



# Epping Forest District Council

## **CABINET** **Monday 18th March 2024**

You are invited to attend the next meeting of **Cabinet**, which will be held at:

**Council Chamber, Civic Offices, High Street, Epping**  
on **Monday 18th March 2024**  
at **7.00 pm**

**Georgina Blakemore**  
Chief Executive

**Democratic Services**                      V Messenger (Democratic Services)  
**Officer:**                                      Tel: (01992) 564243

**Members:**                                      Councillors C Whitbread (Leader of Council & Leader of the  
Conservative Group) (Chairman), N Bedford (Deputy Leader  
& Place Portfolio Holder) (Vice-Chairman), R Balcombe,  
S Patel, J Philip, H Whitbread and K Williamson

**PLEASE NOTE THAT THIS MEETING IS OPEN TO ALL MEMBERS TO ATTEND**

**[This meeting will be broadcast live and recorded for repeated viewing.](#)**

---

### **1. WEBCASTING INTRODUCTION**

This meeting is to be webcast and the Chairman will read the following announcement:

“I would like to remind everyone present that this hybrid meeting will be broadcast live to the internet (or filmed) and will be capable of repeated viewing (or other such use by third parties).

Therefore, by participating in this meeting, you are consenting to being filmed and to the possible use of those images and sound recordings for webcasting and/or training purposes. If any public speakers on MS Teams do not wish to have their image captured, they should ensure that their video setting throughout the meeting is turned off and set to audio only.

Please also be aware that if technical difficulties interrupt the meeting that cannot be overcome, I may need to adjourn the meeting.

**Members are reminded to activate their microphones before speaking”.**

**2. APOLOGIES FOR ABSENCE**

To be announced at the meeting.

To report non-attendance before the meeting, please use the [Members Portal webpage](#) to ensure your query is properly logged.

Alternatively, you can access the Members portal from the front page of the [Council's website](#), at the bottom under 'Contact Us'.

**3. DECLARATIONS OF INTEREST**

To declare interests in any item on this agenda.

**4. MINUTES (Pages 6 - 12)**

To confirm the minutes of the meeting of the Cabinet held on 5 February 2024.

**5. REPORTS OF PORTFOLIO HOLDERS**

To receive oral reports from Portfolio Holders on current issues concerning their Portfolios, which are not covered elsewhere on this agenda.

**6. PUBLIC QUESTIONS AND REQUESTS TO ADDRESS THE CABINET**

To receive any questions submitted by members of the public and any requests to address the Cabinet.

**(a) Public Questions**

To answer questions asked by members of the public after notice in accordance with the provisions contained within Part 4 of the Constitution (Council Rules, Rule Q3) on any matter in relation to which the Cabinet has powers or duties or which affects the District.

**(b) Requests to Address the Cabinet**

Any member of the public or a representative of another organisation may address the Cabinet on any agenda item (except those dealt with in private session as exempt or confidential business) due to be considered at the meeting, in accordance with the provisions contained within Article 7 of the Constitution (The Executive, Paragraphs 27 and 28).

**7. OVERVIEW AND SCRUTINY**

To consider any matters of concern to the Cabinet arising from the Council's Overview and Scrutiny function and to identify any matters that the Cabinet would like the Overview and Scrutiny Committee to examine as part of its work programme.

**8. PAY POLICY STATEMENT (Pages 13 - 21)**

(Leader – Cllr C Whitbread) To recommend the Pay Policy Statement to Council, subject to any amendments or suggestions (C-045-2023-24).

**9. CONDENSATION, DAMP AND MOULD POLICY (Pages 22 - 43)**

(Housing and Strategic Health Partnerships – Cllr Holly Whitbread) To adopt the proposed Condensation, Damp and Mould Policy (C-046-2023-24).

