to address a range of socio-economic and environmental issues, including climate change.	None

Respondent [ID]	Representation Number	Policy/Para/Text	Representation Summary	Officer Comment	Minor/Major amendment required?
Sandra Beavis [5035]	6834	Context, vision and objectives	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	The Council is required to deliver the identified housing need for the district in accordance with Government guidance. In order to ensure future development requirements can be accommodated in a sustainable way, and working with key stakeholders and partners, the provision of sustainable transport corridors over the Plan period, will provide a long term strategy though which to achieve this.	None
Sandra Beavis [5035]	6835	Context, vision and objectives	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	Working with key stakeholders and partners, the provision of sustainable transport corridors over the Plan period, and supported by set of measures in an overarching Transport Strategy, will provide a long term framework though which to achieve modal shift.	None
Sandra Beavis [5035]	6836	Context, vision and objectives	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	The Harlow Local Development Plan, through Policy IN1, seeks the provision of electric charging points for vehicles in all developments.	None

Respondent [ID]	Representation Number	Policy/Para/Text	Representation Summary	Officer Comment	Minor/Major amendment required?
			customers.		
Sandra Beavis [5035]	6837	Context, vision and objectives	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).	The Council has been working closely with key stakeholders, including ECC and HCC to develop an overarching transport strategy for the wider Harlow area. This will set out a package of measures, including enhancement to the public transport network together with the use of technology, to provide fast, safe and convenient access to key destinations across Harlow, in order to facilitate modal shift.	None
Sandra Beavis [5035]	6838	Context, vision and objectives	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	Government guidance suggests that Local Plans should aim to be aspirational but be informed by technical evidence. The plan making process is iterative, reflecting a plan, monitor and manage approach which ensures that, through regular review, policy measures can be re-evaluated and revised.	None
Sandra Beavis [5035]	6839	Context, vision and objectives	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'	The site has been identified following a review of the network of Green Wedges across Harlow during the preparation of the Local Plan. This process evaluated how land contributed to the purposes of the Green Wedge or whether it should be allocated for other purposes. Following this process the site was removed from the Green Wedge.	None
Sandra Beavis [5035]	6840	Context, vision and objectives	I note that the report acknowledges that site specific policies will be required and despite this, it 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.	The Council is required to deliver the identified housing need for the district in accordance with Government guidance, balanced against other considerations including Green Belt and other environmental constraints. In order to ensure future development requirements can be accommodated in a sustainable way, and working with key stakeholders and partners, the Council believes that the overarching transport strategy and the policies and proposals set out in the Local Plan will provide a long term strategy to limit	None

Respondent [ID]	Representation Number	Policy/Para/Text	Representation Summary	Officer Comment	Minor/Major amendment required?
				potential impacts.	
Sandra Beavis [5035]	6841	Context, vision and objectives	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.	The Council is required to deliver the identified housing need for the district in accordance with Government guidance, balanced against other considerations. In order to ensure future development requirements can be accommodated in a sustainable way, and working with key stakeholders and partners, the Council believes that the overarching transport strategy and the policies and proposals set out in the Local Plan will provide a long term strategy to limit potential impacts.	None
Sandra Beavis [5035]	6842	Context, vision and objectives	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.	Should development proposals be brought forward on this site any resultant planning application would have regard to the character of the site and related matters when assessed against adopted planning policies.	None
Sandra Beavis [5035]	6843	Context, vision and objectives	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.	In order to meet the identified housing need for the district, in accordance with Government guidance, the Council has evaluated the development potential of brownfield sites but in addition, and in order to meet this need, some greenfield sites have also been identified as potential housing sites.	None
Sandra Beavis [5035]	6844	Context, vision and objectives	(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. The significance of effects will be mainly caused by the developments within Harlow and only to a lesser extent by those developments surrounding Harlow.	The Council is required to deliver the identified housing need for the district in accordance with Government guidance, balanced against other considerations including Green Belt and other environmental constraints. In order to meet the identified housing need for the district, in accordance with Government guidance, the Council has evaluated the development potential of brownfield sites but in addition, and in order to meet this need, some greenfield sites have also been identified as potential housing sites.	None

Respondent [ID]	Representation Number	Policy/Para/Text	Representation Summary	Officer Comment	Minor/Major amendment required?
Redrow Homes (Ms Kate Holland) [8640]	6854	Context, vision and objectives	<p>The Council's Assessment of area 8 identified that it makes no contribution to purpose 2 (to prevent merging of neighbouring towns) and an average contribution to purposes 1, 3 and 4. As area 8 is currently open countryside it is agreed that the Green Belt serves a 'limited contribution' (achieving mid-range scores in the Green Belt Assessment Criteria) to protecting the countryside from encroachment (purpose 3) and for checking the unrestricted sprawl of large built up areas (purpose 1); however, the boundary of Area 8 is defined by a significant urban feature of the M11 motorway. This provides a strong physical feature to the edge of Harlow Borough and forms a permanent boundary between Harlow District and the neighbouring authority area. It is therefore considered that Area 8 contributes little to Purposes 1 and 3. 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. 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</p>	Noted.	None

Respondent [ID]	Representation Number	Policy/Para/Text	Representation Summary	Officer Comment	Minor/Major amendment required?
			recommendations of the Council's Green Belt Review		
STOP Harlow North [8588] Mr Jed Griffiths [8576]	6427	Context, vision and objectives	As noted in response to paragraphs 1.9 - 1.19 above, SHN notes the efforts made by Harlow District Council to fulfil 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. 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.	The Harlow Local Development Plan had been prepared over a number of stages and has been subject to public consultation in accordance with the adopted Statement of Community Involvement (SCI). The Council has also accorded with the requirements of the Duty to Cooperate in that it has proactively engaged with the relevant strategic policy making authorities and other related bodies in the preparation of the Local Plan as evidenced by the various joint technical studies such as the SHMA and through the signing of a number of Memorandum's of Understanding.	None
Chelmsford City Council (Ms Jenny Robinson) [8636]	6810	Context, vision and objectives	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	Noted.	None

Respondent [ID]	Representation Number	Policy/Para/Text	Representation Summary	Officer Comment	Minor/Major amendment required?
Home Builders Federation (Mr Mark Behrendt) [8450]	6699	Context, vision and objectives	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.	The housing growth proposed for Harlow District has been derived through a joint SHMA in accordance with the Duty to Cooperate. This has included Epping Forest, East Hertfordshire, Uttlesford and Harlow District Councils and sets out a robust and consistent approach to determine current housing need in Harlow and across the wider SHMA area. It should also be noted that East Hertfordshire's new Local Plan has recently been found upon examination based upon this. In order to meet the identified housing need for the district, in accordance with Government guidance, the Council has evaluated the development potential of brownfield sites but in addition, and in order to meet this need, some greenfield sites have also been identified for release.	None
Epping Forest District Council (Ms Alison Blom-Cooper) [8637]	6826	Context, vision and objectives	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.	Noted.	None
Epping Forest District Council (Ms Alison Blom-Cooper) [8637]	6831	Context, vision and objectives	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	It is considered that the suggested amendment would aid clarify the scope of the signed MoU.	Propose minor amendment to the supporting text as follows: "... the integrity of the SAC. The MoU is required because development within Harlow may, in-combination with development in other areas, affect the integrity of European Sites which lie outside of the district. Epping Forest District Council is preparing a Mitigation Strategy for the Epping Forest Special Area of Conservation (SAC), containing measures to address recreational pressures and

Respondent [ID]	Representation Number	Policy/Para/Text	Representation Summary	Officer Comment	Minor/Major amendment required?
			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.		air quality impacts. It is proposed that measures set out within the Strategy will be funded through a proportionate approach to developer contributions within the inner (or if necessary, outer) Zone of Influence (ZOI), the boundaries of which are based on a recent visitor survey and may be modified to reflect the evidence of future survey data. Although it is anticipated that the majority of these contributions will be provided by developments within the inner ZOI, contributions may be sought from developments within the outer ZOI (which currently includes part of Harlow District) if necessary to ensure the implementation of the Strategy and avoidance of adverse effects on the integrity of the SAC."
Deanery of Harlow (Anglican) (Revd Martin Harris) [8586]	6446	Context, vision and objectives	welcome the development of Gilston Garden Town. It is good to see the focus on infrastructure development generally	Noted.	None
STOP Harlow North [8588] Mr Jed Griffiths [8576]	6428	Context, vision and objectives	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.	The Council has been working closely with key stakeholders, including ECC, HCC, E Hertfordshire and Epping Forest DC's and garnered support from Government to develop a co-ordinated approach to the delivery of the Harlow and Gilston Garden Communities. This has been underpinned by joint evidence and the ongoing development of a vision setting out key principles and a Transport Strategy.	None
Hertfordshire County Council (Mr Martin Wells) [8622]	6666	Context, vision and objectives	Paragraph 1.34 should be amended to include Hertfordshire County Council (HCC), as it is both a service provider and Highway Authority.	Noted, this can be addressed through a minor modification to the text in the paragraph.	Modify paragraph if appropriate.
Canal & River Trust (Ms Tessa Craig) [8612]	6850	Context, vision and objectives	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:	The Council offers pre-application advice through the Development Management team and this is acknowledged in the information on the website. It is not considered necessary to duplicate this in the Local Plan which is primarily a policy document.	None

Respondent [ID]	Representation Number	Policy/Para/Text	Representation Summary	Officer Comment	Minor/Major amendment required?
Mr John Graham [8542]	6850	Context, vision and objectives	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.	The population growth forecasts are based on Sub National Population Projections and Household Projections, published by ONS and DCLG respectively, which is the Government's baseline positions for assessing housing needs, and is used as such by planning authorities in England.	None
Home Builders Federation (Mr Mark Behrendt) [8450]	6701	Context, vision and objectives	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. 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. 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.	Through the Duty to Cooperate the Council has been working with Epping Forest, East Hertfordshire and Uttlesford Council's to consider the demographic characteristics and conditions of the identified housing market area and used this to provide a robust assessment of housing need. This has been endorsed through a signed joint memorandum of understanding.	None
Deanery of Harlow (Anglican) (Revd Martin Harris) [8586]	6448	Context, vision and objectives	Affordable housing is a local issue e.g. 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? I.e. 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.)	The Council has set out a housing strategy and associated policies in the Local Plan, based on a robust assessment of local need, taking account of viability and deliverability.	None
Deanery of Harlow (Anglican) (Revd Martin Harris) [8586]	6449	Context, vision and objectives	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	Noted.	None
Hertfordshire County Council (Mr Martin Wells) [8622]	6660	Context, vision and objectives	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.	This is noted and a minor modification has been proposed to clarify the modal hierarchy in Harlow.	

Respondent [ID]	Representation Number	Policy/Para/Text	Representation Summary	Officer Comment	Minor/Major amendment required?
			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.		
Highways England (Mr Mark Norman) [7939]	6679	Context, vision and objectives	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.	Noted.	None
Mrs Karen Garrod [8596]	6722	Context, vision and objectives	For the purposes of sustainable travel plans, the report justifies sustainable travel methods with the inclusion of cycling, walking and public transport. 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.	The Local Plan sets out an ambitious strategy, reflected in other Local Plans being prepared across the Harlow and Gilston Garden Communities, in order to promote a modal shift in public transport use across the wider Harlow area. This is being underpinned by policies and the development of a package of measures that will aim to achieve this over the Plan period.	None
Hallam Land Management & Commercial Estates Group (Mike Newton)[7646]	6791	Context, vision and objectives	The opportunity to create a north/south Sustainable Transport Corridor through Harlow is supported subject to further assessment and, if found sound, should carry a specific policy commitment.	Noted.	None
Essex County Council (Mr Rich Cooke) [8452]	6873	Context, vision and objectives	Text may not place sufficient emphasis on the importance of and localised necessary characteristics of sustainable travel. ECC (Highways) recommends the paragraph is amended. ECC (Highways) recommends the following amendments "There is also a need to increase the frequency of the bus services to the industrial estates; to provide more opportunities to travel sustainably within and in and out of Harlow; to increase the provision of Sunday services; and to improve journey times for buses." The deletion of the last few words of the sentence is recommended as there are other ways of improving bus journey times, such as providing additional Passenger Transport infrastructure.	This is noted and a minor modification has been proposed to the supporting text to acknowledge Council support for the enhancement of public transport links and services across Harlow.	See Schedule of Minor Modifications.

Respondent [ID]	Representation Number	Policy/Para/Text	Representation Summary	Officer Comment	Minor/Major amendment required?
Essex County Council (Mr Rich Cooke) [8452]	6874	Context, vision and objectives	Addition to text suggested in the interests of ensuring that the sustainable travel hierarchy is included, reflected appropriately and sets context for policies / strategies. ECC (Highways) recommends the following additional text is added "Sustainable transport matters (including walking, cycling and public transport) and reducing the need to travel are, therefore, important for the successful future growth of Harlow."	This is noted and a minor modification is proposed to the text to acknowledge the importance of reducing the need to travel.	See Schedule of Minor Modifications
Hertfordshire County Council (Mr Martin Wells) [8622]	6664	Context, vision and objectives	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	The relationship of the River Stort to Harlow is recognised throughout the Local Plan, however, additional references could be added to the Local Plan where appropriate.	Amend wording if appropriate.
Historic England (Ms Debbie Mack) [8623]	6686	Context, vision and objectives	Include Registered Parks and Gardens	This is noted and minor modifications are proposed to the Local Plan to make reference to these.	See Schedule of Minor Modifications
STOP Harlow North [8588]	6429	Context, vision and objectives	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	Harlow serves an important economic role in the M11 corridor, as recognised by a range of technical studies and from support by stakeholders including the Government and the general public. Independent studies have confirmed the clear link between increased critical mass, in terms of population and	None

Respondent [ID]	Representation Number	Policy/Para/Text	Representation Summary	Officer Comment	Minor/Major amendment required?
				housing growth as a catalyst to secure regeneration and economic resilience.	
Essex County Council (Mr Rich Cooke) [8452]	6875	Context, vision and objectives	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). 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."	This is noted and a minor modification is proposed to the text to acknowledge the importance of locating growth at appropriate locations in order to reduce the need to travel.	See Schedule of Minor Modifications
Essex County Council (Mr Rich Cooke) [8452]	6876	Context, vision and objectives	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 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.	This is noted and a minor modification is proposed to the text in order to clarify this statement.	See Schedule of Minor Modifications
Deanery of Harlow (Anglican) (Revd Martin Harris) [8586]	6447	Context, vision and objectives	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.	Noted.	None
The Theatres Trust (Tom Clarke) [216]	6460	Context, vision and objectives	The Trust welcomes that Harlow's vision contains reference to its residents having excellent sporting, leisure and cultural facilities	Noted.	None
The Theatres Trust (Tom Clarke) [216]	6461	Context, vision and objectives	We also welcome that the provision and enhancement of Harlow's sports, leisure, recreational facilities and cultural opportunities are included as a strategic objective.	Noted.	None
Historic England (Ms Debbie Mack) [8623]	6687	Context, vision and objectives	Welcome reference to delivering high quality design through new development whilst protecting and enhancing the districts historic environment.	Noted.	None

Respondent [ID]	Representation Number	Policy/Para/Text	Representation Summary	Officer Comment	Minor/Major amendment required?
Natural England (Ms Sarah Fraser) [8628]	6729	Context, vision and objectives	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.	Noted, however, it is considered that the policies in the Plan provide a robust approach to protecting and enhancing biodiversity.	None
Essex Bridleways Association (Mrs Sue Dobson) [7887]	6411	Context, vision and objectives	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	This is noted, however, it is considered that the policies in the Plan provide robust approach to creating high quality and well-connected spaces.	None
STOP Harlow North [8588]	6430	Context, vision and objectives	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.	The development proposed to the north of Harlow was set out in the Local Plan prepared by East Hertfordshire District Council. That Plan was found sound following public Examination. The infrastructure set out in the Harlow Local Development Plan reflect a suite of requirements that will support the identified growth.	None
Canal & River Trust (Ms Tessa Craig) [8612]	6568	Context, vision and objectives	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 or 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 rom 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	Noted, the Local Plan acknowledges Harlow's important relationship with the River Stort, especially in terms of biodiversity and leisure opportunities it affords.	None

Respondent [ID]	Representation Number	Policy/Para/Text	Representation Summary	Officer Comment	Minor/Major amendment required?
			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.		
GLADMAN (Mr Phill Bamford) [8618]	6622	Context, vision and objectives	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.	Noted.	None
Hertfordshire County Council (Mr Martin Wells) [8622]	6667	Context, vision and objectives	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.	Noted. The Council is continuing to work with its key partners, including ECC and HCC, to progress the delivery of key infrastructure to underpin the Harlow and Gilston Garden Communities.	None

Respondent [ID]	Representation Number	Policy/Para/Text	Representation Summary	Officer Comment	Minor/Major amendment required?
Quod Planning (Mr Philip Murphy) [7958]	6751	Context, vision and objectives	<p>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.</p> <p>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).</p> <p>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.</p> <p>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.</p>	Noted, the Council is continuing to work with its key partners, including developers to secure the delivery of development to support the growth proposed within the Harlow and Gilston Garden Communities.	None
Essex County Council (Mr Rich Cooke) [8452]	6877	Context, vision and objectives	<p>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 * Harlow's residents will be more active, taking advantage of Harlow's excellent * Sporting, leisure and cultural facility* Major progress will have been made to address Harlow's health and wealth inequalities as well as addressing localised</p>	It is considered that the Local Plan provides an overall strategy and series of policy approaches that will address health and wellbeing issues in the district.	Noted.

Respondent [ID]	Representation Number	Policy/Para/Text	Representation Summary	Officer Comment	Minor/Major amendment required?
			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 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.		
Historic England (Ms Debbie Mack) [8623]	6688	Context, vision and objectives	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.	Noted.	None
STOP Harlow North [8588] Mr Jed Griffiths [8576]	6431	Context, vision and objectives	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.	The strategies, policies and proposals set out in the Harlow Local Development Plan have been developed through an iterative process involving businesses, the public and other key stakeholders, in Harlow having regard to the assessment of the key socio-economic and environmental characteristics of the area. This has also involved the participation of other partners through the Duty to Cooperate, including ECC, HCC and Epping Forest, East Hertfordshire and Uttlesford District Councils. The LSCC comprises elected members from these publicly accountable organisations.	None
Essex County Council (Mr Rich Cooke) [8452]	6878	Context, vision and objectives	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'. 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	Noted, these can be addressed through minor modifications to the text in the relevant paragraphs.	Amend wording if appropriate.
Miller Strategic Land [5769]	6465	Context, vision and objectives	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	Noted.	None

Respondent [ID]	Representation Number	Policy/Para/Text	Representation Summary	Officer Comment	Minor/Major amendment required?
Miller Strategic Land [5769]	6506	Context, vision and objectives	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	Noted.	None
Hertfordshire County Council (Mr Martin Wells) [8622]	6669	Context, vision and objectives	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	The need to enhance connectivity between developments is recognised in policy WE2 and policy IN1.	None
Hallam Land Management & Commercial Estates Group (Mike Newton) [7646]	6792	Context, vision and objectives	We support the provision of the Strategic Infrastructure required as part of the Latton Priory site and the principle of Key Gateway Locations	Noted.	None
Historic England (Ms Debbie Mack) [8623]	6689	Context, vision and objectives	Suggest changing managed to enhanced in line with the wording in the NPPF.	This is noted and a minor modification is proposed to the text in order to clarify this statement.	Minor modification to be proposed.
Hertfordshire County Council (Mr Martin Wells) [8622]	6668	Context, vision and objectives	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.	Noted, the Duty to Cooperate and joint working has been a key element in the development of the Local Plan, and has been acknowledged.	None
Essex County Council (Mr Rich Cooke) [8452]	6879	Context, vision and objectives	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. 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.	Noted and a minor modification to address this would be supported.	See Schedule of Minor Modifications
Miller Strategic Land [5769]	6467	Context, vision and objectives	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. Only a holding objection is raised at this stage	Noted.	None

Respondent [ID]	Representation Number	Policy/Para/Text	Representation Summary	Officer Comment	Minor/Major amendment required?
Miller Strategic Land [5769]	6466	Context, vision and objectives	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.	Noted.	None
NHS West Essex CCG (Mrs Jolene Truman) [8584]	6459	Context, vision and objectives	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.	Noted.	None
Home Builders Federation (Mr Mark Behrendt) [8450]	6700	Context, vision and objectives	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 theHMA. 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.	Noted, however, the housing requirement for Harlow has been derived from joint working with Epping Forest, East Hertfordshire and Uttlesford District Councils who comprise the housing market area, and is considered robust.	None
Essex County Council (Mr Rich Cooke) [8452]	6880	Context, vision and objectives	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. ECC (Highways) recommends that wording is added in paragraph 4.13: "... new communities will be able to have direct sustainable access to jobs ..."	Noted, however, the concept of sustainability permeates through the Local Plan and it is not considered necessary to add additional wording in this instance.	None

Respondent [ID]	Representation Number	Policy/Para/Text	Representation Summary	Officer Comment	Minor/Major amendment required?
Essex Bridleways Association (Mrs Sue Dobson) [7887]	6412	Context, vision and objectives	Include provision for equestrians within the new Garden Communities so that the Plan is consistent throughout.	Noted, however, this will be considered on a site by site basis in the masterplans being brought forward for the garden communities across the wider Harlow area.	None
Essex County Council (Mr Rich Cooke) [8452]	6881	Context, vision and objectives	This does not mention the improvements necessary to other transport networks (other than road and public transport networks). 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."	This is noted and a minor modification is proposed to the text in order to clarify this statement	None
Mr Danny McCaughey [8578]	6422	Context, vision and objectives	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). 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.	The Green Wedge network across Harlow, in addition to containing green spaces, served as movement corridors to link the residential neighbourhoods with the town centre, employment and other areas. This principle is maintained in the new Local Plan and they will be utilised to serve as new and enhanced sustainable public transport corridors linking the new with existing neighbourhoods and other key destinations across Harlow and into the adjoining districts of Est Hertfordshire and Epping Forest.	None
Miller Strategic Land [5769]	6468	Context, vision and objectives	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. 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.	The Green Wedge network, is a key and distinctive feature of the town, and has been a significant element in defining the character of Harlow and shaping growth. There is wide support for maintaining the network across Harlow and this is reflected in the principles associated with development of the Harlow and Gilston Garden Communities. Consequently it is important that the extensions of the network are clearly defined on the Policies Map in order to provide certainty. In addition it is also important that specific requirements that have a spatial dimension are shown.	None

