

Mr David Reed  
(by email via Ms Copsey)

**Forward Planning**

Harlow Council  
Civic Centre  
The Water Gardens  
Harlow  
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[www.harlow.gov.uk](http://www.harlow.gov.uk)

15 June 2020

**Harlow Local Plan – Main Modifications Consultation**

Dear Mr Reed,

As you are aware, the consultation period for the Harlow Local Plan Main Modifications ran from 12 March 2020 to 31 May 2020, having been extended by a month due to the Coronavirus pandemic.

**Consultation Process**

The Council notified its statutory/specific and general consultees – as well as members of the public who are on our consultation database and wish to be notified about the Local Plan – about the consultation and subsequently about the extended closing date. The consultation was also advertised in the usual ways in accordance with legislation and the Council's adopted Statement of Community Involvement.

Copies of documents relating to the consultation were also available in libraries and other public buildings in Harlow. Following the closure of these due to the Coronavirus pandemic, consultees were advised that they could request hard copies of the documents from the Council to be sent to their address, free of charge. A small number of people subsequently requested hard copies of documents which were sent to them.

The Council received representations from 28 people/organisations.

**Schedule of Responses**

Please find attached to this email a Schedule of Responses, including the original text of reps, together with summaries and Officer comments prepared by the Council. The reps have been split into 'comments', given ID numbers, grouped by MM and/or topic and have been ordered accordingly. We trust the Schedule is in accordance with the preferences stated in your email (forwarded to us by Ms Copsey on 4 February 2020).

For your information, copies of the original reps are also attached. These will need to be referred to where a respondent submitted a map or plan which has not been included in the Schedule; where this is the case, it has been indicated in the Schedule.

The Council does not consider that the issues identified by respondents to the consultation raise any substantive matters that would delay the progress of the Local Plan towards formal adoption. A significant number of the comments do not relate specifically to the proposed modifications, but are of a more general nature.

## **Chapter 19 – Proposed New Additional (Minor) Modification regarding Implementation within the Harlow and Gilston Garden Town**

The Council proposes an Additional (Minor) Modification to the text in paragraph 19.3 to ensure that officer or Councillor joint working processes, that have presently been specified, are not viewed as absolving the responsibilities of the Council to implement the delivery of the Local Plan, and to ensure flexibility for such joint working processes to change as may be necessary over time.

The current references to the Garden Town Board (which holds an advisory function) and to officer posts specifically for facilitating joint working (incorrectly described as an independent team but are directly accountable to and under the direction of the Councils involved) are proposed to be deleted. Chapter 19 has previously not been subject to any modifications, but we respectfully propose to the Inspector that the draft amendments set out below are considered as an Additional (Minor) Modification to provide consistency with references throughout the Local Plan, including the Inspector's modifications:

### *Paragraph 19.3:*

Bringing forward the Strategic Housing Site East of Harlow, which is part of one of the four new Garden Communities, will require a coordinated and cooperative approach between the Council, the developer and Epping Forest District Council and where appropriate Essex County Council. The preparation and endorsement of an agreed master plan and design code for the site ~~through the Garden Town~~ will ensure consistency between the two authorities. The ~~Garden Town Spatial Vision and Design Guide Charter~~ and the Quality Review Panel will ensure a coherent design approach across the Garden Town. The ~~Council will work with Epping Forest and East Herts District Councils, Essex and Hertfordshire County Councils and strategic partners as necessary~~ ~~Garden Town Board, along with an independent team, will continue~~ to guide the delivery of the Garden Town ~~and The Board~~ may consider that further joint work is required to support the delivery and this will be taken forward by the ~~Garden Town team and the~~ local authorities.

## **Further Information**

Please find below further information which should be read alongside the Schedule of Responses. We trust this information will assist in your consideration of the reps.

Employment: Additional information regarding Comment ID 124 (Barton Willmore acting on behalf of Powerrapid)

Please see extracts below from the Harlow and Gilston Garden Town Employment Commission (Hardisty Jones Associates, Draft Report v3.0), which provide more background information in addition to the Officer comment to this rep. The report is still technically in draft format, but the draft version is in the public domain.

*(xx.) The assessment of future employment sites and premises requirements has been undertaken to be consistent with the 2017 Assessment of Employment Needs. Over the period 2016-33 a requirement for an additional 7-9ha of employment land has been identified. This is over and above the requirements as set out for Harlow in the 2017 study*

*which has informed the Harlow Local Plan allocations. This comprises 1 – 3ha for B1a office uses, 2.5ha of B1b R&D uses and 3ha for B1c/B2/B8 industrial and warehouse uses. When aggregated with the Harlow requirements from the 2017 analysis this creates a total quantitative need for the HGGT over the period 2016-33 (aligned to the respective Local Plans) of 25 – 29ha.*

*(xxiv.) Within the industrial market the evidence suggests continued requirements for new stock to enable modern working practices and technology. The trend is also towards smaller unit sizes. The primary focus for HGGT is expected to be small units and grow on space. The current industrial market in Harlow is viewed as very strong with low void rates and evidence of new developments proving successful.*

*(xxv.) Within the storage, distribution and logistics markets there is a separation between very large regional distribution centres and more localised final mile centres. There is also evidence of a move towards more intensive use of space including multi storey development to reduce land costs. The primary concern for HGGT is footloose logistics uses swallowing up all available supply which constrains growth in target sectors.*