**10. HOUSING ASSET MANAGEMENT STRATEGY 2024-2029 UPDATE (Pages 44 - 61)**

(Housing and Strategic Health Partnerships – Cllr Holly Whitbread) To approve the outline EFDC 2024-2029 Housing Asset Management Strategy, see Appendix 1 attached (C-047-2023-24).

**11. TREE POLICY (UPDATED) 2024 - 2029 (Pages 62 - 72)**

(Regulatory Services – Cllr K Williamson) To agree to adopt the proposed updated overarching tree policy for a 5-year period (C-048-2023-24).

**12. ENDORSEMENT OF THE LATTON PRIORY STRATEGIC DESIGN CODE (Pages 73 - 195)**

(Place – Cllr N Bedford) To agree to endorse the Draft Latton Priory Strategic Design Code (Appendix A) (C-049-2023-24). Please note: Appendix A is published separately.

For information: Appendices attached include – B (Consultation report), C (Consultee response report), D (Design code testing report), E (Highways technical report) and F (Latest Quality Review Panel report).

**13. ENDORSEMENT - EAST OF HARLOW MASTERPLANNING GUIDANCE SUPPLEMENTARY PLANNING DOCUMENT (Pages 196 - 214)**

(Place – Cllr N Bedford) To agree to formally adopt the EHMG SPD (C-050-2023-24). Please note: Appendix A (HGGT Board East of Harlow Masterplanning Guidance Adoption SPD report) is attached.

For information: Appendices published separately include – B (Draft East of Harlow Masterplanning Guidance SPD) and C (East of Harlow Consultation Report).

**14. NORTH WEALD BASSETT STRATEGIC MASTERPLAN FRAMEWORK (Pages 215 - 264)**

(Place – Cllr N Bedford) To agree to formally endorse the North Weald Bassett Strategic Masterplan Framework (C-051-2023/24). Please note: Appendices attached include – B (Consultation Report) and D (Quality Review Panel Report).

For information: Appendices published separately include – A (Final Draft Strategic Masterplan Framework, parts 1 - 6) and C (Statutory and Other Written Consultee Responses).

**15. FIT FOR THE FUTURE TRANSFORMATION PORTFOLIO, GOVERNANCE (Pages 265 - 283)**

(Leader – Cllr C Whitbread) To agree the proposed governance structure for the Fit for the Future Transformation Portfolio in this report and Appendix F (C-052-2023-24).

**16. ANY OTHER BUSINESS**

Section 100B(4)(b) of the Local Government Act 1972, together with paragraphs 6 and 24 of the Council Procedure Rules contained in the Constitution requires that the permission of the Chairman be obtained, after prior notice to the Chief Executive, before urgent business not specified in the agenda (including a supplementary agenda of which the statutory period of notice has been given) may be transacted.

In accordance with Operational Standing Order 6 (non-executive bodies), any item raised by a non-member shall require the support of a member of the Committee concerned and the Chairman of that Committee. Two weeks' notice of non-urgent items is required.

**17. EXCLUSION OF PUBLIC AND PRESS**Exclusion

To consider whether, under Section 100(A)(4) of the Local Government Act 1972, the public and press should be excluded from the meeting for the items of business set out below on grounds that they will involve the likely disclosure of exempt information as defined in the following paragraph(s) of Part 1 of Schedule 12A of the Act (as amended) or are confidential under Section 100(A)(2):

<b>Agenda Item No</b>	<b>Subject</b>	<b>Exempt Information Paragraph Number</b>
<b>18</b>	<b>Epping Forest Operations Hub</b>	<b>3</b>

The Local Government (Access to Information) (Variation) Order 2006, which came into effect on 1 March 2006, requires the Council to consider whether maintaining the exemption listed above outweighs the potential public interest in disclosing the information. Any member who considers that this test should be applied to any currently exempted matter on this agenda should contact the proper officer at least 24 hours prior to the meeting.