Respondent [ID]	Representation Number	Policy/Para/Text	Representation Summary	Officer Comment	Minor/Major amendment required?
STOP Harlow North [8588]	6432	General comment	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.	A East Hertfordshire Local Plan was submitted before the Garden Town was formalised and work on the infrastructure requirements undertaken. Until this is completed and the options agreed no additional wording is proposed at present to the Harlow Local Plan	None
Canal & River Trust [8612]	6569	HGT1	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	Comment is noted. Work is being prepared on a Stort Riverpark which will look to improve footpaths and the towpath as well as bring forward other projects in this area and will ensure the Canal and River Trust forms part of the development of this project. The River Stort Park project is set out in Policy WE1.	None
Hallam Management & Commercial Estates Group [7646]	6788	HGT1	Inconsistency of our policy to EFDC GT Policy. Want it to be the same as EFDC.	Although the two policies differ slightly in some of the wording (some references are not applicable to Harlow as a) they are not within Harlow District; b) additional contextual wording is considered unnecessary by Harlow Council; or c) where Epping Policy is repeating what is covered in other Harlow Policies), the principles of the two policies and what they seek to achieve are exactly the same including: * Ensuring timely infrastructure * long term stewardship * engagement with the public * strategic masterplan and design codes requirement * Quality Review Panel requirement * Adherence with spatial vision/Design Charter and Sir Frederick Gibberd Masterplan * mix of homes including self and custom build *sustainable transport system with Sustainable Transport Corridors, modal shift and parking standards *creating distinctive environments *sustainable construction and *fair cost apportionment for infrastructure taking into consideration land costs.	None
Hallam Management & Commercial Estates Group [7646]	See full representation	HGT1	Although adjoining the Harlow boundary, Latton Priory is located within the administrative boundary of Epping Forest District, and Boyer made representations to the Epping Forest regulation 19 consultation in January 2018 stating that the site is capable of delivering a higher capacity of development.	It is not appropriate for Harlow to comment on the number of homes Epping Forest District Council is proposing.	None

Respondent [ID]	Representation Number	Policy/Para/Text	Representation Summary	Officer Comment	Minor/Major amendment required?
East Herts District Council [8616]	6602	HGT1	East Herts questions the legal basis for including policies that relate to development entirely outside of Harlow's administrative boundary.	The Policy states that the relevant sites are allocated in respective policies. The Policy itself and its principles has been agreed as an appropriate way forward for the Garden Town Communities and should be applied to the sites through the appropriate policies in the respective Local Plans.	None
Epping Forest District Council [8637]	6827	HGT1	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. 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.	For clarity it is considered that the policy should identify all the sites within the Garden Town. Sites not in Harlow are clearly indicated. The Policy itself and it's principles has been agreed as an appropriate way forward for the Garden Town Communities and should be applied to the sites through the appropriate policies in the respective Local Plans. The wording of the Implementation text states that 'the Council will seek to adopt' which provides flexibility in approach. Harlow Council agrees that a joint masterplan should be produced but does not consider this policy prevents this and the principles of the master plan will ensure this so it is not considered necessary to add further text to the policy or in the chapter.	None
Essex County Council [8452]	6882	HGT1	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.	Harlow Council understands the concerns raised and Harlow Council is amenable to some form of change (as set out in the Statement of Common Ground), subject to collaborative work with Epping Council as it is (mostly) a joint policy with the same wording.	No changes at present, Harlow Council amenable to changes which clarify the position of the Garden Town and it's application to other sites in the town.
Natural England [8628]	6730	HGT1	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.	Awaiting updated HRA. Discussions with Epping Forest District Council and Natural England, in relation to Epping Forest, continue so until these are completed Harlow is unclear what amendments should be made.	None

Respondent [ID]	Representation Number	Policy/Para/Text	Representation Summary	Officer Comment	Minor/Major amendment required?
Quod Planning [7958]	6753	HGT1	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'.	The Policy states which district the site is allocated and therefore relate to each authorities' respective policies. The Policy's principles have been agreed as an appropriate way forward for the Garden Town Communities and have been included in appropriate policies in the respective Local Plans.	None
Deanery of Harlow (Anglican) [8586]	6453	HGT1	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.	Agree and Policy HGT1 already refers to walking as does Local Plan objectives and other Development Management Policies. This includes an insertion of a modal hierarchy prioritising walking in Development Management Policy IN1.	None
Redrow Homes [8640]	6851	HGT1	We therefore recommend that 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.	The Vision and Design Guide (was Charter) has been adopted as a material consideration by the three local authorities of the Garden Town and was published for consultation. Comments were taken into consideration when finalising the document.	None
Roydon Parish Council [5434] and Roydon Society [8634]	6771, 6772, 6770	HGT1	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. 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	The site in question is in Epping Forest District Council and allocated in their Local Plan. Harlow is working with the other Garden Town authorities to ensure the correct infrastructure is in place for all sites and ensure masterplanning respects the existing areas including neighbouring settlements. The 60% modal shift is set out in a Transport Strategy currently being finalised and will include objectives and high level actions to implement this. The Sustainable Transport Corridors are an important component of modal shift and the Council is seeking to deliver these with the developers and other partners including neighbouring local authorities and highway authorities.	None

Respondent [ID]	Representation Number	Policy/Para/Text	Representation Summary	Officer Comment	Minor/Major amendment required?
			seems to be towards decreasing, rather than increasing, local bus services.		
Roydon PC [8634]	6770	HGT1	Green Belt gap between Roydon and Harlow would be severely reduced. Planned development almost extends to back gardens on Broadley Common & Old House Lane.	This area is not within the Harlow district and is not covered by the Local Plan; however, this Green Belt gap would be preserved by national Green Belt planning policies to ensure settlements do not coalesce.	None.
Essex County Council [8452]	6889	HGT1 para 5.31	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.	The Sustainable Transport Corridor through Latton Priory forms part of the requirements in the Garden Town IDP and the Garden Town Policy and is therefore considered a requirement of this site. However, if required to make the Plan sound, Harlow Council is amenable to making a further modification to include this.	Amendments have not been included in the proposed modifications currently made but Harlow is amenable to further changes in the Plan to provide greater flexibility in regards to transport corridor.
Hallam Management & Commercial Estates Group [7646]	See full representation	HGT1 2 c	HGT1 2 (c) refers to governance and stewardship. We support and commit to this principle but the policy wording would benefit from further clarification to understand what is anticipated in this regard. Whilst we are happy to engage with Officers in respect of matters of governance and stewardship this matter does not fall to developers alone and requires discussion and collaboration of the Council's, developers, key stakeholders and relevant agencies.	Harlow Council agrees that this will require a collaborative approach and the Garden Town has appointed consultants to review options for implementing stewardship arrangements across the Garden Town and ensuring consistency across the sites.	None

Respondent [ID]	Representation Number	Policy/Para/Text	Representation Summary	Officer Comment	Minor/Major amendment required?
Historic England [8623]	6691	HGT1 2 c	Suggest the addition of heritage assets in the list of stewardship arrangements	The Council could include this as an addition however as a catch all, the policy does already refers to 'other relevant facilities'.	None
Miller Strategic Land [5769]	6470 and 6474	HGT1 2 c	There is no need for this supporting statement to be provided prior to the submission of an outline planning application as required by part 2(c). Indeed, our client will not be in a position to make such a statement until further details are available on the scale of provision required and what the management and maintenance liabilities are likely to involve. Therefore the first line in part 2(c) should be revised to 'prior commencement'	This is not considered to be acceptable. Long term governance and stewardship is critical to ensuring that the principles of the Garden Town are embedded and remain in the future and is an important component of what is being achieved. It is inappropriate to agree the right approach at the planning application process when it is too late to formalise the requirements.	None
Hallam Management & Commercial Estates Group [7646]	See full representation	HGT1 2 d and e	We would welcome the opportunity to provide input into both the 'Spatial Vision and Design Charter Framework' and the 'Design Charter as a collaborative process. These documents must be fully consulted upon and should not be finalised until the Local Plan is adopted as they will be dependent upon the final form of all policies for the Garden Town Communities in the Harlow and Epping Forest Local Plans. Although we support the principle of good quality design across the development, the level of detail and prescription of these Charters must be considered as if this becomes onerous, this will delay the delivery of development.	The Vision and Design Guide (was Charter) has been adopted as a material consideration by the three local authorities of the Garden Town and was published for consultation. It was developed having regard to comments made during this consultation period.	None
Hallam Management & Commercial Estates Group [7646]	See full representation	HGT1 2 g	Whilst we are happy to incorporate an element of self and custom built homes at Latton Priory to support this aspiration, we would recommend that is limited to no more than 1% of the proposed development. In our experience self and custom build houses are unlikely to be taken up in significant numbers on large development sites as they are generally better suited to small scale bespoke sites.	The Council considers that the Harlow policy on self-build as it stands will produce plots to meet the current evidence which identifies 48 registrations for self-build and custom built housing. The Harlow policy will allow a supply of plots to meet need over the plan period. The policy allows developers to have the opportunity to market the plots conventionally after just one year, should they not be taken up. Please note this applies only to sites within Harlow of which Latton Priory is in Epping.	None

Respondent [ID]	Representation Number	Policy/Para/Text	Representation Summary	Officer Comment	Minor/Major amendment required?
Hallam Management & Commercial Estates Group [7646]	See full representation	HGT1 2 h	HGT1 2 (h) relates to small-scale employment generating uses. We would query this reference and would like to understand more clearly how the Council has determined the scale of employment to be provided and whether strategic employment allocations are being regarded as a separate issue from the Garden Town Communities. We would assert that, given the size and scale of the Harlow and Gilston Garden Town, the promotion and allocation of large scale employment allocations is vital to delivering sustainable communities.	Epping Forest District Council will determine the appropriate level of employment development at Latton Farm and on Epping sites taking into consideration economic evidence undertaken for Epping, the Functional Economic Market Area and the employment opportunities already being provided within Harlow.	None
Hallam Management & Commercial Estates Group [7646]	6791	HGT1 2 i	The concept of the Sustainable Transport Corridors is laudable but needs better definition in terms of scope, timing and funding before it can be firmly tied to the garden town proposals. Paragraph 5.16 refers to the preparation of a 'Sustainable Transport Corridor Study' which will presumably provide further clarification and we would request that this Study be discussed with developers. We note that paragraph 5.16 mentions an aspiration to include a modal travel shift towards 60% by sustainable modes of transport and suggest that a precise proportional shift is not applied.	The Sustainable Transport Study will be published as evidence which will provide information on the best routes for the Corridors as well as indicative funding costs. They will assist in achieving the modal shift, of which 60% has been identified as complying with Garden City Principles and providing relief to the highway network. Officers have been working with developers on the Garden Town IDP when identifying how costs for the Corridors should be apportioned and further design and feasibility work is being undertaken to investigate more detailed costings, phasing and exact routes for the corridors.	None
Quod Planning [7958]	6753	HGT1 2 i	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 Sustainable Transport Corridor Study is nearing completion which will set out the rationale behind the proposed route and indicative costs. Further feasibility and design work setting out phasing and firmed up costs is also being developed. The Garden Town IDP will use the costings of the Corridors and apportion the costs across the Garden Town sites. The IDP will also be investigating mechanisms for collecting such contributions but it is inappropriate at this time to set this out in detail in the Local Plan policy until this work is completed. The Garden Town is also preparing a Transport Strategy setting out the high level measures, principles and objectives for implementing a 60% modal shift including measures to deter residents and workers from using the car.	None
Miller Strategic Land [5769]	6470	HGT1 2 k	Note that any new parking standards should be prepared on a Garden Town-wide basis and applying equally to all of the new communities. It also should be noted that the development industry will be given the opportunity to provide formal feedback on any draft new parking standards during a formal consultation period. This is necessary to ensure that the Plan will be deliverable over its period	Harlow Council agrees with this approach in the future however no changes are required to the Plan.	None

Respondent [ID]	Representation Number	Policy/Para/Text	Representation Summary	Officer Comment	Minor/Major amendment required?
Miller Strategic Land [5769]	6470	HGT1 2 m	The design of the new Garden Town Communities must ensure adequate mitigation and adaptation to climate change and the developments will need to meet Building Regulation standards, but construction methods are not relevant to this part of the policy and should be deleted. This will ensure that part 2(m) is the most appropriate strategy when considered against the reasonable alternatives	Construction methods should form part of a consideration in climate change mitigation and adaptation.	None
Hallam Management & Commercial Estates Group [7646]	See full representation	HGT1 2 n	HTG1 2 (n) seeks to ensure that “appropriate measures [are] put in place to equalise and apportion the costs of shared infrastructure and associated land contributions”. We consider that this reference needs further clarification to explicitly state what measures Harlow Council are seeking to implement and how these will equalise costs and land contributions. Without such clarification we cannot comment on the appropriateness or potential impacts of such a measure. The Council will, in particular, need to address how the land and build costs of the proposed secondary schools are to be apportioned between developers and across local authority boundaries.	The Garden Town IDP is apportioning costs of strategic infrastructure items (or where there is a shared facility between sites) in a fair and consistent way taking into consideration land that is required for such facilities. This will feed into a viability model to test the sites. This will also consider other sites outside the Garden Town which will use infrastructure within the Garden Town including Epping sites that will use and therefore contribute towards the secondary school at Latton Priory.	None
Miller Strategic Land [5769]	6471	HGT1 and para 4.13 of Spatial Development Strategy	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.	The Vision and Design Guide (was Charter) has been adopted as a material consideration by the three local authorities of the Garden Town and was published for consultation. Comments were taken into consideration when finalising the document.	None

Respondent [ID]	Representation Number	Policy/Para/Text	Representation Summary	Officer Comment	Minor/Major amendment required?
Essex Bridleways Association [7887]	6413, 6415, 6417, 6418, 6419	HGT1 and throughout	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...' 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.	The Council considers the existing wording in the Policy, the objectives for the Plan and Development Management Policies already make it clear that the Council is seeking to achieve improved access for all users but in particular sustainable modes of travel/choice. Including 'all users' may be misinterpreted of trying to also improve movement for car users which is not an aspiration for Harlow and the Garden Town.	None
Mary Wiltshire [6026]	6847	HGT1 General	Object garden town concept, as Harlow town already struggling with overloaded infrastructure. Any future consultation should show the Harlow residents how the costs would be shared	The Garden Town IDP is apportioning strategic infrastructure costs across all sites both within and outside of Harlow and will identify all necessary infrastructures and prioritise their delivery.	None
Lawson Planning Partnership [8532]	6764	HGT1 General	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.	It is not considered appropriate to include reference to Masterplanning without an agreement going forward on the solution for the hospital. Masterplanning has not taken place and is considered restrictive.	None

Respondent [ID]	Representation Number	Policy/Para/Text	Representation Summary	Officer Comment	Minor/Major amendment required?
Quod Planning [7958]	6754	HGT1 General comment	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.	A East Hertfordshire Local Plan was submitted before the Garden Town was formalised and work on the infrastructure requirements undertaken. Until this is completed and the options agreed no additional wording is proposed at present to the Harlow Local Plan	None
STOP Harlow North [8588]	6438	HGT1 Para 5.11	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.	The Garden Town IDP takes into consideration the full 10,000 at Gilston in regards to providing the appropriate infrastructure provision. All other Garden Town documentation and evidence considers the full 10,000 at Gilston as do infrastructure providers where possible when planning post local plan period	None
Historic England [8623]	6692	HGT1 para 5.14	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 NPPFs definition of sustainable development in terms of its environmental stance which requires the conservation and enhancement of the historic environment.	The TCPA principles are just one strand of the design and masterplanning approach to the Garden Town sites and one element that requires consideration. Policy HGT1 also refers to the Vision and Design Charter (now Guide) as well as Sir Frederick Gibberd's masterplan and there are other specific policies in the respective local plans which ensure that the historic environment is taking into consideration.	None
Quod Planning [7958]	6754	HGT1 para 5.14	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”.	The TCPA principles are a guide along with other important Garden Town documents and other policies within the Plan itself and in the other local plans. It does not replace the local authority policies for specific requirements including affordable housing need which is based on local evidence (Strategic Housing Market Assessment). However the principles of what is trying to be achieved by the TCPA Garden City principles is still endorsed by Harlow Council including appropriate split of affordable housing.	None
Miller Strategic Land [5769]	6472	HGT1 Para 5.16	Although our client is broadly supportive of the preparation of a Sustainable Transport Corridor Study, as referred to at paragraph 5.16, this has not been published for consultation purposes and the first opportunity to discuss a draft version of the document with Harlow District Council	The Sustainable Transport Corridor Study is nearing completion which will set out the rationale behind the proposed route and indicative costs. Further feasibility and design work setting out phasing and firmed up costs is also being developed. The Garden Town IDP will use the costings of the Corridors and apportion the costs across the Garden Town sites. The IDP will also	None

Respondent [ID]	Representation Number	Policy/Para/Text	Representation Summary	Officer Comment	Minor/Major amendment required?
			(HDC) will come at a meeting after the close of the Local Plan consultation. Accordingly there is no way of knowing whether the completed Sustainable Transport Corridor Study will place significant constraints or obligations on strategic growth at East Harlow, which should otherwise be dealt with and tested via formal planning policies in a Development Plan Document (DPD). It is therefore unclear whether the Plan will be deliverable over its period	be investigating mechanisms for collecting such contributions and a viability study will use these costings to determine the viability of East of Harlow.	
Hertfordshire County Council [8622]	6670	HGT1 para 5.2	Paragraph 5.2 should be amended to include Hertfordshire County Council (HCC), as it is both a service provider and Highway Authority.	The paragraph already refers to strategic providers and this includes the County Councils as well as other infrastructure providers and is therefore all encompassing. No amendments to be made.	None
Miller Strategic Land [5769]	6473	HGT1 Para 5.20	Our client would welcome further clarification, prior to EiP, as to the scope of the Garden Town Programme's remit. Although it is appropriate to seek to a coordinated approach and consistent placemaking objectives across the Garden Town, this should not involve an overarching delivery programme which could otherwise delay the delivery of some strategic sites and stall housing delivery in the early parts of the Plan period. Until such clarification is forthcoming, our client would like to raise a holding objection to paragraph 5.20.	Harlow Council agrees that we do not wish to delay the delivery of development sites across the Garden Town however there needs to be a coordinated approach to the delivery of strategic infrastructure and other important strategic decisions such as contribution collection mechanisms and stewardship arrangements with the development proposals coming forward. Ensuring these mechanisms are in place to provide more certainty and help speed up the delivery of these sites.	None
Essex County Council [8452]	6884 and 6885	HGT1 para 5.27	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.	Harlow Council agrees to make this amendment to the Plan through further moderations, if necessary, to ensure flexibility when delivering education facilities. The Statement of Common Ground between Harlow District Council and Essex County Council sets out further detail on this.	Amendments have not been included in the proposed modifications but Harlow is amenable to further changes in the Plan to provide greater flexibility in regards to needs.

Respondent [ID]	Representation Number	Policy/Para/Text	Representation Summary	Officer Comment	Minor/Major amendment required?
Essex County Council [8452]	6886	HGT1 para 5.28	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.	This has already formed part of the Newhall proposals. The Sustainable Transport Corridor through East of Harlow forms part of the requirements in the Garden Town IDP and the Garden Town Policy and is therefore considered a requirement of this site. However if required to make the Plan sound, Harlow Council is amenable to making a further modification to add clarification on this point.	Amendments have not been included in the proposed modifications but Harlow is amenable to further changes in the Plan to provide greater flexibility in regards to needs.
Essex Bridleways Association [7887]	6416	HGT1 Para 5.28	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'.	Development Management Policy IN1 includes reference to bridleways and improvements to the bridleway network and this will apply to the sites in Harlow including East of Harlow.	None
Essex County Council [8452]	6886	HGT1 para 5.29	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 two-form entry site (of 2.1 ha. in area) for a primary school, and a site of approximately 9ha. of D1 land for a secondary school and appropriate contributions towards the secondary school to serve new development.....	Harlow Council agrees to make this amendment to the Plan through further moderations, if necessary, to ensure flexibility when delivering education facilities. The Statement of Common Ground between Harlow District Council and Essex County Council sets out further detail on this.	Amendments have not been included in the proposed modifications but Harlow is amenable to further changes in the Plan to provide greater flexibility in regards to needs.
Essex County Council [8452]	6887 and 6888	HGT1 para 5.30	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.	This is for Epping Council to confirm and changes can be made accordingly if necessary. The change is not considered to impact on the soundness and overall delivery of Harlow's Local Plan.	None
Essex County Council [8452]	6890	HGT1 para 5.32	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 two-form entry site (of 2.1 ha. in area) for a primary	Harlow Council agrees to make this amendment to the Plan through further moderations, if necessary, to ensure flexibility when delivering education facilities. The Statement of Common Ground between Harlow District Council and Essex County Council sets out	Amendments have not been included in the proposed modifications but Harlow is amenable to further changes in the Plan to provide greater

Respondent [ID]	Representation Number	Policy/Para/Text	Representation Summary	Officer Comment	Minor/Major amendment required?
			school and appropriate contributions towards a secondary school to serve new development.	further detail on this.	flexibility in regards to needs.
Miller Strategic Land [5769]	6475	HGT1 Para 5.39	Reference in this paragraph to the Princess Alexandra Hospital (PAH) implies that relocation, either to East Harlow or the Gilston Area, is the only option being considered. In reality there is no secured funding for the relocation of the PAH at this stage and it is possible that the PAH Trust could ultimately decide to redevelop its existing hospital site instead. In order to reflect the current options available to the PAH Trust, paragraph 5.39 should be expanded to refer to the possibility of the hospital redeveloping its existing site	Para 11.18 of the Local Plan already refers to the improvement of PAH including the 'potential' to relocate. If the option is to redevelop the existing site, Harlow Council will support this as the final solution and will bring forward the other housing sites in the Plan.	None
Essex County Council [8452]	6883	HGT1 paras 5.14-5.25	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.	Health is an important element to both Harlow and the Garden Town and underpins evidence and documents being prepared including the recently completed Harlow Health and Wellbeing Strategy. Harlow Council is amenable to adding further details on this matter although we are aware of its importance and it forms part of the overall vision for the Garden Town as set out in the Spatial Vision document.	No changes at present, Harlow Council is amenable to changes which will strengthen supporting text on health either within this policy text or within other sections of the Local Plan.
Hallam Management & Commercial Estates Group [7646]	See full representation	HGT1 Paras 5.29 - 5.31	We recommend that Harlow changes the wording in paragraph 5.29 to be consistent with Epping Forest District's Submission Local Plan policy SP5, paragraph F (i) which reads, "at least 1,050 homes."	Policy HGT1 itself states 'approximately' for the number of homes each Garden Community could provide which provides future flexibility for site dwelling numbers.	None
Historic England [8623]	6680	HGT1.	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	The Vision and Design Guide (was Charter) has been adopted as a material consideration by the three local authorities of the Garden Town and was published for consultation. Comments were taken into consideration and it includes a section on 'maximising visibility and appreciation of our heritage'.	None

Respondent [ID]	Representation Number	Policy/Para/Text	Representation Summary	Officer Comment	Minor/Major amendment required?
A. Martin (for Miller Homes) [5533]	6476	SD1	For NPPF compliance, para 2 should recognise that development also will normally be supported "where relevant policies are out-of-date"	Potential mod to address this.	SD1Where there are no policies specifically relevant to the proposed development or the relevant policies are out-of-date , it will normally be supported, unless material considerations indicate otherwise and/or either of the following apply:.....

