

## Schedule of Modifications

Due to insertions of new paragraphs, the paragraph numbers will subsequently change. These changes have not been indicated below. The paragraph numbers referred to below are the paragraph numbers found in the Pre-Submission version of the Local Plan.

Also, due to the insertion of new Policy PL5, the original Policy PL5 will become PL6, PL6 will become PL7 and so on, up to the end of the 'PL' chapter (Chapter 13). These changes have not been indicated below. The policy numbers referred to below are the policy numbers found in the Pre-Submission version of the Local Plan.

Section, Paragraph/Policy and Page Number <i>(Refer to Pre-Submission version of Local Plan)</i>	Changes to text <del>deletions struck through</del> • <u>additions underlined</u> <i>(Dots denote where the paragraph/policy continues before/after the text)</i>	Reason(s) for change
Whole document	<p>...Garden Town <del>Spatial</del><u>Vision</u> and <del>Design Charter</del><u>Guide</u>...</p> <p>...national <u>planning</u> policies...</p> <p>...<u>Strategic</u> Master Plan... <i>(where appropriate)</i>  ...<del>activities</del> <u>uses</u>... <i>(where appropriate)</i></p> <p><i>Typos and grammar corrections (some of these are shown in the rows below if they are also part of other changes)</i></p>	<p>To update document titles</p> <p>(Where appropriate) To clarify it is planning policies being referred to</p> <p>To correct terminology</p>
Background Pages i - iii	<i>Removed outdated consultation info (dates, etc.)</i>	To update
Chapter 1. Introduction		

<b>Section, Paragraph/Policy and Page Number</b> <i>(Refer to Pre-Submission version of Local Plan)</i>	<b>Changes to text</b> <del>deletions struck through</del> • <u>additions underlined</u> <i>(Dots denote where the paragraph/policy continues before/after the text)</i>	<b>Reason(s) for change</b>
Intro Para 1.1 Page 1	<p>The Harlow Local Development Plan (<u>usually</u> known as the “Local Plan” for brevity) sets out the long-term planning vision for the district and <del>aims to guide</del><u>s</u> future development across Harlow during the Local Plan period. <del>The Local Plan and</del> ensures that development in the district is sustainable and meets the needs of residents, businesses and visitors to the area. <del>Once it has been found sound and subsequently adopted, the</del> <del>new</del> Local Plan <del>will</del> supersede<u>s</u> the Adopted Replacement Harlow Local Plan (2006) <del>and will</del> <u>to</u> become<u>s</u> the basis upon which planning applications are determined. <u>The policies and proposals in the Essex Minerals Local Plan and the Essex and Southend-on-Sea Waste Local Plan are the basis upon which Minerals and Waste proposals are determined by Essex County Council, unless there are material considerations which indicate otherwise.</u></p>	<p>To improve clarity, update wording and correct terminology</p>
Intro New para after para 1.1 Page 1	<p><u>The Local Plan takes into consideration the economic, social and environmental conditions of the district. The preparation of the policies contained within it were informed by the Evidence Base which details the future housing, retail and employment needs of Harlow, together with identification of the necessary supporting infrastructure. All this is balanced against the need to protect key environmental assets. The strategic implications of the evidence were prepared and considered in collaboration with East Hertfordshire, Epping Forest and Uttlesford District Councils, and Essex and Hertfordshire County Councils, in accordance with the obligations of the Duty to Co-operate as set out in the Localism Act 2011. More information on the Duty to Co-operate can be found later in this chapter.</u></p>	<p>To update</p>

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Intro Para 1.2 Page 1	<p>..... A <u>The</u> Policies Map accompanies the Local Plan, <del>which</del> <u>and</u> illustrates the policy themes, areas where existing land uses will be protected and areas <del>for</del> <u>where</u> growth and regeneration <u>have been identified</u>. The Local Plan must be read as a whole and alongside national policies. <del>The Evidence Base, which contains studies such as the Retail Study and Employment Land Review, provides evidence to justify the policies in the Local Plan.</del></p>	To reorder; update
Intro Para 1.3 Page 1	<p>..... the National Planning Policy Framework (NPPF) <u>(2012)<sup>2</sup></u> and Planning Practice Guidance.</p>	To add info
New footnote to accompany Para 1.3 Page 1	<p><u>Paragraph 214 of the NPPF (2019) states “The policies in the previous Framework will apply for the purpose of examining plans, where those plans are submitted on or before 24 January 2019”. The policies of the 2012 NPPF, therefore, applied to the examination of the Harlow Local Plan, which was submitted in October 2018.</u></p>	To add info
Footnote Page 1	<p><del>Proposals relating to Minerals and Waste are determined by Essex County Council against the policies and proposals in their Minerals and Waste Local Plan, unless there are material considerations which indicate otherwise.</del></p>	Info added to paragraph above
Intro Para 1.6 Page 2	<p><del>Once adopted, the Local Plan will replace the Adopted Replacement Harlow Local Plan (2006). It</del> <u>The Local Plan</u> will...</p>	To update

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Intro Para 1.7 Page 2	<p><u>In Spring 2019</u>, <del>T</del>he Local Plan <del>will be</del> <u>was</u> examined by an independent Inspector to assess whether it <del>has been</del> <u>was</u> prepared in accordance with the Duty to Co-operate, legal and procedural requirements, and whether it is sound.</p> <p><del>According to national policies, a Local Plan is considered sound if it meets four tests:</del></p> <ul style="list-style-type: none"> <li><del>• 1. Is it positively prepared? It should be based upon a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;</del></li> <li><del>• 2. Is it justified? It should be the most appropriate strategy, when considered against the reasonable alternatives, based upon proportionate evidence</del></li> <li><del>• 3. Is it effective? It should be deliverable over the Local Plan period and based upon effective joint working on cross boundary strategic priorities</del></li> <li><del>• 4. Is it consistent with national policy? It should enable the delivery of sustainable development in accordance with national policies.</del></li> </ul>	To update

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Intro New paras after para 1.17 Page 4	<u>Pre-Submission Publication (2018)</u>  <u>In 2018, the Council published the Pre-Submission Publication version of the emerging Harlow Local Development Plan, which was the final version before it was submitted for Examination.</u>  <u>The Council invited comments on whether the Local Plan meets the four tests of soundness, as set out by national planning policies. In order to be found sound at the Examination, the Local Plan had to be prepared using strong evidence: identify deliverable strategic development; sufficiently plan for Harlow's housing, infrastructure and employment needs; sufficiently protect the district's environmental assets; and be consistent with national planning policies.</u>  <u>The responses received informed a number of minor changes which were proposed by the Council and submitted – along with the Local Plan, Policies Map, Evidence Base and other accompanying documents – to the Secretary of State on 19 October 2018. The Examination subsequently took place in Spring 2019.</u>	To update
Next Steps Para 1.18 Page 4	<b>Next Steps</b> <del>Following the completion of these consultations, and in accordance with Government guidance, as set out in the NPPF and Planning Practice Guidance, the Council has prepared a Local Plan that has taken into consideration the economic, social and environmental conditions of the district. This has been informed by technical evidence that indicates the future housing, retail and employment needs, together with the identification of the necessary supporting infrastructure, balanced against the need to protect key environmental assets. The strategic implications of the evidence has been prepared and considered in collaboration with the adjoining District Councils of East Hertfordshire, Epping Forest and Uttlesford, in accordance with the obligations of the Duty to Co-operate as set out in the Localism Act 2011.</del>	Deleted to allow update of wording (some wording merged with new paragraphs above)

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Policies Map info Para 1.21 Page 5	The Policies Map also indicated the boundaries and locations of <u>some of</u> Harlow's .....including Conservation Areas, <del>listed buildings</del> , Scheduled Monuments and <del>areas of archaeological value</del> <u>a Registered Park and Garden</u> .	To correct terminology and reflect the fact the not all of Harlow's heritage assets e.g. listed buildings
Policies Map info Para 1.23 Page 5	Housing <del>allocations</del> <u>sites</u> , including the Strategic Housing Site East of Harlow ( <u>part of</u> a new Garden Community), are <del>shown</del> <u>allocated</u> on the Policies Map.....	To correct terminology
Policies Map info Para 1.24 Page 5	Prosperity, <u>Lifestyles and Infrastructure</u>  The Policies Map outlines the hierarchy of retail centres across the district including Neighbourhood Centres and <del>the</del> Hatches. <del>It should be noted that a</del> <u>A</u> separate Area Action Plan is being prepared for Harlow Town Centre <del>that</del> <u>which</u> will be accompanied by a <del>detailed inset map, which will show</del> <u>Policies Map showing</u> major regeneration.....	To correct terminology; tidy wording
Policies Map info Para 1.26 Page 6	Where appropriate <del>and where specific details are known at the time of publication</del> , the locations of the key infrastructure needed to support development <del>will be shown</del> <u>are identified</u> on the Policies Map.	To update; correct terminology
SA info Para 1.28 Page 6	The Local Plan has been subject to a Sustainability Appraisal (SA) which has assessed the potential economic, environmental and social effects of the Local Plan. <del>This is also subject to consultation and can be found on the Council's website.</del> In addition a Habitats Regulation Assessment and Equalities Impact Assessment have been undertaken.	To update

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Duty to Co-operate Para 1.31 Page 6	<p>.....Conservation to ensure no adverse effects on <u>the</u> integrity of the SAC. <u>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 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. In the interim period, 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 the Harlow district), if necessary, to ensure the implementation of the Strategy and avoidance of adverse effects on the integrity of the SAC.</u></p>	To clarify
Assessing apps info Para 1.36 Page 7	<p>Upon receipt of a valid planning application, the proposed development will be <del>assessed on</del> <u>determined using</u> the relevant <del>Strategic policies and Development Management policies in the</del> Local Plan <u>policies</u>. The <u>Essex</u> Minerals Local Plan and the <u>Essex and Southend-on-Sea</u> <del>Replacement</del> Waste Local Plan, <del>prepared</del> <u>adopted</u> by Essex County Council and Southend-on-Sea Borough Council, are the relevant Local Development Plans in respect of minerals and waste matters in <del>the district Harlow</del>. The Harlow Local Plan does not duplicate the Minerals <u>Local</u> Plan or Waste <u>Local</u> Plan. <del>The Furthermore, the</del> policies in <del>this document the Harlow Local Plan</del> do not repeat national guidance or policy<u>ies</u>. <del>Therefore, where a local</del> policy <u>in the Local Plan</u> is absent or silent, it is because adequate national <u>planning</u> policies exist.</p>	To correct terminology; tidy wording

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Chapter 2. Spatial Context		
Population Profile Para 2.13 Page 13	..... There are some variances between different parts of Harlow, with the east being less deprived than areas to the west and south. <u>Furthermore, the district's health profile is higher than the England averages in some respects, such as smoking rates, alcohol related hospital admissions and obesity. Physical activity is also low and therefore there are overall health and wellbeing issues across the town.</u>	To provide additional wording on health and wellbeing in the Local Plan
Transport and Accessibility Para 2.33 Page 16	.....There is also a need to increase the frequency of the bus services to the industrial estates; to provide more opportunities to travel <u>sustainably within and</u> in and out of Harlow <del>and not just within</del> ; to increase the provision of Sunday services; and to improve journey times for buses <del>by decreasing congestion on Harlow's roads.</del>	To ensure travel is sustainable and to consider the fact that there are other measures to improve bus journey times and not just the reduction in congestion
Transport and Accessibility Para 2.34 Page 16	..... There are also aspirations for a modal shift in travel, meaning 60% of <u>travel in the new Garden Town Communities and 50% in the existing area of Harlow</u> would be by sustainable modes of transport. Sustainable transport matters (including walking, cycling and public transport) <u>and reducing the need to travel</u> are, therefore, important for the successful future growth of Harlow.	To recognise that reducing the need to travel is also important to improving sustainability
GI & natural environment Para 2.35 Page 16-17	Green Infrastructure is multi-functional <u>natural and man-made</u> urban and rural green space, including parks, playing fields, woodlands, allotments, <del>and</del> <u>wildlife corridors, rivers, canals and other bodies of water</u> .....	To clarify and strengthen Green Infrastructure definition
Historic Environment Para 2.38 Page 17	.....The district also currently contains 168 listed buildings, 26 locally listed buildings, <u>a Registered Park and Garden</u> and several Scheduled Monuments.	Omission of the district's Registered Park and Garden from the Local Plan



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Issues and Challenges Para 2.44 Page 18	.....Residential growth, <u>located</u> , managed and phased appropriately, will help to provide the investment needed to deliver infrastructure requirements including improvements to <u>the walking and cycling network and</u> 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.	To recognise that the location of development and sustainable transport modes are also important challenges
Issues and Challenges Para 2.45 Page 18	Significant <u>behavioural</u> change is required in the population of Harlow in order to deliver the enhancements needed to ensure Harlow is <u>an attractive</u> , sustainable <u>and healthy</u> town for residents, businesses and visitors.	To clarify that behavioural change will also improve health and sustainability and resolve challenges in the town
Chapter 3. Spatial Vision and Local Plan Strategic Objectives		
Vision, 2 <sup>nd</sup> para Page 20	.....Harlow's residents will be more active, taking advantage of Harlow's excellent sporting, leisure and cultural facilities. <u>The overall health and wellbeing of Harlow's residents will be improved.</u> .....	To provide additional wording on health and wellbeing in the Local Plan
Vision, final para Page 21	.....New development will minimise the use of global resources, support the development of good waste management, <del>and</del> mitigate and adapt to the effects of climate change, <u>and ensure a net gain in biodiversity is delivered</u> .....	To be more NPPF compliant

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Fig. 3.3 (Local Plan Strategic Objectives) Page 22 Fig. 3.3 (Local Plan Strategic Objectives) Page 22 Fig. 3.3 (Local Plan Strategic Objectives) Page 22	<p>.....11.<del>To p</del> Provide and enhance sporting, leisure, recreational facilities and cultural opportunities in the district</p> <p><u>12. Provide opportunities to improve the overall health and wellbeing of Harlow's residents</u> .....</p> <p>.....<del>14</del><u>3</u>. Reduce the need to travel by vehicle, <del>by ensuring</del> <u>and ensure</u> new development is sustainably located <u>and/or</u> accessible by sustainable <u>and innovative</u> modes of transport.....</p> <p>.....<del>14</del><u>15</u>. Improve transport links, particularly for sustainable modes of transport, to <del>community</del> <u>access all facilities and jobs</u>. .....</p>	<p>To include an objective on improving health and wellbeing in Harlow</p> <p>To highlight future innovation in transport</p> <p>To clarify the importance of improving links to all facilities including access to jobs</p>
Chapter 4. Spatial Development Strategy		
Placeshaping info Para 4.5 Page 28	New development will incorporate sufficient open space and Green Infrastructure, protect and integrate existing landscape assets, and enhance, retain and protect biodiverse habitats <u>to ensure a net gain in biodiversity is delivered</u> .....	To be more NPPF compliant
Placeshaping info Para 4.7 Page 28	New development must also have regard to <u>The Town and Country Planning Association's Garden City Principles</u> , the Council's Design Guide and the Harlow and Gilston Garden Town <del>Spatial</del> Vision and Design <del>Charter</del> <u>Guide</u> ..... .....The historic environment, including listed buildings, <u>C</u> onservation <u>A</u> reas, Scheduled Monuments <u>and</u> Registered Parks <u>and</u> Gardens <del>and areas of architectural significance</del> , will be conserved, protected and <del>managed</del> <u>enhanced</u> .	To recognise the importance of the TCPA Garden City Principles, to be more NPPF compliant and to update titles of documents

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Prosperity info Para 4.15 Page 30	It has been identified that approximately 18 to 20ha of additional employment <del>floorspace</del> <u>land</u> is required.....	“Land” is a more accurate descriptor than “floorspace” in this instance
Lifestyles info Para 4.20 Page 31	.....This includes leisure and sporting facilities, playing pitches, playgrounds, allotments, <del>and</del> community halls <u>and places of worship</u> which will help reduce deprivation levels and promote healthy and active lifestyles.	To add reference to religious uses
Lifestyles info New paras after para 4.23 Page 31	<u>The policies in the Local Plan, as a whole, aim to improve the overall health and wellbeing of residents by ensuring that there is access to jobs and education opportunities; improving infrastructure for more sustainable, active and healthy transport choices; protecting and enhancing the natural and historic environment for the benefits of residents; providing leisure, recreation, sporting and retail facilities; and creating well-designed developments.</u>  <u>The Local Plan will ensure there is sufficient health infrastructure in place to support new development. To support these objectives, the Harlow Health and Wellbeing Strategy and the Essex Joint Health and Wellbeing Strategy will be a material consideration in the determination of planning applications.</u>	To provide additional wording on health and wellbeing in the Local Plan
Infrastructure info Para 4.25 Page 31	.....Improvements will be made to the local highway network, <del>and to</del> the <u>footway and cycleway networks</u> and public transport to improve connections within Harlow and to areas outside the district.....	To add reference to improvements to cycle and footway network