Background Papers

Article 17 of the Constitution (Access to Information) define background papers as being documents relating to the subject matter of the report which in the Proper Officer's opinion:

- (a) disclose any facts or matters on which the report or an important part of the report is based; and
- (b) have been relied on to a material extent in preparing the report and does not include published works or those which disclose exempt or confidential information and in respect of executive reports, the advice of any political advisor.

The Council will make available for public inspection one copy of each of the documents on the list of background papers for four years after the date of the meeting. Inspection of background papers can be arranged by contacting either the Responsible Officer or the Democratic Services Officer for the particular item.

**18. EPPING FOREST OPERATIONS HUB (Pages 284 - 288)**

(Contracts, Service Delivery and Improvement – Cllr R Balcombe) To approve the contractor for the design and build of the Operations Hub and agree the budget recommendation (C-053-2023-24).

# Agenda Item 4

## **EPPING FOREST DISTRICT COUNCIL CABINET MEETING MINUTES**

**Monday 5 February 2024, 7.00 pm - 8.57 pm**

**Council Chamber, Civic Offices, High Street, Epping**

<b>Members Present:</b>	Councillors C Whitbread (Chairman), N Bedford (Vice-Chairman), R Balcombe, S Patel, J Philip, H Whitbread and K Williamson
<b>Other Councillors:</b>	Councillors R Brookes, S Heap, S Murray, J H Whitehouse, J M Whitehouse and D Wixley
<b>Apologies:</b>	None.
<b>Officers In Attendance:</b>	Georgina Blakemore (Chief Executive), Louise Baker (Internal Communications Assistant), Surjit Balu (Interim Housing and Property Director), Tom Carne (Corporate Communications Team Manager), Christopher Hartgrove (Interim Director Finance / Deputy 151 Officer (Shared Services)), Melissa Kemp-Salt (Service Director - ICT & Transformation (Shared Services)), Vivienne Messenger (Democratic Services Officer), Steven Mitchell (PR Website Editor) and Andrew Small (Strategic Director, Corporate and Section 151 Officer)
<b>Officers In Attendance (Virtually):</b>	Jennifer Gould (Strategic Director and Chief Operating Officer) and Laura Kirman (Democratic Services Officer)
<b>Also in Attendance:</b>	A Marshall-Smith (Contractor)

---

**[A RECORDING OF THIS MEETING IS AVAILABLE FOR REPEATED VIEWING](#)**

### **95 WEBCASTING INTRODUCTION**

The Leader of Council made a short address to remind everyone present that the meeting would be broadcast live to the internet, and would be capable of repeated viewing, which could infringe their human and data protection rights.

### **96 DECLARATIONS OF INTEREST**

There were no declarations of interest pursuant to the Council's Members' Code of Conduct.

### **97 MINUTES**

That the minutes of the Cabinet meeting held on 15 January 2024 be taken as read and signed by the Leader as a correct record.

### **98 REPORTS OF PORTFOLIO HOLDERS**

There were no verbal reports made by Members of the Cabinet on current issues affecting their areas of responsibility.

**99 PUBLIC QUESTIONS AND REQUESTS TO ADDRESS THE CABINET**

The Cabinet noted that no public questions or requests to address the Cabinet had been received for consideration at the meeting.

**100 OVERVIEW AND SCRUTINY**

The Chairman of the Overview and Scrutiny Committee reported that members had scrutinised the quarter 3 Corporate Performance Report, the Draft Budget for 2024/25 and reviewed its own work programme on 23 January 2024. The Chairman of the Communities Scrutiny Committee, Councillor A Patel, had reported about the pre-scrutiny of the HRA Business Plan. The Finance and Economic Development Portfolio Holder, Councillor J Philip, had also announced the Council's sale of land at North Weald Airfield to Google. The Committee's next meeting would be held on 23 April 2024 when the Youth Council would be making its annual presentation.