Respondent [ID]	Representation Number	Policy/Para/Text	Representation Summary	Officer Comment	Minor/Major amendment required?
Harlow Alliance Party[8621]	6653	General	Support for new homes is welcomed. The Plan sets out policies based on joint evidence set out in the SHMA but aims to address all housing needs in Harlow, and a number of policies in the Plan reflect this. These policies addresses matters such as affordable housing, specialist housing, and community led housing.		None
Gladman[8618]	6625	HS1	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	Harlow is part of the joint West Essex and East Hertfordshire Strategic Housing Market Area. The Local Plan relates only to the identified OAHN for the District. The Council has set out a housing requirement in the Plan in excess of the need articulated in the OAHN in order to address affordability and regeneration issues and reflects the Government's aim of delivering a step change in housing supply. A 20% buffer has been included in the housing figures.	None
Home Builders Federation[8450]	6702	HS1	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 Councils housing requirement should reflect this positon. However it must be recognised that compared to the other Borough's 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 meets 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.	The policy is sound and consistent with national policy because the Council has allocated significantly more sites along with commitments and completions to provide at least 9200 dwellings, some 24% above the OAHN.	None

Respondent [ID]	Representation Number	Policy/Para/Text	Representation Summary	Officer Comment	Minor/Major amendment required?
Miller Strategic Land[5769]	6477	HS1	<p>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).</p> <p>It is noted that the latest Strategic Housing Market Assessment (SHMA) (July 2017) identifies, at Figure 5, an objectively assessment housing need (OAHN) of 7,409 dwellings for Harlow District (i.e. 337 dwellings per annum). However, HDC's decision to increase this figure by approximately 1,800 dwellings (i.e. up to a total of 9,200 dwellings), to contribute towards affordable housing need and wider regeneration objectives, is welcomed.</p> <p>This higher figure is prudent given the general direction of travel at a national level. In particular, the draft revisions to the NPPF (March 2018) seek to introduce a new method of calculating housing need and that method could result in an increase from 337 to 466 dwellings per annum for Harlow District (based on the Government's Housing Need Consultation Data Table (September 2017)). The revised NPPF is likely to include transitional arrangements, whereby local authorities can continue to use their existing OAHN figures, if they submit their new local plan to the Secretary of State within six months of publication of the revised NPPF. These transitional arrangements are highly likely to apply to the new Harlow Local Plan, which is scheduled for submission in September 2018 and would enable the Plan to continue to rely on an OAHN of 7,409 dwellings (i.e. 337 dwellings per annum). The fact that HDC is seeking to exceed this figure and provide at least 9,200 dwellings (i.e. 418 dwellings per annum) should future proof the Plan to a certain degree and reduce the urgency to conduct a local plan review following adoption.</p>	Support is welcomed	None
Harlow Alliance Party[8621]	6647	HS1	<p>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</p>	<p>The Plan is based on a comprehensive suite of evidence, produced and updated in a timely fashion if required. The NPPF and other Government Guidance require LPA's to prepare Local Plans for their area based on an assessment of a range of socio-economic and environmental considerations in order to identify future development needs. The housing need in particular has been evidenced comprehensively by the SHMA. In addition evidence set out in the Harlow Future Prospects Study (Nathaniel Litchfield) makes the clear connection between growth and regeneration.</p>	None

Respondent [ID]	Representation Number	Policy/Para/Text	Representation Summary	Officer Comment	Minor/Major amendment required?
			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.		
Harlow Alliance Party[8621]	6651	HS1	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.	A number of new homes have been given planning permission over the plan period and have been considered in the assessment of housing land supply. In addition housing development has been brought forward as an outcome of the Government permitted development regime allowing commercial properties to be converted to residential use with limited planning control. However, the Council considers that as a planned New Town with particular constraints such as Green Wedges, Green Belt, the opportunities for significant contributions from windfall will be limited and will not make a reliable contribution to supply in the future.	None
Persimmon Homes[8437]	6743	HS1	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.	The Council has allocated significantly more sites along with commitments and completions to provide at least 9200 dwellings, some 24% above the OAHN.	None
STOP Harlow North[8576]	6442	HS1	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.	Harlow is part of the joint West Essex and East Hertfordshire Strategic Housing Market Area. The Local Plan relates, however, only to the identified OAHN for the District. The Council has, set out a housing requirement in the Plan in excess of the need articulated in the OAHN in order to address affordability and regeneration issues and reflects the Government's aim of delivering a step change in housing supply.	None
STOP Harlow North[8576]	6443	HS1	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.	Council considers that as a planned New Town with particular constraints such as Green Wedges, windfall will not make a reliable contribution to supply in the future.	None

Respondent [ID]	Representation Number	Policy/Para/Text	Representation Summary	Officer Comment	Minor/Major amendment required?
Epping Forest District Council[8637]	6824	HS1	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.	Welcome support	None
Natural England[8628]	6731	HS1	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.	Noted	None
Gladman[8618]	6626	HS2	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.	The Plan allocates 1800 dwellings above the OAHN providing a 24% flexibility buffer.	None
Harlow Alliance Party[8621]	6986	HS2	Object to the proposed Local Plan for the future development of the land identified in section HS2 Housing Allocations 3. Land to the West of Deer Park 5. South of Clifton Hatch 6. Ridding Lane 9. East of 144-155 Fennells 10. Pollard Hatch, garages and land attached 11. Land between 2nd Avenue and St Andrews Meadow 15. Playground West of 93-100 Jocelyns 20 Land between Five Acres and Barn Mead These sites are not suitable for housing development. Access to many of these sites is through nearby housing estates on roads that were never designed to take such traffic. Land used for recreational purposes. Believe other sites around which could be used.	The sites have been identified through the evidence set out in the joint Strategic Housing Land Availability study and are considered to be suitable, available and achievable.	None

Respondent [ID]	Representation Number	Policy/Para/Text	Representation Summary	Officer Comment	Minor/Major amendment required?
Historic England[8623]	6681	HS2	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.	Each allocated site is subject to the Policies as set out in the submitted plan. Policy PL11 will ensure that heritage assets are protected. The implementation section associated with this policy sets out the obligations on developers to consider various heritage assets effecting sites.	None
Historic England[8623]	6682	HS2	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.	Each allocated site will be subject to the range of detailed policies set out in the submitted plan. Policy PL11 will ensure that heritage assets are considered and protected. The implementation section associated with this policy sets out the obligations on developers to consider heritage assets.	None

Respondent [ID]	Representation Number	Policy/Para/Text	Representation Summary	Officer Comment	Minor/Major amendment required?
Historic England[8623]	6693	HS2	<p>We note the allocations are simply listed in tabular form and marked on the proposals map.</p> <p>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).</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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</p>	Each allocated site is subject to the Policies as set out in the submitted plan. Policy PL11 will ensure that heritage assets are protected. The implementation section associated with this policy sets out the obligations on developers to consider heritage assets.	None

Respondent [ID]	Representation Number	Policy/Para/Text	Representation Summary	Officer Comment	Minor/Major amendment required?
			<p>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 11 *and Latton Priory Farmhouse listed at grade 11. This requirement should be included in the policy and the supporting text.</p> <p>HS2-7 Kingsmoor Recreation Centre- Kingsmoor House (listed at grade 11*) and its Lodge and Coach house (both listed at grade 11) 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/gpa1-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/)</p> <p>This will help to determine whether this allocation is suitable in terms of the historic environment.</p> <p>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.</p> <p>HS2 - 8 The Evangelical Lutheran Church, Tawneys Road - The Harlow Tye Green Villag</p>		

Respondent [ID]	Representation Number	Policy/Para/Text	Representation Summary	Officer Comment	Minor/Major amendment required?
Ethan Baldry[8559]	6396	HS2	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. 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.	The site's identification for housing will help contribute to meeting identified housing need in the town. There is a significant amount of open space in this area of Harlow. There are alternatives in the vicinity of Fennells, including Parndon Wood Nature Reserve, and other playing fields. Any development that is brought forward on this site will need to be provided with appropriate access to meet ECC highway standards and accord with the adopted car parking standards of the Council. There is a significant amount of alternative open space in this area of Harlow.	None
Harlow Civic Society[5318]	6492	HS2	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.	No reasons given	None
STOP Harlow North[8576]	6444	HS2	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.	By the time of the examination the location of a new hospital should be known	None
Epping Forest District Council[8637]	6828	HS2	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.	The future of PAH should be known by the start of the examination. Commitments since 2017 have been at level which would achieve the Council's housing requirement, along with probable future housing allocated in the Town Centre Area Action Plan	None

Respondent [ID]	Representation Number	Policy/Para/Text	Representation Summary	Officer Comment	Minor/Major amendment required?
Natural England[8628]	6732	HS2	<p>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.</p> <p>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.</p> <p>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.</p>	Noted	None
Princess Alexandra Hospital[8532]	6763	HS2-1	<p>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 onstraints 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.</p> <p>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).</p> <p>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.</p>	Reduction in the capacity has a consequential impact on the Plan, and at this stage of the plan process a modification is not proposed. Policy HS2 states in the note to the policy that dwelling numbers are indicative and that sites will be subject to detailed planning to establish their final capacity. The site is adjacent to the town centre and an uplift to the density proposed by the developer is encouraged on such sites by NPPF.	None
De Merke Estates [8643]	6862	HS2-1	<p>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.</p> <p>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.</p>	The site is being promoted by the Princess Alexandra Hospital (PAH), and consultants have been appointed by the hospital to explore development options. It is anticipated that the Government will make a decision on the future of the hospital in early march. Epping Forest DC have already indicated in their submitted Local Plan that the relocated hospital could be accommodated on land within their district to the East of Harlow.	None

Respondent [ID]	Representation Number	Policy/Para/Text	Representation Summary	Officer Comment	Minor/Major amendment required?
James Humphreys[8561]	6713	HS2-3	<p>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.</p> <p>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.</p>	<p>A significant amount of open space is being protected in this plan. In particular Green Belt, Green Wedge and Green Fingers.</p>	None
James Humphreys[8561]	6714	HS2-3	<p>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.</p> <p>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.</p> <p>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</p>	<p>The allocation is not within a flood risk area according to the Council's Strategic Flood Risk Assessment. It is not singled out in that study for any special attention with regards flooding.</p> <p>This allocation does not impinge on any designated biodiversity or geodiversity designation. Policy PL8 will help protect any such assets on any allocation.</p> <p>There are three potential access points into this site.</p> <p>Harlow is working closely with adjoining authorities on the Garden Town areas in the vicinity of this allocation.</p>	None

Respondent [ID]	Representation Number	Policy/Para/Text	Representation Summary	Officer Comment	Minor/Major amendment required?
			<p>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?</p>		
James Humphreys[8561]	6715	HS2-3	<p>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</p>	<p>There are not significantly enough empty properties to make an impact on housing need. Conversion of offices to flats has boosted our housing supply, but there is no guarantee that this will continue.</p> <p>A significant amount of open space is being protected in this plan. In particular Green Belt, Green Wedge and Green Fingers. There will remain a large area of protected open space.</p>	None

Respondent [ID]	Representation Number	Policy/Para/Text	Representation Summary	Officer Comment	Minor/Major amendment required?
			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.		
Peter Mountstevens [5553]	6920	HS2-3	<p>There is a local belief that HS2-3 site west of Deer Park is "derelict land" as a former recreational area, although I doubt that it would be as "derelict" as a Durham D village of yore (1960's) during the decline of the Northumberland and Durham coalfields. Has the Planning Inspectorate in succession to the Department of the Environment withdrawn the guidance that local authorities should provide 4 acres of recreational i.e. functional open space per 1000 head of population? If this standard still applied, the Deer Park recreational area would best remain reserved for informal outdoor pursuits.</p> <p>Two other sites within the HS2 Housing Allocations section could also be deleted from the final submission without compromising the final total of new housing sites. HS2-15: Land to the north-west of Jocelyns which would bring that Old Harlow housing area unnecessarily close to the A414; and HS2-19: Stewards Farm which remains in beneficial and popular use for riding stables, a use compatible with the former farmhouse - a Grade II Listed Building. I have spoken to the family who run the stables and gather they have 5 years to run on their lease. The nearest alternative stables are at Nazeing and Barnfield, north of Roydon Hamlet. My fondest memory of the Harlow Town Show in the Town Park in the 1970's and 1980's is of the International standard show jumping with riders such as Harvey Smith, David Broome and Caroline Bradley over the August bank Holiday weekend. It's a shame that Hickstead have monopolised show jumping since then in the South-East.</p> <p>Three sites not included within the Housing Allocations section of the HLDP all capable of beneficial residential use are The Square/YWCA hostel site adjacent to the Princess Alexandra Hospital site now earmarked for 650 dwellings, Wych Elm, and the former Motorsales site off Elizabeth Way, east of the 130 dwelling site at Ram Gorse (ex-Rugby Football club) off Parndon Mill Lane, formerly</p>	<p>The allocations in total contribute to the housing land supply.</p> <p>HS2-3: is not derelict, and the standard or recreational land remains appropriate for the town.</p> <p>HS2-15: Design of the layout should ensure that the impact from the A414 would be minimised</p> <p>HS2-19: Put forward in the call for sites by the owner (HDC), if they only have 5 years to run on the lease this would be within the lifetime of the plan.</p>	None

Respondent [ID]	Representation Number	Policy/Para/Text	Representation Summary	Officer Comment	Minor/Major amendment required?
			<p>a "clean, green, safe" setting to St.Mary's, Little Parndon - the listed parish church.</p> <p>Mention of PAH and re-siting of the District Hospital prompts me to support Cllr Danny Purton's suggestion that Hollingson Meads ex-sand and gravel workings would be the largest available site for the hospital within Harlow District to the north of River Way subject to a second Stort Valley road crossing.</p> <p>In conclusion, I would echo Dr. Mervyn Miller's suggestion when viewing Orchard Croft townhouses in December 1998, short-listed for Grade II listing by the then English Heritage that Phase 1 of The Stow Shopping Centre featuring double stretcher bond facing brickwork (as at The Lawn) be given at least Character Area status, a status I have previously recommended for Standingford , Keefield and Archers at Sumners Farm (East).</p>		
Nigel Bangert [8638]	6845	HS2-5	<p>Object HS2-5 South of Clifton Hatch with concern about the flood risk, as during heavy rain, garden has flooded.</p> <p>Houses will be in flood plain, causing flooding, and subsidence.</p> <p>Sufficient houses in Harlow. Additional congestion and pollution</p>	The proposed site is not in an area of flood risk. Any detailed development proposals will be scrutinised through the planning application stage and if any issues arise appropriate mitigation measures will be considered. Jointly prepared evidence, as set out in the SHMA and related studies, shows that Harlow has a significant housing need over the lifetime of the plan.	None

Respondent [ID]	Representation Number	Policy/Para/Text	Representation Summary	Officer Comment	Minor/Major amendment required?
Christina Webb[8613]	6581	HS2-5	<p>I have lived in Radburn Close for over 50 years and my family still live and work in Harlow today. While I understand the need for expansion and progress in the current social climate I don't understand the logic of this site being one of the proposed , Harlow consists of many unused derelict land areas and this land is used by the community on a daily basis. My property overlooks the area in question , the reason I chose this home was to have the pleasure of looking from my windows to cherish and admire the green space , to use this area for family and friends , dog walking or just generally for the wellbeing of being able to walk on the field ! Another concern that I have been made aware of is the potential flood risks will now increase . I understand the field soaks up rainwater which keeps our homes safe, the financial and emotional damage a flood can cause to a property I person is never solved by insurance policies but by not being at risk in the first place ... why subject homes and families to this possibility? So if the plans were to be approved 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 ! like most people who buy their home it is a future investment for them and their fa miles , so what impact will this have on the value of my property. I have worked all my life as did my husband to give the family the best we could as well as the future family to come, so if the value of my home decreases and the impact on my quality of life decreases will I be compensated financially for this ? I suspect not ...</p> <p>As a community no we are not happy with this proposal.</p>	Loss of view is not a valid planning consideration. The site would not involve the loss of any land within Harlow Common or the area which has been designated as important for wildlife. Any subsequent planning application to develop the site will be considered against a number policies set out in the Local Plan to ensure the impact on sites of wildlife and other environmental importance, including flood and drainage issues , together with the amenities of local residents are considered.	None
David Beavis[8615]	6600	HS2-5	<p>OBJECTION TO BUILDING ON SITE HS2-5 (relating to 10.1 & 10.2)</p> <p>Paragraph 10.1 acknowledges that it's important to retain and enhance the natural environment for the enjoyment of residents and visitors. If</p>	The site has not been identified in the Adopted Replacement Harlow Local Plan or Pre-submission Local Plan as Green Wedge. It was brought forward following identification in the SHLAA as a potential housing site in accordance with the agreed methodology. Any subsequent planning application to develop the site will be considered against a number policies	None

Respondent [ID]	Representation Number	Policy/Para/Text	Representation Summary	Officer Comment	Minor/Major amendment required?
			<p>building on the Plot HS2-5 is allowed, it would show a complete disregard for paragraph 10.1</p> <p>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.</p> <p>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.</p> <p>(1) FLOOD RISK (2) OVERSHADOWING(3) LOSS OF PRIVACY (4)INFRINGEMENT OF HUMAN RIGHTS</p> <p>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.</p>	<p>set out in the Local Plan to ensure the impact on sites of wildlife and other environmental importance, including flood and drainage issues , together with the amenities of local residents are considered.</p> <p>The design would have to adhere to the Local Plan requirements along with the Harlow Design guide.</p>	
Masoud Eskandarian[8625]	6727	HS2-5	<p>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</p> <p>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.</p> <p>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.</p>	<p>Loss of view is not a valid planning consideration. Any drainage issues will be mitigated on site and surface water run off will be no more and likely less than existing. Detailed design of the scheme will reduce any loss of privacy and overshadowing to a minimum. The Sustainability Appraisal states that Even the allocation of sites/establishment of site-specific policy through this plan should also be considered a strategic undertaking, i.e. a process that omits consideration of some detailed issues (in the knowledge that they can be addressed at the planning application stage).The SA reflects the strategic nature of the plan and not on a site by site basis.</p>	None
Sandra Beavis[5035]	6832	HS2-5	<p>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</p>	<p>It is not considered that the development of this site will give rise to a significant increase in traffic generation in the area. In addition the site is within a short walk of a proposed sustainable transport corridor that will help reduce reliance on car journeys. There remains a significant amount of open</p>	None

Respondent [ID]	Representation Number	Policy/Para/Text	Representation Summary	Officer Comment	Minor/Major amendment required?
			should not be built on.	land in the town, and this site is adjacent to another field and Harlow Common.	
Angela Parish (Letter and Web)[8550]	6551	HS2 - 9	<p>I am writing with regards to your article published in last weeks Harlow Star regarding the Council's plan to build more houses. Firstly, thank you for being the first person to actually advise us residents of their plans. The Council have never written to us or made us aware of their plans. Secondly, you stated in the article that the consultation period started on the 24th May 2018. I go back to my first point of 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. Thirdly, I live on the Fennells estate and my house overlooks the very small field the Council are planning to build on. Again really disappointing that in my area we have the Nature Reserve where the wildlife will really suffer. I also am a single mum managing to hold down a full time job and bring up two lovely daughters. This in itself is a feat and I am worried about my mental health if the building of houses goes ahead. I have only just come off my anti depressants after 20 years and this all worries me. I have made my objection on the Harlow website which the Council never told us about, surprise surprise. In fact all my information has come from local residents who have never been advised by the Council either. So all in all a very disappointing subject. Anyway thanks for taking the time to read my email and I very much hope that the Council do not get their own way with all this extra building which in a lot of cases will ruin the current residents lives.</p>	The Harlow Local Development Plan had been prepared over a number of stages and has been subject to a number of public consultation exercises in accordance with the adopted Statement of Community Involvement (SCI). How the Council has engaged with the public and the documents it has consulted upon is set out in the Regulation 22 document. The Fennells allocation is adjacent to the local wildlife site and local nature reserve and a drainage bund now separates the allocation from the LWS and LNR. Any subsequent planning application to develop the site will be considered against a number policies set out in the Local Plan to enure the impact on sites of wildlife and other environmental importance and the amenities of local residents are considered.	None
Angela Parish (Letter and Web)[8550]	6390	HS2 - 9	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!	The Fennells allocation is adjacent to the local wildlife site and local nature reserve, a drainage bund now separates the allocation from the LWS and LNR, and that at the application stage any potential impact on the protected areas will be considered and where necessary appropriate mitigation measures put in place. Parking will be provided on the allocation site to accord with the Councils adopted standards.	None
Ray Goodey[8580]	6766	HS2-9	We, as residents were informed that a land was required in order to prevent flooding in the kingsmoor area	The bund was required to alleviate a flooding issue in the area, however, the bund will be retained which will help	None

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			No mention was made that the field would then change status and form part of land for housing. the field as a natural green space and as used by many residents, not only Fennells residents. The Loral church use it, dog walkers, joggers, personal trainers/ It would be a real shame to lose it	protect any new housing that would be brought forward on the site in the future from flooding.	
Mrs Samantha Baldry[8554]	6391	HS2-9	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	The site's identification for housing will help contribute to identified housing need in the town. There is a significant amount of open space in this area of Harlow. There are alternatives in the vicinity of Fennells, including Parndon Wood Nature Reserve, and other playing fields. Any development that is brought forward on this site will need to be provided with appropriate access to meet ECC highway standards and accord with the adopted car parking standards of the Council. Effect on property value is not a planning consideration. Impact on amenity during construction is temporary and will be mitigated by working hours through appropriate planning conditions.	None
Mrs Samantha Baldry[8554]	6775	HS2-9	Please can you help protect the Fennells Field. We are aware that this green space is currently under consultation for allocation as a proposed site for residential housing under the Harlow Local Plan. This consultation period is due to end on 6th July so time is of the essence. We are aware that should this be approved it does not mean that housing development is guaranteed, but it is one step closer to the loss of this beautiful and widely used space and it will be harder to fight at a later date. This green space is currently under Flood Alleviation works which have been ongoing for 5 months and I have been informed by Tom Palmer at Essex County Council that completion is due the first week of July. We have been assured that the timing of this project is purely co-incidental with the proposed allocation and is in no way connected with preparing this site for proposed housing. This green space is widely used by the Fennells residents and surrounding community. It is used by children, their friends and family throughout 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. I have gathered photographic evidence of the field in use dating back to 2007 (my first digital	The site's identification for housing will help contribute to meeting identified housing need in the town. There is a significant amount of open space in this area of Harlow. There are alternatives in the vicinity of Fennells, including Parndon Wood Nature Reserve, and other playing fields. Any development that is brought forward on this site will need to be provided with appropriate access to meet ECC highway standards and accord with the adopted car parking standards of the Council. There is a significant amount of open space in this area of Harlow.	None

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			<p>camera) and am happy to provide this. There are also people in the Fennells area that can testify to the use of this space for over 40 years. My mother, who is 76 years old, played on this field in 1954 when she was a young girl.</p> <p>I appreciate the ever increasing need for housing in the local area. Large developments such as Gilston and Gilden Way are making a great contribution to this ever increasing need. However, 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.</p> <p>Please, please help protect this small field that means so much to so many. We believe that is should remain protected for those that use and rely on it currently and for the future children of this community.</p> <p>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. We would welcome any help and support you could give us in our attempts to preserve the Fennells field.</p>		
Miss Erin Rose BALDRY [8560]	6397	HS2-9	<p>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.</p>	<p>The site's identification for housing will help contribute to meeting identified housing need in the town. There is a significant amount of open space in this area of Harlow. There are alternatives in the vicinity of Fennells, including Parndon Wood Nature Reserve, and other playing fields. Any development that is brought forward on this site will need to be provided with appropriate access to meet ECC highway standards and accord with the adopted car parking standards of the Council. There is a significant amount of open space in this area of Harlow.</p>	None
Miss Erin Rose BALDRY [8560]	6408	HS2-9	<p>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!</p>	<p>The site's identification for housing will help contribute to meeting identified housing need in the town. There is a significant amount of open space in this area of Harlow. There are alternatives in the vicinity of Fennells, including Parndon Wood Nature Reserve, and other playing fields. Any development that is brought forward on this site will need to be provided with appropriate access to meet ECC highway standards and accord with the adopted car parking standards of the Council.</p>	None