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Fig. 4.1 (Key Diagram – Legend) Page 33	<u>Indicative Location of</u> <del>A</del> <u>n</u> new allotment	To clarify that the location of the new allotment provision on the Strategic Housing Site East of Harlow is currently indicative and not definite
Fig. 4.1 (Key Diagram) Page 33	<i>Modified the Indicative Sustainable Transport Corridor route</i>	To update the route to ensure it reflects the revised indicative route in the Garden Town draft Transport Strategy
Fig. 4.1 (Key Diagram) Page 33	<i>Modified the Existing Employment Areas</i>	To remove Pearson from the employment area due to its conversion to residential use
Fig. 4.1 (Key Diagram) Page 33	<i>Included 'New education facility' annotation</i>	To reflect the need for new education facilities in Harlow in the Local Plan period
Chapter 5. Development and Delivery of Garden Communities in Harlow and Gilston Garden Town		
Chapter 5 heading	5. <u>DEVELOPMENT AND DELIVERY OF GARDEN COMMUNITIES IN THE HARLOW AND GILSTON GARDEN TOWN</u>	To add full title of chapter, which had previously become truncated in error
Chapter intro New para after para 5.1 Page 36	<u>Harlow and Gilston Garden Town comprises the whole of Harlow, together with four new Garden Town Communities planned on Garden City principles, as follows:</u> • <u>South of Harlow (Latton Priory);</u> • <u>West of Harlow (Water Lane Area);</u> • <u>East of Harlow; and</u> • <u>Gilston Area (including seven villages).</u>	To improve clarity and reflect the fact that the Garden Town also includes the urban area of Harlow and the Garden Communities need to take this into account

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Chapter intro New para after para 5.2 Page 36	<u>The four Garden Town Communities will be well connected and not considered in isolation to the urban fabric of Harlow. The master plan processes for these sites must integrate with and regenerate neighbouring areas of Harlow.</u>	To improve clarity and reflect the fact that the Garden Town also includes the urban area of Harlow and the Garden Communities need to take this into account
Local Plan Strategic Objectives Para 5.7 Page 37	<p>.....Objective 11 - <del>To p</del> Provide and enhance sporting, leisure, recreational facilities and cultural opportunities in the district</p> <p><u>Objective 12 - Provide opportunities to improve the overall health and well-being of Harlow's residents</u></p> <p>Objective 13-2 - Ensure that development is fully supported by providing the necessary infrastructure including education, healthcare and other community facilities</p> <p>Objective 14-3 - Reduce the need to travel by vehicle <del>by ensuring</del> and <u>ensure</u> new development is sustainably located <u>and</u>/or accessible by sustainable <u>and innovative</u> modes of transport</p> <p>Objective 15-4- Improve transport links, particularly for sustainable modes of transport, to <del>community</del> <u>access all</u> facilities <u>and jobs</u></p>	To add additional objective on health and wellbeing thereby changing subsequent objective numbering. Further clarity added to objectives
Policy HGT1 Page 38	<p>.....(d) Gilston Area <u>(including seven villages)</u> - delivering approximately.....</p> <p>.....2. <u>The Council will work with the Harlow and Gilston Garden Town partners to deliver the principles of this policy for all four Garden Town Communities.</u> The design, development and phased delivery <del>of each Garden Town Community of the Strategic Housing Site East of Harlow. as allocated on the Policies Map.</del> must accord with.....</p>	

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	<p>....(c) .....including <u>heritage assets</u>. Green Infrastructure, the public realm, community facilities.....</p> <p>....(d) a Strategic Master Plan must be developed <del>for each of the Garden Town Communities</del> in <del>accordance</del> <u>general conformity</u> with the Harlow and Gilston Garden Town <del>Spatial</del> Vision and Design <del>Charter</del> <u>Guide</u> .....</p> <p>....(e) .....be consistent with and adhere to <del>the</del> <u>any</u> relevant Design Codes;</p> <p>....(f).....with the proposed development to mitigate any impacts <del>of the new Garden Town Communities</del>, to meet the.....</p> <p>....(i).....accessible and safe transport system which <u>reduces single-occupancy car use and</u> maximises the use.....and the new Garden Town Community<u>ies</u>;</p> <p>.....(l) create distinctive environments which relate to the surrounding area <del>and</del> <u>protect or enhance</u> the natural and historic landscapes, <del>and</del> systems <u>and wider historic environment</u>, Green Infrastructure and biodiversity;</p> <p><u>(m) a Heritage Impact Assessment will be required to inform the design of the Garden Town Community to ensure heritage assets within and surrounding the site are conserved or enhanced and the proposed development will not cause harm to the significance of a heritage asset or its setting, unless the public benefits of the proposed development considerably outweigh any harm to the significance or special interest of the heritage asset in question;.....</u></p> <p><u>.....(p) key transport interventions (such as M11 J7a and provision of sustainable</u></p>	<p>To reflect Statements of Common Ground with Essex County Council and Historic England and to ensure consistency with Epping Forest District Council's equivalent Garden Town policies. The changes also ensure that the Policy applies directly to the Strategic Site East of Harlow, the only Garden Community within Harlow</p>

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	<u>transport (providing viable alternatives to the private car) will be required as prerequisites of this development being occupied. Measures to ensure future upkeep/maintenance of sustainable transport provision will be required.</u>	
HGT1 Implementation Para 5.15 Page 40	.....to provide an overarching spatial vision <del>across each Community</del> and a design <del>charter</del> <u>guide for each Community</u> that will inform.....	To update; improve clarity
HGT1 Implementation Para 5.16 Page 41	.....Aspirations include a modal travel shift <u>meaning towards 60% by sustainable modes of transport of travel in the new Garden Communities and 50% in the existing area of Harlow would be by sustainable modes of transport.</u>	To reflect the objectives in the Harlow and Gilston Garden Town draft Transport Strategy
HGT1 Implementation Para 5.21 Page 42	..... <del>The Councils will seek to adopt the Strategic Master Plans as Supplementary Planning Documents (SPDs).</del>	Repeats a later sentence in para 5.22
HGT1 Implementation Para 5.24 Page 42	.....The developments <del>also provide opportunities to</del> <u>should</u> promote high environmental standards in terms of energy efficiency, <u>construction quality</u> , design and low-carbon technologies, and set <del>an example</del> <u>a high performance benchmark</u> for future major development.	To reflect advice received from BRE on ensuring the sustainability of policies; ensure consistency with other work, including BRE work, carried out for each local authority in the Garden Town
HGT1 Implementation Para 5.27 Page 44	.....The development is required to provide community facilities including Early Years facilities, <del>a two form entry primary school and</del> <u>two sites of at least 2.1ha and 2.9ha in area for primary school provision and at least 10ha of land in addition to</u> appropriate contributions <del>(including the provision of land)</del> towards a new secondary school.....	To clarify in regards to the education position for the entire Garden Community East of Harlow in the Garden Town, not just the Harlow portion of the site



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HGT1 Implementation Para 5.28 Page 44	<p>..... These include <del>works to widen the B183 Gilden Way, a left turn slip road from the new M11 Junction 7a, a link road approach to the Strategic Housing Site East of Harlow northern access road, and linkages into walking and off-road cycle networks</del> <u>the provision of direct bus/walk/cycle access and linkage to/through the Newhall site as part of the Sustainable Transport Corridor improvements (to be consistent with the mitigation terms of the planning permission granted for the Newhall development). Linkages into other walking and off-road cycle networks will be required.</u> In addition to Epping Forest's access requirement, Harlow will require the provision of an additional access roads to the south <del>unless it can be shown that a third access is not required.</del> <u>Suitable highway improvements will need to be agreed overall with Essex County Council as the Highway Authority.</u>.....</p>	<p>To reflect the transport requirements required for the Strategic Site East of Harlow and to reflect changes made to Epping Forest District Council's equivalent Garden Town policies/wording</p>
HGT1 Implementation Para 5.29 Page 44	<p>..... a new <del>two-form-entry</del> <u>site of at least 2.1ha in area for a</u> primary school, and <u>at least 10ha of land in addition to</u> appropriate.....</p>	<p>To reflect changes made to Epping Forest District Council's equivalent Garden Town policies/wording</p>
HGT1 Implementation Para 5.32 Page 44	<p>.....a new <del>two-form-entry</del> <u>site of at least 2.5ha in area for a</u> primary school.....</p>	<p>To reflect changes made to Epping Forest District Council's equivalent Garden Town policies/wording</p>



Section, Paragraph/Policy and Page Number <i>(Refer to Pre-Submission version of Local Plan)</i>	Changes to text <del>deletions struck through</del> • <u>additions underlined</u> <i>(Dots denote where the paragraph/policy continues before/after the text)</i>	Reason(s) for change
HGT1 Implementation Para 5.39 Page 45	<del>Two potential sites for relocation of Princess Alexandra Hospital are currently being considered through a Strategic Outline Business Case: one in the Gilston area to the north of Harlow, and one at land to the east of Harlow within the Epping Forest District. In March 2019, the PAH Board approved the recommended preferred way forward for the provision of a new hospital. This option comprises the development of a new state of the art local acute hospital. The hospital is to be located on approximately 12ha of greenfield land within the Epping Forest portion of the East of Harlow Garden Town Community.</del>	To update the latest position on the possible relocation of Princess Alexandra Hospital including the preferred location
Chapter 6. Promoting Sustainable Development		
Local Plan Strategic Objectives Para 6.4 Page 48	.....Objective <del>43</del> <u>14</u> - Reduce the need to travel by vehicle <del>by ensuring new</del> <u>and ensure new</u> development is sustainably located <u>and</u> /or accessible by sustainable <u>and innovative</u> modes of transport	To clarify the objectives and correct numbering
Policy SD1 Page 49	.....Where there are no policies specifically relevant to the proposed development <u>or the relevant policies are out-of-date</u> , it will normally be supported, unless material considerations indicate otherwise and/or either of the following apply:.....	To be more NPPF compliant
Chapter 7. Housing Strategy and Growth Locations		

<b>Section, Paragraph/Policy and Page Number</b> <i>(Refer to Pre-Submission version of Local Plan)</i>	<b>Changes to text</b> <del>deletions struck through</del> • <u>additions underlined</u> <i>(Dots denote where the paragraph/policy continues before/after the text)</i>	<b>Reason(s) for change</b>
Local Plan Strategic Objectives Para 7.5 Page 52	..... <u>Objective 12 - Provide opportunities to improve the overall health and wellbeing of Harlow's residents</u>	To add the new health and wellbeing objective to Chapter 7
HS1 Justification Para 7.6 Page 53	.....an additional 1,800 dwellings are <del>provided</del> <u>identified</u> , giving a total <u>requirement</u> of 9,200 dwellings. Since the start of the Local Plan period, <del>5,558</del> 7,159 dwellings have been <del>granted</del> <u>completed or have</u> planning permission, which have contributed <del>towards meeting this</del> <u>to the</u> housing requirement. <del>This leaves sites for 1,042 dwellings to be identified</del> <u>The Strategic Housing Site East of Harlow and the allocations in Policy HS2 identify a supply of 10,791 dwellings, which allows for the non-implementation of sites over the Local Plan period.</u> ....	To update figures; clarify
HS1 Justification Fig 7.1 Page 53	Completions at 31 March <del>2017</del> <u>2019</u> <del>1,436</del> <u>2,462</u> Commitments at 31 March <del>2017</del> <u>2019</u> <del>4,122</del> <u>4,697</u> Strategic Housing Site East of Harlow 2,600 Additional requirement <del>1,042</del> <u>1,032</u> TOTAL SUPPLY <del>9,200</del> <u>10,791</u>	To update figures

<b>Section, Paragraph/Policy and Page Number</b> <i>(Refer to Pre-Submission version of Local Plan)</i>	<b>Changes to text</b> <del>deletions struck through</del> • <u>additions underlined</u> <i>(Dots denote where the paragraph/policy continues before/after the text)</i>	<b>Reason(s) for change</b>
HS1 Implementation Para 7.24 Page 55	<p>..... In addition, a buffer of 5% or 20% should be added to the five-year requirement if there has been a persistent<del>a</del> undersupply of dwellings in the past. Based on the 9,200 dwelling requirement annualised to 418 dwellings per annum <u>over the Local Plan period, 25093,345</u> dwellings should have been completed by March 2017<del>9</del>. <del>In reality</del> However, there were <del>1,436</del> <u>2,462</u> completions <del>(239 dwellings per annum)</del> achieved during this period, resulting in a shortfall of <del>1,073</del> <u>883</u> dwellings on the requirement. This shortfall indicates a <u>persistent under-supply and a 20% buffer</u>, <del>of 633 dwellings,</del> should be provided <u>to meet the requirements of national planning policies</u>. <del>Therefore, additional housing sites that can be completed in the five years need to be brought forward in order to meet the five-year housing requirement calculation (see Appendices).</del></p>	To update figures; clarify
HS1 Implementation New paras after para 7.24 Page 56	<p><u>National planning policies require a five-year supply of deliverable dwellings. The housing requirement of 9,200 dwellings (418 dwellings per annum) over the Local Plan period equates to 4.5 years of housing land supply with a 20% buffer.</u></p>	To clarify as to the requirement and need for a stepped trajectory to meet 5 years' worth of deliverable dwellings as required by NPPF

<b>Section, Paragraph/Policy and Page Number</b> <i>(Refer to Pre-Submission version of Local Plan)</i>	<b>Changes to text</b> <del>deletions struck through</del> • <u>additions underlined</u> <i>(Dots denote where the paragraph/policy continues before/after the text)</i>	<b>Reason(s) for change</b>
HS1 Implementation New paras after para 7.24 Page 56 (continued)	<p><u>To ensure that a five-year supply is achieved, a stepped trajectory is proposed for the Local Plan period. The need for a stepped trajectory arises because a significant number of homes will be delivered on large residential sites at Newhall, the Strategic Housing Site East of Harlow and at the Princess Alexandra Hospital, which will be delivered in the later part of the Local Plan period.</u></p> <p><u>As Harlow is a former New Town with tightly-drawn boundaries and a planned nature, with distinctive Green Wedges which are uniquely important to the district's distinctive green character, there is little scope to deliver housing sites to fulfil a five-year housing land supply as may be the case in a large district.</u></p> <p><u>A target of 361 dwellings per annum has, therefore, been identified for the period of 2011/12 to 2023/24. Using this figure to calculate under-supply from previous years and applying a 20% buffer will deliver a six-year supply of deliverable dwellings to comply with national planning policies. From 2024/25 to the end of the Local Plan period, an increased target of 501 dwellings per annum has been set to meet the 9,200 dwelling requirement (see Appendices 1 and 2 for the supply calculation and trajectory.</u></p>	<p>To clarify as to the requirement and need for a stepped trajectory to meet 5 years' worth of deliverable dwellings as required by NPPF</p>

Section, Paragraph/Policy and Page Number <i>(Refer to Pre-Submission version of Local Plan)</i>	Changes to text <b>deletions struck through</b> • <b>additions underlined</b> <i>(Dots denote where the paragraph/policy continues before/after the text)</i>	Reason(s) for change												
HS1 Implementation Para 7.26 Page 56	There have been <del>1,436</del> <u>2,462</u> dwelling completions since the start of the Local Plan period (1 April 2011). There is planning permission for <del>4,122</del> <u>4,697</u> dwellings (as at 31 March 2017 <sup>9</sup> ) which contributes to the housing supply. The Local Plan is, therefore, required to allocate at least <del>3,700</del> <u>2,041</u> dwellings. The housing trajectory (see Appendices <u>1 and 2</u> ) illustrates the expected rate of housing delivery for the Local Plan period.	To update figures												
Policy HS2 Page 57	<p>.....</p> <table border="1"> <thead> <tr> <th>R E F.</th><th>LOCATION</th><th>DWELLING CAPACITY</th></tr> </thead> <tbody> <tr> <td>1</td><td>Princess Alexandra Hospital</td><td><del>650</del><u>550</u></td></tr> <tr> <td>4</td><td><del>Lister House,</del> Staple Tye Mews, Staple Tye Depot and The Gateway Nursery</td><td><del>42</del><u>30</u></td></tr> <tr> <td>9</td><td>Land east of 144-154</td><td><del>23</del><u>20</u></td></tr> </tbody> </table>	R E F.	LOCATION	DWELLING CAPACITY	1	Princess Alexandra Hospital	<del>650</del> <u>550</u>	4	<del>Lister House,</del> Staple Tye Mews, Staple Tye Depot and The Gateway Nursery	<del>42</del> <u>30</u>	9	Land east of 144-154	<del>23</del> <u>20</u>	To update figures and name of ref. 4
R E F.	LOCATION	DWELLING CAPACITY												
1	Princess Alexandra Hospital	<del>650</del> <u>550</u>												
4	<del>Lister House,</del> Staple Tye Mews, Staple Tye Depot and The Gateway Nursery	<del>42</del> <u>30</u>												
9	Land east of 144-154	<del>23</del> <u>20</u>												
HS2 Justification Para 7.31 Page 57	.....There have been <del>1,436</del> <u>2,462</u> dwellings completed during the period of 1 April 2011 to 31 March 2017 <sup>9</sup> and an additional <del>4,122</del> <u>4,697</u> dwellings have planning permission. This leaves a residual requirement of <del>3,642</del> <u>2,041</u> dwellings to be provided.	To update figures												

<b>Section, Paragraph/Policy and Page Number</b> <i>(Refer to Pre-Submission version of Local Plan)</i>	<b>Changes to text</b> <b><del>deletions struck through</del> • <u>additions underlined</u></b> <i>(Dots denote where the paragraph/policy continues before/after the text)</i>	<b>Reason(s) for change</b>
HS2 Justification Para 7.32 Page 58	<p>.... allocated in Policy HS2 for <del>1,147</del> <u>1,032</u> dwellings provide a total of <del>3,747</del> <u>3,623</u> dwellings. This is <del>105</del> <u>1,582</u> dwellings more than the residual requirement of <del>3,642</del> <u>2,041</u>.....</p>	To update figures