**101 HRA BUSINESS PLAN**

The Housing and Strategic Health Partnerships Portfolio Holder, Councillor H Whitbread, introduced the report and stated that the Council was working with partners to maximise affordable housing and shared home ownership. Historically Council-owned garage sites had been developed as they were brownfield sites. Many had gone through the planning process and developments were being built. It was important with the new social housing regulations that the housing stock was up to the required standards. The HRA Business Plan was an overarching review of how the Council was managing its housing and was a working business plan that would evolve over time.

The Interim Director of Housing and Property, S Balu, advised that a bespoke HRA model was used to provide a reasonable cashflow projection for the 30-year plan. A recent independent stock condition survey, which included thermal efficiency, had been undertaken when 50% of Council properties had been surveyed to establish their condition and to forecast over 30 years a profile of expenditure that should be future-proofed. With the increasing social housing legislation there was a need to invest in the Council's housing stock.

The HRA business plan had been developed in partnership with the Council's Finance Team and its retained consultant Abovo-Consult. Consultant A Marshall-Smith presented the HRA Business Plan to the Cabinet.

The Leader stated there had been dramatic changes over the last two years since the original 30-year plan had been approved in 2022 including the war in Ukraine, high interest rates and Covid pressures, and queried if there were any potential difficulties that could make the business plan veer off course, or policy-wise? The Interim Director of Housing and Property replied there were key challenges from balancing the green agenda and the target around net zero with the business plan. The Regulator of Social Housing had also increased the focus on gas and electric appliances, so the Council needed to make homes as efficient as possible.

The report set out the options considered, if any, and the reasons for the recommendation and the decision.

**Decisions:**

- (1) That the Cabinet noted the Safe and Prudent HRA business plan.
- (2) That the Cabinet approved the HRA Business Plan.

- (3) That the Cabinet received a yearly performance update, which would include stringent stress testing.
- (4) That the Cabinet noted the opportunity to improve our estates which would improve the life span of our assets and feed into our ongoing work to 'create great places where people want to live'.

## **102 HOME OWNERSHIP STRATEGY 2023/24 TO 2028/29**

The Housing and Strategic Health Partnerships Portfolio Holder, Councillor H Whitbread, introduced the report and stated that this would be the Council's first formally agreed Home Ownership Strategy, as it was good practice to have one. The strategy showed how the Council dealt with the sale of council residential properties, as well as the calculation and collection of leaseholder service charges, providing information to solicitors and supporting Section 20 consultations for planned works where needed. The report detailed that there had been 341 completed Right to Buy (RTB) applications since 2010/11. It was noted that there were no questions raised.

The report set out the options considered, if any, and the reasons for the recommendation and the decision.

### **Decision:**

- (1) That the Cabinet approved the Draft Home Ownership Strategy 2023/24 to 2028/29.

## **103 INDEPENDENT LIVING FOR OLDER PEOPLE STRATEGY 2023 TO 2028**

The strategy would give direction and a framework to the Independent Living Service for modernising housing services for older people and, the independent living schemes that the Council provided. The Housing and Strategic Health Partnerships Portfolio Holder introduced the strategy, which contained a high-level Annual Delivery Plan that would be developed further in 2024. Priorities included making sure the housing stock was fit for purpose to meet an increase in demand of affordable housing for older people and also ensure the independent living scheme accommodation went to local people first.

Councillor Jon Whitehouse commented that older people who had previously lived in or had relatives that lived in the district had been able to apply for the housing supplementary list, so it would be useful to keep this option. Also, why was the issue with mobility vehicles not going to be addressed by the Council until 2030? Councillor H Whitbread replied that regarding the supplementary list, where there was a family connection in the district the Council did need to have this ability. Following the Grenfell Tower fire, stricter regulations concerning communal corridors had been implemented. The Interim Director of Housing and Property advised that the Asset Management Strategy, which would go before the Cabinet on 18 March 2024, would be looking at the volume of storage space in relation to the number of mobility scooters. Councillor N Bedford suggested a scheme for people to be able to book a mobility scooter that was secured in a specific area, as this would satisfy fire regulations. Councillor H Whitbread thought this was an excellent suggestion.