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Mrs Bryony Lopez [8563]	6409	HS2-9	<p>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.</p> <p>It would also have a negative impact on the local wildlife and the already overcrowded parking.</p> <p>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.</p>	The site's identification for housing will help contribute to meeting identified housing need in the town. There is a significant amount of open space in this area of Harlow. There are alternatives in the vicinity of Fennells, including Parndon Wood Nature Reserve, and other playing fields. Any development that is brought forward on this site will need to be provided with appropriate access to meet ECC highway standards and accord with the adopted car parking standards of the Council. There is a significant amount of open space in this area of Harlow.	None
Mr Mike Stokes [8551]	6410	HS2-9	<p>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.</p>	The site's identification for housing will help contribute to meeting identified housing need in the town. Any development that is brought forward on this site will need to be provided with appropriate access to meet ECC highway standards and accord with the adopted car parking standards of the Council. There is a significant amount of open space in this area of Harlow.	None
Mrs Sarah Gibbins[8562]	6437	HS2-9	<p>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. We want to give them a childhood like we did where we enjoyed the open space and wildlife that we, thankfully have here. You talk about how Harlow benefits from a range of biodiversity assets, many of which pre-date the development of the new town, such as an ancient woodland and well established sites of wildlife "importance". Sir Frederick Gibberds master plan for Harlow sought to retain these assets in order to preserve the rich diversity of habitats in the district. Why do you feel it necessary to ruin a popular space with a proposal of housing, if you talk highly of Gibberds original plan? We see so many people, including ourselves use the field for different reasons such as dog walking, children playing, family picnics/rounders, children's birthday parties, I've seen coaches pull up of people doing an orienteering task. I honestly think that you have just ticked this area with no thought of others to say that it's ok to build here, why were we never consulted of this? Perhaps the council need to think about consulting residents on future proposals, surely we have a right? The government talk about child obesity and how it's on the rise yet taking away recreational areas will further heighten this issue even more as you are not letting children play outside in these areas as they will be nonexistent!!</p> <p>Parking and access is already an issue on certain days of the year due to our proximity to Parndon Wood Crematorium. These include Mother's day, Fathers day, Easter and Christmas. This will further escalate the issues with more homes and cars in this area. We experience issues with parking and access when Parndon Wood Nature Reserve holds an event.</p> <p>The negative impact on the natural environment which currently supports wildlife in our area worries us, our little girl</p>	The site's identification for housing will help contribute to meeting identified housing need in the town. The site has not been identified as a site of importance for wildlife or nature conservation. There is a significant amount of open space in this area of Harlow and there are alternative green spaces and wildlife sites adjoining the site including Parndon Wood Nature Reserve, Local Wildlife Sites and a Local Nature Reserve other playing fields. These identified sites are outside the boundary of site allocated for housing. Any development that is brought forward on this site will need to be provided with appropriate access to meet ECC highway standards and accord with the adopted car parking standards of the Council. There is a significant amount of open space in this area of Harlow.	None

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			<p>amongst many others enjoy this. Last year alone we had pheasants in our front garden, foxes and deer out on the field which was just a pleasure to see. Please don't take this away. Let the wildlife enjoy this space as much as we do.</p> <p>From a personal point of view we consider it will reduce the value of our properties through no fault of our own, as mentioned earlier we bought our houses with the benefit of the present amenities and environment. What about our right of light, pollution, noise etc? Do you actually think about your residents?! To our knowledge there are no improvements to infrastructure to cope with additional families which will occupy these dwellings, particularly the problems with highway infrastructure. There will also be unknown effects on schools, doctors and hospitals.</p>		
Mr Dean Burns[8552]	6441	HS2-9	<p>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 off 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.</p>	<p>The site's identification for housing will help contribute to meeting identified housing need in the town. The site has not been identified as a site of importance for wildlife or nature conservation. There is a significant amount of open space in this area of Harlow and there are alternative green spaces and wildlife sites adjoining the site including Parndon Wood Nature Reserve, Local Wildlife Sites and a Local Nature Reserve other playing fields. These identified sites are outside the boundary of site allocated for housing. Any development that is brought forward on this site will need to be provided with appropriate access to meet ECC highway standards and accord with the adopted car parking standards of the Council. There is a significant amount of open space in this area of Harlow.. Detailed design of the development will wherever possible reduce the removal of valuable vegetation. Effect on property price is not a planning issue.</p>	None
Peter Mountstevens [5553]	6919	HS2-9	<p>As a local resident of Fennells (since 1987), I have been concerned at the above proposal for 23 dwellings for the land east of 144-154 Fennells in community beneficial use as a children's play area into the 21st Century, now proposed to be allocated for housing by 2032.</p> <p>I understand that a six figure sum has been spent on the importation of inert material to provide four ox-bow like earth bunds to prevent surface water run-off from the southern portion of the site and flooding of Parndon Wood Road at its junction with the main Fennells access road which has occurred at least once in 10 years since 1987. I was given to understand at a public consultation regarding the flood prevention measures last November at</p>	<p>The proposed allocation does not in itself impose on the Nature Reserve or the SSSI. The developer would be expected to set out any potential impact on those protected areas (PL8).</p>	None

Respondent [ID]	Representation Number	Policy/Para/Text	Representation Summary	Officer Comment	Minor/Major amendment required?
			<p>Parndon Wood Nature Reserve HQ that felled logs from the coppiced neighbouring woodlands would be used as part of the surface water holding bund system, although there is no sign of that happening to date.</p> <p>I would object to the principle of the proposed change of use at site HS2-9 as this would create a perilous precedent for urban development immediately adjacent to Fennells Field, the open part of Parndon Wood Nature Reserve, an SSSI, which contains several healthy mature oak trees, all arguably of greater public amenity value than the preserved ash trees within the 1972-built Fennells housing area. Tony Morton and I tried to enhance the wildflowers present with ex-3M cowslips!</p> <p>Whilst the bunding operation will be effective in preventing motocross access by travellers as at Latton Common, I would suggest that the surface water flood risk would remain - if developers remove the bunds - given that the site still forms a feeder area to the culverted Parndon Brook north of Kingsmoor House and Milwards, thus ruling out the creation of habitable rooms at ground floor level - as at Ducketts Mead, Roydon (N. of the village green) within the River Stort floodplain.</p>		
Jennifer Bedford[8557]	6719	HS2 - 15	<p>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.</p>	<p>Green Wedge study indicated that this land did not fulfil the functions of the Green Wedge as set out in the Local Plan. Sensitive design and layout, should enhance the character of the area. The Local Plan has to provide a balance between meeting identified housing need and protection of local amenity,</p> <p>However, any subsequent planning application to develop the site will be considered against a number policies set out in the Local Plan to ensure the impact on sites of wildlife and other environmental importance, including flood and drainage issues , together with the amenities of local residents are considered.</p> <p>It is also considered that Harlow has significant areas of open space that will fulfil many of the issues that have been raised in this representation and will be protected.</p> <p>There will be no access from the site directly onto the A414.</p>	None

Respondent [ID]	Representation Number	Policy/Para/Text	Representation Summary	Officer Comment	Minor/Major amendment required?
Aimee Turvill [8607]	6550	HS2-15	<p>Please note we would like to register our objection 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.</p> <p>Long gone are the days where there is one car per household, in addition the area would be ruined as there are a lot of wildlife within the area of the field and by having to cut back trees and bushes to gain access would disturb this and make the area very noisy from the traffic and cause air pollution from the traffic on the main road leading to Edinburgh way and the industrial area within Edinburgh Way. If road access was given on the stretch of the A414 behind the field that would be in our opinion dangerous as well as cars pick up a lot of speed and by having a turning there could cause a serious accident. When we purchased Jocelyns last July we paid for an extra search to check that building could not happen on this area and it came back saying it could not due to the area being "Green Wedge" conservation area, we asked our solicitor at the time what this meant and we were told that it meant it could not be built on at all as Councils do not permit it as they like to preserve these areas.</p> <p>We also feel that it would affect the natural sunlight at the front of our property and we would be extremely over looked which again is a key reason why we liked the property as we liked that although we had houses backing on to us we had privacy at the front.</p> <p>Jocelyn's has a mixed community with older and younger generations this development would ruin this for everyone especially the younger generation who play out the front as this would become too busy and unsafe for them to do so.</p> <p>By building these houses it will without a doubt ruin the area and affect property prices for residents within Jocelyn' s.</p>	Any development that is brought forward on this site will need to be provided with appropriate access to meet ECC highway standards and accord with the adopted car parking standards of the Council, as well as the other relevant planning policies as set out in the Local Plan. This will ensure that the design and nature of the development has regards to the amenity of local residents. The Green Wedge study indicated that this land did not fulfil the purposes of the Green Wedge as set out in the local plan. There are no proposal to provide access from this site on to the A414,	None

Respondent [ID]	Representation Number	Policy/Para/Text	Representation Summary	Officer Comment	Minor/Major amendment required?
Nikki Kellman[8629]	6742	HS2-15	<p>My friend only moved to the area 11months ago in their first home and they did all the necessary ground searches which they paid extra for to see if there was any planned developments on the site mentioned, as the land in question is green wedges and there was nothing planned they bought their property, however this is not the case.</p> <p>As a regular visitor to Jocelyns I feel the parking situation needs to be addressed before more properties are developed, these are a few questions relating to this issue:</p> <ul style="list-style-type: none"> * how is this development going to affect the house prices especially when someone only moved into the are 11 months ago? * Access is not viable through Jocelyns as a lot of disturbance to the parking will occur as it will mean less parking places? * How will the drainage system cope? * Will involve noise pollution whilst the development is built and further noise from A414? * Properties 93-100 Jocelyns there daylight will be impaired when they have limited daylight already? * Where do you suggest that dog walkers let their dogs run free? * Children play in that area, where are they meant to go? Play in the road..... <p>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.</p> <p>I DO NOT THINK THIS IS A VIABLE AREA TO BUILD ON.</p>	<p>The Local Plan had been prepared over a number of stages and has been subject to a number of public consultation exercises in accordance with the adopted Statement of Community Involvement (SCI). How the Council has engaged with the public and the documents it has consulted upon is set out in the Regulation 22 document. The impact of development property value is not a planning consideration especially as such an impact can be positive as well as negative. It is also noted that any subsequent planning application to develop the site will be considered against a number policies set out in the Local Plan to ensure the impact on sites of wildlife and other environmental importance, including flood and drainage issues , together with the amenities of local residents are considered. Any potential noise disturbance during the construction phase will be limited through the imposition of appropriate conditions. It is also considered that there is open space in vicinity to meet the needs of local residents.</p>	None

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B.K and J.T Drabble[8611]	6552	HS2-15	<p>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.</p> <p>Long gone are the days where there is one car per household, in addition the area would be ruined as there are a lot of wildlife within the area of the field and by having to cut back trees and bushes to gain access would disturb this and make the area very noisy from the traffic and cause air pollution from the traffic on the main road leading to Edinburgh way and the industrial area within Edinburgh Way. If road access was given on the stretch of the A414 behind the field that would be in our opinion dangerous as well as cars pick up a lot of speed and by having a turning there could cause a serious accident. We also feel that it would affect the natural sunlight at the front of our property and we would be extremely over looked which again is a key reason why we liked the property as we liked that although we had houses backing on to us we had privacy at the front.</p> <p>Jocelyn's has a mixed community with older and younger generations this development would ruin this for everyone especially the younger generation who play out the front as this would become too busy and unsafe for them to do so.</p> <p>By building these houses it will without a doubt ruin the area and affect property prices for residents within Jocelyn' s.</p>	Development will incorporate parking within the site accord with the Councils adopted standards. Access would not be on to A414. The design of any development would have to have regard to the Local Plan requirements along with the Harlow Design guide.	None
Ricky Goldblatt[8631]	6769	HS2 - 15	<p>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.</p> <p>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.</p>	Any development that is brought forward on this site will need to be provided with appropriate access to meet ECC highway standards and accord with the adopted car parking standards of the Council, as well as the other relevant planning policies as set out in the Local Plan. This will ensure that the design and character of the development has regards to the amenity of local residents. There are no proposals to provide access from this site on to the A414.	None
Gillian Atkins[8577]	6421	HS2-20	<p>I object to the proposal to use the Green Wedge area of Land between Barn Mead and Five Acres for housing. The recommendation by the proposal would destroy Gibberd's idea of separating housing areas. This area floods in winter and many cars, lorries and 2 tow trucks have been stuck in the mud. A potential risk of flooding may be transferred to existing houses. The Green Wedge Review stated - Green Wedges</p>	Any potentials drainage issues will be considered at the planning application stage and if necessary appropriate mitigation measures initiated on site. The land is not currently Green Wedge. The allocation does not compromise the Gibberd Principles in this instance.	None

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			should retain the open character of existing uses and safeguard the land and be protected from inappropriate development. English Heritage stated - Green Wedges are an important element of the Gibbard principals in laying out Harlow and should therefore be protected d from future encroachment.		
De Merke Estates [8643]	6863	HS2-21	<p>A review of the other 20 No. housing allocations has been undertaken, as enclosed at Appendix 2. All the sites were assessed in the most recent SHLAA dated 2014. As can be seen from the table in Appendix 2, whilst all the sites were considered developable, only 5 No. of the sites were considered deliverable and the other 15 No. were not.</p> <p>3.9 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.</p> <p>3.10 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.</p> <p>3.11 Reviewing the site allocations against the SHLAA raises further discrepancies in relation to the capacity of numerous sites, with some considerable differences in the capacity figures between the two documents and no explanation over how this has occurred. Of particular note is HS2-2 where the capacity has increased by 62 dwellings between the SHLAA and LDP. HS2-7 has increased by 10 dwellings and HS2-8 has increased by 21 dwellings.</p> <p>3.12 The SHLAA is the only supporting evidence published by HDC which considers the allocated sites and there is no additional evidence demonstrating the sites can achieve the capacities as set out in the LDP, which appear to be over optimistic in some instances.</p> <p>3.13 Furthermore, there are a number of queries regarding the current uses of the allocated sites. There does not appear to be any assessment or consideration as to the current use of the sites, with the majority of them having existing buildings that are still in use. These uses are included in Appendix 2, ranging from a Church to pubs, shops and restaurants.</p>	<p>The respondent puts forward a number of points with regards the allocations in policy HS2.</p> <p>All but three of the allocated sites and the strategic site East of Harlow are in the ownership of the District Council.</p> <p>The representation is based on the submitted plan with a base date for housing of 31st March 2017. Since then there has been significant progress in the number of dwelling commitments (new permissions, starts) and completions.</p> <p>In addition the Council has set up housing development company as one mechanism amongst others, specifically to bring forward housing land in its ownership. The company has proposed 5 year housing delivery plan, which indicates that 6 allocated sites will deliver and contribute to the five year land supply. HS2-1 (Lister House) has planning permission for 46 dwellings. Other sites (smaller than 10 dwellings) are also scheduled to come forward as part of the five year supply, in total this equates to 180 dwellings. Dwelling numbers put forward in the delivery plan correspond to the indicative numbers in Policy HS2, although two sites have a minor increase of 2 dwellings.</p>	None

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			<p>3.14 As there is no mention of these existing uses, there is no consideration as to whether these are coming to an end, if leases are expiring for example, and when this is expected to occur. 18 No. of these allocated sites are owned by HDC, so this information would be available to HDC and should be included in an assessment of whether the sites are available or expected to be available. Given that some of the sites with current uses are included in HDC's trajectory within the next 5-years, to assess whether the sites are available or deliverable, the current use must be considered.</p> <p>HDC's apparent failure to do this results in the allocations again being contrary to Paragraph 47 of the NPPF.</p> <p>3.16 HDC's apparent failure to do this results in the allocations again being contrary to Paragraph 47 of the NPPF.</p> <p>3.17 6 No. of the allocated sites comprise hatches, which provide day-to-day needs for the local area. Policy RS3 sets out that these will be redeveloped for a mix of retail, residential and community uses. However, these all have existing uses and there is no consideration as to whether these will be sought to be retained on site, whether there are existing leases or agreements restricting the redevelopment of the site or removal of these uses.</p> <p>3.18 It is also noted that a number of the allocated sites are currently open space that is accessible to the public with footpaths and defined entrances, including playing fields and recreation grounds.</p> <p>3.19 Policy WE1 states that strategic green infrastructure and 'other open spaces' which contribute to the green infrastructure will be protected and enhanced. Supporting Paragraphs 10.5 to 10.13 set out the importance of the green infrastructure within Harlow and how this should be protected from inappropriate development.</p> <p>3.20 Policy PL5 further seeks to protect such sites, stating development on 'other open spaces' (not Green Wedges or Green Fingers) would only be allowed where it would not compromise the landscape character, openness, biodiversity or urban design principles; and the development would not remove access to an open space which is of high quality and/or high public value in providing opportunities for sport and recreation. Paragraph 13.25 states:</p>		

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			<p>...the preservation of Other Open Spaces is fundamental to ensuring the original design of Sir Frederick Gibberd's master plan for Harlow is respected, which planned the district to be interspersed with many open spaces to offset the provision of small private gardens</p> <p>3.21 Paragraphs 13.26 and 13.27 state other open spaces can be of public value where they have a role or function which makes a positive contribution to the character of the area, such as opportunities for amenity and recreational uses.</p> <p>3.22 An Open Space and Green Infrastructure Study has been published as part of the LDP evidence base. This was undertaken in 2013, with the assessment looking at current and future needs in relation to open space. Figure 2.4 shows the future housing development included in the assessment, which does not accord with the LDP, being out dated evidence.</p> <p>The Open Space and Green Infrastructure Study sets out recommended standards for green and open spaces based on current provision and feedback gained from consultation undertaken. This identified that some areas lack funding and maintenance, and that improving these would enhance these spaces.</p> <p>3.24 This Study does not support the release of open spaces for development, with the impact of the loss of such sites allocated in the LDP not having been considered. These allocations therefore have the potential to have a negative impact on the provision of open spaces, contrary to Policies WE1, PL5 and PL7 which all seek to protect existing green infrastructure.</p> <p>3.25 Furthermore, Policy L2 states developments that result in the loss of all or part of any recreation, sports, cultural or community uses/or facilities will not be permitted unless one or more of the following criteria is met: (a) It can be demonstrated that the use and/or facility is surplus to requirements and an alternative replacement is not required; (b) Replacement uses and/or facilities of equivalent or better quantity or quality are provided in a suitable location before the existing use and/or facility is replaced. The replacement should be provided in an agreed location; (c) Such a development is ancillary or will support and enhance the existing use and/or facility.</p>		

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			<p>3.26 The criteria set out in Policy L2 are similar to those in Paragraph 74 of the NPPF. It does not appear that HDC has considered such criteria in allocating sites on open spaces.</p> <p>3.27 Recreation uses are defined in Paragraph 16.11 as formal or informal activities and including open spaces, play spaces, buildings and other facilities used by people for enjoyment in their free time.</p> <p>3.28 It does not appear that HDC has undertaken any assessment regarding whether the above can be met for the allocations made on sites which have recreation, sports, cultural or community uses/facilities. Policy L2 will be applicable to 13 of the 20 allocations (excluding the hospital), potentially restricting development on all 13 sites.</p> <p>3.29 As identified above, there are various concerns and queries regarding HDC's housing allocations, with limited evidence published to support their allocation and many unresolved issues. The development of the majority of the sites would conflict with Policies elsewhere in the LDP and it is not clear how this would be overcome. Until such evidence or supporting information is published it is not considered that HDC has demonstrated that all the housing allocation sites are developable and raises substantial doubts over whether the identified 1,147 dwellings will be delivered.</p> <p>As such, the housing allocations under Policy HS2 are not positively prepared, justified, effective or consistent with national policy.</p>		
Redrow Homes[8640]	6853	HS3	<p>As currently worded, Policy HS3 relies on the Garden Town Charter to inform development on the Strategic Site. If there are delays to the production of this document, or the Councils decide to produce a different type of document this would preclude any development being brought forwards without being in breach of the policy requirements (as it would not be possible to comply with the Charter). This would frustrate delivery of development which is an important element of Harlow Council's housing supply.</p> <p>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"</p>	The land is part of the East of Harlow Strategic site and will need to be planned in accordance with the Harlow and Gilston Garden Town Design Guide and Harlow and Gilston Garden Town Vision as specified by policy and a comprehensive master plan and phasing should be formulated with all interested parties. The housing land supply should be considered as a whole not just the allocations, there is a five year supply of deliverable sites, and as such land at Moor Hall Road does not need to be allocated.	None

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			and "Positively Prepared" and could therefore be considered "Sound" in accordance with Paragraph 182 of the NPPF.		
Miller Strategic Land[5769]	6479	HS3	<p>Our client supports the allocation in Policy HS3 for 2,600 dwellings and associated infrastructure at East Harlow (in Harlow District).</p> <p>However, our client objects to the following specific criteria:</p> <p>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.</p> <p>Our client respectfully requests that Policy HS3 is amended as follows:</p> <ul style="list-style-type: none"> - 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." 	<p>Welcome the support for development of 2600 dwellings at Land East of Harlow.</p> <p>HS3a The Spatial Vision has been published.</p> <p>HS3b Proposed wording is very similar to HS3b and does not warrant a modification</p> <p>HS3c Infrastructure Delivery Plan has been published, but awaiting a Garden Town IDP. Modification not justified.</p> <p>HS3f Policy says similar to Hatches, it being an indication of the type of local retail facility required, also caveated by "appropriate"</p> <p>HS3g Infrastructure Delivery Plan has been published, but awaiting a Garden Town IDP which may indicate appropriate infrastructure costs for the Garden Town. Modification not justified.</p> <p>HS3i Harlow is recognised as a sculpture town. The provision of work of art has been embedded in development since early New Town. It is appropriate that developers recognise that along with other New Town Principles.</p> <p>The Strategic Site cannot be developed in isolation, and requires input from a number of agencies, and collaborative working in accordance with the Duty to Cooperate around a Master Plan and other guidance such as the Harlow and Gilston Garden Town Design Guide and Harlow and Gilston Garden Town Vision.</p>	None

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			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.		

