

Our Ref: RJC/HC/HLDP
Date: 10 May 2019
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Email: rich.cooke@essex.gov.uk

Mr D Reed – Planning Inspector
C/o The Programme Officer
Harlow Local Development Plan Examination

By email copseyandrea@gmail.com

Dear Mr Reed

Re: Harlow Local Development Plan Examination – Essex County Council representations on Harlow and Gilston Garden Town policies for the Harlow Local Development Plan

Thank you for providing an opportunity for Essex County Council (ECC) to discuss its representations on the above Local Plan (LP) through the examination hearings process. This letter relates to the ECC representations referenced by Harlow Council (HC) as row / representation no. 12 (as referenced in the Statement of Common Ground table). This concerns the HC (and EFDC) LP approach to the Garden Town growth and in particular, that of Policies HGT1 (Development and Delivery of Garden Communities in the Harlow and Gilston Garden Town) and HS3 (Strategic Housing Site East of Harlow). ECC suggested alternative wording for Policy HGT1 (and its supporting text), that it understands is acceptable in principle to HC in some respects. I hope that ECC articulated the importance that it attaches to this matter through its representations, hearing statements and oral evidence. At the HLDP hearing session held on 29 March 2019, you noted the parties concerned (ECC, HC, & EFDC) were seeking agreement on this matter. I am not repeating the full text and detail of the ECC representations on this matter, since this has been provided previously to you by HC, alongside all other representations.

Some discussions have been undertaken between ECC and HC / EFDC that sought to resolve this issue but a substantial agreement could not be reached (regarding the descriptive term 'Garden Communities'). It was advised to you that the same issue was also considered and discussed at the HC Local Plan examination hearing session (on 21 March) where ECC made similar representations. As you will be aware, an EFDC participant at the HLDP hearing session on 29 March 2019 advised you that whilst EFDC might be willing to make a minor text change such as that proposed for paragraph 2.107 of its Local Plan, it would not be willing to accommodate or reflect that change in any of its specific Local Plan policies. Similarly, HC has agreed to make some changes to supporting text of its policies, which help to clarify the position and ECC welcomes and supports those. However, importantly, HC and EFDC have agreed that they do not intend to change the use of the expression 'Garden Communities' for the planned strategic developments. This position remains at odds with ECC's stated position. ECC understands that these changes are currently being compiled into a full schedule of proposed modifications, as you requested.

Consequently, whilst ECC welcomes the proposed amendments to paragraph 5.2 (supporting Policy HGT1), as agreed with HC, these do not meet the substantive point of ECC's representation fully, given the context of the more substantive unaltered Local Plan policies HGT1 and HS3. Given the remaining position of HC (and EFDC) on this matter, and an unwillingness to change the wording of these policies, ECC considers that it is unlikely that agreement will be able to be reached by the parties concerned. Commentary on the stance of both Councils is provided within Appendix 1 of the SoCG between HC and ECC, making clear that the matter could not be resolved by agreement (see document details below).

Concluding Comments

ECC has invested a considerable amount of time and effort in seeking to resolve its outstanding representations on the HLDP with HC officers, in line with the duty to co-operate. This work has been outlined in a Statement of Common Ground (SoCG) between ECC and HC, as published on 22 March 2019 (document reference EX0018). However, given the considerations outlined above, ECC needs to advise that its only option in this particular matter is to maintain its outstanding representation for the purposes of the HLDP examination. We therefore trust that you will give this representation and ECC's submissions due consideration in your deliberations on the HC LP and hope that if supporting the amendments outlined in ECC's representation (or a change to similar effect) that this will be reflected consistently in relevant policy wording that relates to the Garden Town developments (including Policies HGT1 and HS3).

If any queries or other matters arise in response to the contents of this letter, please contact me via the contact details provided above or below. A letter to explain this position has also been provided to the EFDC Local Plan examination inspector (dated 30 April).

Yours sincerely

Rich Cooke
Principal Spatial Planner, Planning Service

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