<b>Section, Paragraph/Policy and Page Number</b> <i>(Refer to Pre-Submission version of Local Plan)</i>	<b>Changes to text</b> <del>deletions struck through</del> • <u>additions underlined</u> <i>(Dots denote where the paragraph/policy continues before/after the text)</i>	<b>Reason(s) for change</b>
<p>Policy HS3 Page 58-59</p>	<p>.... Developers must produce a <u>Strategic Master Plan</u> <del>based on</del> <u>in general conformity with</u> the <u>Harlow and Gilston Garden Town Charter Design Guide and</u> in partnership with....</p> <p>.....</p> <p>.....of the Harlow and Gilston Garden Town <del>Spatial</del> Vision and Design <del>Charter Guide</del>, including the provision of Green Wedges and Green Fingers (incorporating public <u>natural/semi-natural</u> open space) and.....</p> <p>.....</p> <p><u>(c) include the provision of direct walk/cycle/bus access and link to the Newhall site as part of the Sustainable Transport Corridor;</u></p> <p><u>(d) provide footpaths, cycleways and bridleways within the development and link them to the existing Harlow network and adjacent networks in the Epping Forest District;</u></p> <p>) provide <del>necessary</del> <u>community</u> infrastructure, including, but not limited to:-</p> <p><u>a new primary school of at least 2.9ha site area;</u></p> <p><u>in addition to any necessary contributions, the provision of land for at least 10ha for a secondary school if required by the Strategic Master Plan;</u></p> <p><u>child care and Early Years;</u></p> <p><u>youth services;</u></p> <p><u>healthcare facilities;</u></p> <p><u>multi-purpose community space and facilities;</u></p> <p><u>an allotment;</u></p> <p><u>indoor and outdoor sports facilities, which may be shared-use;</u></p> <p><u>neighbourhood equipped areas for play and locally equipped areas for play.</u></p> <p><del>health centres and education facilities , as set out in the Infrastructure Delivery Plan (IDP);</del></p>	<p>The changes reflect Statements of Common Ground with Essex County Council and Historic England. It also reflects changes made to Epping Forest District Council's equivalent policies for the East of Harlow Garden Community. The changes also add further clarity.</p>

<b>Section, Paragraph/Policy and Page Number</b> <i>(Refer to Pre-Submission version of Local Plan)</i>	<b>Changes to text</b> <del>deletions struck through</del> • <u>additions underlined</u> <i>(Dots denote where the paragraph/policy continues before/after the text)</i>	<b>Reason(s) for change</b>
<p>Policy HS3 Page 58-59 (continued)</p>	<p><del>(d) — provide footpaths, cycleways and bridleways within the development and link them to the existing Harlow network</del></p> <p><del>(e) provide indoor and outdoor sports facilities, which may be shared use, neighbourhood equipped areas for play and locally equipped areas for play;</del></p> <p>(f) provide <del>for</del> appropriate local retail facilities, similar to Neighbourhood Centres (incorporating an element of employment use) and Hatches elsewhere in Harlow;</p> <p><del>(g) — provide for appropriate community facilities as set out in the IDP such as allotment provision, youth services and libraries;</del></p> <p><del>(h)</del> <u>be designed in a way which conserves and where appropriate enhances heritage assets and their settings, including listed buildings, Scheduled Monuments, Registered Parks and Gardens and Conservation Areas;</u></p> <p>....</p> <p><u>(i) provide satisfactory water supply and waste water network infrastructure for occupants; and</u></p> <p>....</p> <p>Any application for development on the site in the form of individual or part/phased development <del>will be assessed on</del> <u>should be in general conformity with a Strategic Master Plan which has been endorsed by the Council as well as</u> the <u>Harlow and Gilston</u> Garden Town <del>Charter</del> <u>Design Guide</u>.</p> <p>Developers will be expected to contribute towards the strategic highway and other infrastructure requirements, <del>proportionate with the impact that the development would have on them</del> <u>as set out in the Infrastructure Delivery Plan.</u></p>	<p>The changes reflect Statements of Common Ground with Essex County Council and Historic England. It also reflects changes made to Epping Forest District Council's equivalent policies for the East of Harlow Garden Community. The changes also add further clarity.</p>



Section, Paragraph/Policy and Page Number <i>(Refer to Pre-Submission version of Local Plan)</i>	Changes to text <del>deletions struck through</del> • <u>additions underlined</u> <i>(Dots denote where the paragraph/policy continues before/after the text)</i>	Reason(s) for change
HS3 Justification Para 7.35 Page 59	The Strategic Housing Site East of Harlow was identified as part of a joint study <u>(the Harlow Strategic Site Assessment, 2016)</u> with the Housing Market Area (HMA) districts.....	To add title of document
HS3 Implementation Para 7.43 Page 60	Developers will be required to produce a master plan <del>based on</del> <u>in general conformity with</u> the <u>Harlow and Gilston</u> Garden Town <del>Charter</del> <u>Design Guide and</u> in partnership with....	For clarity and use the correct document title
HS3 Implementation New para after para 7.43 Page 60	<u>The Strategic Housing Site East of Harlow forms part of a wider Garden Town Community, the northern part of which has been allocated in the Epping Forest Development Plan for 750 dwellings, which will be subject to the preparation of a Strategic Master Plan. With regards to part e(ii) of Policy HS3, if the Strategic Master Plan indicates that the secondary school is not required within the Harlow district part of the site, then consideration will be given to appropriate alternative development and associated infrastructure having regard to the policies in the Local Plan, and the balance of uses within the Strategic Site as a whole.</u>	To reflect changes being proposed by Epping Forest District Council to their equivalent Policy for the East of Harlow Garden Town Community.
Chapter 8. Economic Development and Prosperity Strategy		
Local Plan Strategic Objectives Para 8.4 Page 64	<u>.....Objective 12 - Provide opportunities to improve the overall health and wellbeing of Harlow's residents</u>	To add in the new health and wellbeing objective to Chapter 8

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Policy ED1 Page 65	Future Employment <del>Floorspace</del> <u>Land</u>  .... up to 18.8ha of B1 uses <del>will be delivered</del> <u>are allocated</u> at Harlow Business Park....  ....A further 2.2ha of land <del>will be delivered</del> <u>is allocated</u> for employment uses at Templefields....	“Land” is a more accurate descriptor than “floorspace” in this instance  To correct wording/terminology
ED1 Justification Para 8.7 Page 65	.....expansion of Princess Alexandra Hospital will strengthen these growth sectors. <u>London Road, which forms part of the Enterprise Zone, has been specifically identified to facilitate the Research and Development sector of the local economy. Warehouse and general industrial uses on this site will, therefore, be resisted.</u>	To clarify the role and uses expected to be developed and delivered on the Enterprise Zone at London Road
ED1 Justification Para 8.10 Page 66	..... This concluded that 10 to 24ha of office <del>floorspace</del> (B1) and 68ha of industrial <del>floorspace</del> (B2/B8) <u>land</u> should be planned for during the period of 2016 to 2033.	“Land” is a more accurate descriptor than “floorspace” in this instance
ED1 Justification Para 8.11 Page 66	For Harlow, the <del>document</del> <u>evidence</u> identified the need to plan for a further 2 to 4ha of office <del>floorspace</del> (B1) and 16ha of industrial <del>floorspace</del> (B2/B8) <u>land</u> between.....	“Land” is a more accurate descriptor than “floorspace” in this instance

<b>Section, Paragraph/Policy and Page Number</b> <i>(Refer to Pre-Submission version of Local Plan)</i>	<b>Changes to text</b> <del>deletions struck through</del> • <u>additions underlined</u> <i>(Dots denote where the paragraph/policy continues before/after the text)</i>	<b>Reason(s) for change</b>
<p>Policy ED2 Page 67</p>	<p>ED2 Protecting Existing Employment <del>Floorspace</del> <u>Areas</u></p> <p>Existing <del>strategic e-Employment sites</del> <u>Areas</u> at The Pinnacles, Templefields, <del>and London Road</del> <u>Burnt Mill, Staple Tye, Bush Fair and Church Langley</u> will be retained and enhanced for a mix of office, industrial and warehouse uses and other associated activities <u>in accordance with Policy PR1</u>.</p> <p><u>The Enterprise Zone at London Road will facilitate the Research and Development Sector and other associated activities. Employment uses which are not related to the Research and Development sector will be resisted.</u></p> <p>Grow-on space will be supported on existing <del>allocated e-Employment sites</del> <u>Areas</u> and on future employment sites identified at The Pinnacles (ED<del>1-01</del>) and Templefields (ED<del>1-03</del>).</p> <p>Neighbourhood Service Areas <u>at The Stow, Bush Fair and Staple Tye</u> will be protected <u>in accordance with Policy PR2</u> and the provision of.....</p> <p><del>Existing employment sites and Neighbourhood Service Areas are identified on the Policies Map. In all the above cases, developers will be expected to work with Broadband service providers to ensure that the provision of future proofed high speed Broadband infrastructure is available to occupiers and this should be by fibre connection wherever possible.</del></p>	<p>“Areas” is a more accurate descriptor than “floorspace”/“sites” in this instance</p> <p>To further clarify the policy, ensure consistency with the Policies Map and other policies in the Local Plan and to add further wording on Broadband provision as a result of the Essex Statement of Common Ground</p>

<b>Section, Paragraph/Policy and Page Number</b> <i>(Refer to Pre-Submission version of Local Plan)</i>	<b>Changes to text</b> <del>deletions struck through</del> • <u>additions underlined</u> <i>(Dots denote where the paragraph/policy continues before/after the text)</i>	<b>Reason(s) for change</b>
ED2 Justification Para 8.16 Page 67	<p>The district's existing <del>e</del><u>E</u>mployment <del>a</del><u>A</u>reas <u>and Neighbourhood Service Areas, as set out in this policy at Templefields, London Road and The Pinnacles, and shown on the Policies Map,</u> continue to make an important contribution.....</p> <p>.....The Council will continue to implement the masterplan for London Road. <u>In respect of London Road North, this policy will ensure that the site continues to deliver Research and Development uses to support the overall economic development strategy for Harlow. The Local Development Order for London Road North lists development uses permitted on the site.</u></p>	To clarify what employment areas Policy ED2 refers to and make reference to the LDO and permitted uses for London Road North.
ED2 Justification New para after 8.17 Page 68	<p><u>To continue to support existing knowledge-based industries, and to promote the development of new ones such as creative industries, high speed broadband is, therefore essential. Policy ED2, along with Policy IN4, aims to improve and secure the delivery of high speed broadband infrastructure.</u></p>	To justify additional wording in Policy ED2 on broadband provision.
ED2 Implementation New para after para 8.19 Page 68	<p><u>When submitting an application, developers for new Employment Areas will be expected to provide information to demonstrate how they have sought to secure high speed broadband provision as part of their proposals.</u></p>	To clarify implementation of the new Broadband wording in Policy ED2.

Section, Paragraph/Policy and Page Number <i>(Refer to Pre-Submission version of Local Plan)</i>	Changes to text <del>deletions struck through</del> • <u>additions underlined</u> <i>(Dots denote where the paragraph/policy continues before/after the text)</i>	Reason(s) for change
Chapter 9. Retail Ambitions and Town Centre Redevelopment		
Local Plan Strategic Objectives Para 9.4 Page 72	.... <u>Objective 12 - Provide opportunities to improve the overall health and wellbeing of Harlow's residents</u>	To add the new health and wellbeing objective to Chapter 9
RS3 Justification Para 9.19 Page 76	..... <del>The Strategic policies list strategic housing allocations</del> <u>Policy HS2 allocates sites for housing</u> , including Hatches identified for mixed used redevelopment. These Hatches are <u>also</u> listed in Fig. 9.1 and <u>identified</u> on the Policies Map.	To tidy wording; cross-reference policies
RS3 Justification Fig. 9.1 Page 76	<i>Added footnote to table</i> <u>*Dwelling numbers are indicative and sites will be subject to detailed planning to establish their final capacity.</u>	To clarify that dwelling numbers are indicative
Chapter 10. Linking Development Sites to the Wider Environment		
Local Plan Strategic Objectives Para 10.4 Page 80	.... <u>Objective 12 - Provide opportunities to improve the overall health and wellbeing of Harlow's residents</u>	To include the new health and wellbeing objective to Chapter 10
WE1 Implementation Para 10.11 Page 82	.....Green Infrastructure also includes <del>water</del> <u>rivers, canals and other</u> bodies <del>found in green spaces of water, as well as</del> <u>and non-</u> accessible green spaces which provide visual amenity.....	To clarify and strengthen Green Infrastructure definition

<b>Section, Paragraph/Policy and Page Number</b> <i>(Refer to Pre-Submission version of Local Plan)</i>	<b>Changes to text</b> <del>deletions struck through</del> • <u>additions underlined</u> <i>(Dots denote where the paragraph/policy continues before/after the text)</i>	<b>Reason(s) for change</b>
WE1 Implementation Para 10.12 Page 82	<u>At a strategic scale,</u> <del>the</del> the Green Infrastructure network in Harlow includes the Green Belt, Green Wedges, Green Fingers <del>and</del> Other Open Spaces <u>and the River Stort</u> . At a smaller scale, it <del>also</del> includes trees, hedgerows, <u>ponds, streams</u> and landscaping in developments, such as green roofs or green walls.....	To clarify and strengthen Green Infrastructure definition
WE1 Implementation Para 10.15 Page 83	....corridors across the district. <u>The actions and measures contained in the Water Framework Directive will be used to provide opportunities for the Stort Riverpark.</u>	To cross-reference policy with WFD
Policy WE2 Page 84	<p>.....The roles of the Green Wedges are to:.....</p> <p>.....(b) provide Green Infrastructure, including open spaces for sport, recreation and quiet contemplation, <u>wildlife corridors, footpaths, cycleways and bridleways, and rivers, canals, ponds, lakes and other bodies of water;</u>.....</p> <p>..... The roles of the Green Fingers are to:.....</p> <p>.....(h) provide Green Infrastructure, <u>including</u> wildlife corridors, <u>footpaths, cycleways and bridleways; and rivers, canals, ponds, lakes and other bodies of water;</u>.....</p>	To ensure water bodies are referenced in the roles of the GWs and GFs. Letters also added to replace the bullet points, for clarity

<b>Section, Paragraph/Policy and Page Number</b> <i>(Refer to Pre-Submission version of Local Plan)</i>	<b>Changes to text</b> <del>deletions struck through</del> • <u>additions underlined</u> <i>(Dots denote where the paragraph/policy continues before/after the text)</i>	<b>Reason(s) for change</b>
<p>Policy WE3 Page 86</p>	<p><u><b>General Strategy for Biodiversity and Geodiversity</b></u></p> <p><del>All biodiversity and geodiversity assets in the district will be preserved and enhanced. Assets of sufficient importance have a designation. The types of asset designations are:</del></p> <ul style="list-style-type: none"> <li><del>(a) National designations (e.g. Sites of Special Scientific Interest)</del></li> <li><del>(b) Local designations (e.g. Local Wildlife Site or Local Nature Reserve)</del></li> <li><del>(c) Ancient woodland</del></li> <li><del>(d) Aged or veteran trees outside ancient woodland</del></li> </ul> <p><del>Nationally and locally designated assets are identified on the Policies Map.</del></p> <p><u>Internationally Designated Wildlife Sites</u></p> <p>-</p> <p><u>1. Where necessary, contributions towards the measures set out in the Epping Forest Mitigation Strategy, which will be in place by the time the Local Plan is adopted, will be sought from developments within the Epping Forest recreational Zone of Influence (ZOI) in order to mitigate and avoid in-combination effects on the Epping Forest Special Area of Conservation (SAC). Contributions will also be sought to address any in-combination air pollution impacts:</u></p> <p>-</p> <p><u>2. Development proposals which may have an adverse impact on any internationally designated wildlife site, either alone or in-combination, must satisfy the requirements of the Conservation of Habitats and Species Regulations, determining site-specific impacts and avoiding or mitigating against impacts identified.</u></p> <p><u>Nationally Designated Wildlife sites</u></p> <p>-</p> <p><u>3. Development which would harm the nature conservation or geological interest of an nationally important wildlife site, as shown on the Policies Map, will not be permitted unless:</u></p>	<p>To comply with the NPPF (paras. 174-177 NPPF 2012).</p> <p>No European sites are located within the District.</p> <p>There are four European Sites that lie beyond the District boundary but are located within sufficient proximity that the Local Development Plan could provide linking impact pathways that could impact the integrity of those European sites.</p> <p>As such, these are included within the scope of the Habitats Regulations Assessment of the Local Development Plan.</p> <p>The sites are: Epping Forest Special Area of Conservation) SAC; Lee Valley Special Protection Area (SPA) and Ramsar site; and Wormley-Hoddesdonpark Woods SAC.</p>

