

**Environment and Planning**

MM Consultation 2021  
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22 September 2021

**Subject: Epping Forest Local Plan: Main Modifications Consultation**

Dear Sir/Madam,

Harlow Council would like to take this opportunity to make representations on the Main Modifications consultation for the Epping Forest Local Plan (EFLP).

Before doing so, however, the new Conservative administration would like to reiterate its opposition to development south and west of Harlow, and express its reservations over development to the east. This is a position it has held for over a decade, since the party was last in power in 2012. A motion was passed at the Harlow full council meeting last Thursday (17 September) reiterating that position and the chief executive will be writing to express the position of the council, as described in the motion, shortly.

In the meantime, we would like to make the following observations and recommended changes to the Main Modifications table and maps as circulated:

Epping Forest Special Area of Conservation (SAC)

It is noted that the majority of Modifications relate to the Epping Forest SAC. This is supported and provides further clarity in respect of the evidence base that underpins the Plan and the mitigation strategies coming forward to protect the Forest.

A modification to Latton Priory and Water Lane which now includes references to the provision of strategic natural green space is supported.

Housing numbers

The proposed housing number in the EFLP and housing numbers for the Garden Communities remain the same. Modifications are proposed to make the Garden Community site numbers 'minimum' (MM20 & MM21). This is not supported and we wish for this wording to be removed from the modifications and the Plan reverts back to the original wording in respect of housing numbers for the Garden Communities.

In the same way as the Harlow Local Plan, the inclusion of a stepped housing trajectory in the Modifications is supported as are the changes to the trajectory for East of Harlow which was agreed in the Statement of Common Ground addendum (*MM15 & MM114*).

#### Sustainable transport corridors

The Council supports Modifications which require elements of the sustainable transport provision to be available when Garden Communities are first occupied (*MM19*) and Modifications which refer to land being safeguarded for the corridors (*MM21*). This must go further however and make specific reference to the sustainable transport corridors as they form a major component in delivering growth and ensuring modal shift across Harlow. It should be referenced as a sustainable transport measure which may need to be a prerequisite of development. It is recommended that *MM19* '**New Point after xviii**' be amended as follows;

'Ensure key transport interventions (such as M11 Junction 7a and provision of sustainable transport such as the Sustainable Transport Corridors (providing viable alternatives to the private car) are provided as prerequisites of development being occupied....'

In order to clarify the delivery of the STC further, there is an opportunity to amend Policy SP4 part (xiii) to refer to the need for Garden Communities to deliver the STC via the way of contributions and through on-site delivery of the STC as part of their development proposals. We recommend that Policy SP4 part (xiii), in addition to the Modifications being proposed, could be amended to reflect this as well as Modifications to Policy SP5 in respect of all sites.

A Modification is proposed to Policy SP5 for Water Lane which refers to the site paying contributions towards sustainable transport corridors (*MM21*). The current policy wording for Latton Priory however explicitly states that the Latton Priory site will pay for the North to South Sustainable Transport Corridor. To be consistent 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 is consistent with the apportionment approach undertaken for the Garden Town Infrastructure Delivery Plan.

To take into account the points made above, suggested wording for Policies SP4 and SP5 are set out below:

(xiii) Contribute to the delivery of the Sustainable Transport Corridors, both within the Masterplan boundary and outside of the development site via the way of planning contributions, and the establishment of an integrated, accessible and safe transport system which maximises the use of the sustainable transport modes of walking, cycling and public/ community transport, and reduces single occupancy car use in order to improve air quality, reduce emissions and promote healthy lifestyles. Development must provide high quality, safe and direct walking and cycling routes and linkages to and from Harlow which give priority over vehicular traffic;"

Latton Priory:

(xii) Highway and transport improvements including contributions towards sustainable transport corridors both within the Masterplan boundary and through off-site planning contributions to the north-south sustainable transport corridor, works to Southern Way and Second Avenue corridor, and upgrades to Junction 7 of the M11;

East of Harlow:

(xi) Highway and transport improvements including contributions towards sustainable transport corridors both within the Masterplan boundary and through off-site planning contributions, linkages into off-road cycle and walking networks;

Water Lane:

(ix) Highway and transport improvements including contributions towards sustainable transport corridors both within the Masterplan boundary and through off-site planning contributions; works to Water Lane/A1169 roundabout; A1025/Abercrombie Way signals and traffic calming along ~~the A1169~~ Southern Way Corridor;

The inclusion of a map showing the sustainable transport corridors is supported (*MM21*). However *MM21* states that “Land will be safeguarded for the Sustainable Transport Corridors in accordance with Map x.x and the Policies Map”, however neither the Policies Map or the Index of Mapping table shows a Modification to the Policies Map to reflect this. Either an indicative STC route should be included on the Policies Map or the Modification should be amended. We strongly recommend that the routes, both within Harlow and within the Garden Communities themselves, be included as a Modification to Maps 2.1 through to 2.4.