The Leader remarked that this was an excellent strategy including the Annual Delivery Plan, which should be kept under review annually, so it was fit for purpose.

The report set out the options considered, if any, and the reasons for the recommendation and the decision.



**Decision:**

- (1) That the Cabinet considered the Independent Living for Older People in Epping Forest Strategy 2023/24 to 2028/29 should be reviewed annually, so that it was fit for purpose.
- (2) That the Cabinet approved the Annual Delivery Plan, summarised within the appendices of the strategy document.

**104 FIT FOR THE FUTURE - EFDC TRANSFORMATION PORTFOLIO**

The Leader, Councillor C Whitbread, remarked that other councils were looking at the transformation progress and the report brought together a number of strands mainly for the north Essex councils and partnership working especially with Braintree District Council and Colchester City Council. The Covid crisis had caused a change with a move to a hybrid way of working, using digital options and having virtual meetings. However, progress and change were good as this was the best option for our future. There were challenging financial decisions to be made now and in the future. The transformation portfolio was looking at the next four to ten years. The report would formalise our partnerships with other councils by creating a new, shared back office for the corporate services referenced in the report and with the creation of a reserve of up to £3 million for the purposes of investing in the Council's Fit for the Future Portfolio. There would also be greater opportunities for being a digital council especially through ease of access for our customers, and perhaps by having one website portal for several councils including Essex County Council.

Councillor S Heap commented this was more a question for Qualis, but the residents had not been consulted and would there be an opportunity for Buckhurst Hill to move to Redbridge Borough Council? The Leader replied that he did not believe the residents in Buckhurst Hill would want to move to Redbridge BC. This was about the structure of this Council and working in partnership and being closer together with other councils to get the best value for our residents. Qualis brought in a substantial return and managed our business estate which was therefore important for the future.

Councillor Jon Whitehouse commented that shared services would be scrutinised by the Audit and Governance Committee this March, which would provide more clarity. Why was a reserve figure of £3 million decided upon and what would be the criteria for taking money out of this reserve? The Leader replied that there was no particular reason for the £3 million reserve figure, but it was reached after due consideration and would be worked with over a period of time. It was important this was a transparent process that would be regularly scrutinised.

The report set out the options considered, if any, and the reasons for the recommendation and the decision.

**Decision:**

- (1) That the Cabinet agreed to the creation of a Reserve of up to £3 million for the purposes of investing in the Council's Fit for the Future Portfolio. The Reserve was to be created using part of the initial windfall of interest income created from the sale of part of the employment land at North Weald. Funding would be taken from the Revenue Budget over a period of two years, as far as delivering a balanced budget allowed.
- (2) That the Cabinet agreed that funding in 2024/25 of up to £40,000 would be considered as part of the 2024/25 budget process, for the purposes of establishing a post to collectively represent North Essex Councils (appendix A)

and to establish a detailed terms of reference for NEC and develop a clear programme of work.

- (3) That the Cabinet agreed the Council should work with Braintree District Council and Colchester City Council to develop a full business case and proposed approach to delivery for a single shared back office for the corporate services referenced in this report and to approve the release of £180K from the Transformation Reserve to support development of the business case.
- (4) That the Cabinet noted that a full governance proposal for the Fit for the Future transformation reserve would be presented to the Cabinet for agreement in March 2024.