*(xxxi.) The Harlow Business Park, Harlow Science Park and East Road allocations within the Harlow Local Plan should be progressed as anticipated. Harlow Science Park should continue to be protected as a premium site aligned to the economic ambitions around the target sectors. Early thought should be given to where further Science Park related development might be located in the long term given limitations on expansion to the current site. Harlow Business Park should be developed in keeping with its surroundings with potential for a mix of B1a, b and c uses. East Road has a permitted/constructed scheme which is almost fully taken up. The larger employment sites at Harlow should be used to accommodate larger occupiers and users which may not be appropriate within the new Garden Communities.*

*(xxxvi.) There is concern that footloose logistics development could crowd out higher value industrial uses and hamper efforts to achieve the economic ambitions for the HGGT, particularly given the proximity of HGGT to both the M11 and M25 providing strong attraction for such users. The allocation of new employment sites at Harlow for B1 uses is therefore helpful in protecting these sites. However, there is a need to strategically plan long term for large scale footloose logistics uses across a wide geography given their role as critical economic infrastructure for the modern economy. Without alternative appropriate long term locations for such uses pressure will remain on sites in and around the HGGT which is a clear risk to the ambitions for transformation. This should be explored with stakeholders with a wider geographic focus such as the LEPs and UK Innovation Corridor.*

MM1: Additional information regarding Comment IDs 177 (Cllr Michael Hardware) and 208 (Epping Forest DC)

These comments raise points relating to whether MM1 should make reference to reducing single-occupancy car use, or whether it should reference reducing car use (i.e. all car use) instead.

The Garden City Principle states that integrated and accessible transport systems, with walking, cycling and public transport designed to be the most attractive forms of local transport. The HGGT Vision (November 2018) sets out the principle of providing integrated transport: a viable and preferred alternative to cars to achieve a modal shift.

Please note that the Vision was still in the early stages of preparation when the emerging Harlow Local Plan was submitted. The Vision has since been endorsed as a material consideration by the Garden Town partners.

The HGGT Transport Strategy (still in draft format following consultation; it is therefore in the public domain) establishes three objectives: (1) achieve a target where 50% of all journeys across Harlow will be made by active and sustainable modes and this target rising to 60% within the new communities; (2) to plan and deliver transport interventions and services for the whole town against the following hierarchy: - reduce the need to travel; - walking and cycling; - public transport; private vehicles; (3) support and encourage a culture of active and sustainable travel.

The above therefore do not make exception in relation to single occupancy car use.

Infrastructure (Water): Additional information regarding Comment ID 93 (Thames Water)

The Council contacted Thames Water to request clarification regarding their rep. The reply that the Council received on 11 June 2020, from Chris Colloff at Savills (acting on behalf of Thames Water), is attached at Appendix 1 to this letter.

### **Council Process**

At the Council's Cabinet meeting of 27 February 2020, delegated authority was given for the Head of Environment and Planning, in consultation with the Chair of the Local Development Plan Panel, to forward consultation responses received to the Planning Inspectorate. As such, the Schedule of Responses has also been reported to the Council's Portfolio Holder for the Environment.

We understand from your previous communication that you plan to issue your final report at the end of June 2020. Once we receive the report and it has been considered by the Council, and in the event that you are satisfied the Local Plan is sound, it is anticipated the Local Plan will be referred to Full Council for formal adoption in July 2020 following any further required modifications.

Please do not hesitate to contact us if you have any questions. We look forward to receiving your final report.

Yours sincerely



**Andrew Bramidge**

Head of Environment and Planning

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## Appendix 1: Email from Thames Water regarding Comment ID 93

**From:** Chris Colloff [<mailto:CColloff@savills.com>] **On Behalf Of** Thames Water Planning Policy  
**Sent:** 11 June 2020 08:47  
**To:** Wendy Hague; Paul MacBride  
**Cc:** Nicky Mchugh; Devcon Team; Thames Water Planning Policy  
**Subject:** Harlow Main Modifications Consultation

Dear Wendy,

I am writing further to our conversation and the response from Thames Water on the recent main modifications consultation. Following further discussions with Thames Water I have provided further clarification of the position below.

The comments raised in the response related to potential impacts on the capacity of the treatment works at Rye Meads if all development came forward as a result of the increase in the housing figure in Policy HS1 from 9,200 to 10,620. However, it is appreciated that the change is to provide flexibility to help ensure that the target of 9,200 over the local plan period is met and is not an increase in the target itself. Thames Water's assessments to date have been based on the 9,200 target. If more development is delivered then it may be that upgrades to existing sewage treatment works are required earlier than currently anticipated, however, it is unlikely that such impacts would occur until later in the local plan period.

To help address this Thames Water are keen to work closely with Harlow and other local authorities to understand delivery rates following the adoption of the plan. This can then feed into their business plan preparations for AMP8 which will cover the period from April 2025 to March 2030 and AMP9 which will cover the period from April 2030 to March 2035 to ensure that funding is sought for any necessary upgrades to the sewage treatment at the appropriate time.

The changes to the Local Plan, including amendments to Policy PL10 and SIR1, and the commitment with Harlow agreed through the statement of common ground will assist Thames Water in monitoring delivery through encouraging developers to engage with Thames Water at an early stage and maintaining ongoing co-operative working with the council following the adoption of the Local Plan. This will assist Thames Water to justify funding for future upgrades through future business plans and help ensure that such upgrades are delivered at the necessary time.

Kind regards,

Chris

**Chris Colloff**  
**Associate**  
**Planning**

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