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Historic England[8623]	6694	HS3	<p>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 barn s at Sheeri ng Hall all listed at grade 11 as well as Sheering Hall itself to the north of the site which is listed at grade 11 *).</p> <p>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.</p> <p>As currently worded the policy includes no protect ion 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 t heir settings through careful design, landscaping heritage buffer zones.</p> <p>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.</p>	Each allocated site including the strategic housing site East of Harlow is subject to a range of policies as set out in the submitted plan. Policy PL11 will ensure that heritage assets are considered and protected. The implementation section associated with this policy sets out the obligations on developers to consider heritage assets.	None
EssexCounty Council[8452]	6891	HS3	<p>This policy makes no specific reference in policy or supporting text to connections with/delivery of the (East-West) Sustainable Transport Corridor.</p> <p>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.</p>	Council is accepts this	additional wording to criterion (b) making reference to the sustainable transport corridor as follows: (b) provide local highway solutions to address the impact on the wider strategic road network (including necessary links to the new Junction 7a on the M11); <u>and the east-west sustainable transport corridor as indicated on the Policies Map</u>

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Environment Agency[8443]	6502	HS3	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.	Welcome support, however it is considered that incorporating the detail of the response in this policy would be better served in a statement of common ground with the developer	None
Epping Forest District Council[8637]	6829	HS3	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.	Paragraph 7.36 points out the site allocation is split between two authorities. The Council suggests that implementation section is expanded to better explain how HS3 and HGT1 align with regard to strategic master planning. The Council has recommended amendments to paragraph 5.27, please see reps 6884 and 6885 of the ECC. Which recommends a further modification on this point.	Change paragraph 7.41 to explain how HS3 and HGT1 align with regard to strategic master planning. Suggested wording: 7.41 Given the importance and scale of the Strategic Housing Site East of Harlow in delivering the Garden Town Communities, development proposals will be required to accord with Policy HGT1 <u>which requires a Strategic Master Plan to be produced to guide development of the site, in accordance with the Harlow and Gilston Garden Town Design Guide and Harlow and Gilston Garden Town Vision</u> .
Natural England[8628]	6733	HS3	We also recommend that there should be a policy commitment to ensuring that masterplanning delivers net gains for biodiversity and the environment.	This aspect is covered elsewhere by policy in the Plan see policy PL8,	None
Hertfordshire County Council [4642]	6673	HS3	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	The policy already refers to infrastructure and statutory providers and this includes the County Councils as well as other infrastructure providers and is therefore all encompassing. No amendments to be made.	None
Deanery of Harlow (Anglican) [8586]	6451	HS4	I welcome the work to restore pitches for the Travelling Community locally.	Support is welcomed	None
K.Garrods[8596]	6720	SHLAA	Development between A414 and M11 J7 should be developed for housing.	The land referred does not fall within administrative area of Harlow District Council so is a matter for Epping Forest District Council to consider.	None

Respondent [ID]	Representation Number	Policy/Para/Text	Representation Summary	Officer Comment	Minor/Major amendment required?
CEG and Hallam Land Management[7646]	6789		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	Whilst forming part of the wider Garden Town the site is not within the administrative area of Harlow Council. However Harlow is providing more than the OAHN (7400) for Harlow (1800 dwellings above to provide 9200). This is because the Harlow Local Plan is setting out a housing requirement in excess of the need articulated in the OAHN in order to address affordability and regeneration issues and reflects the Government's aim of delivering a step change in housing supply.	None

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A. Parish [8550], E. R. Baldry [8560]	6390, 6401	HS2-3 (Fennells)	Nature Reserve will suffer.	The relevant Local Plan policies will protect biodiversity in the local area and ensure any adverse impacts are mitigated against.	None.
A. Turvill [8607], J. Humphreys [8561], E. R. Baldry [8560]	See full representation	HS2-3 (Fennells), HS2-15 (Jocelyns)	Site is in Green Wedge / conservation area.	Sites have been removed from Green Wedge and are not in a Conservation Area.	None.
M. Eskandarian [8625]	See full representation	HS2-5 (S of Clifton Hatch)	Not protecting historical environmental asset.	This site is not of notable historic value.	None.
M. Eskandarian [8625]	See full representation	HS2-5 (S of Clifton Hatch)	Regarding new development taking into account the Green Wedges and Green Belt: A green belt or greenbelt is a policy and land use designation used in land use planning to retain areas of largely undeveloped, wild, or agricultural land surrounding or neighbouring urban areas. Similar concepts are greenways or green wedges which have a linear character and may run through an urban area instead of around it. In essence, a green belt is an invisible line designating a border around a certain area, preventing development of the area and allowing wildlife to return and be established.	The site in question is not in the Green Belt or Green Wedge. The Local Plan, its policies and supporting evidence base documents use the NPPF definition and purposes of the Green Belt, and the Local Plan contains a specific set of roles and functions which Green Wedges and Green Fingers deliver.	None.
S. Beavis [5035]	6839	HS2-5 (S of Clifton Hatch)	Protected Green Wedges and Green Fingers provide wildlife corridors	This site is not in a Green Wedge or Green Finger.	None.
S. Beavis [5035]	6843	HS2-5 (S of Clifton Hatch)	All new development should be on brownfield land and green spaces left undeveloped to accord with Gibberd Masterplan.	The Local Plan (and forthcoming associated topic papers) explain that as much brownfield land has been used as possible; however, due to the nature of Harlow being planned from the outset, there is only a limited supply of such land. As much green space has been retained as possible and will be protected through the relevant Local Plan policies.	None.

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R. Goldblatt [8631]	6769	Housing site HS2-15 (Jocelyns)	Already massive decrease in Harlow parks.	Harlow has a notably high level of Green Infrastructure, parks and open spaces, thanks mostly to the original masterplan for the town which sought to preserve original open features. The Local Plan policies strongly protect such assets.	None.
B. Darbble & J. Darbble (8611), J. Humphreys (8561), M. Eskandarian (8625), R. Goodey (8580), S. Beavis (5035), S. Baldry (8493), E. Baldry (8559), E. R. Baldry (8560), R. Goodey (8580)	See full representation	HS2-15 (Jocelyns), HS2-3 (E of Kath Way), HS2-5 (S of Clifton Hatch), HS2-9 (Fennells); plus various WE/PL policies with direct ref to particular housing site	Each rep objected to the inclusion of : - damage to: natural environment, Green Infrastructure, biodiversity, wildlife (including butterfiles), fauna (including wild flowers), trees, bushes and/or historic hedgerows - green space is important for health; space well-used for dog walking, informal sports, other informal recreation	The relevant Local Plan policies will ensure housing development on these sites provide compensatory open spaces, protect and enhance biodiversity and protect historic hedgerows/trees. Any adverse impacts would need to be mitigated against.	None.
N. Bangert [8638], C. Webb [8613], D. Beavis [8615], J. Humphreys [8561], K. Garrod [8596], M. Eskandarian [8625], S. Beavis [5035]	See full representation	HS2-15 (Jocelyns), HS2-3 (E of Kath Way), HS2-5 (S of Clifton Hatch), HS2-9 (Fennells); plus various WE/PL policies with direct ref to particular housing site	Increased flood risk and surface run-off if green space is developed; lower-level houses at risk of flooding.	The level of flood risk would be established at the planning application stage. Sustainable Drainage Systems, which mimick natural drainage as closely as possible, are one solution to offset increased surface run-off caused by development.	None.

Respondent [ID]	Representation Number	Policy/Para/Text	Representation Summary	Officer Comment	Minor/Major amendment required?
Hallam Land Management and Commercial Estates Group [7646]	6790	ED1	<p>Policy ED1: Future Employment Floorspace allocates Harlow Business Park, The Pinnacles, London Road (Harlow Enterprise Zone) and East Road, Templefields as the District's employment land allocations to meet the employment land requirements over the plan period. Overall these three sites will provide 20ha of employment land. However, policy ED1 states that 18.8ha of B1 Uses will be delivered at Harlow Business Park and London Road.</p> <p>Policy PR2 so it appears that almost all the employment land provision is taken up by B1 uses – Development within Neighbourhood Service Areas also supports the provision of offices, light industrial and start-up units falling within use class B1. As demonstrated in the Employment Needs Assessment, Harlow's largest employment need is for B2/B8 uses (at a figure of 16ha), yet the pre-submission local plan does not make reference to how Harlow District intends on accommodating this need. Further clarity is needed on how Harlow District will meet this, or if Harlow's B2/B8 need is being met elsewhere in the FEMA.</p>	Harlow's Economic Development Strategy is to create a step-change from the bulky B2/B8 uses and return to the historic B1 uses building on existing planned facilities such as Public Health England and the Science Campus at the Enterprise Zone. B1 employment will help create a sustainable place to live and work and will support the homes coming forward in the Garden Town by providing high quality jobs thereby reducing out-commuting and improve wages/boost the local economy. Furthermore Harlow does not have the land for B2/B8 uses although some land in Policy ED1 has been set aside for such uses and the existing employment areas will also provide for such uses. The Garden Town is preparing employment evidence for the distribution of employment uses but land in Harlow is finite and through the Employment MOU the Council will work with other authorities to identify the right employment type across the FEMA as a whole. The Employment MOU also agrees that further work is required to identify the shortfall identified by existing evidence.	None
Essex County Council [8452]	6892	ED2	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.	Broadband provision for the Harlow area is detailed in Development Management Policy IN4. The policy requires broadband provision in major development including buildings of more than 1,000sqm in size. This policy will ensure provision of broadband for employment sites and a separate section for Policy ED2 is not required. The requirement for broadband provision also forms part of the Harlow Local Plan Vision.	None
Natural England [8628]	6734	ED1	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.	Awaiting updated HRA. Discussions with Epping Forest District Council and Natural England in relation to Epping Forest continue.	None

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Weston Homes Plc [8590]	6787 and 6782	ED1 & Policies Map	<p>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 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 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. 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.</p>	<p>The employment area east of Fifth Avenue and north of Edinburgh Way has a mix of uses including offices, D1 leisure uses and residential development, of which Pearson House was developed for residential use under Permitted Development. The existing occupiers of Pearson House relocated to the Enterprise Zone. This shows that the existing office use was still operational and therefore there was still a potential for the building to be used for offices. Although the Council accepts the current mix of uses in this location and recent Permitted Development conversions, it is still considered an important area for office uses, close to the town's main railway station and will still encourage employment development in the first instance. The Council may accept alternative uses in line with policies in the Local Plan if viability issues arise and suitable evidence is provided. This will not be solely on the basis that other uses already exist in the area.</p>	None

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Essex Bridleways Association [7887]	6420	ED4	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.	The Council considers the existing wording in the Policy, the objectives in the Plan and Development Management Policies already make it clear that the Council is seeking to achieve improved access for all users but in particular sustainable modes of travel/choice. Including 'all users' may be misinterpreted of trying to also improve movement for car users which is not an aspiration for Harlow and the Garden Town.	None

Respondent [ID]	Representation Number	Policy/Para/Text	Representation Summary	Officer Comment	Minor/Major amendment required?
Barton Willmore (for De Merke Estates) [8399]	See full representation	GW review	18 Green Wedges were assessed, some of substantial size with limited viewpoints. Limited number of sites chosen for assessment of removal - not clear how chosen. Four Council-owned sites proposed for removal, all currently publicly accessible and none have buildings - not clear why these were chosen for removal.	See response to other Barton Willmore representation for more information as to why some areas were chosen for removal and others were not. Additionally, land use/ownership does not have much weight, if at all, when assessing land on Green Wedge functions/roles.	None.
Barton Willmore (for De Merke Estates) [8399]	See full representation	GW review	Within Wedge #7, eight specific locations were chosen for assessment. 7.1, closest to site, has no consideration to residential uses of the site or the nearby agricultural area.	As explained in the Methodology in the Review, site visits to specific locations in the Green Wedge network were visited and assessed on a Perceptual characteristic set. The Perceptual characteristics focussed ONLY on perceptual factors. Points were spread evenly across each Wedge and located away from the boundaries of the Green Wedge network (to avoid influences from areas outside of the Wedge network) and assessed in similar weather at similar times of weekdays. Points could only be assessed where land was publically accessible, allowing a true reflection of the public's perception. The Perceptual set of scores fed into the other sets of scores (Structural, Recreational and Ecological), from which an average score was derived.	None.
Barton Willmore (for De Merke Estates) [8399]	See full representation	GW review	It is not clear how sites were chosen for assessment.	As explained in the Review, sites which were assessed in detail for removal from the Green Wedge were: 1. on the edges of the Green Wedge network (i.e. abutting a Green Wedge boundary - this was clearly important as removing land away from a boundary would leave a 'hole' in the Green Wedge network); and 2. small in size; and 3. not suitable for re-designation as Green Fingers; and 4. not of significant ecological importance; and 5. not required to meet leisure open space deficit. If the site was assessed in the Open Spaces Study, the findings of that were also considered. Land with secondary school buildings, which abutted a Green Wedge boundary, were considered for removal by default.	None.

Respondent [ID]	Representation Number	Policy/Para/Text	Representation Summary	Officer Comment	Minor/Major amendment required?
Barton Willmore (for De Merke Estates) [8399]	See full representation	GW review	Note: Barton Willmore carried out their own assessment of the site based on the roles/functions of Green Wedges (paraphrased below for reference) and concluded:1. separating neighbourhoods - site not providing separation between neighbourhoods2. preserving original features - site does not contain significant natural landscape features requiring preservation3. preserving historic areas - site is located in a Conservation Area, but the Conservation Area designation protects the setting and character of the area anyway4. bringing sense of countryside into urban areas - contains a dwelling and outbuildings and is not open countryside, plus is close to the rugby club overflow parking site which has an urbanising effect and the area has been isolated from open countryside through construction of Church Langley etc.5. providing recreation facilities - does not provide recreation facilities6. provision of transport/wildlife corridors - does not form part of a transport or wildlife corridor7. protecting undeveloped corridors of land - does not provide undeveloped corridors of open land.	As stated above, the Green Wedge review did not consider the removal of any land which would result in a 'hole' being created in the Green Wedge network. The site is approx. 75 - 180 metres away from a Green Wedge boundary, depending on which point you measure from, and so removal of this site would create a 'hole' in the Green Wedge, unless the area to the south closest to the Green Wedge boundary (an additional 1.8ha, approx.) was also removed. Nonetheless, the following comments are made on Barton Willmore's own assessment of the site in question (note that this is a brief desk-based exercise and is not a binding/detailed assessment of the land:1. Whilst it is true that the site does not separate neighbourhoods, it is not necessarily appropriate to assess an individual site on this factor, or at least give it much weight, as it is generally a larger Green Wedge as a whole that provides this.2. Agreed.3. The methodology scores Green Wedge areas more positively if they contain a Conservation Area, as the Green Wedge would contribute to the Conservation Area.4. The role relating to countryside specifically states "bringing a sense of countryside into urban areas", not that it has to be open countryside. In any case, a dwelling and some outbuildings could contribute to this, depending on their size, as this is a rural feature associated with farms.5. Agreed.6 and 7 - while the site is not a recognised wildlife corridor or an undeveloped corridor of land, it is clearly relatively open land and therefore has the potential to act as a wildlife corridor to other parts of the Green Wedge.	None.
Environment Agency [8443]	6502	WE1	Water Framework Directive has actions/measures - these should be used as a tool to shape opportunities for Stort Riverpark development.	Potential mod to address this.	10.15 The Council will work with adjoining Councils and other appropriate bodies, through the Duty to Co-operate and the Harlow and Gilston Garden Town, to bring forward the 'Stort Riverpark', as well as future Green Infrastructure projects to maintain and improve footpaths, cycleways and bridleways and wildlife

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					corridors across the district. The actions and measures contained in the Water Framework Directive will be used to provide opportunities for the Stort Riverpark.
Quod (for Places for People) [7958]	6755	WE1	New linear Stort Riverpark should be included on policies map	Not appropriate as there is no direct policy relating to the park (aside from references to it).	None.
D. Naylor [8579]	6434	WE2	Footpaths through Green Wedges and Green Fingers signposted inconsistently; Access to Green Wedge north of Harlow inc. the golf club is difficult; Harlow Council must be more assertive when dealing with Essex CC on these PRoW	Footpath signage is not a planning issue. Essex CC are responsible for allocating footpaths. Policies in the Local Plan encourage use of footpaths and other sustainable transport methods.	None.
D. Naylor [8579]	6436	WE2	Implementation - monitoring unclear on reviewing quality of footpaths; no criteria for judging amenity/access; no guidance on possible diversions. Create overseeing group of interested parties.	Essex CC are responsible for footpaths. Policies in the Local Plan encourage use of footpaths and other sustainable transport methods.	None.
Essex CC [8452]	See full representation	WE2	ECC suggests consideration of adding reference in Policy WE2 to potential use of green wedges or fingers for sustainable transport corridors	It is considered that use of the Green Wedges/Fingers for the Sustainable Transport Corridors is already covered in the Green Wedge/Finger roles.	None.
Quod (for Places for People) [7958]	6756	WE2	In implementation, include further detail on future GW in Stort Valley	Further detail not yet known.	None.
Natural England [8628]	6737	WE3	Policy doesn't refer to need to promote the preservation etc. of Green Infrastructure assets and the protection/recovery of priority species, as per NPPF	Preservation of GI assets already well embedded in policies, but potential mod to address issues regarding priority species.	DM policy para 13.44 The Council may require a Management Plan to be submitted, which demonstrates how the future maintenance of the Green Infrastructure and landscaping would be managed, in order to protect its quality and functionality in the long-term, including, where appropriate, the protection and

Respondent [ID]	Representation Number	Policy/Para/Text	Representation Summary	Officer Comment	Minor/Major amendment required?
					recovery of priority habitats and species.
Natural England [8628]	6737	WE3	Distinctions should be made between hierarchy of international/national/locally designates sites to ensure appropriate protection, in accordance with NPPF. No distinction made.	Already covered in DM policy ("the greater the significance of the asset, the greater the weight that is given to the asset's protection.")	None.
Natural England [8628]	6737	WE3	Policy doesn't reflect Avoid Mitigate Hierarchy of NPPF	This is covered in the Development Management policy PL8.	None.
Natural England [8628]	6737	WE3	Requires reference to international sites (Epping Forest SAC), priority habitats/species.	Awaiting updated HRA	None.
Natural England [8628]	6737	WE3	Needs policy commitment to delivery of Mitigation Strategy.	Awaiting updated HRA	None.
Quod (for Places for People) [7958]	6757	WE3	Clarify what is meant by biodiv/geo assets. No detail on how other biodiv assets are defined.	Potential for mod to address this.	<p>Copy DM policy paras 13.47-48 into new paras before 10.26, as follows:</p> <p>Designated biodiversity and geodiversity assets are allocated on the Policies Map. In Harlow, the highest order asset type is Sites of Special Scientific Interest, followed by locally designated sites, ancient woodland, and aged or veteran trees found outside ancient woodland. There are, as yet, no designated geodiversity assets in Harlow.</p> <p>The Council will seek to protect and enhance non-designated assets of biodiversity and geodiversity importance, identified in Evidence Base studies, to extend the geodiversity and the network of biodiversity and open spaces</p>

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					across the district.
E. Baldry [8560]	6400	WE3	Fennells near SSSI	Local Plan and national policies will ensure the SSSI is protected from impacts of any nearby or adjacent development.	None.
Natural England [8628]	6737	WE3, PL7, PL8	Recommend ensuring biodiv net gain delivered, as per NPPF.	Potential mod to address WE3 and PL8 issues, but not PL7 as this would cause repetition.	<p>WE3 All biodiversity and geodiversity assets in the district will be preserved and enhanced, to ensure a net gain in biodiversity.....</p> <p>PL8 Development should contribute to and enhance biodiversity or geodiversity assets, to ensure a net gain in biodiversity.....</p>
Quod (for Places for People) [7958]	6757	WE3, PL8	WE3 requires all biodiversity/geodiversity assets to be preserved & enhanced, but PL8 allows for impacts on assets providing negatives are mitigated. Clarify contradiction.	No change, as mitigations could still provide net increase in enhancements and preservation.	None.
D. Naylor [8579]	6435	WE4	Implementation - access to heritage sites by footpaths inconsistent; extension to sculpture trail map would be beneficial.	Not a planning issue, but other policies encourage use of footpaths and other sustainable transport methods.	None.
Herts CC [8622]	6663	WE4	Clarify - architectural remains are also non-designated heritage assets. Development may have impact on archaeological remains and these cannot always be preserved or enhanced. Amend text in accordance with PL11: "heritage assets ... will be preserved or enhanced, <u>or will otherwise be subject to adequate arch investigation and recording</u> "	Already require recording of assets lost in the Implementation, so not required to add it to the policy.	None.

Respondent [ID]	Representation Number	Policy/Para/Text	Representation Summary	Officer Comment	Minor/Major amendment required?
Historic England [8623]	6695	WE4	Change "preserve" to "conserve" better reflect NPPF.	No change, to ensure consistency throughout Local Plan with use of the word "preserve".	None.
Historic England [8623]	6695	WE4	Refer to Registered Parks and Gardens, not just historic.	Potential mod to address this.	WE4 Registered Historic P arks and G ardens.....The Conservation Areas, Scheduled Monuments and Registered H Historic P Parks and g Gardens are identified on the Policies Map.....
S. Baldry [8554]	6393	WE4	Fennells development goes against heritage and Gibberd design of communities with hatches, shops and green space	Policies in Local Plan will ensure that new development respects the Gibberd principles, including provision of green space	None.