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Policy WE3 (continued) Page 86	<p><u>Nationally Designated Wildlife sites</u></p> <p><u>3. Development which would harm the nature conservation or geological interest of a nationally important wildlife site, as shown on the Policies Map, will not be supported, unless:</u></p> <ul style="list-style-type: none"> <li><u>- (a) it is required in connection with the management or conservation of the site; or</u></li> <li><u>- (b) the development provides appropriate avoidance or mitigation measures and, as a last resort, provides compensation to offset any adverse impacts on the interest features of the site; or</u></li> <li><u>- (c) there are imperative reasons of overriding public interest for the development; and</u></li> <li><u>- (d) there is no alternative to the development.</u></li> </ul> <p><u>Compensation for the harm will be required.</u></p> <p><u>Locally designated sites of wildlife value</u></p> <p><u>4. Development on, or which negatively affects, a Local Wildlife Site or Local Nature Reserve, as shown on the Policies Map, will not be supported unless:</u></p> <ul style="list-style-type: none"> <li><u>- (a) local development needs significantly outweigh the nature conservation value of the site; and</u></li> <li><u>- (b) the development provides appropriate avoidance or mitigation and, as a last resort, provides compensation measures to offset any detriment to the nature conservation interest on the site.</u></li> </ul>	<p>See reasons on previous page.</p>



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WE3 Justification Para 10.25 Page 86	..... identified in the future. <u>Development within Harlow may, in-combination with development in other areas, affect European Sites which lie beyond the district.</u>	See reasons for Policy WE3 change
WE3 Implementation Para 10.26 Page 86	<del>The</del> <u>All</u> biodiversity and geodiversity assets <u>in Harlow</u> are protected from inappropriate development.	To clarify protection of biodiversity and geodiversity assets
WE3 Implementation New para after para 10.26 Page 86	<u>Designated biodiversity and geodiversity assets are allocated on the Policies Map. The order of asset type follows the hierarchy in this policy (i.e. Sites of Special Scientific Interest are the highest order asset type). Non-designated assets of biodiversity and geodiversity importance, which extend the geodiversity and network of biodiversity and open spaces across the district, are identified in Evidence Base studies.</u>	To clarify what designated and non-designated biodiversity and geodiversity assets are
WE3 Implementation Para 10.27 Page 86	.....in accordance with their level of <u>international</u> , national, regional or local importance.	See reasons for Policy WE3 change
Policy WE4 Page 87	Heritage assets and their settings found within the district will be <del>preserved</del> <u>conserved</u> or enhanced.....  .....(d) <del>Historic</del> <u>Registered</u> Parks and Gardens.....  ..... The Conservation Areas, Scheduled Monuments and <del>Historic</del> <u>a Registered</u> <del>pParks</del> and <del>gGardens</del> are identified on the Policies Map.....	To correct terminology  Not required – now explained more suitably elsewhere To correct terminology  Also letters added to replace bullet points, for clarity

Section, Paragraph/Policy and Page Number <i>(Refer to Pre-Submission version of Local Plan)</i>	Changes to text <del>deletions struck through</del> • <u>additions underlined</u> <i>(Dots denote where the paragraph/policy continues before/after the text)</i>	Reason(s) for change
Chapter 11. Strategic Infrastructure Requirements		
Local Plan Strategic Objectives Para 11.5 Page 90	<p>....Objective 11 - <del>To p</del><u>Provide</u> and enhance sporting, leisure, recreational facilities and cultural opportunities in the district</p> <p><u>Objective 12 - Provide opportunities to improve the overall health and wellbeing of Harlow's residents</u></p> <p>Objective <del>13</del><u>14</u> - Reduce the need to travel by vehicle <del>by ensuring</del> <u>and ensure</u> new development is sustainably located <u>and/or</u> accessible by sustainable <u>and innovative</u> modes of transport</p> <p>Objective <del>14</del><u>15</u> - Improve transport links, particularly sustainable modes of transport, to <del>community facilities</del> <u>access all facilities and jobs</u></p>	To include additional objective on health and wellbeing in Chapter 11 and further clarification to the objectives
Policy SIR1 Page 91	.....The Policies Map identifies infrastructure items which <u>require safeguarding or</u> have a land use implication....	To clarify that the infrastructure items on the Policies Map also require safeguarding
SIR1 Justification Para 11.12 Page 93	..... education providers including independent schools and academy trusts. <u>Land given over for schools must meet the criteria set out in Essex County Council's Developer's Guide to Infrastructure Contributions.</u>	To ensure that developers are aware of the Developer's Guide to Infrastructure Contributions when considering land for schools

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SIR1 Justification Para 11.13 Page 93	<p>In Harlow there is an overall need to provide <del>11.1FE of</del> <u>additional</u> secondary school places <del>(gross)</del>. A new secondary school will be provided <del>in the Epping Forest District,</del> in the new Garden <u>Town</u> Community to the east of Harlow, and a new 8FE secondary school is being opened in Harlow <u>(the new 'Sir Fredrick Gibberd Academy')</u>. <u>While this contributes some capacity to meet housing growth, this is being established to serve existing population (cohort) growth.</u> There is also additional capacity in some of the existing secondary schools in Harlow. <u>The provision of new schools in the new Garden Town Community to the east of Harlow will have a land use implication; however their location is still to be determined by an agreed Strategic Master Plan.</u></p>	<p>To clarify the position in respect of school provision in Harlow</p>
SIR1 Justification Para 11.14 Page 93	<p>There is an overall need to provide <del>11.9FE of</del> <u>additional</u> primary school places <del>(gross)</del> in Harlow <u>as set out in the Infrastructure Delivery Plan (IDP),</u> of which some.....</p>	<p>To clarify the position in respect of school provision in Harlow</p>
SIR1 Justification Para 11.17 Page 93	<p>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 <u>(West and East Essex and North Hertfordshire)</u> and NHS <u>England</u> to deliver new health facilities as part of planned growth. New healthcare facilities will be delivered <u>where necessary,</u> as part of new settlements ideally located in accessible locations, situated in a local centre with a range of other community facilities. <u>Increasing capacity within current infrastructure will also be explored.</u></p>	<p>To clarify the important contributors to the provision of healthcare in Harlow and to identify the potential for increasing capacity within existing healthcare infrastructure</p>

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SIR1 Justification Para 11.18 Page 93	<p>The Princess Alexandra Hospital NHS Trust <del>is currently considering options to meet its future service requirements including the potential option to relocate to an alternative location in the Harlow and Gilston Garden Town. Two potential sites are being considered, the first in the Gilston area to the north and the second to the east of Harlow within the Epping Forest district. The location will be determined through a Strategic Outline Business Case.</del> <u>has approved a preferred way forward for the provision of a new hospital. This option comprises the development of a new state of the art local acute hospital at land within the Epping Forest portion of the East of Harlow Garden Town Community.</u></p>	<p>To update the latest position on the possible relocation of Princess Alexandra Hospital including the preferred location</p>

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<p>SIR1 Justification New paras after para 11.18 Page 94</p>	<p><u>In the event that the Hospital is relocated, land at Princess Alexandra Hospital may be redeveloped for housing with a capacity of up to 550 homes (see Policy HS2).</u>  <u>In the event that the Hospital is not relocated and remains in situ, the redevelopment of the site for healthcare purposes will be supported and taken forward in accordance with the agreed master plan to be prepared by the Hospital Trust. Under the latter option, surplus land may be identified which could accommodate approximately 100 new homes. The purpose of the master plan would be to provide certainty for the Hospital Trust, to allow for the phased delivery of its strategic long-term objectives for healthcare provision and investment.</u></p> <p><u>New and improved healthcare facilities play an important role in sustaining the Harlow and Gilston Garden Town and the Council will work with the hospital and all relevant parties to help deliver this.</u></p>	<p>To update the latest position on the possible relocation of Princess Alexandra Hospital including the redevelopment of the existing site for housing if it were relocated</p> <p>To further clarify the Council's role in helping to deliver healthcare across the Garden Town</p>

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SIR1 Justification New paras after para 11.23 Page 94	<p><u>The Council will seek the best use of existing infrastructure as well as providing the best possible opportunity to provide additional infrastructure capacity. The Council also supports the use of smart energy solutions to support low carbon developments. Developments should consider the incorporation of energy storage, demand side response, smart metering and smart heating controls to optimise the efficient use of heating and power systems.</u></p> <p><u>The Council recognises that decarbonisation may lead to increased uptake of heat pumps, electric heating, electric vehicles and renewable energy. Developments should seek to ensure that electrical infrastructure is designed to accommodate a future increase in electricity demand and renewable energy generation through appropriately sized substations and consideration of three phase supply to domestic properties.</u></p>	<p>To reflect BRE advice to ensure the sustainability of policies, by ensuring that proposals take into account overall demand for energy and delivery of long term emission reductions by operating flexibly in response to the demand on the grid, and by ensuring that proposals consider transport and energy infrastructure development for electric vehicles &amp; delivery of long term emission reductions. Also to ensure consistency with other work, including BRE work, carried out across the Garden Town authorities</p>
SIR1 Justification Para 11.30 Page 94	<p>.....The Development Management policies <del>ensure</del> <u>encourage</u> <del>that</del> broadband coverage <u>to be extended</u> <del>ed</del> into new developments and that telecommunications equipment is provided in Harlow.</p>	<p>To better match the DM policy</p>
SIR1 Justification New para after para 11.30 Page 95	<p><u>When there is a capacity constraint and improvements in off-site infrastructure are not programmed, planning permission will only be granted where the appropriate infrastructure improvements to the satisfaction of the relevant water and sewerage undertaker will be completed prior to occupation of the development.</u></p>	<p>To ensure that off-site infrastructure is completed and appropriately phased with new development coming forward.</p>

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SIR1 Implementation Para 11.33 Page 95	.....Specific infrastructure items that are required to deliver growth locations and development sites will mostly be funded by Section 106 Agreements between the Council, <u>County Council</u> and the developer.....	To refer to the County Council when negotiating on S106 agreements with developers
SIR1 Implementation New para after para 11.34 Page 96	<u>Household Waste Facilities</u>  <u>The Council will work together with Essex County Council to consider and deliver greater capacity, where appropriate, for the local management of household waste which serves Harlow. Collaboration will be required with Hertfordshire County Council in respect of waste needs for the wider Garden Town area. Any facilities should be of a sufficient size and capacity that meets the needs of this growth and situated within an easily accessible location within the catchment areas of the new Garden Town communities.</u>	To identify the potential needs for increasing the capacity of household waste facilities. This has arisen since the production of the Harlow Infrastructure Delivery Plan
Policy SIR2 Page 96	..... <del>5</del> <u>6. Cambridge Road where it enters Harlow from Hertfordshire to the east of the District</u> <del>6.</del> <u>7.</u> Vehicular and pedestrian access points to the north of the Town Centre <del>7.</del> <u>8.</u> Vehicular and pedestrian access points at as you first enter the strategic employment sites .....	To recognise Cambridge Road as an important key destination for vehicles, pedestrians and cyclists within close proximity of Harlow Mill Station and as a key entrance point from Hertfordshire including Bishop's Stortford and Sawbridgeworth. Also clarify Eastern Crossing as being the Second Stort Crossing to be delivered
Chapter 13. Placeshaping		

<b>Section, Paragraph/Policy and Page Number</b> <i>(Refer to Pre-Submission version of Local Plan)</i>	<b>Changes to text</b> <b><del>deletions struck through</del> • <u>additions underlined</u></b> <i>(Dots denote where the paragraph/policy continues before/after the text)</i>	<b>Reason(s) for change</b>
Local Plan Strategic Objectives Para 13.5 Page 102	<u>.....Objective 12 - Provide opportunities to improve the overall health and wellbeing of Harlow's residents</u>	To include an objective on health and wellbeing in Chapter 13
Policy PL1 Page 103	<p>.....(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 <del>Spatial</del> Vision and Design <del>Charter</del> <u>Guide, the services and access chapter of the Essex Design Guide.</u> and relevant national guidance;</p> <p>(b) it protects, enhances or improves local distinctiveness <u>without restricting style and innovation, whilst</u> taking account of local character <u>and context, including</u> patterns of development, urban form and landscape character, Green Infrastructure including trees and landscaping, building typology, <del>detailing and materials front boundary treatments</del> and the historic environment;</p> <p><del>(d)</del> <u>(c)</u> it responds to the scale, height, massing, architectural detailing, <del>and</del> materials <u>and front boundary treatments</u> of the surrounding area, <u>and</u> is visually attractive- <del>and respects its context without restricting style and innovation;</del></p> <p><del>(e)</del> <u>(d)</u> it provides appropriate physical, legible and safe connections with surrounding streets, paths, neighbouring development and Green Infrastructure; .....</p>	<p>To add reference to Essex Design Guide and clarify which chapter is relevant</p> <p>To improve clarity by moving certain wording between paragraphs and swapping paragraphs (c) and (d)</p>
PL1 Implementation Para 13.9 Page 103	<p>.....This will be used to guide and assess future development across Harlow and will be a material consideration in the determination of planning applications. <u>Applicants should also refer to the services and access chapter of the Essex Design Guide, which provides detailed highways design guidance.</u></p>	To add reference to Essex Design Guide and clarify which chapter is relevant



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Policy PL3 Page 105	<p>New development will be expected to deliver high standards of sustainable design and construction and efficient energy usage, <u>taking account of predicted changes to heating and cooling requirements as a result of climate change.</u> <del>Such development will be supported where it meets or exceeds the minimum standards required by Building Regulations.</del></p>	<p>To reflect BRE advice to ensure the sustainability of policies, by ensuring the increasing number of extreme weather events, as a result of climate change, are considered in development design; also to ensure consistency with other work, including BRE work, carried out across the Garden Town authorities. The Building Regs requirement is now in the Implementation section where it is now more specific.</p>
PL3 Justification Para 13.16 Page 105	<p>This policy encourages applicants to consider the impact of their development and seek ways to address the effects, <u>above and</u> beyond those measures required by Building Regulations. <u>The preferable amount by which the minimum Building Regulations standards should be exceeded is set out in the Implementation section of this policy, and is based on policy recommendations of the UK Green Building Council which were, in part, derived from the now-defunct Code for Sustainable Homes Level 4 standard.</u></p>	<p>To justify the reasoning behind the new wording in the Implementation section, which encourages developers to exceed minimum Building Regulations standards by at least 19%.</p>
New footnote relating to para 13.16 Page 105	<p><u>UK Green Building Council, 2018. Driving sustainability in new homes: a resource for local authorities.</u></p>	<p>To provide a reference</p>

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PL3 Justification New para after existing para 13.16 Page 105	<u>This policy assists in the delivery of the Local Plan Strategic Vision, which states that, by 2033, new development will mitigate and adapt to the effects of climate change; and also reflects the Government's amendments to the Climate Change Act 2008, which increase the greenhouse gas emissions 2050 target from 80% reduction to 100% reduction.</u>	To justify the reasoning behind the new wording in the Implementation section, which encourages developers to exceed minimum Building Regulations standards by at least 19%.
PL3 Implementation Para 13.17 Page 105	<p>The Building Regulations set out the minimum requirements for the conservation of fuel and power. <u>Development will be supported where it exceeds the minimum standards required by Building Regulations. The amount by which the standards should be exceeded is preferably at least 19%. The Council supports development that follows the principles of sustainable construction, and encourages developers to deliver schemes which adopt a fabric-first approach to development and meet the performance and quality set by appropriate standards, such as Passivhaus, Home Quality Mark (HQM) and BREEAM UK New Construction 2018.</u> <del>The associated guidance suggests measures to reduce energy consumption and carbon dioxide emissions, which should include the consideration of:</del></p> <ul style="list-style-type: none"> <li><del>(a) — appropriate layout and building orientation to maximise solar gain in the winter;</del></li> <li><del>(b) — the use of Green Infrastructure, such as trees and rain gardens;</del></li> <li><del>(c) — efficient use of all roof and vertical surfaces for the installation of low carbon technologies and green roofs;</del></li> <li><del>(d) — integrating passive ventilation, such as wind catchers, or low energy options where mechanical ventilation or cooling is required;</del></li> <li><del>(e) — generating energy from on-site renewable or low carbon energy systems;</del></li> <li><del>(f) — the use of local, sustainable and energy efficient materials; and</del></li> <li><del>(g) the re-use of existing resources.</del></li> </ul>	<p>To reflect BRE advice to ensure the sustainability of policies, by ensuring that developers deliver on all aspects of sustainability and quality for all types of new buildings; to ensure consistency with other work, including BRE work, carried out across the Garden Town authorities</p> <p>The exceedance of minimum Building Regs would ensure that developers provide suitably robust strategies to address the increasing required levels of energy efficiency</p> <p>The deleted points are now incorporated in new paragraphs</p>

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<p>PL3 Implementation New paras after para 13.17 Page 105</p>	<p><u>Development proposals must demonstrate how the reduction of energy consumption and carbon dioxide emissions is being considered. The wellbeing of building occupants must also be addressed within the design and layout, by minimising risks of overheating and providing adequate daylight and ventilation. These factors can be addressed by:</u></p> <p><u>(a) incorporating a range of natural heating and cooling measures as part of the design and layout, including passive ventilation (or low-energy options where mechanical cooling is required) and ensuring appropriate building layout and orientation;</u></p> <p><u>(b) incorporating the use of Green Infrastructure, such as trees and rain gardens;</u></p> <p><u>(c) including passive design measures such as window sizing, thermal mass, building orientation and shading;</u></p> <p><u>(d) generating energy from on-site renewable or low-carbon energy systems, including on-site electricity generation for major development;</u></p> <p><u>(e) ensuring the efficient use of all roof and vertical surfaces for the installation of low carbon technologies and green roofs;</u></p> <p><u>(f) considering room layout, depth, height and window opening for optimum daylighting;</u></p> <p><u>(g) evaluating the risk of overheating and evidencing through modelling to support the design decisions, such as the use of dynamic simulation and thermal modelling to analyse a building's performance in terms of energy usage and internal temperatures;</u></p> <p><u>(h) maintaining good indoor air quality by providing sufficient ventilation to purge any pollutants such as emissions of formaldehyde &amp; volatile organic compounds (VOCs) from building materials and surface finishes, as well as stale air from other activities such as cooking, bathing, etc.;</u></p> <p><u>(i) using local, sustainable and energy-efficient construction materials which consider adaptation to and mitigation of the impacts of climate change;</u></p> <p><u>(j) re-using existing resources.</u></p>	<p>To reflect BRE advice to ensure the sustainability of policies, by including examples of how new development can reduce energy consumption and carbon dioxide emissions and improve the health and wellbeing of building users. Also to ensure consistency with other work, including BRE work, carried out across the Garden Town authorities</p>