## **105 ADJOURNMENT OF CABINET MEETING**

The Cabinet agreed to adjourn the meeting to 6 February 2024 and resume at 19.00 to consider the remaining agenda items below:

- Quarter 3 Budget Monitoring Report
- Any Other Business: Draft Budget Proposals for 2024/25
- Exclusion of Public and Press: Any Other Business – Draft Budget Proposals for 2024/5 (Appendix Eii)

## **106 QUARTER 3 BUDGET MONITORING REPORT 2023/24**

The Finance and Economic Development Portfolio Holder, Councillor J Philip, reported that in respect of the capital position, the sale of the land to Google at North Weald Airfield had made a significant change and had an encouraging effect on the rest of the municipal year in that the Council had more than £4 million in reserves. Therefore, the quarter 3 forecast represented a positive outlook. This income though did not affect strategic tax changes the Council had to make. These were detailed in the report along with the General Fund Revenue Budget that forecast overspends on Planning & Development (£1,034,467), HRA Recharges (£310,000) and Customer Services (£325,200). In addition, the underspend forecasts included Corporate Services, mainly ICT, (£445,460) and Community & Wellbeing (£397,709) because of the Government's homelessness grant received by the Council. The Portfolio Holder outlined the changes in the HRA revenue forecast, General Fund Capital Programme, HRA Capital Programme, and the wider financial performance and risk also specified in the report. No questions were raised by other Cabinet members or councillors present at the meeting.

The report set out the options considered, if any, and the reasons for the recommendation and the decision.

### **Decision:**

- (1) That the Cabinet noted the General Fund revenue position at the end of Quarter 3 (31st December 2023) for 2023/24, including actions being undertaken or proposed to ameliorate the position, where significant variances had been identified (including Appendix A).
- (2) That the Cabinet noted the General Fund capital position at the end of Quarter 3 (31st December 2023) for 2023/24 (including Appendix B).
- (3) That the Cabinet noted the Housing Revenue Account revenue position at the end of Quarter 3 (31st December 2023) for 2023/24, including actions proposed to ameliorate the position, where significant variances had been identified.

- (4) That the Cabinet noted the Housing Revenue Account capital position at the end of Quarter 3 (31st December 2023) for 2023/24 (including Appendix C).
- (5) That the Cabinet noted the wider position on Financial Performance and Risk at the end of Quarter 3 (31st December 2023).

## 107 ANY OTHER BUSINESS

### (a) Draft Budget Proposals for 2024/25

The Finance and Economic Development Portfolio Holder remarked that the Fit for the Future programme was a key part of the draft budget. Through transformation some of the financial impacts would decrease and the Council might be able to reduce staff numbers through natural wastage rather than by redundancies. The General Fund MTFP included a £2.152 million contribution to the Transformation Revenue Reserve. The report listed the budget cuts, but this draft budget was allowing the Council to preserve the Police for a short time, keep the Highway Rangers and allocate funding to some of the Youth Council's projects. Inflation would continue, as would Council costs continue to rise. With staff salaries likely to increase next year, the Council must continue to balance outgoings with incoming revenue.

The Housing and Strategic Health Partnerships Portfolio Holder welcomed the retention of the Police for a further year and was of the opinion the Council should publicise the achievements of the Police, who continued working on County Lines operations and dealing with anti-social behaviour in The Broadway, Loughton. The Finance and Economic Development Portfolio Holder stated it was important that residents understood the importance of the Police achievements especially in the rural areas of the district, such as with thefts of farm vehicles, and the additional services provided to our residents.

Several Cabinet members praised the exceptional services the Highway Rangers provided, which benefitted the district and helped local councils save money. Councillor N Bedford commented that from the increase in fees and with more planning applications coming into Planning (Development Management), this would all help to increase revenue. The Leader and Finance and Economic Development Portfolio Holder had been reluctant to increase Council Tax, but it was proposed to go up by 2.99%, which equated to 9 pence per week for a Band D property. Income from Qualis and the Government grants announced on 5 February all contributed to the Council's income.

Councillor S Murray thanked the Finance and Economic Development Portfolio Holder for the draft budget but voiced his concern over the removal of grants to Citizens Advice (CA) and Voluntary Action Epping Forest (VAEF) which helped people in the district. Councillor J Philip replied that all service directorates had been tasked with making savings. Therefore, it was unfair for voluntary groups not to have a reduction, but the impact had been reduced for this municipal year and to lessen the impact further, the Council could schedule in the payment reductions.