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Miss M Wiltshire [6026]	6847	Infrastructure	If Harlow Council does not have the will to prevent these settlements being dumped around our boundary by other local authorities...then it should make neighbouring authorities pay their share for the infrastructure. Any future plans for consultation should shown us how the costs for this infrastructure will be shared.	The Garden Town IDP will apportion costs for strategic infrastructure amongst the development sites to ensure that the correct level of infrastructure is delivered to support these number of homes.	None
Harlow Alliance Party [8621]	6654	IDP	The present infrastructure and indeed public services are stretched to their limit. Many of the roads can no longer cope with the amount of traffic on them. Odd road improvements are inadequate for the massive increase in traffic. There are no plans for a new secondary school. Appears that they have submitted the local plan without giving the details of the additional infrastructure needed in health, education, wellbeing and transport. It is not acceptable that a Sustainability Transport Corridor Study for Harlow and Gilston Garden Development is currently being prepared.	Harlow Council has prepared an Infrastructure Delivery Plan for the Harlow area which also attempts to identify infrastructure for the entire Garden Town area. This did identify secondary school needs and transport interventions including sustainable transport solutions to reduce car usage. To complement this study, a Garden Town IDP is being prepared which will look to apportion infrastructure costs across the Garden Town sites where the infrastructure is strategic in nature. This includes the Sustainable Transport Corridor where indicative costs have been identified and the most suitable routes identified. Evidence has been prepared to demonstrate how the most suitable routes were identified and are currently indicative on the Council's policies map.	None
Harlow Civic Society [5318]	6493	Strategic Infrastructure	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.	The Sustainable Transport Corridors will be designed purely for sustainable transport including walking, cycling and for a rapid bus which serves the development sites and key facilities as well as existing residential areas. They are an important element to delivering a modal shift towards sustainable modes thereby improving existing highway network, air quality.	None

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STOP Harlow North [8588]	6445	Strategic Infrastructure	<p>There are a number of critical infrastructure projects identified in this chapter and in Policy SIR1, the delivery of which is over-dependent on external factors and co-operation between the public sector and developers. In particular, SHN would draw attention to item SIR1-3, the second crossing of the River Stort at River Way. The delivery of this project is dependent on the implementation of a policy in the East Herts District Plan for the construction of a Second Stort Crossing and its connection to the A414 northern bypass. At the East Herts Examination Hearings, it was apparent that no agreement had been reached on the details of the route and the provision of the land necessary for its construction.</p> <p>In paragraphs 11.29 and 11.30, there is reference to the capacity of the Rye Meads Waste Water Treatment Plan. Thames Water have given assurances that there will be adequate capacity to 2036, but there is no strategy for drainage in the longer term. As SHN has stated elsewhere, the capacity at Rye Meads is also linked to its proximity to the important wildlife sites.</p>	<p>There are infrastructure requirements that will require external support such as items of infrastructure delivered by the county councils, developers, CCGs etc. There will also be funding gaps in some infrastructure where funding may be required from other sources. Appropriate phasing plans will be put in place to ensure the most essential infrastructure is in place to enable delivery of new homes. The Garden Town IDP will assist in prioritising infrastructure items, phasing their delivery and help apportion costs to development sites. It will help identify the funding gaps, the delivery mechanisms that can be put in place and potential sources of funding. The River Stort crossing has been agreed by all parties including developer, highway authorities and local authorities with an indicative route and an agreement that CPO may be required. This crossing has been agreed through the East Herts Local Plan which has been adopted. Thames Water has prepared an updated position statement (which further supports the Garden Town Watercycle Study) which does not identify any constraints in the Local Plan or issues which would prevent development coming forward in the Local Plan period.</p>	None
Environment Agency [8443]	6501	SIR 1 SIR 2 AND SIR 3	<p>SIR1-1, SIR1-2, SIR1-3 involve the River Stort. As these environments are recognised as Green Infrastructure by Harlow and there is the intention to develop a 'Stort Riverpark', it is expected that identified steps to improve these environments would be included in the Infrastructure Delivery Plan (IDP). We recommend identifying the link to green infrastructure, and the legislative requirements outlined in the WFD and the TRBMP, are detailed within the IDP. This would further cross reference with the Strategic Infrastructure Requirements, helping to ensure SIR1-1 and SIR1-3 don't result in deterioration of the River Stort, and contribute to improving these environments. Additionally, it would cross reference with the suggested alterations of PL10 (water quality and the inclusion of WFD).</p>	<p>Harlow Council is recommending further changes to Development Management Policies to take into account the Environment Agency's comments. Furthermore the documents referred to are statutory in nature and therefore it is not considered necessary to add further wording in this part of the Local Plan. The Stort Riverpark is being developed and contributions towards Green Infrastructure will be identified in the IDP or included if no indicative cost is yet to be established.</p>	None

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Essex County Council [8452]	6893	SIR1	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.	Policy SIR1 identifies infrastructure projects which can be identified on the Policies Map. As the exact location of education provision is yet to be determined through Master planning, they cannot be identified on the Policy Map and therefore will not be included in the policy. However the Statement of Common Ground between Harlow and Essex County Council has agreed additional wording in the text of Policy SIR1 to agree education having a land use implication.	None
Lawson Planning for Princess Alexandra Hospital [8532]	6765	SIR1	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.	As the solution for improving the hospital is yet to be decided (redevelop of existing site or relocation) and as relocation is likely to be on land outside of the Harlow District boundary, it would be inappropriate to include it in the list of items on SIR1 which have been identified on the Policies Map. Para 11.18 already refers to the improvement of PAH including the potential to relocate.	None
Thames Water [8433]	6776 and 6777	SIR1 and IDP	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.	It is not considered appropriate to add phasing condition text to Policy SIR1 which is strategic in nature. However Harlow Council agrees that the Local Plan can make it explicit that infrastructure for water/wastewater should be completed before first occupation and will agree this additional wording as part of a schedule amendments to the Plan	Agree additional supporting text in the Plan

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Miller Strategic Land [5769]	6480	SIR1 and IDP	The IDP currently lacks further information in respect of overall infrastructure costs and how those costs will be apportioned across the wider Garden Town. In many cases the format of the IDP also makes it unclear as to which proposed developments will be expected to contribute to which infrastructure. 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.	The Garden Town IDP has used the Harlow IDP and has updated costings and sought to set out what Andrew Martin Associates has recommended - apportion costings, prepare a consistent and appropriate methodology for that apportionment and considered Reg. 122 and CIL in its approach. The GT have been working closely with developers of the GT sites in relation to costings, apportionment approaches and viability testing of costs.	None
Hertfordshire County Council [8622]	6677	SIR1 Chapter or HGT1 and para 11.32	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. 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.	Harlow Council agrees that additional Household Waste Recycling Facilities will be required and this is identified in the Harlow IDP and also noted in the Garden Town IDP with solutions to be identified. It is agreed that additional wording be added to the Local Plan under Policy SIR1 in supporting text to also note the need for these additional facilities. The Local Plan acknowledges the responsibilities of the County Councils but is not intending to list all services as suggested by HCC. They are however acknowledged in the IDPs.	Agree with suggested amendments to supporting text in relation to additional HWRC facilities.
NHS West Essex CCG [8584]	6458	SIR1 Para 11.17	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.	Following a review of this representation Harlow Council has agreed to amend the wording to refer to both Clinical Commissioning Groups and the future possibility of increasing the capacity of existing infrastructure. This provides flexibility in approach and recognises the importance of both CCGs in delivering healthcare across the entire area.	Agree amendments to supporting text

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Quod Planning [7958]	6753	Sustainable Transport Corridor	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 Garden Town is currently preparing a Transport Strategy setting out the reasoning and principles of the 60% modal shift and high-level objectives and actions to implement this. A detailed strategy of actions including the delivery of schemes and projects will develop from the Transport Strategy. Some of these have already been identified in the Garden Town IDP and apportioned across development sites.	None
Mr D McCaughey [8578]		Sustainable Transport Corridor link through Green Wedge and STC on Key Diagram	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 houses, businesses and infrastructure already in place on this green wedge would be disrupted and potentially destroyed by this indicative link. Whilst the council has cut back in recent years on bus services the disruption this work would cause and removal of a vital cycle link to the town centre from these surrounding areas will add little if any benefit to the local area. This entire area is also a valued walking area for the local communities and residents and a vital cycle/walking link to the town centre and surrounding areas/businesses. I would strongly suggest that residents in every area positioned throughout and adjacent to the green wedge would oppose this indicative link.	The Sustainable Transport Corridor is for the use of sustainable transport modes only and will improve cycling and walking links for all residents and provide a rapid bus transit which will improve connections for all residents and employees. Although it has been identified in the Green Wedge, the STC is important to ensuring a modal shift is achieved and will help improve the overall health and wellbeing of the town by reducing car usage and therefore improve air quality, health etc.	None

Respondent [ID]	Representation Number	Policy/Para/Text	Representation Summary	Officer Comment	Minor/Major amendment required?
Quod Planning [7958]	6752	Northern By-Pass	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. 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.	Essex County Council produced a transport Technical Note in March 2017 which did test the impact of a Northern by-pass. It did conclude that there would be a reduction in flows across the network of Harlow particularly at Gilden Way. However it is acknowledged that creating a modal shift would also have a significant effect on flows as well as other positive impacts on residents. At present the Northern by-pass is a scheme identified beyond the Plan period and therefore it will be monitored and remain in the Local Plan as a possible solution in the future if required.	None
Quod Planning [7958]	6754	West Anglia Mainline	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.	Four tracking of the West Anglia Mainline has been identified as an important project to not only deliver improved services and faster journey times along the line and to Stansted Airport but also to enable Crossrail 2. Although it may not be required in the early or middle parts of the Plan, Harlow Council will champion and support four tracking when required. As stated in paragraph 11.9 preceding the list, these projects have also been identified in the long term and in some cases beyond the Plan Period and should be included.	None

Respondent [ID]	Representation Number	Policy/Para/Text	Representation Summary	Officer Comment	Minor/Major amendment required?
Hertfordshire County Council [8622]	6658	Para 11.9 c	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. 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.	Harlow Council agrees that the Central Stort Crossing will require widening and that sustainable transport provision along this route (which forms part of the Sustainable Transport Corridor) will need to be given priority. The Garden Town Transport Strategy currently being prepared will set this out in more detail and will confirm the overarching principle for requiring modal shift in the Garden Town and the high-level actions that need to be put in place to achieve this. Policy SIR1 and HGGT policy refer to the Sustainable Transport Corridors as does the allocation on the Policies Map.	None
Essex County Council [8452]	6895	Para 11.13	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 11.1FE of additional secondary school places (gross). 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.	Agree that in order to ensure consistency and clarification the text in this paragraph should be amended to refer to the new Sir Fredrick Gibberd Academy which will mostly be serving the existing population (cohort) growth. This will be included in a Statement of Common Ground with Essex County Council.	Agree with suggested amendments to supporting text.

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Essex County Council [8452]	6896	Para 11.14	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.	Harlow Council agrees that specific forms of entry should be removed. The Policy itself already refers to the IDP.	Agree with suggested amendments to supporting text.
Mr James Humphreys [8561]	6712	Healthcare	Additional house building, not only on Katherines Way, but at other sites, will force the local healthcare system into complete meltdown. I firmly believe that GP and community health services are starting to fail badly in Harlow, and while there is improvement in the hospital, local GP surgeries still have to deal with a challenging patient population and deprivation in some parts of Harlow and the wards surrounding mine (Staple tye etc...). My fear is that it could become a lot worse and turn areas into healthcare slums as many will not be able to access a basic quality of healthcare	Harlow Council and authorities in the Garden Town (Epping, East Herts, ECC and HCC) have been working closely with the healthcare providers and developers to ensure that there is sufficient healthcare provision in the Garden Town for the future by providing sufficient building/footprint floorspace in masterplanning proposals, by identifying such needs in the IDP and to ensure that the phasing of development is in line with the infrastructure requirements. The IDPs for Harlow and the Garden Town have both sought to identify the correct requirement and cost for such facilities and the Local Plan includes the need for such facilities as part of new sites.	None

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Quod Planning [7958]	6475	Princess Alexandra Hospital	No proposals for the location of the hospital have been definitively agreed at this stage and it is premature to conclude that the hospital will be relocated to one of the two potential sites. Instead, the plan should simply state that "three potential options are being explored: the phased redevelopment of the hospital's existing site and the consideration of two potential relocation sites".	Harlow Council agree that no definitive solution to PAH expansion has been identified as yet, whether this be relocation or redevelopment. No changes will be made to the Plan at present until a solution is finalised. If the existing site were to be redeveloped/expanded then this will take precedent over any housing allocation.	None
Essex County Council [8452]	6897	Para 11.33	<p>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.'</p> <p>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</p>	Agree with Essex County Council's suggested wording which includes the County Council as an important contributor to infrastructure provision and component of the S106 process. This additional wording has been agreed through the Statement of Common Ground with Essex County Council	Agree with suggested amendments to supporting text.
Essex County Council [8452]	6898	SIR2	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.	Agree that there is an additional existing crossing which is also an important entry point into Harlow to the north-east and should also be included in the list of gateway entrances. Agree additional gateway in Policy SIR2 and in the Statement of Common Ground with Essex County Council.	Agree with amendment to Policy to include additional gateway entrance.

Respondent [ID]	Representation Number	Policy/Para/Text	Representation Summary	Officer Comment	Minor/Major amendment required?
Canal and River Trust [8612]	6573	SIR2	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. We would also request that paragraph 11.36 should be amended to refer to discussion with landowners and statutory consultees for completeness.	Agree to consult Canal and River Trust with any proposals that may affect the River Stort. Is not considered necessary to add further text to paragraph 11.36 as any design work/application would require consultation with the Trust.	None
GLADMAN [8618]	6630	SIR3	A blanket policy that seeks to refuse development where it is demonstrated that minerals will be sterilised is therefore contrary to this guidance as an exercise should be carried out to assess whether it is practicable and feasible to extract the mineral before a decision can be made on the application.	Unsure what this representation is referring to. If it is a policy in the County Council Waste and Minerals Local Plans then these have already been adopted and are not subject to change through the Harlow Local Plan	None
Quod Planning [7958]	6752	Compulsory Purchase Orders and delivery of the Crossings	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. 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	It has not been agreed officially that CPO is the only route required to deliver the crossings but the Local Plan is clear that where CPO is required the Council will investigate this as an option and use it. It is not considered appropriate to add further wording on this point or identify specific projects at present. The Garden Town IDP will look at what infrastructure is required strategically and apportion costs to develop sites - this will include the crossings where relevant.	None

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			required from all new development.		
Mrs K Garrod [8596]	6722	General comments made on travel modes	This representation made several helpful comments as to how to improve sustainable travel in the town including: - cycling initiatives in the town centre - measures to improve movement of buses around residential streets - car sharing schemes - taxi sharers	These ideas will be considered as part of the Garden Town Transport Strategy and as part of a more detailed action plan setting out projects and measures to improve walking, cycling and bus provision in the town	None
Miller Strategic Land [5769]	6469	Policy Map	E-W STC should be referred to as 'Approved' and not 'Indicative' and show correct route through Newhall. Add two indicative access points on Key Diagram for East of Harlow	At the point of agreeing the route, evidence was yet to be completed and the route may also change once more detailed feasibility work/designing has been undertaken (beyond the scope required for the Local Plan). Therefore it is more appropriate at this time to refer to the route in its entirety as indicative although we appreciate that a bus route through Newhall has already been agreed and therefore is being delivered.	Amendable to adding Newhall link (already suggested by ECC and agreed we are amendable to this change in the HGT chapter as well)

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A. Martin (for Miller Homes) [5533]	6467	PL1	No way of knowing whether completed Spatial Vision/Design Charter will place constraints/obligations on East of Harlow site. Raise holding objection to part (a).	The Spatial Vision has now been consulted on and the Design Charter is in preparation, for endorsement by the Council prior to Local Plan Submission.	None.
Barton Willmore (for De Merke Estates) [8399]	See full representation	PL1	The Council has not developed an appropriate evidence base to support the inclusion of reference to the Spatial Vision or Design Charter within Policy PL1 and it is unreasonable to require compliance with documents that have yet to be published. The Policy is therefore not 'Justified'.	The Spatial Vision has now been consulted on and the Design Charter is in preparation, for endorsement by the Council prior to Local Plan Submission.	None.
Canal & River Trust [8612]	6570	PL1	Add protection, enhancement and improvement of Stort as distinctive environmental feature and leisure attraction.	Not appropriate in this policy.	None.
Essex CC [8452]	6899	PL1	Add reference to new Essex Design Guide.	Potential mod to address this.	(a) it is supported by a design rationale based on an understanding and analysis of local context and character, taking into consideration the Adopted Harlow Design Guide Supplementary Planning Document (SPD), the Harlow and Gilston Garden Town Spatial Vision and Design Charter, the Essex Design Guide and relevant national guidance;
E. R. Baldry [8560]	6403	PL2	Fennells allocation doesn't reflect policy. Privacy, overlooking, daylight loss, aspect and outlook all negatively impacted.	Individual planning applications would consider these factors based on the requirements of this policy.	None.
Home Builders Federation [8450]	6703	PL3	Unclear what aim of policy is. Meeting existing building regulations is not a planning matter. Policy could be used erroneously to refuse planning permissions that the Council determines are insufficiently sustainable. Against NPPF which requires a clear indication as to how the decision maker should react to a development proposal. Therefore delete PL3 and 13.13-13.19	Local Plan specifically states that development would be supported where it goes beyond minimum Building Reg. requirements. Must not delete the whole policy as it contains important requirements about sustainability etc.	None.
Persimmon Homes [8437]	6744	PL3	Should not state Building Regulations adherence.	Reference to Building Regulations designed to encourage applicants to go beyond the minimum requirements.	None.

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Persimmon Homes [8437]	6744	PL3	High standards' not properly defined.	Standards would be assessed on a case-by-case basis.	None.
Persimmon Homes [8437]	6744	PL3	Cost of going above Building Regs not considered.	The policy does not require going beyond Building Regulations; only encourages it.	None.
Persimmon Homes [8437]	6744	PL3	Possible mod is to state that design should have regard to measures to reduce energy consumption.	Design and energy consumption is already considered in the Local Plan.	None.
A. Martin (for Miller Homes) [5533]	6482	PL4	Too restrictive, more so than Green Belt policies. Green Wedge should be step-down from Green Belt. E.g. existing Green Wedges contain social clubs, sports clubs, schools and extensive fields, allotments, public spaces and other uses reflecting Green Wedge roles. Policy should be amended to allow these uses. Add point after (a) stating "it is for social club, sports club, education or allotment related development, or public open space".	The Green Wedge policies reflect the local application of Green Wedge protection policies. There is existing strong evidence for the Green Wedges being particularly important to Harlow, including the New Town heritage, local support, etc. The uses mentioned in the rep are already covered by small-scale development.	None.
Barton Willmore (for De Merke Estates) [8399]	See full representation	PL4	"Preserved and enhanced" is a new addition to the policy, but no evidence/justification to support this.	The Green Wedge policies reflect the local application of Green Wedge protection policies. There is existing strong evidence for the Green Wedges being particularly important to Harlow, including the New Town heritage, local support, etc.	None.
Barton Willmore (for De Merke Estates) [8399]	See full representation	PL4	"Preserving/enhancing" effectively only allows building demolition and so conflicts with allowing small-scale development.	Small-scale development can still preserve and enhance the Green Wedge roles, so development is not just limited to demolition.	None.
Barton Willmore (for De Merke Estates) [8399]	See full representation	PL4	Higher tests placed on Green Wedge land than Green Belt land. Green Belt should have more restrictive test as it is of national interest.	Local application of policies. Strong evidence for GW being particularly important to Harlow, New Town heritage, local support, etc.	None.

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Barton Willmore (for De Merke Estates) [8399]	See full representation	PL4	Does not recognise that some areas do not contribute towards roles/functions of the Green Wedge. Could release land that does not.	Already considered this through the Green Wedge Review.	None.
Barton Willmore (for De Merke Estates) [8399]	See full representation	PL4	Amend to allow site-by-site approach for Green Wedge development.	The Green Wedge Review has already established which sites should be released from the Green Wedge. Any small-scale development would be assessed on a case-by-case basis.	None.
Canal & River Trust [8612]	6576	PL4	Para 13.23. Small-scale development should include facilities/services related to existing use, inc. moorings/required waterway uses.	Potential mod to address this.	13.23 Small-scale development can include householder applications, school or sports related development, recreation and community uses, waterway uses and facilities/services related to an existing use.
E. R. Baldry [8560]	6404	PL4	Small scale development mentioned in policy but Fennells is for 23 properties - how is this small scale?	Small-scale development is defined in the implementation. The Fennells site is no longer in the Green Wedge so this policy does not apply to it.	None.
Essex CC [8452]	6900	PL4	Add "and historic significance" before "of the Green Wedges and Green Fingers are preserved"	Historic significance of Green Wedges/Fingers is already covered in the roles/functions and therefore by the protection of the Green Wedges/Fingers.	None.
Environment Agency [8443]	6498	PL4, PL5, PL7	Within the justification and implementation, it's recommended that rivers and canals are recognised as a valid and valuable aspect of green infrastructure and open spaces. Also cross ref with PL10 and WFD.	Local Plan should be read as a whole so cross-referencing is not required. Rivers/canals - for PL4, see para 13.23 draft mod; PL5 - change would not be appropriate; for PL7, see 13.43 draft mod.	None.
Essex CC [8452]	See full representation	PL6	Para 13.35. Hedgerows Regulation 1997 Note the 's' has been incorrectly omitted, and should be added to accord with the title of the regulations.	The 's' is already in place.	None.
Environment Agency [8443]	6498	PL7	Rivers and canals should be recognised as valid and valuable aspect of GI and open spaces, mirroring understanding of such environments.	Already covered by mod in response to Herts CC's comments about GI definition needing to include blue assets	None.

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Environment Agency [8443]	6498	PL7	Recommend cross referencing this policy with PL10.	The Local Plan generally avoids cross-referencing to other policies because the Local Plan should be read as a whole.	None.
Environment Agency [8443]	6503	PL8	Development sites should be checked for invasive species and measures put in place to follow biosecurity and eradicate invasive species on site. Para 13.49 - Add ref to the Essex Biodiversity Validation Checklist to enable checking of biodiversity at early stage in planning.	Already mentioned invasive species in implementation - but potential mod to add in eradication of invasive species. Checklist - potential mod to amend. The checklist states that it is for major apps submitted to ECC so we cannot require it, but reference can be made to it.	13.49 The Council may require assessments of biodiversity and geodiversity assets to be submitted, which identify the impacts of development and any necessary mitigation and/or compensatory measures, and consider the presence of invasive, non-native species and their management, including biosecurity measures and the eradication of invasive species. To ensure compliance with national biodiversity policy and legislation, applicants are advised to refer to the Essex Biodiversity Validation Checklist (or its successor), available on the Essex County Council website.
Essex CC [8452]	6903	PL8	Para 13.48. Add commitment to declaration of LNRs to provide opportunities for people to enjoy nature.	Potential mod to address this, as well as mod to amend wording at para 13.45.	13.45 As a planned New Town, Harlow benefits from networks of open spaces which contribute to the biodiversity of the district, conserve habitats of local significance and enable the appreciation of wildlife provide opportunities for people to enjoy nature. 13.48 The Council will seek to protect and enhance non-designated assets of biodiversity and geodiversity importance, identified in Evidence Base studies, to extend the geodiversity and the network of biodiversity

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					and open spaces across the district. If the richness of biodiversity evident at a non-designated asset increases sufficiently, it may become formally declared as a designated asset, such as a Local Wildlife Site or Local Nature Reserve. Information of any such declarations would be made available on the Council's website.
Essex CC [8452]	6902	PL8	Para 13.46, replace the existing aims described as “halting decline” with the words <u>“to achieve a net gain for biodiversity”</u> .	Potential mod to address this.	13.46 Helping to protect and enhance biodiversity is one of the fundamental aims of national policies and guidance, to halt the overall decline in biodiversity to achieve a net gain in biodiversity. This policy aims to ensure the continued protection and enhancement of biodiversity and geodiversity assets in Harlow.
Essex CC [8452]	6903	PL8	Para 13.48, Add reference to LoWS and LNRs.	Potential mod to address this.	13.47 Designated biodiversity and geodiversity assets are allocated on the Policies Map. In Harlow, the highest order asset type is Sites of Special Scientific Interest, followed by locally designated sites (Local Wildlife Sites and Local Nature Reserves), ancient woodland, and aged or veteran trees found outside ancient woodland. There are, as yet, no designated geodiversity assets in

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					Harlow.
Essex CC [8452]	6901	PL8	<p>Restructure as follows:</p> <p>a) Conserve and enhance existing biodiversity and geodiversity assets</p> <p>b) Where the above is not possible, appropriate and effective measures must mitigate the negative effects on these assets</p> <p><u>c) Where there is a residual impact, compensatory measures will need to be secured offsite.</u></p> <p>d) Creates new biodiversity and creates links to existing biodiversity and geodiversity assets to <u>deliver net gain</u> for biodiversity.</p>	It is considered that restructuring is not appropriate for this policy. Delivering net gain is already addressed as new biodiversity has to be created and existing biodiversity protected anyway. Compensatory measures offsite could mean an asset could be harmed as long as compensatory measures are provided elsewhere. Therefore this could conflict with protecting an individual existing asset.	None.
Natural England [8628]	6737	PL8, PL9	Needs policy commitment to delivery of Mitigation Strategy.	No change, as this is referenced in the Implementation of the policy.	None.
Environment Agency [8443]	6504	PL9	Mention that all land considered to be contaminated needs Preliminary Risk Assessment. Further investigations, remediation, risk assessments, long-term maintenance regimes and validation reports may be needed if land is contaminated.	Potential mod to address this.	<p>13.55 13.55 The Council may will require a Preliminary Risk Assessment assessments of any pollution and/or contamination of land considered to be contaminated to be undertaken and submitted, which identify any existing pollution and/or contamination, and the impacts of the development and any necessary mitigation and/or compensatory measures. For example, an assessment of light may need to take into consideration the detail of the angles of lights, lighting design, light spillage, luminance levels, height of</p>

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					light columns and proposed hours of use. Mitigation measures could include the use of baffles and appropriate building design to minimise impacts. The Council may also impose conditions to control and manage pollution and contamination levels. Further investigations, assessments, long-term maintenance regimes and validation reports may also be required if land is contaminated.
Environment Agency [8443]	6504	PL9	Give more weight to groundwater in implementation. Reason - ensure risks to groundwater are minimised, where contaminated sites have potential to mobilise contaminants.	Potential mod to address this.	New para after 13.55 Where contaminated sites have the potential to mobilise contaminants, or where there is a high-risk development proposal within a vulnerable ground water area, mitigation measures must ensure the risks to groundwater are minimised.
Environment Agency [8443]	6504	PL9	State that planning permission would not be granted for development that poses threat to quality of surface and/or groundwater.	Already dealt with under PL10.	None.
Environment Agency [8443]	6504	PL9	Reference importance for development to not adversely impact upon SPZs.	Already dealt with under PL10.	None.
Environment Agency [8443]	6504	PL9	Mention avoiding high risk development proposals within vulnerable groundwater areas, i.e. petrol stations, cemeteries.	See potential mod for new para after 13.55.	None.