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PL3 Implementation New paras after para 13.17 Page 105 (continued)	<p><u>Where a low-carbon district heating scheme is proposed, the Council will expect the scheme to demonstrate that any proposed heating and cooling systems have been selected in line with the following order of preference:</u></p> <p><u>(a) if possible, connection with heat distribution networks which exist at the time;</u></p> <p><u>(b) site-wide heat network fuelled by renewable energy sources;</u></p> <p><u>(c) communal network fuelled by renewable energy sources;</u></p> <p><u>(d) individual Air Source Heat Pump.</u></p>	<p>To reflect BRE advice to ensure the sustainability of policies, by ensuring that new heating and cooling systems are as efficient as possible. Also to ensure consistency with other work, including BRE work, carried out across the Garden Town authorities</p>
PL3 Implementation Para 13.18 Page 106	<p>.....to reducing carbon dioxide (CO2) emissions. <del>The energy hierarchy set out in the Strategic policies should be considered within the Sustainability Statement.</del></p> <p>The Sustainability Statement should <del>also</del> make clear how measures.....</p>	<p>Energy hierarchy not included in the Strategic policies, as its requirements would be covered by this policy in any case</p>

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<p>Policy PL4 Page 106</p>	<p>.....</p> <p>(b) it is for <del>essential</del> infrastructure, <u>including and</u> local transport infrastructure, which <del>must</del> demonstrates a requirement for a Green Wedge or Green Finger location <u>and demonstrates it is of benefit to the wider community;</u></p> <p>(c) it is for the <u>alteration, extension or</u> replacement of buildings, <del>provided that the new building/buildings are in the same use and not more harmful than what is being replaced;</del></p> <p><del>(d) — it constitutes strategic infrastructure development which can demonstrate that it is of benefit to the wider community.</del></p> <p>.....</p> <p>(<del>e</del> <u>d</u>) it demonstrates that the roles and functions <u>and historic significance</u> of the Green Wedges and Green Fingers <u>(as set out in policy WE2)</u> are preserved, enhanced and not adversely affected; and</p> <p>(<del>f</del> <u>e</u>) it demonstrates.....</p> <p><u>Where development includes replacement uses, redevelopment, extensions or alterations, it must meet all the following criteria:</u></p> <p><u>(f) it does not result in a greater negative impact on the roles and functions of the Green Wedges and Green Fingers than the existing development;</u></p> <p><u>(g) it does not result in disproportionate additions to the original building(s); and</u></p> <p><u>(h) any replacement buildings must be in the same use.</u></p>	<p>To ensure the policy is compliant with the new Green Belt policy</p> <p>To recognise the historic significance of Green Wedges and Green Fingers; to cross-reference policy WE2</p> <p>To ensure the policy is compliant with the new Green Belt policy</p>

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PL4 Implementation Para 13.22 Page 107	.....Details of their roles and functions are set out in <del>the Strategic policies</del> <u>Policy WE2</u> .	To cross-reference policies
PL4 Implementation Para 13.23 Page 107	Small-scale development can include householder applications, school or sports related development, recreation and community uses. <u>waterway uses and facilities/services related to an existing use</u> .	To include waterway uses and facilities related to existing use

<b>Section, Paragraph/Policy and Page Number</b> <i>(Refer to Pre-Submission version of Local Plan)</i>	<b>Changes to text</b> <del>deletions struck through</del> • <u>additions underlined</u> <i>(Dots denote where the paragraph/policy continues before/after the text)</i>	<b>Reason(s) for change</b>
<p><u>PL5 Green Belt (new policy after PL4)</u> Page 108</p>	<p><u>Development on land designated as Green Belt must meet one or more of the following criteria:</u></p> <p><u>(a) it is for the provision of appropriate facilities for outdoor sport, recreation and cemeteries;</u></p> <p><u>(b) it is for local transport infrastructure which must demonstrate a requirement for a Green Belt location;</u></p> <p><u>(c) it is for the alteration, extension or replacement of buildings;</u></p> <p><u>(d) it comprises one or more of the following:</u></p> <p><u>(i) buildings for agriculture or forestry;</u>  <u>(ii) limited affordable housing for community needs;</u>  <u>(iii) mineral extraction;</u>  <u>(iv) engineering operations;</u>  <u>(v) development brought forward under a Community Right to Build Order;</u></p> <p><u>(e) it is for material changes in the use of the land;</u></p> <p><u>(f) it is for elements of renewable energy projects which could conflict with the purposes of the Green Belt and impact the openness of the land, but there are demonstrable, very special circumstances for it.</u></p> <p><u>Additionally, development must meet all the following criteria:</u></p> <p><u>(g) it does not conflict with the purposes of the Green Belt;</u></p> <p><u>(h) it preserves the openness of the land; and</u></p> <p><u>(i) it does not adversely affect the roles and functions of adjoining or nearby land which is designated as Green Wedge or Green Finger.</u></p>	<p>To ensure there is a clear policy regarding Green Belt land in Harlow. The policy follows NPPF requirements and also adds a point (i) which is necessary due to local circumstances</p>

<b>Section, Paragraph/Policy and Page Number</b> <i>(Refer to Pre-Submission version of Local Plan)</i>	<b>Changes to text</b> <del>deletions struck through</del> • <u>additions underlined</u> <i>(Dots denote where the paragraph/policy continues before/after the text)</i>	<b>Reason(s) for change</b>
<u>PL5 Green Belt (new policy, continued)</u> Page 108	<u>Where development includes replacement uses, redevelopment, extensions or alterations, it must meet all the following criteria:</u>  <u>(i) it does not result in a negative impact on the purposes of the Green Belt and the openness of the land than the existing development;</u>  <u>(k) it does not result in disproportionate additions to the original building/buildings; and</u>  <u>(l) any replacement buildings must be in the same use.</u>  <u>Where development does not meet any of the criteria in this policy, it will only be supported where very special circumstances exist.</u>	<p>To ensure there is a clear policy regarding Green Belt land in Harlow. The policy follows NPPF requirements and also adds a point (i) which is necessary due to local circumstances</p>
<u>PL5 Justification (new paras after policy)</u> Page 108	<u>The Green Belt is a national designation, the fundamental aim of which is to prevent unrestricted urban sprawl, as well as providing a number of purposes as set out in national planning policies.</u>  <u>Since the Ministry of Housing and Local Government Circular in 1955, which recommended that Local Planning Authorities should establish Green Belts, the Green Belt has had great importance attached to it by subsequent Governments. As such, it is protected from inappropriate development through both national and local planning policies. The construction of new buildings and other development which does not meet the criteria of this policy would, therefore, not be supported, unless very special circumstances exist.</u>	<p>To justify the new policy</p>



<b>Section, Paragraph/Policy and Page Number</b> <i>(Refer to Pre-Submission version of Local Plan)</i>	<b>Changes to text</b> <del>deletions struck through</del> • <u>additions underlined</u> <i>(Dots denote where the paragraph/policy continues before/after the text)</i>	<b>Reason(s) for change</b>
<u>PL5 Justification</u> <u>(new paras after</u> <u>policy, continued)</u> Page 108	<p><u>The Green Belt in Harlow contributes to and links with the wide-ranging Green Infrastructure in the district, including the Green Wedges and Green Fingers. The Green Belt in Harlow also provides a physical link with the Green Belt and wider countryside in the surrounding Epping Forest and East Hertfordshire districts.</u></p> <p><u>The purpose of this policy is to continue to protect the Green Belt in Harlow from inappropriate development, as such development would conflict with the Green Belt purposes and be harmful to the Green Belt.</u></p> <p><u>As detailed in other Local Plan policies, Harlow's Green Wedges and Green Fingers make a significant and important contribution to the district's Green Infrastructure, by providing a number of roles and functions for the benefits of visitors, residents and wildlife.</u></p> <p><u>One of the functions is to provide access to wider countryside and other open spaces and, therefore, most Green Belt land in Harlow adjoins, or is near to, land designated as Green Wedge or Green Finger. To assist with the protection of the Green Wedges and Green Fingers afforded by other Local Plan policies, this policy ensures that any development in the Green Belt does not adversely affect the roles and functions of adjoining or nearby Green Wedge or Green Finger land.</u></p>	<p>To justify the new policy</p>

<b>Section, Paragraph/Policy and Page Number</b> <i>(Refer to Pre-Submission version of Local Plan)</i>	<b>Changes to text</b> <del>deletions struck through</del> • <u>additions underlined</u> <i>(Dots denote where the paragraph/policy continues before/after the text)</i>	<b>Reason(s) for change</b>
<p><u>PL5 Implementation</u> (new paras after Justification) Page 108</p>	<p><u>The purposes of the Green Belt are set out in national planning policies, as follows:</u></p> <ol style="list-style-type: none"> <li><u>1. to check the unrestricted sprawl of large built-up areas;</u></li> <li><u>2. to prevent neighbouring towns merging into one another;</u></li> <li><u>3. to assist in safeguarding the countryside from encroachment;</u></li> <li><u>4. to preserve the setting and special character of historic towns; and</u></li> <li><u>5. to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.</u></li> </ol> <p><u>Whilst these purposes are not weighted in terms of significance, national planning policies recognise that the fundamental aim of the Green Belt is to provide permanently open land to prevent unrestricted urban sprawl.</u></p> <p><u>Small-scale development can include householder applications, school or sports related development, recreation, cemeteries and community uses.</u></p> <p><u>For development relating to renewable energy, the very special circumstances may include the wider environmental benefits associated with increased production of energy from renewable sources.</u></p> <p><u>The very special circumstances, which would be required for the support of development which does not fall within the criteria of this policy only exist where the potential harm to the Green Belt, by reason of inappropriateness of the development and any other harm, is clearly outweighed by other considerations.</u></p> <p><u>Buildings which are to be reused as part of a development must be of permanent and substantial construction.</u></p>	<p>To provide implementation details for the new policy</p>

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PL7 Implementation Para 13.42 Page 111	Green Infrastructure is multi-functional natural and man-made <u>urban and rural</u> green space, including parks, playing fields, woodlands, allotments and wildlife corridors. <u>rivers, canals and other bodies of water</u> . At a smaller-scale, it also includes measures to assist climate change mitigation, such as green roofs, <del>and</del> green walls. <u>rain gardens and ponds</u> .	To clarify and strengthen Green Infrastructure definition
PL7 Implementation Para 13.44 Page 112	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. <u>including, where appropriate, the protection and recovery of priority habitats and species.</u>	To be more NPPF compliant and ensure protection and recovery of priority habitats and species

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Policy PL8 Page 112	<p>Development should contribute to and enhance biodiversity or geodiversity assets, <u>to ensure a net gain in biodiversity.....</u></p> <p>.....The greater the significance of the asset, the greater the weight that is given to the asset's protection. <u>Distinction will be made between the hierarchy of international, national and locally designated and non-designated sites so that the level of protection afforded is consistent with their status.</u></p> <p>(a) it <del>creates new biodiversity and protects geodiversity assets and creates links to</del> <u>conserves and enhances</u> existing biodiversity and geodiversity assets;</p> <p>(b) <u>where (a) is not possible,</u> it includes <del>the protection and enhancement of appropriate and effective measures to mitigate the negative effects on</del> existing biodiversity and geodiversity assets;</p> <p><u>(c) where there is a residual impact, it includes provision for compensatory measures to be secured off-site;</u></p> <p><del>(e d) where it can be demonstrated that protection and enhancement of</del> <u>it creates</u></p>	To be more NPPF compliant
PL8 Justification Para 13.45 Page 112	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 <del>enable the appreciation of wildlife</del> <u>provide opportunities for people to enjoy nature.</u>	To clarify opportunities for people arising from these assets
PL8 Justification Para 13.46 Page 112	Helping to protect and enhance biodiversity is one of the fundamental aims of national <u>planning</u> policies and guidance, <del>halt the overall decline in biodiversity to</del> <u>achieve a net gain in biodiversity.....</u>	To be more NPPF compliant

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PL8 Implementation Para 13.47 Page 112	<p>..... In Harlow, the highest order asset type is Sites of Special Scientific Interest, followed by locally designated sites <u>(Local Wildlife Sites and Local Nature Reserves)</u>, ancient woodland, and aged or veteran trees found outside ancient woodland.....</p>	To add information
PL8 Implementation New para after para 13.48 Page 112	<p><u>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.</u></p>	To add information on potential future declaration of assets
PL8 Implementation Para 13.49 Page 113	<p>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 <u>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</u></p>	To ensure eradication of invasive species; and add advice that ensures developers check the Essex Biodiversity Validation Checklist

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Policy PL9 Page 113	<p>All development proposals must minimise and, where possible, reduce all forms of pollution and contamination. <u>For air quality, the acceptability or otherwise of a proposal will be determined with reference to the relevant limit values or National Air Quality Objectives.....</u></p> <p>..... Where it can be demonstrated that pollution and/or contamination is unavoidable, appropriate measures must mitigate the negative effects of the development. <u>Where adequate mitigation cannot be provided, development will not normally be permitted.</u></p>	To clarify and be more NPPF compliant
PL9 Implementation Para 13.55 Page 114	<p>The Council <del>may</del> <u>will</u> require <del>assessments of any pollution and/or contamination– a Preliminary Risk Assessment of land considered to be contaminated</del> 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. ....</p> <p>.....The Council may also impose conditions to control and manage pollution and contamination levels. <u>Further investigations, assessments, long-term maintenance regimes and validation reports may also be required if land is contaminated</u></p>	<p>To require all contaminated land to be subject to Preliminary Risk Assessment</p> <p>To ensure further possible necessary investigative work is carried out if land is contaminated</p>
PL9 Implementation New para after para 13.55 Page 114	<p><u>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.</u></p>	To further protect groundwater

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Policy PL10 Page 114-115	<i>Re-order Policy titles as follows:</i> <del>2.</del> <u>1.</u> Water Management <del>3.</del> <u>2.</u> Flooding <del>4.</del> <u>3.</u> Sustainable Drainage Systems (SuDS) <del>1.</del> <u>4.</u> Water Quality	To structure policy more appropriately

<b>Section, Paragraph/Policy and Page Number</b> <i>(Refer to Pre-Submission version of Local Plan)</i>	<b>Changes to text</b> <del>deletions struck through</del> • <u>additions underlined</u> <i>(Dots denote where the paragraph/policy continues before/after the text)</i>	<b>Reason(s) for change</b>
<p>Policy PL10 Page 114-115</p>	<p>.....<del>4</del><u>4</u>. Water Quality Development must not <del>adversely affect</del> <u>cause deterioration to</u> water quality, including quality of waterways and other bodies of water, identified Source Protection Zones (SPZ), Aquifers and all other groundwater. <u>Development must aim to improve such water quality.</u></p> <p>New development adjacent to water courses should seek to include restoration and deculverting. The culverting of water courses should be avoided. <u>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.</u></p> <p><u>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.</u></p> <p>.....<del>32</del><u>32</u>(a) it must not increase the risk of flooding elsewhere <u>and must aim to reduce flood risk overall</u>; .....</p> <p>.....<del>32</del><u>32</u>(c)-<del>flood</del> <u>finished floor</u> 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 <del>watertight depth</del> <u>finished floor level</u> of 300mm above the <del>normal</del> <u>predicted</u> water level; .....</p> <p>.....<del>2</del><u>2</u> (d) <u>proposed development in Flood Zone 3b must be 'water compatible' or 'essential' development</u>.....</p> <p>.....<del>32</del><u>32</u> (g) flood flow routes should be <del>preserved</del> <u>configured to enable surface water to drain</u>;.....</p>	<p>To ensure water quality improvement and increased protection for biodiversity</p> <p>To ensure financial contributions are made where deculverting or other enhancements are unfeasible</p> <p>To ensure reduction of flood risk</p> <p>To correct terminology</p> <p>To clarify the only types of development allowed in this Flood Zone area To correct terminology</p>