Councillor Janet Whitehouse welcomed the news on the Highway Rangers but the proposed reduction in funding for CA and VAEF would be significant for residents. There was often no other alternative for residents other than CA. She was also concerned about the proposed savings in Democratic Services and with their staff reduction last year would feel reluctant to increase their workload, e.g. with a Task and Finish Panel. Councillor J Philip recognised it was not ideal for the funding reductions proposed for CA and VAEF and might relook at these. He continued that greater savings on Member allowances would be achieved as only 54 councillors would be elected this May, so the impact on Democratic Services would be less. It was important scrutiny members looked at their options on what could be achieved by reviewing particular reports or policies, so that time could be freed up for a Task and Finish Panel if this was what they wanted to do. In reply to Councillor D Wixley's query on scrutiny,

Councillor J Philip would not tell Overview and Scrutiny what to scrutinise, but it might help to establish if there was enough support and interest to scrutinise something or scrutinise in a different way.

Councillor R Brookes remarked that there was still much to be done on The Broadway redevelopment, which had been allocated some funding in the budget. Councillor J Philip agreed that the Council needed to preserve the funding for the development of The Broadway.

The report set out the options considered, if any, and the reasons for the recommendation and the decision.

**Decision:**

- (1) That the Cabinet considered the final revenue and capital budget proposals for 2024/25 as presented in Appendices A to E of this report, together with the comments received from the Overview & Scrutiny Committee.
- (2) That the Leader and the Finance and Economic Development Portfolio Holder (in conjunction with other Cabinet members if necessary) could agree any further minor changes prior to the Draft Budget 2024/25 being recommended to Full Council for approval.
- (3) That the Cabinet recommended to Council:
  - (a) The budget for 2024/25 and the updated Medium-Term Financial Plan; and
  - (b) The level of Council Tax increase for 2024/25.

**108 EXCLUSION OF PUBLIC AND PRESS**

**(b) Any Other Business: Draft Budget Proposals for 2024/5 (Appendix Eii)**

The Leader announced that the Cabinet would go into private session as questions were to be raised regarding Appendix Eii, which included exempt information as defined below.

**Decision:**

That in accordance with Section 100(A)(4) of the Local Government Act 1972, the public and press be excluded from the meeting for the item of business set out below on grounds that it would involve the likely disclosure of exempt information as defined in the following paragraph(s) of Part 1 of Schedule 12A of the Act (as amended) or are confidential under Section 100(A)(2):

Agenda Item No	Subject	Exempt Information Paragraph Number
13 a	Any Other Business – Budget Proposals 2024/5 – Appendix Eii	3

**CHAIRMAN**

## **Report to the Cabinet**

**Report reference:** C-045-2023-24  
**Date of meeting:** 18 March 2024



**Portfolio:** Leader – Cllr C Whitbread  
**Subject:** Pay Policy Statement  
**Responsible Officer:** Joanne Budden (01992 562312)  
**Democratic Services Officer:** V Messenger (01992 5642430)

---

### **Recommendations/Decisions Required:**

The Cabinet is asked to;

- (1) **Recommend the Pay Policy Statement to Council, subject to any amendments or suggestions.**

### **Executive Summary:**

Section 38 (1) of the Localism Act 2011 requires the Council to produce a Pay Policy Statement for each financial year setting out details of its remuneration policy. Specifically, it should include the Council's approach to its highest and lowest paid employees.

It draws on the Review of Fair Pay in the Public Sector (Will Hutton 2011) and concerns over low pay.

### **Reasons for Proposed Decision:**

To enable members of the Cabinet to comment on the Council's Pay Policy Statement before it is agreed by full Council.

### **Other Options for Action:**

The content of the Statement could be amended.