#### Garden Community sites

##### ***Latton Priory***

Map 2.2 and *MM21* propose amending the Green Belt boundary for Latton Priory to the south in order to include the entire Masterplan area. The build line and number of homes currently remain the same with the additional land to be removed from the Green Belt earmarked for open space or other appropriate uses. This Modification is supported as it provides a more defensible and robust Green Belt boundary, safeguards land for open space whilst also retaining flexibility for other uses if required.

A Modification is also being proposed to the supporting Maps which would redraw the main access road for the site. This is to reflect the Inspector’s request for further technical work to be done. The Modification shows 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 we would strongly suggest 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. The proposed Modifications do not go far enough in providing additional explanatory text around this access route and we strongly recommend that this is included within the Plan which will then accompany the maps.

Modifications are proposed which clarify the employment provision of one hectare of office/research and development uses at land adjoining Dorrington Farm in addition to employment provision at Dorrington Farm itself (*MM21*). A further Modification which states that masterplanning may determine a better location for the employment is proposed. This flexibility is supported by the Council as its clear Dorrington Farm remains an employment allocation in the EFLP. There is an opportunity however to make reference in the Modifications 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.

Modifications which look to protect Harlow Woods Site of Special Scientific Interest at both Latton Priory and Water Lane Garden Communities are supported (*MM21*).

Officers and Members wish to be directly involved in the masterplanning process for Latton Priory to help deliver the right transport solutions and development locations for this site.

### ***Water Lane***

In order to provide a degree of flexibility, the Modifications propose wording that would enable some limited residential development to be located elsewhere within the Water Lane site in order to facilitate a better alignment of the sustainable transport corridor. This is supported as the Plan is clear that the overall housing number for Water Lane will not change.

### ***East of Harlow***

The Inspector's post-examination note requested further justification for the land uses at East of Harlow in order to determine the extent of the Green Belt boundary change. It is positive to see that Epping Forest Council is continuing to release the entire Masterplan area from the Green Belt. This will enable development to come forward without having to justify very special circumstances including the relocation of the Princess Alexandra Hospital. It is agreed that the best approach to determining the build-to line is through an agreed masterplan approach.

Modification (*MM21*) will include a new section after Part H and this is mostly supported. We believe this wording will provide assurance to the Inspector that, although there is no fixed masterplan in place at present, if there is any surplus land in the Epping portion of the site it will be planned and managed accordingly. This is subject however to the reservation of adequate land for the Princess Alexandra Hospital Health Campus to the north. Similar wording has been set out in the Harlow Local Development Plan paragraph 7.50 albeit this refers to the secondary school only and not community and health facilities. It is recommended that the Modification be amended to

clarify what is meant by health facilities as Harlow Council still supports the relocation of the Hospital to the Epping portion of the East of Harlow site and work is progressing at pace on this.

Modifications to Map 2.4 show an amended boundary for the East of Harlow site which will now include land off Moor Hall Road and other minor amendments to land ownership boundaries. This is supported. The Modifications table also suggests that the revised Map for the East of Harlow will include an 'indicative' road for the M11 Junction 7a but it is not clear whether or not this has been included. This should not be defined as indicative on the Map as work is progressing fast on this and by the time the EFLP is adopted the road will be substantially, if not fully complete.

### Conclusions

It is clear that the Modifications proposed have taken into consideration the Inspector's post-examination note and various evidence base and technical work undertaken since the hearing sessions took place. However the Council has set out a number of changes to the Modifications in this response that we believe will make the EFLP sound and ensure the Garden Communities, if they all come forward, and the Garden Town are delivered sustainably.

We look forward to working with Epping Forest Council during the delivery and development phases of the Garden Town and the Garden Communities.

If you require any further information in relation to this response please contact Andrew Bramidge in the first instance: [REDACTED] or [REDACTED]

Yours faithfully,

[REDACTED]

**Cllr Michael Hardware**  
Portfolio Holder for Strategic Growth

Email: [REDACTED]