<b>Section, Paragraph/Policy and Page Number</b> <i>(Refer to Pre-Submission version of Local Plan)</i>	<b>Changes to text</b> <del>deletions struck through</del> • <u>additions underlined</u> <i>(Dots denote where the paragraph/policy continues before/after the text)</i>	<b>Reason(s) for change</b>
Policy PL10 Page 114-115	<p>.....<del>32</del> (hi) where necessary, planning permission will be conditional upon <del>flood-protection and/or runoff control measures being operative before other works.</del> <u>the submission and approval of a drainage management strategy that addresses all forms of flood risk.</u></p> <p><u>Development within identified Critical Drainage Areas may, depending on the outcomes of a specific flood risk assessment, be required to contribute to funding for the delivery of appropriate flood alleviation schemes.....</u></p> <p>.....<del>4</del><u>3</u> <b><u>Waste Water and</u> Sustainable Drainage Systems (SuDS)</b></p> <p><u>Development proposals should identify how there is sufficient surface water, foul drainage and treatment capacity which can serve the development. Surface and foul water systems must be separate.</u></p> <p><u>The use of SuDS in all development proposals, including the retrofitting of SuDS, is encouraged and will be supported</u> Where SuDS are required, the drainage scheme must meet the following criteria:.....</p> <p>.....<del>4</del><u>3</u> (c) achieve <del>greenfield</del> runoff rates <u>in line with the guidance of the non-statutory technical standards for sustainable drainage</u>;.....</p>	<p>To clarify what planning permission would be conditional upon</p> <p>To recognise Critical Drainage Areas</p> <p>To strengthen the policy by including foul water requirements</p> <p>To include retrofitting of SuDS</p> <p>To ensure runoff rates adhere to the relevant guidance</p>

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PL10 Justification Para 13.57 Page 116	This policy will ensure that the quality of drinking water is maintained, avoiding harmful polluting developments which affect its quality. <u>The requirement 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.</u>	To ensure water quality improvement and increased protection for biodiversity
PL10 Justification New paras after para 13.61 Page 116	<u>A number of Critical Drainage Areas have been identified based on the results of the Harlow Surface Water Management Plan. The risk of surface water flooding in these areas needs to be reduced and drainage improved.</u>	To recognise Critical Drainage Areas
PL10 Justification New paras after para 13.61 Page 116 (continued)	<u>The requirement that any proposed development in Flood Zone 3b must be 'water compatible' or 'essential' development is in accordance with national guidance and the Strategic Flood Risk Assessment.</u>	To explain FZ 3b requirement
PL10 Implementation New paras after para 13.63 Page 116	<u>The Water Cycle Study emphasises the importance of non- residential development meeting a level of BREEAM compliance regarding water efficiency. The meeting of BREEAM 'Excellent' rating for water efficiency in non- residential buildings is, therefore, supported.</u>  <u>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.</u>	To encourage non-residential buildings to be as water efficient as Possible  To include retrofitting of buildings regarding improving water efficiency

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PL10 Implementation Para 13.67 Page 117	<p>.....(d) where possible, flood storage should be maximised through the use of Green Infrastructure <u>and by providing level- for-level, volume-for-volume floodplain compensation for development within the 1-in-100-year (plus climate change) extent.</u></p>	To strengthen policy regarding floodplain compensation; also replaced bullet points with letters, for clarity
PL10 Implementation Para 13.68 Page 117	<p>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> <p><del>1. into the ground (infiltration);</del>  <del>2. to a surface water body;</del>  <del>3. to a surface water sewer, highway drain, or another drainage system;</del>  <del>4. to a combined sewer.</del></p> <p><u>1. store rainwater for later use;</u>  <u>2. use infiltration techniques, such as porous surfaces in non- clay areas;</u>  <u>3 attenuate rainwater in ponds or open water features for gradual release including the use of SuDS;</u>  <u>4. attenuate rainwater by storing in tanks or sealed water features for gradual release, including the use of SuDS;</u>  <u>5. discharge rainwater direct to a watercourse;</u>  <u>6. discharge rainwater to a surface water sewer/drain;</u>  <u>7. discharge rainwater to the combined sewer.</u></p>	To expand hierarchy to include other options

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PL10 Implementation New paras after para 13.68 Page 117	<p><u>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.</u></p> <p><u>Water-compatible development and essential development are referred to in this policy. As defined by national guidance, water-compatible development includes flood control infrastructure, sewage transmission and pumping stations, navigation facilities and water-based recreation (excluding sleeping accommodation). Essential development includes essential transport infrastructure which has to cross the area at risk, wind turbines and essential utility infrastructure, such as power stations, which requires the location for operational reasons.</u></p>	<p>To ensure adherence with national guidance on restoration of floodplain</p> <p>To define the development referred to in part 3(b) of the policy</p>
PL10 Implementation Para 13.72 Page 117	<p>.....The Essex SuDS Design Guide provides guidance on local standards for water quality and water quantity from developments and guidance on SuDS design. <u>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</u></p>	<p>To ensure developers consider natural flood management techniques</p>
PL10 Implementation New paras after para 13.72 Page 117	<p><u>All proposed development must engage 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 on such actions and measures.</u></p> <p><u>Appropriate arrangements for foul water must be identified where the local public sewer network does not have adequate capacity. Developers must demonstrate how any upgrades of the existing sewerage network, to alleviate capacity issues, would be delivered in advance of the development. New development must connect to mains foul drainage, but a foul drainage assessment may be required if non-mains foul drainage is proposed.</u></p>	<p>To ensure the TRBMP is considered by developers and EA is consulted</p> <p>To provide further details on the requirements for waste water</p>

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Policy PL11 Page 118	<p>.....(d) the extent to which the development would enhance <u>,or better reveal,</u> the significance of the heritage asset;.....</p> <p>.....Where development affects a heritage asset or its setting, <del>an appropriate management plan, which includes</del> a Heritage Statement, must be <del>in place</del> <u>submitted</u> to conserve and enhance the asset and its setting.</p> <p>Where 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 <u>presents the asset's optimum viable use and</u> is necessary to secure the future conservation of the asset and that any negative impacts are outweighed.</p>	<p>To ensure 'hidden' assets are sufficiently recognised</p> <p>To clarify what needs to be demonstrated</p>
PL11 Implementation Para 13.78 Page 119	<p>Designated heritage assets <del>can</del> include listed buildings, curtilages of listed buildings, conservation areas, <del>archaeological remains,</del> Scheduled Monuments and <u>Registered historic p</u>Parks and <u>g</u>Gardens. <u>Such assets, except Conservation Areas, are administered by Historic England. Non-designated assets include</u> Locally <del>!</del>Listed <del>b</del>Buildings, <del>are known as non-designated assets. Historic England administers national designations which include all designated heritage assets apart from conservation areas, monuments, sites, places, areas or landscapes which a Local Authority deems to have special historic or architectural interest.-</del></p>	<p>To ensure archaeological sites have sufficient recognition</p>
PL11 Implementation Para 13.79 Page 119	<p>National policies and guidance outline the rationale behind the designation of heritage assets, with special architectural or historic interest being at the core of any designation decision. <u>Proposals for enabling development would be assessed having regard to Historic England's latest guidance on enabling development.</u> National policies also set out the hierarchy of significance of historic assets.</p>	<p>Clarify guidance on enabling development</p>

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PL11 Implementation Para 13.83 Page 119	Where planning permission is required for alterations or additions to listed and locally listed buildings, <del>a Statement of Significance and</del> a Heritage Statement.....	Heritage Statement is more applicable than a Statement of Significance
Chapter 14. Housing		
Local Plan Strategic Objectives Para 14.4 Page 124	..... <u>Objective 12 - Provide opportunities to improve the overall health and wellbeing of Harlow's residents</u>	To include a health and wellbeing objective in Chapter 14
Policy H1 Page 125	Development of the Strategic Housing Site East of Harlow ( <u>allocated in Policy HS3</u> ) and other sites for housing (allocated in <del>the Strategic policies</del> <u>Policy HS2</u> ) will be supported..... ....Development of all allocated housing sites must <del>accord</del> <u>be in general conformity</u> with the <u>appropriate guidance, including principles of</u> the Harlow and Gilston Garden <del>Town Spatial Vision</del> <u>Town Vision</u> and <del>Design Charter</del> <u>Design Guide</u> .	To cross-reference policies
H1 Justification Para 14.5 Page 125	The housing requirement for the district is set out in <del>the Strategic policies</del> <u>Policy HS1</u> .....	To cross-reference policies
H1 Implementation Para 14.7 Page 125	..... <del>Given the important contribution that housing sites in Harlow will make to the development of the new Garden Communities in the Harlow and Gilston Garden Town, the development of all allocated housing sites must accord with the Garden Town Spatial Vision and Design Charter.</del>	To avoid repetition of policy wording

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Policy H4 Page 128	<p>..... (c) the existing building is unfit for human habitation, and cannot be <del>economically</del> <u>viably</u> improved and brought back into residential use;.....</p>	To clarify
Policy H5 Page 129	<p><del>All new dwellings should be at least Building Control Regulations Part M4(2) standard for accessible and adaptable homes to meet the occupiers' future needs. To ensure that new homes are both accessible and adaptable to meet the changing needs of occupants, the Council requires that:</del></p> <p><u>(a) all new dwellings are at least Building Regulations Part M4(2) standard for accessible and adaptable homes; and</u></p> <p><u>(b) in addition, major residential development, should provide Building Control Regulations Part M4(3) standard dwellings for wheelchair users should be provided. The proportion is set out in the latest Strategic Housing Market Assessment (SHMA) or other additional appropriate evidence directly related to the housing needs of Harlow.</u></p>	To clarify the policy; incorporate a viability test for exemption to part (b) of the policy
H5 Justification New para before para 14.23 Page 129	<p><u>National planning guidance states that a policy requiring wheelchair accessible dwellings should only be applied to those dwellings where the local authority is responsible for allocating or nominating a person to live in that dwelling. Consequently, the Council will negotiate a proportion of wheelchair adaptable (market and affordable housing) and/or wheelchair accessible (affordable housing only) dwellings, as appropriate, based on the latest Strategic Housing Market Assessment (SHMA) or other additional appropriate evidence directly related to Harlow's housing needs.</u></p>	To further clarify the Council's approach to implementation; to comply with government guidance

<b>Section, Paragraph/Policy and Page Number</b> <i>(Refer to Pre-Submission version of Local Plan)</i>	<b>Changes to text</b> <del>deletions struck through</del> • <u>additions underlined</u> <i>(Dots denote where the paragraph/policy continues before/after the text)</i>	<b>Reason(s) for change</b>
H5 Justification Para 14.23 Page 129	National <u>planning</u> policies require Local Plans to support Building <del>Control</del> <u>Regulations</u> .....	To correct terminology
H5 Justification New paras after para 14.25 Page 129	<u>Harlow has an ageing population, which has important implications for the future delivery of housing over the Local Plan period. Essex County Council (ECC) is the provider of social care in Harlow. ECC's approach to Independent Living (Extra Care) encourages the provision of specialist accommodation in Essex as a means by which older people can continue to live healthy and active lives within existing communities. For Harlow, the evidence base (the Housing LIN SHOP@ tool ) predicts a need for 104 units of Extra Care accommodation (i.e. 'whole market demand') in addition to the current Extra Care provision in the district. This provision is in addition to the requirement for other specialist accommodation such as sheltered housing.</u>  <u>It is ECC's intention to facilitate the development of at least one 60 unit Extra Care scheme in the next five years in Harlow to meet Adult Social Care demand in the district. In addition to the Evidence Base mentioned previously, ECC will be publishing an updated Market Position Statement in 2019 setting out its intentions for the provision of Extra Care across the county, which will also inform this Local Plan. This approach to meeting the specialist accommodation needs of older people is intended to reduce the demand for residential/nursing home care across the county. Extra Care schemes are part of a wider accommodation pathway to enable older people to remain as independent as possible, with the right housing and support to meet their needs.</u>	To provide further evidence on the need for Independent Living in Harlow
H5 Implementation Para 14.26 Page 129	The Building <del>Control</del> <u>Regulations</u> Part M4(2) and Part M4(3) .....	To correct terminology



Section, Paragraph/Policy and Page Number <i>(Refer to Pre-Submission version of Local Plan)</i>	Changes to text <del>deletions struck through</del> • <u>additions underlined</u> <i>(Dots denote where the paragraph/policy continues before/after the text)</i>	Reason(s) for change						
H5 Implementation Para 14.27 Page 130	.....required to be of Building <del>Control</del> <u>Regulations</u> Part M4(3) standard.....	To correct terminology						
Policy H6 Page 130	<p><del>A range of housing types and sizes, across a range of tenures, must be provided in major residential development.</del></p> <p><del>The Council will support community led housing developments on appropriate sites.</del> <u>On new housing developments, an appropriate mix of housing tenures, types and sizes will be expected to be provided, in order to create balanced communities which reflect Harlow's housing needs and local character. To achieve this, developers should take into account the latest Strategic Housing Market Assessment, or other additional appropriate evidence directly related to Harlow's housing needs.</u></p> <p><u>Where appropriate and in accordance with policies in the Local Plan, the following types of housing should be provided:</u></p> <p><u>(a) affordable housing;</u> <u>(b) accessible and adaptable housing;</u> <u>(c) self-build and custom-build housing plots;</u> <u>(d) community-led housing.</u></p>	To clarify the requirements of the policy and set out the types of housing to be provided						
H6 Justification Fig. 14.1 (Range of housing types,	<table><tr><td>.....</td><td></td></tr><tr><td>Market Housing</td><td>%</td></tr><tr><td>.....</td><td>.....</td></tr></table>	.....		Market Housing	%	.....	.....	To correct figure error
.....								
Market Housing	%							
.....	.....							

Section, Paragraph/Policy and Page Number <i>(Refer to Pre-Submission version of Local Plan)</i>	Changes to text <del>deletions struck through</del> • <u>additions underlined</u> <i>(Dots denote where the paragraph/policy continues before/after the text)</i>			Reason(s) for change							
sizes and tenures) Page 130		<table><tr><td rowspan="3">House</td><td></td><td></td></tr><tr><td>4 Bedrooms</td><td><del>0.02</del></td></tr><tr><td>.....</td><td>.....</td></tr></table>	House			4 Bedrooms	<del>0.02</del>	.....	.....		
House											
	4 Bedrooms	<del>0.02</del>									
	.....	.....									

<b>Section, Paragraph/Policy and Page Number</b> <i>(Refer to Pre-Submission version of Local Plan)</i>	<b>Changes to text</b> <del>deletions struck through</del> • <u>additions underlined</u> <i>(Dots denote where the paragraph/policy continues before/after the text)</i>	<b>Reason(s) for change</b>
<p>Policy H8 Page 132</p>	<p><del>Major residential development must provide</del> <u>In residential developments of more than 10 dwellings, it will be expected that</u> at least 30% affordable housing <u>is provided.</u></p> <p>Reduction of this percentage <del>-will require an independent viability assessment.</del> <u>may be permitted for viability reasons. Any reduction or non-agreement between the developer and the Council will require an independent viability assessment.</u></p> <p><u>Affordable housing within a development will normally be provided on-site, unless exceptional circumstances should require it to be provided elsewhere, with the agreement of the Council. Applicants will be required to submit justification for off-site construction or financial contributions.</u></p> <p><u>Affordable housing provision will be expected to have regard to the recommended tenure mix identified in the latest Evidence Base on housing need and affordable housing products defined in current national planning policies.</u></p> <p><u>Affordable housing will be incorporated into the overall design layout to avoid significant clustering of affordable housing. The design of affordable housing should make it indistinguishable from market housing.</u></p> <p><u>Legal agreements with the Council will ensure that affordable housing benefits, for both affordable rented and intermediate housing, are secured for first and subsequent occupiers and retained as affordable.</u></p>	<p>To be more specific as to the requirements of the Council with regards affordable housing; including a review of percentage reduction if economic circumstances change</p>

Section, Paragraph/Policy and Page Number <i>(Refer to Pre-Submission version of Local Plan)</i>	Changes to text <del>deletions struck through</del> • <u>additions underlined</u> <i>(Dots denote where the paragraph/policy continues before/after the text)</i>	Reason(s) for change
H9 Implementation Para 14.45 Page 133	This policy will be delivered through the approval of individual planning applications sites allocated in <del>the Strategic policies</del> <u>Policy HS2</u> , and.....	To cross-reference policies
H9 Implementation Para 14.46 Page 133	<del>The Strategic policies indicate the sites that will contain an element of self build or custom build housing. In addition, other allocated sites will be expected to make a contribution to meet the demand.</del> <u>Policy H6 identifies that developers must provide self-build and/or custom build housing as part of the dwelling mix.</u> The Council encourages developers and land owners to consult the Council's <del>register</del> to establish the current demand for self-build and custom-housebuilding and meet that demand accordingly.	To cross-reference policies; remove reference to developers consulting the Council's register to avoid conflict with the GDPR
Policy H10 Page 134	..... (a) the development would not have an unacceptable adverse effect on the character of the locality, the appearance of the street scene, the amenities enjoyed by the occupiers of neighbouring dwellings, <del>or designated and locally identified habitats</del> <u>biodiversity or geodiversity assets, or Other Open Spaces</u> ;.....  .....(d) the development would be within a reasonable distance of shops, schools, healthcare and <del>other</del> community/leisure facilities;.....	To correct terminology and add Other Open Spaces  To clarify that shops aren't considered as community facilities
H10 Justification Para 14.47 Page 134	<del>The Strategic policies allocate pitches for Travellers, allocate pitches for Travellers.</del> <u>Policy HS4 identifies the restoration of pitches at the Fern Hill Lane site to fulfil the need for the Travelling Community in Harlow</u> over the Local Plan period.....	To cross-reference policies;
Chapter 15. Prosperity		

