

**Strategic Growth and
Regeneration**

FMM Consultation 2022
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7 December 2022

**Consultation on further Main Modifications to Epping Forest District's emerging
Local Plan October 2022**

Dear Sir/Madam,

Harlow Council would like to take this opportunity to submit observations to the further Main Modifications consultation for the Epping Forest Local Plan (EFLP) as set out in the schedule published on the 28th of October 2022.

As you will be aware this Council had previously submitted representations to the Main Modifications to the EFLP in September 2021. It is noted that some changes are now being proposed to the Plan following this Council's representations to the Main Modifications.

Notwithstanding our ongoing co-operation to support and secure the delivery of the development associated with the Harlow and Gilston Garden Town (HGGT) it is important that the emerging Plan provides a consistent planning framework in order achieve this aim. One of the key objectives of the Harlow and Gilston Garden Town is to ensure some consistency across the three Districts. This has been achieved through the East Hertfordshire and Harlow Local Plans, but there is a danger that this is undermined if there are different approaches and standards for the developments. Harlow Council would like, therefore, to make the following observations and suggested changes to the further Main Modifications table to reflect this.

With regard to the Harlow and Gilston Garden Town Vision and given the common goals of the Garden Town partners, it is important that this is not diluted through potential ambiguity associated with the relevant wording. To this end it is considered that it would be prudent to retain the phrase "adhere to" rather than "have regard to", in order to avoid potentially different interpretations arising across the GT local authority areas. This would reflect the aims of policies HGT1 Development and Delivery of Garden Communities in the Harlow and Gilston Garden Town and HS3 Strategic Housing Site East of Harlow as set

out in the Harlow Local Development Plan adopted in 2020 following public examination. This would ensure consistency with the already adopted East Hertfordshire and Harlow Local Plans.

It is also noted that when referring to housing numbers reference is made to a “minimum of” in terms of on-site provision. With specific regard to the Latton Priory strategic housing site there are clear capacity limitations, as shown in current transport modelling, based on the provision of 1,050 dwellings. Again, to ensure consistency of approach across the HGGT, the housing numbers for this site should be as stated rather than as a “minimum”.

With regard to the Sustainable Transport Corridors, and in respect of comments previously made to the Main Modification, as well as to ensure consistency, it is recommended that all of the Epping Garden Communities make contributions towards the sustainable transport corridors in their entirety in Policy SP5 with similar wording to that proposed for Water Lane. This would reflect the apportionment approach undertaken for the Garden Town Infrastructure Delivery Plan.

To reflect the above, the suggested wording for the strategic sites adjacent to Harlow should include the wording “contributions towards sustainable transport corridors both within the Masterplan boundary and through off-site planning contributions”. This is the approach that is already being implemented at Gilston as part of the wider HGGT programme.

In addition, it would also be helpful if it could be confirmed where the land to be safeguarded for the Sustainable Transport Corridors is shown on the relevant mapping in the Plan, as it is currently not clear. Whilst a Modification has been proposed to the supporting Map relating to the main access to the Latton Priory site it does not go far enough in providing additional explanatory text to justify this, consequently we recommend that appropriate text is included.

Harlow Council would like to reiterate a response it made to the 2021 Modifications in relation to the supporting Maps which would redraw the main access road for the Latton Priory site. This was to reflect the Inspector’s original request for further technical work to be done. The Modification showed an ‘Indicative Access Road’ connecting Rye Hill Road with London Road. This is only shown on Maps 2.1 and 2.2 and not indicated within any policy or supporting text changes.

This is broadly supported as it still provides a degree of flexibility in relation to the best access solution. However, it is strongly suggested that the Plan includes further Modifications, either within Policy or supporting text that refers to the PJA access study. This study provides detailed guidance on how traffic movements on this connection must be managed including focussing traffic eastwards through design of the scheme and ensuring the Rye Hill road connection is a less attractive through route by designing it such a way that focusses local traffic accessing local services. At present the current proposed Modifications do not go far enough in providing additional explanatory text around this

access route and it is strongly recommend that this is included within the Plan to accompany the relevant mapping.

With regard to the employment provision of one hectare of office/research and development uses at land Dorrington Farm at Latton Priory, reference should also be made to the Harlow and Gilston Garden Town Employment Commission (2020) which provides detail as to how the one hectare can be translated into floorspace requirements.

In conclusion, the further Main Modifications have addressed a number of matters previously raised by this Council in respect of the Main Modifications. However, to ensure consistency of approach of the Local Plans in the area, including the Adopted Harlow Local Development Plan, it is recommended the current observations are reflected in the final version of the Epping Forest Local Plan.

If you require any further information in relation to this response, please contact Paul MacBride in the first instance:Redacted....

Yours faithfully,

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Andrew Bramidge

Director of Strategic Growth and Regeneration

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