

Harlow Local Development Plan Examination

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CM20 1WG

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Dear Mr Bramidge

HARLOW LOCAL DEVELOPMENT PLAN EXAMINATION

I am writing to confirm my closing remarks at the end of the hearing sessions on 4 April.

As noted in my initial letter to the Council dated 14 December 2018, the views of Natural England in relation to the HRA of the plan are critical and whilst an update to the HRA was published on 18 March and there was some useful discussion at the hearings, NE reserved their position and their definitive response is still awaited, albeit promised by the end of April. As matters stand, an adverse effect on the integrity of the Epping Forest SAC as a result of the plan cannot be ruled out. Even if the updated HRA (which concludes there would be minimal impact) is agreed and no mitigation is required, with further visitor surveys due this year, NE made clear a policy to future proof the plan in respect of the Epping Forest SAC would be necessary.

In the circumstances it is necessary to await the conclusions of NE on the HRA to determine what policy implications there are for the plan. Alongside those conclusions it would be helpful if the Council were to prepare a statement of common ground (SOCG) with NE to take account of the conclusions and to address NE's outstanding concerns in their letter dated 5 July 2018 and their matter statements, including suggested wording for new or amended policies and supporting text in the plan. This should include consideration of any recreational impacts on the Hatfield Forest SSSI and any need for the provision of diversionary recreation space.

I was also advised during the hearings that the overall Garden Town Infrastructure Delivery Plan and Viability Reports would be published in mid-April. Given their direct relevance to the deliverability of the plan copies should be forwarded as soon as they are available together with a statement explaining how the assessment of the plan's viability is affected by the cost of the critical items of strategic infrastructure needed to deliver the Garden Town as a whole. Given the importance of these reports I shall give an opportunity to interested parties to make representations on them.

In the intervening period, there are a number of outstanding matters that the Council could progress to assist the examination:

- A SOCG with Historic England seeking to address the concerns in their letter dated 3 July 2018 and their matter statements, again suggesting amended policies and text
- A SOCG with LPP addressing the concerns of the Princess Alexandra Hospital NHS Trust in relation to the points raised at the hearings with regard to the housing capacity of

the existing site and the fall-back position if the hospital were not to relocate for any reason

- A SOCG with Essex County Council seeking to address their various concerns, not least their submission that a specific policy should be included covering health and wellbeing matters
- Suggested changes to the wording of Policies HGT1 and HS3 and their supporting text in the light of the discussion at the hearings and the latest wording of the complementary policies in the emerging Epping Forest Local Plan

In the light of the above and any other matters that arise, the Council should maintain a comprehensive list of potential modifications to the plan (whether main or minor is not important at this stage) and also a set of plans showing any necessary changes to the submitted policies map. I will ask for these to be submitted for my consideration at an appropriate time.

As you will appreciate, I am not bound by any agreements reached in the SOCGs or any amendments suggested by the Council but they would be very helpful and will be fully taken into account.

When the outstanding matters set out above are sufficiently clarified I will give a suitable opportunity to the other participants in the examination to comment on any new material before progressing to the formal main modifications stage. Should substantive concerns be raised that cannot reasonably be dealt with in writing, a further hearing session(s) may be necessary.

For my part I will give careful consideration to the issues raised during the hearings and will write to you in due course setting out the main modifications required to ensure the soundness of the plan.

Can I take this opportunity to thank Mr Beglan, yourself, Mr MacBride, all the other Council officers and consultants who together presented the Council's plan so clearly, also the support staff who ensured the practical arrangements for the examination hearings worked smoothly. I would also like to thank the ECC, EFDC and EHDC officers who attended for their input and all the other participants for their invaluable contribution to the hearing discussions and my understanding of the plan. Finally, I would like to thank Andrea Copsey, the programme officer, for her sterling assistance throughout the process to date.

Yours sincerely

David Reed

INSPECTOR