Section, Paragraph/Policy and Page Number <i>(Refer to Pre-Submission version of Local Plan)</i>	Changes to text <del>deletions struck through</del> • <u>additions underlined</u> <i>(Dots denote where the paragraph/policy continues before/after the text)</i>	Reason(s) for change
Introduction Para 15.3	..... A key priority is to maintain and enhance the role of Harlow Town Centre and, as such, the policies seek <u>to restrict</u> the sub-division of units.	To add missing words
Introduction Para 15.4	.....This will ensure that sites in the Town Centre are considered in the first instance, followed by edge-of-centre, then Neighbourhoods, then <del>and</del> Hatches, <u>then Retail Parks</u> . Out-of-centre locations will only be considered as a last resort. Development must be appropriate to the function, size and character of the centre <u>in which it would be located</u> .	To better reflect the Retail Hierarchy and to add missing words
Local Plan Strategic Objectives Para 15.6 Page 138	<u>.....Objective 12 - Provide opportunities to improve the overall health and wellbeing of Harlow's residents</u>	To include an objective on health and wellbeing in Chapter 15
Policy PR1 Page 139	Development in <u>existing</u> Employment Areas..... .....(b) the development will <u>materially</u> increase the number of jobs for local residents;.....	To improve clarity and to clarify the type of increase is a material increase
Policy PR1 Page 139	Development in the <u>existing</u> Neighbourhood Service Areas..... ..... (a) evidence must be provided to demonstrate that the unit has been vacant and actively marketed for Use Class B1to the satisfaction of the Council for at least 12 months or for an appropriate period of time <del>previously</del> agreed with the Council;.....	To improve clarity
PR2 Implementation Para 15.16 Page 141	..... <del>The Council will determine how long a marketing exercise should be on a case-by case basis.</del>	To remove as it conflicts with policy wording

Section, Paragraph/Policy and Page Number <i>(Refer to Pre-Submission version of Local Plan)</i>	Changes to text <del>deletions struck through</del> • <u>additions underlined</u> <i>(Dots denote where the paragraph/policy continues before/after the text)</i>	Reason(s) for change
Policy PR3 Page 142	1. Provision of employment floorspace Employment development outside <u>existing</u> Employment Areas and Neighbourhood Service Areas will be <del>permitted</del> <u>supported</u> where:  .....2. Loss of employment floorspace Development resulting in the loss of Use Classes B1, B2, B8 and waste uses will <del>not</del> be permitted outside of the district's Employment Areas and Neighbourhood Service Areas <del>unless</del> <u>where</u> it meets the following criteria:.....	To correct wording
PR4 Implementation Para 15.24 Page 143	This policy will be applied to major developments and secured through <del>a</del> planning obligation <u>s</u> ,.....	To provide the plural
PR5 Implementation Para 15.27 Page 144	<del>The Strategic policies</del> <u>Policy RS1</u> sets out the hierarchy of retail centres in Harlow.....	To cross-reference policies
PR5 Implementation Para 15.28 Page 145	....that the proposal will not have a negative impact on the vitality and viability of <del>existing centres</del> <u>the town centre</u> and that the development increases overall sustainability and accessibility.....	To correct terminology
PR5 Implementation Para 15.29 Page 145	This policy seeks to maintain active frontages in <del>the Town Centre</del> <u>all retail centres</u> to provide.....	To ensure better compliance with the policy
Policy PR6 Page 145	1. Primary Frontages Development in the Town Centre primary frontages will be <del>permitted</del> <u>supported</u> where:.....	To correct terminology
PR6 Justification Para 15.32 Page 145	This policy supports Main Town Centre Uses including commercial, leisure, evening and night-time uses in secondary frontages <del>where it is considered appropriate and where it strengthens the role of the Town Centre as a sub-regional centre.</del>	To ensure better compliance with the policy

Section, Paragraph/Policy and Page Number (Refer to Pre-Submission version of Local Plan)	Changes to text <del>deletions struck through</del> • <u>additions underlined</u> (Dots denote where the paragraph/policy continues before/after the text)	Reason(s) for change
Policy PR8 Page 147	Development in Neighbourhood Centre frontages, which falls in Use Classes A1, A2, A3, A4, A5, D1, D2, Sui Generis and C3, <del>must meet</del> <u>will be supported subject to</u> the following criteria:.....	To clarify
PR8 Implementation Para 15.40 Page 147	.....calculated will be set out in <del>a Supplementary Planning Document (SPD)</del> <u>the Council's Authority Monitoring Report (AMR).</u>	To correct document type/title
PR10 Implementation Para 15.48 Page 149	..... whilst still having the flexibility to offer space for bulky goods and mitigating the impact on the Town Centre's viability and vitality <u>from the sale of non-bulky goods.</u>	To clarify
Chapter 16. Lifestyles		
Local Plan Strategic Objectives Para 16.4 Page 152	.....Objective 11 – <del>To p</del> Provide and enhance sporting, leisure, recreational facilities and cultural opportunities in the district <u>Objective 12 - Provide opportunities to improve the overall health and wellbeing of Harlow's residents</u>	To include an objective on health and wellbeing in Chapter 16
Policy L1 Page 153	L1 Open Spaces, Play Areas, <u>Allotments</u> and Sporting Provision and Facilities in Major Development In major development <u>and depending on demonstrable need,</u> public open space, <del>and</del> play space, <del>and, where appropriate,</del> allotments and sporting <del>provision and</del> facilities are required, <del>together in all cases with</del> <u>to be provided (or upgraded in the case of existing facilities).</u> <u>along with</u> their <u>ongoing</u> management and maintenance.	To add allotments to title  To recognise that in some cases, new facilities may not be needed and existing ones could be upgraded

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L1 Implementation Para 16.7 Page 153	The Adopted Open Space, Sport and Recreation Supplementary Planning Document (SPD) ( <u>or successor</u> ) and.....	To allow for the replacement of the SPD
Policy L2 Page 154	1. Development for the provision of recreational, sporting, cultural and community uses and facilities Development for the provision of recreational, sporting, cultural and community uses and/or facilities, <del>including playing fields, play spaces, allotments and sports clubs,</del> will be <del>permitted</del> <u>supported</u> where it meets the following criteria:..... ..... Developments that will result in the loss of all or part of any recreational, sport <u>ing</u> s, cultural <del>or and</del> community uses and/or facilities will not be <del>permitted</del> <u>supported</u> unless it meets one or more of the following criteria:	To ensure consistency with Policy L1
L2 Justification Para 16.10	....allotments <u>and</u> , sporting facilities <del>and parks</del> . It also...	To ensure consistency with policy
L2 Implementation New para after para 16.13 Page 155	<u>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.</u>	To require evidence that a facility/use has been marketed sufficiently prior to its possible loss
L3 Justification Para 16.15 Page 155	.....major new developments will contribute towards this. <u>This policy will also manage the relocation and loss of public art and will give due consideration to the historic significance of the artwork or its setting.</u> The Council will prepare a Public Art.....	To ensure the relocation/loss of public art is considered



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L3 Implementation New para before para 16.16 Page 155	<u>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.</u>	To ensure viability is considered

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<p><u>Policy L4 Health and Wellbeing (new Policy)</u> Page 156</p>	<p><u>The Council will seek to deliver development and growth which has a positive impact on the health and wellbeing of residents, and address issues of health deprivation and health inequality in the district in accordance with the objectives of the Harlow Health and Wellbeing Strategy and in response to the various Evidence Base sources.</u></p> <p><u>When promoting development, applicants should consider the impact on the health and wellbeing of new and existing residents, having regard to the following principles:</u></p> <p><u>(a) infrastructure required to encourage physical exercise, including sport and recreation facilities, walking, and cycling and bridleway routes;</u></p> <p><u>(b) the provision of accessible open space, Green Infrastructure and landscaping;</u></p> <p><u>(c) the provision of new or enhanced healthcare facilities, working with the relevant health authorities;</u></p> <p><u>(d) the location and links between community facilities, homes, education and employment opportunities and sustainable travel options;</u></p> <p><u>(e) the provision of opportunities to grow food and avoiding unhealthy eating options; and</u></p> <p><u>(f) good quality design, having regard to the Essex Design Guide, which incorporates active design principles.</u></p> <p><u>Applicants may be required to prepare a Health Impact Assessment to determine the extent of potential health impacts from development proposals and set out appropriate mitigation measures.</u></p>	<p>To include an overall health and wellbeing Policy in the Local Plan</p>

<b>Section, Paragraph/Policy and Page Number</b> <i>(Refer to Pre-Submission version of Local Plan)</i>	<b>Changes to text</b> <del>deletions struck through</del> • <u>additions underlined</u> <i>(Dots denote where the paragraph/policy continues before/after the text)</i>	<b>Reason(s) for change</b>
<u>L4 Justification (new paras after policy)</u> Page 156	<p><u>The Council wants all residents to live in environments that support good health and wellbeing and is committed to ensuring that residents benefit from the positive impacts that development and infrastructure growth can have on health and wellbeing. This is further supported through the outcomes of the Harlow Health and Wellbeing Strategy. Along with policies in the Local Plan as a whole, this policy ensures that development proposals have considered measures that will improve the health and wellbeing of residents and not contribute towards further worsening health issues across the district.</u></p> <p><u>The principles set out in this policy have been informed by the Town and Country Planning Association's Guide 8: Creating health promoting environments, which states that good living environments can have a positive impact on health equalities. This policy has also been developed having regard to health and wellbeing issues identified in Harlow, as evidenced by the Essex Joint Strategic Needs Assessment and Public Health Profiles produced by Public Health England.</u></p> <p><u>The Harlow and Gilston Garden Town partners are also developing a health framework using the NHS Healthy Towns Criteria, which will set out projects or interventions that could be enhanced in proposed developments and other opportunities for improving health and wellbeing across the Garden Town. Once complete it will be endorsed by the Garden Town local authorities and the Health and Wellbeing Boards.</u></p>	To provide justification for new policy

<b>Section, Paragraph/Policy and Page Number</b> <i>(Refer to Pre-Submission version of Local Plan)</i>	<b>Changes to text</b> <del>deletions struck through</del> • <u>additions underlined</u> <i>(Dots denote where the paragraph/policy continues before/after the text)</i>	<b>Reason(s) for change</b>
<p><u>L4 Implementation</u> (new paras after Justification) Page 156</p>	<p><u>Implementation</u>  <u>This policy refers to the Essex Design Guide which addresses health and wellbeing through the following sections:</u></p> <ul style="list-style-type: none"> <li>• <u>Landscape and Greenspaces</u></li> <li>• <u>Layout Design</u></li> <li>• <u>Street and Roads</u></li> <li>• <u>Internal Design Details</u></li> <li>• <u>Architectural Details</u></li> <li>• <u>Thematic sections dealing with: ageing populations; digital and smart technology; active design; health &amp; wellbeing itself</u></li> </ul> <p><u>The Essex Design Guide, alongside the Harlow Design Guide and the Harlow and Gilston Garden Town Vision and Design Guide, should be used to help design good quality schemes that limit adverse impacts on and promote health and wellbeing in the first instance. These will help ensure that health and wellbeing are addressed at the earliest possible, conceptual / design stage of any development. This is necessary to help enable smoother and timelier progress through the development and planning application process. Accordingly, supporting master-planning work for larger developments will be required to ensure that these matters are addressed from the outset.</u></p> <p><u>Where appropriate, this policy supports the use of Health Impact Assessments (HIA) for certain types of developments. HIAs allow the Council to assess the impact that the proposed development will have on the health and wellbeing of residents. These assessments ensure that the Council can work with developers to optimise the positive impacts on the health and wellbeing of potential development and reduce, remove or mitigate any identified unintended consequences that may arise on health from the submitted proposal.</u></p> <p><u>Applicants should refer to the Essex wide HIA guidance, updated and agreed by the Essex local authorities, which assists in the preparation of HIAs.</u></p>	<p>To provide implementation details for new policy</p>

<b>Section, Paragraph/Policy and Page Number</b> <i>(Refer to Pre-Submission version of Local Plan)</i>	<b>Changes to text</b> <del>deletions struck through</del> • <u>additions underlined</u> <i>(Dots denote where the paragraph/policy continues before/after the text)</i>	<b>Reason(s) for change</b>
L4 Implementation <u>(new para after Justification. continued)</u> Page 156	<u>This policy also refers to active design principles which have been produced by Sport England in partnership with Public Health England and is embedded in the Essex Design Guide. Active design is about designing and adapting where we live to encourage activity in everyday lives. It is a combination of ten principles that promote activity, health and stronger communities through built design and is an important consideration for new development proposals.</u>	To provide implementation details for new policy
<b>Chapter 17. Infrastructure</b>		
Local Plan Strategic Objectives Para 17.8 Page 159	<u>.....Objective 12 - Provide opportunities to improve the overall health and wellbeing of Harlow's residents</u>  Objective <del>13</del> <u>14</u> - Reduce the need to travel by vehicle <del>by ensuring</del> <u>and ensure</u> new development is sustainably located <u>and/or</u> accessible by sustainable <u>and innovative</u> modes of transport  Objective <del>14</del> <u>15</u> – Improve transport links, particularly for sustainable modes of transport, to <del>community facilities</del> <u>access all facilities and jobs</u>	To include an overall health and wellbeing objective in Chapter 17 and to clarify other objectives

Section, Paragraph/Policy and Page Number <i>(Refer to Pre-Submission version of Local Plan)</i>	Changes to text <del>deletions struck through</del> • <u>additions underlined</u> <i>(Dots denote where the paragraph/policy continues before/after the text)</i>	Reason(s) for change						
Policy IN1 Page 159	<p>Sustainable Accessibility All development should have regard to the modal hierarchy as set out <del>in the</del> <del>Strategic Policies</del> <u>below</u>:</p> <table><tr><td rowspan="5"><u>TOP</u>  ↓  <u>BOTTOM</u></td><td><u>Opportunities to reduce travel demand and the need to travel</u></td></tr><tr><td><u>Vulnerable road user needs such as pedestrians and cyclists</u></td></tr><tr><td><u>Public transport passenger needs</u></td></tr><tr><td><u>Powered two wheeler user needs such as mopeds and motorbikes</u></td></tr><tr><td><u>Other motor vehicle user needs</u></td></tr></table> <p><u>New development proposals should investigate ways to reduce the use of the car and promote alternative ways to travel and this should be detailed in a supporting Travel Plan.</u></p> <p>New developments including redevelopments, changes of use and Town Centre and transport interchange improvements will be required to link to <u>,or provide public transport services which link,</u> to the existing cycleway, footway, public right of way and bridleway network, and, where appropriate.....</p>	<u>TOP</u>  ↓  <u>BOTTOM</u>	<u>Opportunities to reduce travel demand and the need to travel</u>	<u>Vulnerable road user needs such as pedestrians and cyclists</u>	<u>Public transport passenger needs</u>	<u>Powered two wheeler user needs such as mopeds and motorbikes</u>	<u>Other motor vehicle user needs</u>	<p>Modal hierarchy missing from Strategic Policies. Included within Policy IN1 to clarify the modal hierarchy for Harlow</p> <p>Moved from later paragraph (more appropriate here)</p> <p>To ensure public transport provision is considered as part of new development proposals</p>
<u>TOP</u>  ↓  <u>BOTTOM</u>	<u>Opportunities to reduce travel demand and the need to travel</u>							
	<u>Vulnerable road user needs such as pedestrians and cyclists</u>							
	<u>Public transport passenger needs</u>							
	<u>Powered two wheeler user needs such as mopeds and motorbikes</u>							
	<u>Other motor vehicle user needs</u>							

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IN1 Implementation Para 17.13 Page 160	<del>New development proposals should investigate ways to reduce the use of the car and promote alternative ways to travel and this should be detailed in a supporting Travel Plan. Opportunities should also be sought to collaborate in the development of travel plans and travel planning measures across the wider Garden Town. For residential development, Applicants should look at.....</del>	To refer to opportunities for developing travel plans in the Garden Town to further support modal shift; ; to ensure all development and not just residential is considered. Deleted text moved to more appropriate place, in policy
IN3 Implementation Para 17.25 Page 162	<del>.....However, applicants will need to demonstrate the level of parking provided is appropriate and will not lead to problems of road congestion and movement and on-street parking on the adjacent highway network.</del>	To ensure the emphasis is on the Council considering what is appropriate in this case.
Policy IN4 Page 163	<b>1. Broadband Provision in Major Development</b> <del>Major development should contribute towards the provision of infrastructure suitable to enable the delivery of high speed broadband services across the Harlow area. Developers will be expected to work with Broadband service providers to ensure that the provision of future proofed high speed Broadband infrastructure is available including connections to buildings, and this should be by fibre connection wherever possible.....</del>  .....2. Broadband Infrastructure Development Broadband infrastructure development <del>must be accompanied by a report which meets</del> the following criteria:.....	To clarify the broadband infrastructure needed to future proof major development       To ensure greater compliance with other policies
Policy IN5 Page 164	.....(a) <u>appropriate</u> evidence has been provided to show.....	To ensure evidence provided is appropriate