Respondent [ID]	Representation Number	Policy/Para/Text	Representation Summary	Officer Comment	Minor/Major amendment required?
Environment Agency [8443]	6495	PL10	Policy could be more robust by also including Natural Flood Management techniques. This could be very effective for developments near ordinary watercourses.	Potential mod to address this.	13.72 Developers should refer to the Council's Strategic Flood Risk Assessment for further information and advice. Reference should also be made to the Harlow Surface Water Management Plan and the Essex SuDS Design Guide. The Essex SuDS Design Guide provides guidance on local standards for water quality and water quantity from developments and guidance on SuDS design. Developers should also consider national guidance on natural flood management techniques and working with natural processes, which seek to protect, restore and emulate the natural functions of catchments, floodplains and rivers.

Respondent [ID]	Representation Number	Policy/Para/Text	Representation Summary	Officer Comment	Minor/Major amendment required?
Environment Agency [8443]	6495	PL10	<p>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.'</p> <p>strengthen 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</p> <p>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. The buffer zone will provide a naturalised buffer free of built 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.</p>	Potential mod to address this.	<p>14. Water Quality Development must not adversely affect cause deterioration to water quality, including quality of waterways and other bodies of water, identified Source Protection Zones (SPZ), Aquifers and all other groundwater. Development must aim to improve such water quality.</p> <p>New development adjacent to water courses should seek to include restoration and deculverting. The culverting of water courses should be avoided. Where the applicant can demonstrate that deculverting or other river enhancements are unfeasible, a financial contribution will be sought to restore another section of the same watercourse.</p> <p>New development adjacent to designated main rivers must provide and maintain an undeveloped buffer zone, of at least eight metres, to the watercourse. Such development must also include a long-term scheme to protect and enhance the conservation value of the watercourse.</p> <p>13.57 This policy will ensure that the quality of drinking water is maintained, avoiding harmful polluting developments which affect its quality. The requirement</p>

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					for development adjacent to designated main rivers to provide an undeveloped buffer zone will ensure the enhancement and protection of local biodiversity, provide space for flood water and provide access for maintenance. The necessity for a scheme to protect and enhance the conservation value of a watercourse, and to aim to improve water quality, is required by the Water Framework Directive and/or the Thames River Basin Management Plan.
Environment Agency [8443]	6495	PL10	After the sentence 'it must not increase the risk of flooding elsewhere', its should be added 'and aim to reduce flood risk overall'.	Potential mod to address this.	32(a) . it must not increase the risk of flooding elsewhere and must aim to reduce flood risk overall;
Environment Agency [8443]	6495	PL10	The implementation section needs to make specific reference that all developments, whether residential, commercial or Strategic Infrastructure Requirements projects are required to engage in he actions and measures as specified by the TRBMP, where feasibly possible and reasonable, and developers should seek to liaise with the Environment Agency over such actions and measures.	Potential mod to address this.	New para after 13.72 All proposed development must engage in the actions and measures as specified by the Thames River Basin Management Plan, where feasibly possible and reasonable. Developers should liaise with the Environment Agency over such actions and measures.

Respondent [ID]	Representation Number	Policy/Para/Text	Representation Summary	Officer Comment	Minor/Major amendment required?
Environment Agency [8443]	6495	PL10	Older buildings are the least efficient with resource use. Encourage retrofitting these buildings to increase their water efficiency.	Potential mod to address this.	New para between 13.63 and 13.64. Harlow contains a significant number of older buildings which will not be as efficient with water use as modern buildings. Measures to retrofit such buildings to increase their energy efficiency are, therefore, encouraged.
Environment Agency [8443]	6495	PL10	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.	Yes, NPPF technical guidance says LAs should seek opportunities to do this. Potential mod to address this.	New para between 13.68 and 13.69. It is expected that space is created for flooding to occur by restoring the functional floodplain, wherever possible, through a reduction of development footprint within Flood Zone 3b.
Environment Agency [8443]	6495	PL10	Encourage the requirement of a BREEAM 'Excellent' rating for water efficiency of non-residential buildings. This is referenced and evidenced in your recent WCS.	Harlow WCS states "The Harlow-Gilston Garden Town has the opportunity to seek BREEAM status for all new, residential and non-residential buildings" and does not encourage requirement of BREEAM Excellent.	None.
Environment Agency [8443]	6495	PL10	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.	Already covered by NPPF technical guidance.	None.
Environment Agency [8443]	6495	PL10	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.	See possible mod for para 13.57.	None.
Environment Agency [8443]	6495	PL10	c) flood levels' should be replaced with 'finished floor levels'.	Addressed through other comments.	None.

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Environment Agency [8443]	6498	PL10	Justification - Reference should be made that under the WFD, waterbodies must be at 'good' ecological status/potential (i.e. clean and healthy) by 2027. The UK has a legal obligation to meet this target None of your watercourses are currently achieving 'good' ecological status/potential.	See possible mod for para 13.57.	None.
Environment Agency [8443]	6495	PL10	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.	Addressed through IDP.	None.
Environment Agency [8443]	6495	PL10	Para 13.67- Flood storage should be maximised by green infrastructure and by providing level-for-level volume-for-volume floodplain compensation for development within the 1 in 100 year plus climate change extent.	Potential mod to address this.	13.67where possible, flood storage should be maximised through the use of Green Infrastructure and by providing level-for-level, volume-for-volume floodplain compensation for development within the 1-in-100-year (plus climate change) extent.
Environment Agency [8443]	6495	PL10	13.68 - SUD's should be mentioned here in the aims to discharge surface water. Whilst there is mention on guidance and references to SUD'S, there is no mention of where SUD's would be required. SUD's are mentioned in depth in your SFRA, so this outline policy should be strengthened to ensure there implementation.	See possible mod for para 13.68.	None.
Essex CC [8452]	6905	PL10	Revise part 3(c): 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 <u>finished floor level</u> of 300mm above the <u>predicted</u> water level;	Potential mod to address this.	23 (c) flood levels of 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 watertight depth finished floor level of 300mm above the normal predicted water level;

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Essex CC [8452]	6905	PL10	Revise part 3(g): flood flow routes should be <u>configured to enable surface water to drain;</u>	Potential mod to address this.	23 (g) flood flow routes should be preserved configured to enable surface water to drain;
Essex CC [8452]	6905	PL10	Revise part 3(h): where necessary, planning permission will be conditional upon <u>the submission and approval of a drainage management strategy that addresses all forms of flood risk</u>	Potential mod to address this.	23 (h) where necessary, planning permission will be conditional upon flood protection and/or runoff control measures being operative before other works. the submission and approval of a drainage management strategy that addresses all forms of flood risk
Essex CC [8452]	6905	PL10	Revise part 4(c): achieve runoff rates <u>in line with the guidance of the non-statutory technical standards for sustainable drainage</u>	Potential mod to address this.	43 (c) achieve greenfield runoff rates in line with the guidance of the non-statutory technical standards for sustainable drainage;
Essex CC [8452]	6905	PL10	Re-order so 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). Reason - this area is considered to be less capable of effective regulation and enforcement than other subject areas of the policy.	Potential mod to address this.	<i>Re-order as follows:</i> 2. 1. Water Management 3. 2. Flooding 4. 3. Sustainable Drainage Systems (SuDS) 1. 4. Water Quality
Essex CC [8452]	6905	PL10	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. Add reference to Critical Drainage Areas (to support the policy) – this could be done at paragraph 13.61.	Potential mod to address this.	PL10 new sentence at end of flooding section Development within identified Critical Drainage Areas may, depending on the outcomes specific flood risk assessment, be required to contribute to funding for the delivery of appropriate flood alleviation schemes. New para after 13.61 A number of Critical Drainage Areas have been identified based on the results of the Harlow Surface Water Management Plan. The risk

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					of surface water flooding in these areas needs to be reduced and drainage improved.
Home Builders Federation [8450]	6704	PL10	On many brownfield sites it may be impossible to achieve part 4(c) level of run off. Guidance by Defra says brownfield development must achieve close as is practicable to greenfield run off rates. I.e. a development may not be able to deliver green field run off rates but that it should seek an improvement over the current site. Amend to “(c) Post-development run off rates should be reduced as far as practicable below existing run off rates for that site.”	See Essex CC's comments on PL10 part 4(c)	None.

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Thames Water [8433]	6779	PL10	<p>Para 13.68. Discharge of rainwater to combined sewer should be last resort. Hierarchy should be expanded to include other options, e.g. adopted in London Plan. Amend hierarchy as follows:</p> <ol style="list-style-type: none"> 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 	Potential for mod to address this.	<p>13.68 In terms of surface water flooding, the general aim should be to discharge surface run off as high up the following hierarchy of drainage options as reasonably practicable:</p> <ol style="list-style-type: none"> 1. into the ground (infiltration); 2. to a surface water body; 3. to a surface water sewer, highway drain, or another drainage system; 4. to a combined sewer. 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, including the use of SuDS; 4. attenuate rainwater by storing in tanks or sealed water features for gradual release, including the use of SuDS; 5. discharge rainwater direct to a watercourse; 6. discharge rainwater to a surface water sewer/drain; 7. discharge rainwater to the combined sewer.
Thames Water [8433]	6778	PL10	<p>Extend to encourage SuDS use even when not required by national policy and support retrospective use of SuDS. Amend text as follows: 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</p>	Potential for mod to address this.	<p>43. Sustainable Drainage Systems (SuDS)</p> <p>The use of SuDS in all development proposals, including the retrofitting of SuDS, is encouraged and will be supported.</p> <p>Where SuDS are required,</p>

Respondent [ID]	Representation Number	Policy/Para/Text	Representation Summary	Officer Comment	Minor/Major amendment required?
					the drainage scheme must meet the following criteria:.....
Essex CC [8452]	6908	PL11	Amend: 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 <u>and those archaeological sites that are not Scheduled</u> are known as non-designated assets <u>and also contribute to the overall significance of the historic environment of Harlow.</u> Historic England administers national designations which include all designated heritage assets apart from conservation areas.	Potential mod to address this.	13.78 Designated heritage assets can include listed buildings, curtilages of listed buildings, conservation areas, archaeological remains , Scheduled Monuments and Registered Historic Parks and Gardens. Such assets, except Conservation Areas, are administered by Historic England. Non-designated assets include Locally Listed Buildings, monuments, sites, places, areas or landscapes which a Local Authority deems to have special historic or architectural interest. are known as non-designated assets. Historic England administers national designations which include all designated heritage assets apart from conservation areas.
Essex CC [8452]	6906	PL11	Revise (d): “The extent to which the development would enhance, <u>or better reveal</u> , the significance of a heritage asset”.	Potential mod to address this.	PL11 (d) the extent to which the development would enhance, or better reveal , the significance of the heritage asset;

Respondent [ID]	Representation Number	Policy/Para/Text	Representation Summary	Officer Comment	Minor/Major amendment required?
Essex CC [8452]	6906	PL11	Revise (a): the impact of development upon the character, appearance, setting , or any other aspect of the significance of the asset'. Reason - setting is not asset itself upon which harm can be caused, but development in an asset's setting can harm the asset's significance if the setting contributes to its interest value.	Potential mod to address this.	PL11(a) the impact of development on the character, appearance, setting , or any other aspect of the significance of the asset or its setting;.....
Essex CC [8452]	6907	PL11	3rd and 4th paras - change: "Where development has the potential to affect a heritage asset..." and "...it must be demonstrated that the development presents the asset's optimum viable use and is necessary...." Reason - unclear; confused about difference between Heritage Statement and Management Plan and the correct time to request these.	1st change - "has the potential" is not a term used in the Local Plan policies. 2nd change - potential mod to address this.	PL11Where the heritage asset is at risk and the development would conflict with other policies of the Local Plan, it must be demonstrated that the development presents the asset's optimum viable use and is necessary to secure the future conservation of the asset and that any negative impacts are outweighed.
Essex CC [8452]	6906	PL11	Revise (b): replacing the current word 'harmonises' with either 'respond to' 'or otherwise 'reflect'. Reason - 'harmonise' can be seen to inhibit modern design/architecture.	Retain 'harmonise' to ensure strong link is maintained with Harlow's New Town heritage, etc.	None.
Essex CC [8452]	6906	PL11	Revise (c) to consider ref to Gibberd Master Plan to ensure development respects its fundamental principles.	Not considered necessary to reference Gibberd Master Plan at this point in the policy.	None.
Historic England [8623]	6697	PL11	Include requirement for desk or field assessment to be submitted where proposals affect sites or are within/adjacent to sites of known archaeological interest, or sites where there is archaeological interest. Mentioned in para 13.88 but include in policy.	Requirements for assessments etc. are being put in Implementation where this is already mentioned.	None.
Historic England [8623]	6683	PL11	Delete final paragraph of policy (enabling development). NPPF states that enabling development is development that is not otherwise according with adopted policy. Not necessary component of Local Plan. Policy on heritage at risk rather than enabling development would be better.	No change, to ensure heritage at risk is protected through the requirements of this sentence.	None.

Respondent [ID]	Representation Number	Policy/Para/Text	Representation Summary	Officer Comment	Minor/Major amendment required?
Redrow Homes[8640]	6856	H1	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.	Both the Harlow and Gilston Garden Town Design Guide and Harlow and Gilston Garden Town Vision are now published and form part of the evidence base.	None
Miller Strategic Land[5769]	6483	H1	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.	Noted	None
EssexCounty Council[8452]	6909	H2	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.	Withdrawn by Essex CC	None
De Merke Estates [8643]	6865	H2	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.	Support for this policy is welcomed, it should be noted that other policies in the plan should also be followed, such as Green Wedge Policy.	None

Respondent [ID]	Representation Number	Policy/Para/Text	Representation Summary	Officer Comment	Minor/Major amendment required?
Morley Grove Residents Association (Sheila Sullivan) [5043]	6440	H3	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).	The Council considers that 1 in 5 is an appropriate level which will preserve the character of the residential area and protect the amenities of the local residents. Article 4 directions will be sought by the Council as and when necessary based on evidence of an issue in a particular area.	None
Redrow Homes[8640]	6857	H5	<p>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'.</p> <p>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.</p>	National Guidance allows Local Plans to set additional technical requirements exceeding the minimum standards required by Building Regulations. The SHMA published in 2015 sets out evidence and recommendations for the proportion of accessible dwellings based on their tenure. A Local Plan Viability Study took into consideration all policies, including H5 and has not considered implementation of this policy would render schemes unviable.	None
Gladman[8618]	6632	H5	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	National Guidance allows Local Plans to set additional technical requirements exceeding the minimum standards required by Building Regulations. The SHMA published in 2015 sets out evidence and recommendations for the proportion of accessible dwellings based on their tenure. A Local Plan Viability Study took into consideration all policies, including H5 and has not considered implementation of this policy would render schemes unviable.	None

Respondent [ID]	Representation Number	Policy/Para/Text	Representation Summary	Officer Comment	Minor/Major amendment required?
Home Builders Federation[8450]	6705	H5	<p>This policy is unsound as it has not been justified</p> <p>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.</p> <p>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:</p> <p>"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."</p>	<p>National Guidance allows Local Plans to set additional technical requirements exceeding the minimum standards required by Building Regulations. The SHMA published in 2015 sets out evidence and recommendations for the proportion of accessible dwellings based on their tenure. A Local Plan Viability Study took into consideration all policies, including H5 and has not considered implementation of this policy would render schemes unviable.</p> <p>Respondent correctly points out 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.", However, this is guidance and the joint SHMA indicates that 10% of market dwellings should be wheelchair accessible, based on the evidence.,</p>	None

Respondent [ID]	Representation Number	Policy/Para/Text	Representation Summary	Officer Comment	Minor/Major amendment required?
Miller Strategic Land[5769]	6484	H5	<p>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.</p> <p>Full Reference: O - 6484 - 5769 - H5 Accessible and Adaptable Housing - iv</p> <p>Change To Plan: Our client respectfully requests that the first two paragraphs in Policy H5 are amended to read:</p> <p>“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.</p> <p>In addition, for major residential development, 10% of new affordable dwellings must be Building Control Part M4(3) standard (i.e. wheelchair user dwellings).”</p>	<p>National Guidance allows Local Plans to set additional technical requirements exceeding the minimum standards required by Building Regulations. The SHMA published in 2015 sets out evidence and recommendations for the proportion of accessible dwellings based on their tenure. A whole plan Viability Study took into consideration all policies, including H5 and has not considered implementation of this policy would render schemes unviable.</p> <p>Whilst NPPG points out 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.", However, this is guidance and the joint SHMA indicates that 10% of market dwellings should be wheelchair accessible, based on the evidence.</p>	None
Countryside Properties[8451]	6588	H5	<p>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.</p> <p>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.</p>	<p>National Guidance allows Local Plans to set additional technical requirements exceeding the minimum standards required by Building Regulations. The SHMA published in 2015 sets out evidence and recommendations for the proportion of accessible dwellings based on their tenure. A Local Plan Viability Study took into consideration all policies, including H5 and has not considered implementation of this policy would render schemes unviable.</p> <p>Whilst NPPG points out 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.", However, this is guidance and our SHMA indicates that 10% of market dwellings should be wheelchair accessible, based on the evidence.</p>	None

Respondent [ID]	Representation Number	Policy/Para/Text	Representation Summary	Officer Comment	Minor/Major amendment required?
Persimmon Homes[8437]	6745	H5	<p>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.</p> <p>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 Governments intention, it would have made these standards mandatory.</p> <p>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.</p> <p>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.</p> <p>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:</p> <p>"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."</p>	<p>National Guidance allows Local Plans to set additional technical requirements exceeding the minimum standards required by Building Regulations. The SHMA published in 2015 sets out evidence and recommendations for the proportion of accessible dwellings based on their tenure. A Local Plan Viability Study took into consideration all policies, including H5 and has not considered implementation of this policy would render schemes unviable.</p> <p>Whilst NPPG points out 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.", However, this is guidance and our SHMA indicates that 10% of market dwellings should be wheelchair accessible, based on the evidence.</p>	None

Respondent [ID]	Representation Number	Policy/Para/Text	Representation Summary	Officer Comment	Minor/Major amendment required?
EssexCounty Council[8452]	6910	H5	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.	Support is welcomed	None
De Merke Estates [8643]	6866	H5	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.	National Guidance allows Local Plans to set additional technical requirements exceeding the minimum standards required by Building Regulations. The SHMA published in 2015 sets out evidence and recommendations for the proportion of accessible dwellings based on their tenure. The Local Plan Viability Study took into consideration all policies, including H5 and has not considered implementation of this policy would render schemes unviable.	None
Places for People [7958]	6758	H6	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." 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."	The Council considers that this suggestion will enhance the clarity of the Local Plan and is amenable to this suggested wording change to paragraph 14.30 in the submitted plan.	Paragraph 14.30 is updated to include the following: <u>"....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."</u>

Respondent [ID]	Representation Number	Policy/Para/Text	Representation Summary	Officer Comment	Minor/Major amendment required?
Redrow Homes[8640]	6858	H6	<p>The 2015 SHMA identifies a housing mix at Figure 14.1; 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.</p> <p>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).</p>	The policy is not prescriptive about following the joint SHMA's suggested range of house types sizes and tenure per se. The policy states that developers should provide a range of house types, and the figure, derived from the consultant's findings, will ensure Harlow's identified needs are met. The SHMA 2015 breakdown of affordable to market housing reflects the whole plan period, whereas the Affordable Housing Update base-date is 2016 and is split between affordable rent and intermediate affordable housing and does not therefore reflect the market housing element.	None
Home Builders Federation[8450]	6706	H6	<p>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.</p>	The policy is not prescriptive in respect of the joint SHMA's suggested range of house types sizes and tenure per se. The policy acknowledges that developers should provide a range, and the figure in the supporting text reflects the independent assessment undertaken by consultants that set out Harlow's needs. The SHMA 2015 breakdown of affordable to market reflects the whole plan period, whereas the Affordable Housing Update base-date is 2016 and is split between affordable rent and intermediate affordable housing and does not therefore reflect the market housing element.	None
Miller Strategic Land[5769]	6485	H6	<p>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.</p>	The policy is not prescriptive about following the SHMA's suggested range of house types sizes and tenure per se. The policy rightly says that developers should provide a range, the figure helpfully puts forward what our consultants have said will meet Harlow's needs. The SHMA 2015 breakdown of affordable to market reflects the whole plan period, whereas the Affordable Housing Update base-date is 2016 and is split between affordable rent and intermediate affordable housing and does not reflect the market housing element.	None

Respondent [ID]	Representation Number	Policy/Para/Text	Representation Summary	Officer Comment	Minor/Major amendment required?
Countryside Properties[8451]	6594	H6	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.	The policy is not prescriptive about following the SHMA's suggested range of house types sizes and tenure per se. The policy rightly says that developers should provide a range, the figure puts forward what our consultants have said will meet Harlow's needs. The SHMA 2015 breakdown of affordable to market reflects the plan period, whereas the Affordable Housing Update base-date is 2016 and is split between affordable rent and intermediate affordable housing and does not reflect the market housing element.	None
Persimmon Homes[8437]	6746	H6	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.	The policy is not prescriptive in respect of the joint SHMA's suggested range of house types sizes and tenure per se. The policy acknowledges that developers should provide a range, and the figure in the supporting text reflects the independent assessment undertaken by consultants that set out Harlow's needs. The SHMA 2015 breakdown of affordable to market reflects the whole plan period, whereas the Affordable Housing Update base-date is 2016 and is split between affordable rent and intermediate affordable housing and does not therefore reflect the market housing element.	None
Home Builders Federation[8450]	6707	H8	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.	The Council's affordable housing policy is sound and this reflected in the findings of the Local Plan Viability study which states "In most cases, schemes can accommodate the Council's affordable housing requirement as per policy H8 of 30%. However, the Council's flexible approach to application of its affordable housing targets (subject to viability) will ensure the viability of developments is not adversely affected over the economic cycle."	None
Miller Strategic Land[5769]	6486	H8	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").	Noted: However, The Council's whole plan viability states "In most cases, schemes can accommodate the Council's affordable housing requirement as per policy H8 of 30%. However, the Council's flexible approach to application of its affordable housing targets (subject to viability) will ensure the viability of developments is not adversely affected over the economic cycle."	None

Respondent [ID]	Representation Number	Policy/Para/Text	Representation Summary	Officer Comment	Minor/Major amendment required?
Tetlow King Planning [8630]	6768	H8	<p>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.</p> <p>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.</p>	<p>SHMA sets out the evidence for the tenure and points developer to the latest version for split, including affordable rent and intermediate housing.</p> <p>The plan boundary is for the Harlow District only, from evidence set out in the 2017 Affordable Housing Update the Council is aware that Harlow's need is greater than the adjacent Districts. The Local Plan is unable to dictate the affordable housing apportionment</p> <p>Each site contribution to affordable housing is negotiated individually and is dependent on the viability of the site.</p> <p>Policies elsewhere in the plan indicate tenure split and typologies and are consequently not required in this policy specifically.</p>	None
Countryside Properties[8451]	6597	H8	<p>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.</p>	<p>Policy states major development. This is defined in NPPF 2012 and 2018 as "For housing, development where 10 or more homes will be provided, or the site has an area of 0.5 hectares or more. For non-residential development it means additional floorspace of 1,000m2 or more, or a site of 1 hectare or more, or as otherwise provided in the Town and Country Planning (Development Management Procedure) (England) Order 2015." The 10 unit threshold is also reflected in the Town and Country Planning (Development Management Procedure) (England) Order 2015.</p>	None

Respondent [ID]	Representation Number	Policy/Para/Text	Representation Summary	Officer Comment	Minor/Major amendment required?
Persimmon Homes[8437]	6747	H8	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.	The Council's whole plan viability states "In most cases, schemes can accommodate the Council's affordable housing requirement as per policy H8 of 30%. However, the Council's flexible approach to application of its affordable housing targets (subject to viability) will ensure the viability of developments is not adversely affected over the economic cycle."	None
Places for People [7958]	6759	H9	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.	The Council considers that the policy as it stands will produce plots to meet the current evidence which identifies 48 applications for self-build and custom built housing. The policy will allow a supply of plots to meet need over the plan period. It is noted that the policy allows developers to have the opportunity to market the plots conventionally after just one year, should they not be taken up.	None
Redrow Homes[8640]	6859	H9	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'.	The Council considers that the policy as it stands will produce plots to meet the current evidence which identifies 48 applications for self-build and custom built housing. The policy will allow a supply of plots to meet need over the plan period. It is noted that the policy allows developers to have the opportunity to market the plots conventionally after just one year, should they not be taken up.	None

Respondent [ID]	Representation Number	Policy/Para/Text	Representation Summary	Officer Comment	Minor/Major amendment required?
Gladman[8618]	6633	H9	<p>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.</p>	<p>The Council considers that the policy as it stands will produce plots to meet the current evidence which identifies 48 applications for self-build and custom built housing. The policy will allow a supply of plots to meet need over the plan period. It is noted that the policy allows developers to have the opportunity to market the plots conventionally after just one year, should they not be taken up.</p>	None
Home Builders Federation[8450]	6708	H9	<p>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 selfbuild 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</p>	<p>The Council considers that the policy as it stands will produce plots to meet the current evidence which identifies 48 registrations for self-build and custom built housing. The policy will allow a supply of plots to meet need over the plan period. The policy allows developers to have the opportunity to market the plots conventionally after just one year, should they not be taken up.</p>	None

Respondent [ID]	Representation Number	Policy/Para/Text	Representation Summary	Officer Comment	Minor/Major amendment required?
			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.		
Miller Strategic Land[5769]	6487	H9	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 selfbuild from 5% to 1%.	The Council considers that the policy as it stands will produce plots to meet the current evidence which identifies 48 registrations for self-build and custom built housing. The policy will allow a supply of plots to meet need over the plan period. The policy allows developers to have the opportunity to market the plots conventionally after just one year, should they not be taken up.	None

Respondent [ID]	Representation Number	Policy/Para/Text	Representation Summary	Officer Comment	Minor/Major amendment required?
Persimmon Homes[8437]	6748	H9	<p>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.</p> <p>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.</p> <p>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.</p>	The Council considers that the policy as it stands will produce plots to meet the current evidence which identifies 48 registrations for self-build and custom built housing. The policy will allow a supply of plots to meet need over the plan period. The policy allows developers to have the opportunity to market the plots conventionally after just one year, should they not be taken up.	None
National Federation of Gypsy Liaison Groups[8627]	6728	H10	<p>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.</p>	This policy was developed so that those that accord with the traveller definition will meet the policy criteria and that there is a demonstrable need for more traveller pitches. It is not considered incompatible with HS4 which points to H10 should additional pitches be sought.	None
Environment Agency[8443]	6505	H10	<p>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.</p>	Welcome support	<p>expand H10 implementation section to refer to sequential test with the inclusion of a new paragraph as follows:</p> <p><u>14.51 Site allocations will be required to adhere to the sequential test to steer proposed developments to areas with lowest probability of flooding .</u></p>

Respondent [ID]	Representation Number	Policy/Para/Text	Representation Summary	Officer Comment	Minor/Major amendment required?
BOC [8571]	6560 and 6564	PR1 and PR3	BOC believe that it is important to provide adequate protection for existing operational facilities and existing business operations (with the potential to generate noise) should not be put at risk by inappropriately proximate proposals, be they proposed by either Local Plan allocations or planning applications. Without this protection there is a risk that the Local Plan is not sound as it is not in compliance with relevant NPPF/NPPG guidance. BOC feel that the modifications to the following policies (PR1, PR3) would ensure that the local plan is sound as they would improve protection to existing employment facilities should inappropriately proximate proposals come forward.	The proposed amendments to the policy do not sit well in the location proposed by BOC. Existing and established occupiers which are noisy will not be restricted. They will be factored in when considering noise sensitive developments. Policy PL2 considers the compatibility and sensitivity of adjacent uses. PL9 also considers noise and the relationship of development to the surrounding built environment. Therefore noisy development is already considered in other policies.	None
Miller Strategic Land [5769]	6488	PR4	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.	The implementation section of this policy sets out the requirement of an action plan setting out how an applicant intends to achieve the policy. The action plan may evident the lack of local skills. However there should be active engagement with the local college, Harlow Council and chamber of commerce to seek local skills where acceptable and appropriate. A process demonstrating where it has not proved appropriate should be set out and this will be considered by the Council.	None
Indigo Planning Limited [8632]	6773	PR5	Proposed Policy RR5 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).	The threshold is to secure the future vitality and viability of the town centre which is a sub-regional town centre and will be providing important facilities and services to future development in the entire Garden Town. The threshold is lower than the NPPF but this is to secure the future of the town centre and was identified in the Council's Retail Needs Study.	None
Indigo Planning Limited [8632]	6774	PR7	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. As such, this policy requirement should be removed.	The Policy aims to retain a mix of uses and larger retail units in the town centre and to manage the sub-division of these units. Two years is not considered to be an insurmountable amount of time given the long term viability and vitality of the town centre and the number of units that are above the threshold size as set out in the policy.	None

Respondent [ID]	Representation Number	Policy/Para/Text	Representation Summary	Officer Comment	Minor/Major amendment required?
M. Harris (Deanery of Harlow) [8586]	6452	Lifestyles	Need section on green issues, eg energy efficiency? Danger that sustainable development could be easily ignored.	Already addressed in policies on sustainable development, design, climate change and energy efficiency.	None.
Barton Willmore (for De Merke Estates) [8399]	See full representation	L1	Public open space and play space on major development not always achievable on smaller sites which are only just above threshold to be considered major development. Amend to say provided only where appropriate.	Potential mod to address this.	New para after 16.8 If providing public open space and play space in major development would not be achievable, developers will be required to submit a viability appraisal to show that such provision would render the scheme unviable.
Countryside Properties (Barker Parry) [8451]	6599	L1	Contributions should allow facilities to upgrade, rather than providing additional facilities which may not be needed. Make L1 more flexible to allow facility improvement and meet demonstrable need.	Potential mod to address this.	L1 In major development, and depending on demonstrable need, public open space, and play space, and, where appropriate, allotments and sporting provision and facilities are required to be provided (or upgraded in the case of existing facilities), along with together in all cases with their ongoing management and maintenance.
Countryside Properties (Barker Parry) [8451]	6599	L1	Open Space SPD (2007) and PPS (2009) out of date and don't reflect recent developments.	PPS now updated in form of Sports Facilities Study. Open Space SPD is planned to be updated.	None.
Countryside Properties (Barker Parry) [8451]	6599	L1	Could maximise development accommodated on a site where off-site contributions are preferable over on-site facilities.	Maximising development on a site would be proposed by the developer in any case and therefore they would try to demonstrate that provision cannot be met on-site, as required by para 16.7.	None.
M. Harris (Deanery of Harlow) [8586]	6454	L2	Need reference to S106 money being available for locals including adjoining community etc activities.	This is already addressed in policy IN6.	None.
T. Clarke (Theatres Trust) [216]	See full representation	L2	Implementation - strengthen by setting criteria by which proposals for loss of facilities will be assessed - 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.	Potential for mod to address this.	New para after 16.13 Marketing of a use or facility that is surplus to requirements, as appropriate for the condition and existing use of the facility, must be undertaken by a suitably competent person. The Council will determine how long a marketing exercise should be on a case-by-case basis.

Respondent [ID]	Representation Number	Policy/Para/Text	Representation Summary	Officer Comment	Minor/Major amendment required?
A. Martin (for Miller Homes) [5533]	6488	L3	Delete part (1).	The policy is important for continuing Harlow's heritage and status as a Sculpture Town.	None.
Barton Willmore (for De Merke Estates) [8399]	See full representation	L3	No consideration of viability issues, especially for smaller sites.	Potential mod to address this.	New para after 16.16 If providing public art in major development would not be achievable, developers will be required to submit a viability appraisal to show that such provision would render the scheme unviable.
Barton Willmore (for De Merke Estates) [8399]	See full representation	L3	Not considered the likely cumulative impacts of proposed local standards on new development (as per NPPF) so L3 should say public art required where appropriate to meet the tests of soundness.	Covered by mod proposed for para 16.16.	None.
Essex CC [8452]	6912	L3	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.	Unclear as to how there could be a circumstance where an artwork's loss wouldn't be harmful to its historic significance.	None.
Home Builders Federation [8450]; A. Martin (for Miller Homes) [5769]	6709; See full representation	L3	PPG states 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. No supporting evidence base how it considers public art to meet any of these tests. If all major developments required to have public art it must have evidence to show how this policy meets the required tests in relation to all such sites.	No change, as lack of evidence required for such a change.	None.

Respondent [ID]	Representation Number	Policy/Para/Text	Representation Summary	Officer Comment	Minor/Major amendment required?
Canal & River Trust [8612]	6578	IN1	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. 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	The policy refers to Public Rights of Way of which the River Stort Towpath is. The intention of the policy is to ensure connectivity with pathways which are accessible and therefore ensure free movement for the public. It is considered that footpaths and Public Rights of Way therefore cover this. The Garden Town is preparing a Transport Strategy which will recognise the importance of improving the existing infrastructure in order to create a modal shift and this will also include short term improvement projects.	None
De Merke Estates [8643]	6869	IN1	There is no Government guidance that sets standards or requirements for such charging points and this aspect of Policy IN1 is therefore not justified and should be removed. HDC has not published any evidence or consideration regarding the design or viability implications of this aspect of Policy IN1. In addition, there has been no assessment of the impact of providing such charging points on the National Grid and therefore if any additional infrastructure needs to be planned for to meet such demand. If HDC are requiring such spaces, such an assessment should have been carried out in accordance with Paragraphs 157 and 177 of the NPPF.	The Government continues to drive measures to encourage the use of electric vehicles and transition to cleaner vehicles with zero or ultra-low emissions, improving air quality and making the UK a more environmentally friendly place. Although there is no current government guidance, this may change over the lifetime of the Plan and Policy IN1 will ensure that the Garden Town responds to future changes in the way we move and improve the quality of life for residents. The justification text explains that applicants should investigate the viability of charging points. In some circumstances it may not be viable and this should be set out in an application.	None
Essex County Council [8452]	6913	IN1	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.	Harlow District Council agrees that this is an omission from the Policy and has agreed through the Statement of Common Ground that this should be included.	Agreed additional wording to Policy IN1
Essex County Council [8452]	6895	IN1	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)	This is an omission from Policy IN1 and agree that it is an important component of the Plan which supports Policy HGT1 and the need for a modal shift away from car usage and the impending Transport Strategy for the Garden Town. Having reviewed the Local Plan and the current policies it is considered appropriate to include the hierarchy in policy IN1. Wording has been agreed with Essex County Council as part of the Statement of Common Ground.	Agree amendment to Policy IN1.

Respondent [ID]	Representation Number	Policy/Para/Text	Representation Summary	Officer Comment	Minor/Major amendment required?
Hertfordshire County Council [8622]	6661	IN1	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.	Harlow District Council understands the importance of increasing sustainable transport within, to and from the town. This is recognised in the objectives, Vision, Policy HGT1 and through the identification of the Sustainable Transport Corridors in Policy SIR1 and on the Policies Map. Furthermore the Council is proposing to include a modal hierarchy in Policy IN1 and is fully committed to completing and implementing a Transport Strategy for the Garden Town which sets out more detail on providing sustainable measures and achieving a modal shift. Furthermore Policy HGT1 refers to the need to develop specific parking standards for the Garden Town communities.	None
Persimmon Homes [8437]	6749	IN1	The Policy states; 'Development must provide electric vehicle charging points 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 Para 17 and 154 of the NPPF. The impact on 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.	Harlow Council agrees that there is not currently any specific government guidance in place for electric vehicle charging points although it is clear that the governments long term intention is to move away from more harmful forms of vehicles to more efficient and ultra-low emission vehicles. The Council considers the policy to be flexible to future changing circumstances without having to review the Local Plan. The government guidance would likely be followed by local authorities which is when this policy would apply. It also assists the Council in discussing the use of charging points in new developments in Harlow which is an important aspect of improving sustainability in the Garden Town and improving health and wellbeing for residents.	None

Respondent [ID]	Representation Number	Policy/Para/Text	Representation Summary	Officer Comment	Minor/Major amendment required?
Redrow Homes [8640]	6860	IN1	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. 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.	The Government continues to drive measures to encourage the use of electric vehicles and transition to cleaner vehicles with zero or ultra-low emissions, improving air quality and making the UK a more environmentally friendly place. Although there is no current government guidance, this may alter over the lifetime of the Plan and Policy IN1 will ensure that the Garden Town responds to future changes in the way we move and improve the quality of life for residents. The justification text explains that applicants should investigate the viability of charging points. In some circumstances it may not be viable and this should be set out.	None
Redrow Homes [8640]	6861	IN2	Policy IN2 requires that development must not cause: a) A significant detrimental impact on highway congestion and movement; b) Not cause a detrimental impact on the safety of all highway users including pedestrians, cyclists and horse-riders. 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'.	The Policy has been prepared positively in that it does not say that proposals will be refused but that development must ensure there is no detrimental impact on highway congestion and movement. This wording is not considered to be over and above the old NPPF or new NPPF and in line with the Council's aspiration for changing modal shift and not affecting highway congestion across the town.	None

Respondent [ID]	Representation Number	Policy/Para/Text	Representation Summary	Officer Comment	Minor/Major amendment required?
Miller Strategic Land [5769]	6490	IN2	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' and '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.	The Policy has been prepared positively in that it does not say that proposals will be refused but that development must ensure there is no detrimental impact on highway congestion and movement. This wording is not considered to be over and above the old NPPF or new NPPF and in line with the Council's aspiration for changing modal shift and not affecting highway congestion across the town.	None
Hertfordshire County Council [8622]	6662	IN3	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 interpretation, and would not enable effective parking restriction at sustainable locations as proposed within supporting text of the local plan.	Policy IN3 is consistent with Essex County Council's parking standards however it is recognised in Policy HGT1 that the major developments will require their own parking approaches and the same policy refers to the need for modal shift for the Garden Town. The approach to parking needs to be fully developed jointly with the Garden Town authorities including two highway authorities before the Harlow Local Plan can include specific standards.	None
Home Builders Federation [8450]	6710	IN3	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.	Policy IN3 ensures that there is a consistent approach across Essex for parking provision although Harlow Council accepts that to ensure flexibility; the standards themselves are not contained in the policy. This is because other documents may be prepared that define different parking standards such as a Garden Town Communities Parking Strategy or other SPD. The supporting justification text states that a different provision to that stipulated in the Essex Parking Standards may be acceptable so long as a suitable justification is put forward by the applicant.	None

Respondent [ID]	Representation Number	Policy/Para/Text	Representation Summary	Officer Comment	Minor/Major amendment required?
Home Builders Federation [8450]	6711	IN4	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.	Policy IN4 applies to major developments and should enable high speed broadband services which coincides with Part R1 of the Building Regulations and is not considered over and above existing requirements. If Building Regulations were to change over the lifetime of the Plan it is considered that this Policy will continue to ensure that high speed broadband continues to be provided through new major developments including commercial uses.	None
Persimmon Homes [8437]	6750	IN4	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 construction, internal layout and performance of new dwellings local planning authorities are only allowed to adopt 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.	Policy IN4 applies to major developments and should enable high speed broadband services which coincides with Part R1 of the Building Regulations and is not considered over and above existing requirements. If Building Regulations were to change over the lifetime of the Plan it is considered that this Policy will continue to ensure that high speed broadband continues to be provided through new major developments including commercial uses.	None
Miller Strategic Land [5769]	6491	IN4	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.	Accept this point.	None

Respondent [ID]	Representation Number	Policy/Para/Text	Representation Summary	Officer Comment	Minor/Major amendment required?
Essex County Council [8452]	6915	IN6	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.	It is considered that the Developer's Guide is overly prescriptive for the purposes of the Local Plan and Developer Contributions Guide is also being updated. The wording suggested by ECC may be subject to change over the course of the Plan Period and difficult for us to update. The Statement of Common Ground with Essex County Council has agreed that the Developer Contributions Guide be referred to in supporting text. However Harlow Council does not agree with replacing Policy IN6 with the ECC wording.	None
Natural England [8628]	6741	IN6	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'.	Awaiting updated HRA. Discussions with Epping Forest District Council and Natural England in relation to Epping Forest continue.	None
Quod Planning [7958]	6760	IN6	In accordance with the aspirations set out in Policy HGT1 criteria 2n, PfP 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.	The Garden Town is currently preparing an IDP which amongst other things will consider various options for collecting contributions towards strategic infrastructure as well as looking at the apportionment approach to costs. This may include the introduction of a Garden Town levy to ensure fairness across the Garden Town and the IDP in it's apportionment exercise has considered the CIL regulations (if they were to remain in place). However the future status of CIL and mechanisms for collecting contributions is currently ambiguous and it would be inappropriate at present to include a specific mechanism in Local Plan policy which requires agreement between a number of interested parties including other local authorities and County Councils.	None

Respondent [ID]	Representation Number	Policy/Para/Text	Representation Summary	Officer Comment	Minor/Major amendment required?
Hertfordshire County Council [8622]	6674	Infrastructure Chapter Para 17.10	Paragraph 17.10 should be amended, 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.	This text refers to the delivery of infrastructure within Harlow itself thereby it only refers to the one local highway authority. However we recognise that there are schemes closely linked where the highway authority responsible will be Hertfordshire County Council. In this instance the local highway authority referred to in the paragraph which Harlow would work with would be HCC.	None
Hertfordshire County Council [8622]	6676	Infrastructure Chapter Para 17.36 and 17.37	Paragraph 17.36. 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”	It is currently considered that the list covers transport including those related to sustainable transport and is not an exhaustive list. Para 17.37 only refers to the sites within Harlow of which Harlow and Essex County Council can seek contributions and therefore we do not agree with the additional wording suggested by HCC.	None

Respondent [ID]	Representation Number	Policy/Para/Text	Representation Summary	Officer Comment	Minor/Major amendment required?
Hertfordshire County Council [8622]	6674	Infrastructure Chapter Para 17.4	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.	The Development Management Policies relate to sites and planning applications which are within and determined by Harlow Council and Essex County Council. Although Hertfordshire Council documents will help shape and form masterplans for the Garden Town sites, they would not be used to determine applications when they are submitted or used to refuse applications.	None
Essex County Council [8452]	6914	Paras 17.13 onwards	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.	Policy HGT1 refers to creating a step-change in modal shift and the Garden Town Transport Strategy currently being prepared will set out high level measures to making this shift happen including how to change behaviour. A modal hierarchy is now recommended for insertion into Policy IN1 which sets out the principle of the car being low down in the importance of movement and should be followed through any development proposal.	None

Respondent [ID]	Representation Number	Policy/Para/Text	Representation Summary	Officer Comment	Minor/Major amendment required?
Historic England [8623]	6695	Glossary	Mention designated and non-designated assets, locally listed buildings and registered parks/gardens.	Modifications will be proposed to clarify terminologies used, including designated and non-designated assets, locally listed buildings and registered parks/gardens.	<p>Conservation Area An area of notable environmental or historical interest or importance which is administered by the Council as a Designated Heritage Asset and benefits from additional planning controls to protected by law it from against undesirable changes.</p> <p>Designated Heritage Asset Includes listed buildings and their curtilages, conservation areas, Scheduled Monuments and Registered Historic Parks and Gardens. A building, monument, site, place, area or landscape identified as having Such assets have been judged to be of national importance in terms of architectural or historic interest, therefore benefitting from additional planning controls. 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). They are administered by Historic England, with the exception of Conservation Areas which are administered by the Council.</p> <p>Locally Listed Building Buildings which do not quite meet the criteria for being nationally listed by Historic England, but which are still of architectural or historical importance in the local area. Such assets, which are non-designated heritage assets, have a degree of significance meriting consideration in planning decisions and are administered by the Council.</p>

Respondent [ID]	Representation Number	Policy/Para/Text	Representation Summary	Officer Comment	Minor/Major amendment required?
					<p>Non-designated heritage asset includes Locally Listed Buildings, monuments, sites, places, areas or landscapes identified as having a degree of significance meriting consideration in planning decisions but which are not nationally designated heritage assets. Such assets are administered by the Council.</p> <p>Registered Historic Park/Garden Gardens, grounds, parks and other planned open spaces which are administered by Historic England and registered on the Register of Historic Parks and Gardens of special historic interest in England. They are designated heritage assets and benefit from the associated additional planning controls.</p> <p>Scheduled Monument Nationally important monuments, usually archaeological remains that are afforded greater protection against inappropriate development through the Ancient Monuments and Archaeological Areas Act 1979 (as amended). They are designated heritage assets, administered by Historic England, and benefit from the associated additional planning controls.</p>