<b>Section, Paragraph/Policy and Page Number</b> <i>(Refer to Pre-Submission version of Local Plan)</i>	<b>Changes to text</b> <del>deletions struck through</del> • <u>additions underlined</u> <i>(Dots denote where the paragraph/policy continues before/after the text)</i>	<b>Reason(s) for change</b>
<p>Policy IN6 Page 165</p>	<p>Planning permission will only be granted for development if <del>the</del> provision is secured for related infrastructure, affordable housing, services, facilities and environmental protection <u>and any other planning contributions</u> which are necessary to make the development acceptable in planning terms, directly related to the development, and fairly and reasonably related in scale and kind.</p> <p>The provision of such requirements shall be secured either as part of development proposals, through the use of conditions attached to planning permissions, or through planning obligations. Where it can be demonstrated that provision on-site is not feasible then provision elsewhere, or a <u>financial</u> contribution towards this provision, will be required.</p> <p>Where a planning application extends beyond the district boundary, prior agreement for the provision and location of any necessary obligations will need to be obtained from relevant parties.</p> <p><u>Where the submission of a viability assessment has been justified, the Council will require an independent review of the viability of the scheme to be prepared, the costs of which shall be met by the developer. Where it is accepted that planning contributions are reduced below the requirements set out in policies of the Local Plan, a viability review mechanism will be required to enable a fully policy compliant level of contributions to be achieved over the lifetime of the project. Other than in exceptional circumstances, viability assessments will be made publicly available.</u></p>	<p>To ensure all planning contributions are considered</p> <p>To ensure the contribution is financial</p> <p>To ensure an independent review of the viability of the scheme is prepared where the submission of a viability assessment is justified; to ensure a viability review mechanism is in place to enable fully policy compliant levels of contributions</p>



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IN6 Implementation Para 17.34 Page 165	<p>Planning obligations are negotiated on a case-by-case basis. <u>The approach to development viability, including how it should be taken into account in decision making, should be in accordance with national planning guidance. Viability review mechanisms will be considered on an individual basis taking into consideration matters such as the scale and phasing of the development and may be required both early and late in the development process. Further guidance will be available in an Adopted Planning Obligations Supplementary Planning Document (SPD).</u> <del>Where developers believe that viability is an issue, applicants will need to make a submission to the Council which should include the following:-</del></p> <p><del>(a) a financial viability appraisal;</del>  <del>(b) a statement outlining the benefits and risks of not meeting the policy requirements and the site being delivered immediately.</del></p>	To provide implementation details for the viability review mechanisms
IN6 Implementation Para 17.36 Page 165	<p>Development can create a need for the provision of services, facilities and infrastructure both on-site and off-site. This provision may include, <u>but not be limited to</u>.....  <u>.....(l) any other infrastructure items identified in the Local Plan.</u></p>	<p>To clarify</p> <p>To ensure all infrastructure items identified in the Local Plan are considered</p>
IN6 Implementation Para 17.39 Page 166	<p>.....phasing of development, and measures to meet other <u>Local Plan</u> policies and objectives, such as the protection of the environment.</p>	To improve clarity
<b>Chapter 18. Monitoring</b>		
To update to reflect the changes and updates across the Local Plan, as well as the specific changes below:		

Section, Paragraph/Policy and Page Number <i>(Refer to Pre-Submission version of Local Plan)</i>	Changes to text <del>deletions struck through</del> • <u>additions underlined</u> <i>(Dots denote where the paragraph/policy continues before/after the text)</i>	Reason(s) for change
Housing Strategy and Growth Locations Page 169	Percentage of new dwellings meeting the Building <del>Control</del> <u>Regulations</u> Part M4(2) Standard for accessible and adaptable homes	To correct terminology
Housing Strategy and Growth Locations Page 169	Number of dwellings for wheelchair users under the Building <del>Control</del> <u>Regulations</u> Part M4(3) standard in major residential development	To correct terminology
Retail Ambitions and Town Centre Redevelopment Page 171	<del>Concentration of same Use Class in Neighbourhood Centres --- target No more than two adjacent units being in the same Use Class other than A1 --- relevant policy PR8</del>	Not relevant to PR8
Linking Development Sites to the Wider Environment Page 172	No <del>loss</del> change in Green Belt, Green Wedge, <u>or</u> Green Finger <u>boundaries</u> , or <u>loss of</u> Other Open Space	To clarify what is meant by change to Green Belt etc.
Linking Development Sites to the Wider Environment Page 172	Change in number of <del>biodiversity and geodiversity designated assets in the district</del> <u>Local Sites in Positive Conservation Management</u>	To accord with the Single Data List 160-00 return to Government
Linking Development Sites to the Wider Environment Page 172	<u>Amount of land in new development incorporating Sustainable Drainage Systems --- target Increasing trend --- relevant policy PL10</u>  <u>Amount of land in existing development which has been retrofitted to incorporate Sustainable Drainage Systems --- target Increasing trend --- relevant policy PL10</u>	To ensure monitoring of SuDS in development

Section, Paragraph/Policy and Page Number <i>(Refer to Pre-Submission version of Local Plan)</i>	Changes to text <del>deletions struck through</del> • <u>additions underlined</u> <i>(Dots denote where the paragraph/policy continues before/after the text)</i>	Reason(s) for change
Lifestyle Page 173	Change in <del>number</del> <u>provision</u> of public art in Harlow – target No net loss <del>in</del> <u>of</u> public art provision <del>and increase in amount</del> -- relevant policy L3	To improve clarity
Lifestyle Page 173	<u>Quality of infrastructure, facilities and/or design which would improve health--- target Increase ---- relevant policy L4</u>	To include new indicator for new policy
Glossary		
Allotment Page 180	<del>An 'allotment garden', or any parcel of land not more than five acres in extent, cultivated or intended to be cultivated as a garden farm, or partly as a garden farm and partly as a farm.</del> <u>Land cultivated for the production and personal consumption of fruit and vegetables.</u>	To improve clarity
Ancient woodland Page 180	A protected area that has been wooded continuously since at <del>least</del> <u>the year</u> 1600 <del>or earlier.</del>	To tidy wording
Article 4 Direction Page 180	Direction removing some or all <del>permitted</del> development rights <del>for example within a conservation area or curtilage of a listed building.</del> <u>permitted by The Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended).</u> Article 4 Directions are issued by local authorities.	To add relevant legislation

Section, Paragraph/Policy and Page Number <i>(Refer to Pre-Submission version of Local Plan)</i>	Changes to text <del>deletions struck through</del> • <u>additions underlined</u> <i>(Dots denote where the paragraph/policy continues before/after the text)</i>	Reason(s) for change
Attenuation Page 180	<u>Relating to rivers, attenuation is the</u> <del>R</del> reduction of peak flow and increased duration of a flow event.	
<u>BREEAM (Building Research Establishment Environmental Assessment Method)</u> Page 180, after Biodiversity	<u>An international scheme providing independent third party certification of the sustainability performance of individual buildings, infrastructure projects and communities. Assessment and certification can take place at a number of stages, from design and construction to operation and refurbishment.</u>	To add definition of BREEAM
Building Regulations Page 180	The minimum <u>national</u> standards for design, construction and alterations to buildings, <del>They are developed by the Government and</del> <u>as</u> approved by Parliament.	To correct terminology
Community Infrastructure Levy (CIL) Page 181	A levy allowing local authorities to raise funds from owners or developers of land undertaking new building projects in <del>their</del> <u>the local</u> area. <del>Learn more about the Community Infrastructure Levy.</del>	To delete unnecessary wording
Conservation Area Page 181	An area of notable environmental or historical interest or importance which is <u>administered by the Council as a Designated Heritage Asset and benefits from additional planning controls to</u> <del>protected by law against it from</del> undesirable changes.	To clarify terminology

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Heritage Asset Page 183	<p><u>Designated</u> Heritage Asset</p> <p><del>A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. Heritage asset includes designated heritage assets and assets identified by the local planning authority (including local listing).</del> <u>Includes listed buildings and their curtilages. Conservation Areas, Scheduled Monuments and Registered Parks and Gardens. Such assets have been judged to be of national importance in terms of architectural or historic interest, therefore benefitting from additional planning controls. They are administered by Historic England, with the exception of Conservation Areas which are administered by the Council. Some assets may also be on the Essex Historic Environment Record.</u></p>	To clarify terminology
Development Management Policies Page 181	<p>Local Plan policies which guide applicants <del>applying for</del> <u>submitting planning applications to obtain</u> planning permission for proposed development. <del>The proposed development is assessed on these policies and other policies in the Local Plan. The Council, in its capacity as Local Planning Authority, uses these policies (and other policies in the Local Plan and national policies) to assess and determine such</del> <u>planning applications</u></p>	To correct terminology

<b>Section, Paragraph/Policy and Page Number</b> <i>(Refer to Pre-Submission version of Local Plan)</i>	<b>Changes to text</b> <del>deletions struck through</del> • <u>additions underlined</u> <i>(Dots denote where the paragraph/policy continues before/after the text)</i>	<b>Reason(s) for change</b>
Development Plan Document (DPD) Page 181	Development Plan Documents provide a spatial strategy, <u>policies</u> and, where needed, a more detailed action plan for a specific area. They are accompanied by a Policies Map which illustrates the spatial extent of policies in the DPD. <u>The Local Plan is a DPD</u> .....	To correct terminology
Duty to Co-operate Page 181	<del>Places</del> <u>Arising from the Localism Act 2011, this is</u> a legal duty on Local Planning Authorities.....	To add name of legislation
East of England Plan (EEP) Page 181	The <del>plan set out an overarching development strategy</del> <u>Regional Spatial Strategy</u> for the eastern region, <del>and was</del> officially revoked by Parliament in January 2013.	To add info
Employment Area Page 181	Area allocated for <u>employment uses</u> , to meet the <u>employment</u> needs of local residents and reduce out-commuting, offering a wide range of jobs to create a well-balanced community.	To improve clarity

Section, Paragraph/Policy and Page Number <i>(Refer to Pre-Submission version of Local Plan)</i>	Changes to text <del>deletions struck through</del> • <u>additions underlined</u> <i>(Dots denote where the paragraph/policy continues before/after the text)</i>	Reason(s) for change
Enterprise Zone (EZ) Page 182	An area in which <del>state</del> incentives such as tax concessions <u>and relaxed planning controls</u> are offered to encourage business investment <u>and development</u> .	To improve clarity
Flood Zone Page 182	<del>..... Developers and local authorities should seek to reduce the overall level of flood risk, relocating development sequentially to areas of lower flood risk and attempting to restore the floodplain and make open space available for flood storage.....</del>	Not suitable for Glossary
Green Belt Page 182	An area of open land around an urban area, on which <del>building</del> <u>inappropriate development</u> is restricted, primarily to prevent unrestricted sprawl <u>and to provide the other nationally-set purposes of Green Belt land</u> .	- To ensure greater NPPF compliance
Green Finger Page 183	Linear, open and predominantly green spaces which link to Green Wedges and <u>primarily</u> have a recreational/movement function. <u>as well as providing the other roles and functions as detailed in the Local Plan</u> .	To add more information

Section, Paragraph/Policy and Page Number <i>(Refer to Pre-Submission version of Local Plan)</i>	Changes to text <del>deletions struck through</del> • <u>additions underlined</u> <i>(Dots denote where the paragraph/policy continues before/after the text)</i>	Reason(s) for change
Green Infrastructure (GI) Page 183	<del>Refers to multi functional green spaces that provide habitat, flood protection, cleaner air, and cleaner water.</del> <u>Green Infrastructure is multi-functional natural and man-made urban and rural green space, including parks, playing fields, woodlands, allotments and wildlife corridors, rivers, canals, lakes and other bodies of water. At a smaller-scale, it also includes measures to assist climate change mitigation, such as green roofs, and green walls, rain gardens and ponds.</u>	To add info; be consistent with the amended GI policies in the Local Plan
Green Wedge Page 183	A series of <u>open and predominantly</u> green spaces, kept free from <del>inappropriate</del> development, which run through the <del>urban area</del> <u>district</u> and <u>provide roles and functions as detailed in the Local Plan, including</u> <del>allowing</del> residents to <u>easily</u> access <del>to important landscapes and the wider</del> countryside.	To clarify; add info
<u>Grow-on space</u> Page 183	<u>The development of a new commercial building(s) which will provide space to enable the business to expand in situ, without having to relocate to larger accommodation.</u>	To include definition of grow-on space
<u>Home Quality Mark (HQM)</u> Page 183, after Hatch	<u>Used by developers to demonstrate the high quality of their housing, by providing impartial information from independent experts on a new home's quality. It indicates the health and wellbeing benefits, overall expected costs and environmental footprint arising from living in the new home.</u>	To include definition of Home Quality Mark



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<u>Locally Listed Building</u> Page 183, after Local Development Order	<u>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.</u>	To clarify the difference between a Listed Building and a Locally Listed Building
Local Plan Page 184	<del>⓪ A Development Plan Document setting out the o</del> verarching strategy for an area, setting out the future development proposals for at least 15 years, <u>with policies against which planning applications are determined. Accompanied by a Policies Map.</u>	To clarify; add info
Major Development Page 184	Development involving <del>any</del> one or more of the following: (a) the winning and working of minerals or the use of land for mineral-working deposits; (b) waste development; (c) the provision of <u>ten or more</u> dwellinghouses <u>,or where number of dwellinghouses is unknown, the site area is 0.5 hectares or more;</u> <del>where—</del> <del>(i)the number of dwelling houses to be provided is 10 or more; or</del> <del>(ii)the development is to be carried out on a site having an area of 0.5ha or more and it is not known whether the development falls within sub-paragraph (c)(i);</del> (d) the provision of a building <u>(s)</u> <del>or buildings where the</del> - floor space to be <u>built is</u> <del>created by the development is</del> 1,000 sqm or more; or (e) development carried out on a site <del>having</del> <u>with</u> an area of 1 hectare or more.	To correct terminology/clarify

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Minor Development Page 185	Development <u>involving the provision of</u> <del>involving any one or more of the following:</del> (a) <del>1-9 between one and nine dwellinghouses (inclusive), and unless floorspace exceeds 1,000m<sup>2</sup>/under half a hectare)</del> <u>or where number of dwellinghouses is unknown, the site area is less than 0.5 hectares; or</u> (b) <del>office / light industrial up to 999m<sup>2</sup>/under 1 hectare</del> (c) <del>general industrial up to 999 m<sup>2</sup>/under 1 hectare</del> (d) <del>retail up to 999 m<sup>2</sup>/under 1 hectare</del> (e) <u>gypsy/traveller site - 0 to 9 pitches</u> <del>fewer than 10 pitches; or</del> (c) any other use - floor space to be built is less than 1,000 sqm, or site area is less than 1 hectare.	To correct terminology/units of measurement
<del>National Park—</del> Page 185	<del>The statutory purposes of national parks are to conserve and enhance their natural beauty, wildlife and cultural heritage and to promote opportunities for public understanding and enjoyment of their special qualities. National parks are designated by Natural England, subject to confirmation by the Secretary of State under the National Parks and Access to the Countryside Act 1949 (as amended).</del>	Not relevant to Local Plan
<u>Non-Designated Heritage Asset</u> Page 185, after New Town	<u>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 and may be on the Essex Historic Environment Record.</u>	To clarify terminologies used

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<u>Passivhaus</u> Page 186, after Other Open Spaces	<u>Also known as 'passive house'. A standard for energy efficiency in a building to reduce its ecological footprint, resulting in ultra-low energy buildings requiring little energy for heating or cooling, primarily using passive features such as solar gain or natural ventilation. Can be applied to offices and residential buildings, as well as both new and refurbished buildings.</u>	To add definition of Passivhaus
People with disabilities Page 186	People <del>have</del> <u>are defined as having</u> a disability if they have a physical or mental impairment,.....	To clarify
Pollution Page 186	Pollution can arise from a range of emissions <u>and sources</u> , including smoke,.....	To add info
<u>Registered Parks and Gardens</u> Page 187, after Primary and Secondary Frontages	<u>Gardens, grounds, parks and other planned open spaces which are administered by Historic England and registered on the Register of Parks and Gardens of special historic interest in England. They are designated heritage assets and benefit from the associated additional planning controls.</u>	To include definition of Registered Park/Garden
Scheduled Monument Page 187	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). <u>Scheduled Monuments are designated heritage assets, administered by Historic England, and benefit from the associated additional planning controls.</u>	To clarify terminologies used

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<u>Spatial Development Strategy</u> Page 187, after Source Protection Zones (SPZ))	<u>Broadly sets out how the Vision for Harlow and the Themes and Strategic Objectives of the Local Plan will be achieved and delivered. The aims of the Strategy include protecting and enhancing important areas which offer residents a good quality of life, and changing areas through new development to improve living standards for existing and future residents. The Key Diagram graphically represents the Strategy.</u>	To include definition of Spatial Development Strategy
<u>Strategic Growth Strategy</u> Page 188, after Strategic Flood Risk Assessment (SFRA)	<u>Provides the Strategic Policies to deliver the Spatial Development Strategy.</u>	To include definition of Strategic Growth Strategy
<u>Statement of Common Ground</u> Page 187, after Statement of Community Involvement	<u>A statement of common ground is a written record of the progress made by strategic policy-making authorities during the process of planning for strategic cross-boundary matters. It documents where effective co-operation is and is not happening throughout the plan-making process, and is a way of demonstrating at examination that plans are deliverable over the plan period, and based on effective joint working across local authority boundaries.</u>	To include definition of Statement of Common Ground
Sui Generis Page 188	Uses of land or buildings not falling into any of the Use Classes identified by the <u>Town and Country Planning (Use Classes) Order 1987 (as amended)</u> , for example theatres, launderettes, car showrooms and filling stations.	To add legislation title

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Sustainable Drainage Systems (SuDS) Page 188	A sequence of management practices and control structures designed to drain surface water in a more sustainable fashion than some conventional techniques <u>and to mimic natural drainage as closely as possible.</u>	To add info
<b>Appendices</b>		
Appendices 1 and 2 Page 192 & 193	Updated to reflect updated housing figures	To update housing figures