### **Report:**

1. The Localism Act 2011 requires the Council to publish a Pay Policy Statement setting out details of its remuneration policy. Specifically including the Council's approach to its highest and lowest paid employees.
2. The Council's Pay Policy Statement was first published on the Council's website in March 2012. This is updated on an annual basis.
3. The matters which must be included in the statutory Pay Policy Statement are as follows;

- The Council’s policy on the level and elements of remuneration for each chief officer
- The Council’s policy on the remuneration of its lowest paid employee (together with its definition of ‘lowest paid employees’ and its reasons for adopting that definition)
- The Council’s policy on the relationship between the remuneration of its chief officers and other officers
- The Council’s policy on specific aspects of chief officers’ remuneration: remuneration on recruitment, increases and additions to remuneration, use of performance-related pay and bonuses, termination payments and transparency.

4. The Act defines remuneration in broad terms and guidance suggests that it is to include not just pay but also charges, fees, allowances, benefits in kind, increases in/enhancements of pension entitlements and termination payments.

5. The draft Pay Policy Statement for 2024/2025 sets out the Council’s current practices and policies and is attached at Appendix 1 for comment. The amendments are highlighted.

6. Changes to the various policies and guidelines will continue to be agreed in accordance with current practices.

**Resource Implications:**

There are no resource implications as it is a statement of current practice and policies. Any implications will be subject to member reports as required.

**Legal and Governance Implications:**

The Policy Statement ensures that the Council complies with its duty under the Localism Act 2011.

**Safer, Cleaner and Greener Implications:**

N/A

**Consultation Undertaken:**

N/A

**Background Papers:**

Hutton Review of Fair Pay in the Public Sector: March 2011

**Impact Assessments:**

Risk Management

The Council would not comply with the Localism Act 2011 if it did not produce and publish a Pay Policy Statement.

Equality Impact Assessment

Is this a new policy (or decision) or a change to an existing policy, practice or project?	Yes
--	-----

Describe the main aims, objectives and purpose of the policy or decision	To ensure the Council's compliance with its duty under the Localism Act 2011.	
What outcome(s) are you hoping to achieve (ie decommissioning or commissioning a service)?	Update the Pay Policy Statement which is a statement of fact.	
Does or will the policy or decision affect: <ul style="list-style-type: none"> <li>• service users</li> <li>• employees</li> <li>• the wider community or groups of people, particularly where there are areas of known inequalities?</li> </ul>	Employees, however the Pay Policy Statement is not a mechanism to change remuneration or policy. It is a document which sets out what the pay and terms and conditions are for employees.	
Will the policy or decision influence how organisations operate?	No	
Will the policy or decision involve substantial changes in resources?	No	
Is this policy or decision associated with any of the Council's other policies and how, if applicable, does the proposed policy support corporate outcomes?	No	
What does the information tell you about those groups identified?	N/A	
Have you consulted or involved those groups that are likely to be affected by the policy or decision you want to implement? If so, what were their views and how have their views influenced your decision?	N/A	
If you have not consulted or engaged with communities that are likely to be affected by the policy or decision, give details about when you intend to carry out consultation or provide reasons for why you feel this is not necessary:	N/A	
<b>Use this section to assess any potential impact on equality groups based on what you now know.</b>		
Age, Disability, Gender, Gender reassignment, Pregnancy/maternity, Marriage/civil partnership, Race, Religion/belief, Sexual orientation	The Pay Policy Statement is a statement of fact and there is no impact on any protected groups. Any proposed changes to remuneration will be subject to further assessment	
Does the EqIA indicate that the policy or decision would have a medium or high	No	See comment above

adverse impact on one or more equality groups?		
--	--	--

<b>Action plan to address and monitor adverse impacts</b>		
What are the potential adverse impacts?	What are the mitigating actions?	Date they will be achieved.
N/A		



# **EPPING FOREST DISTRICT COUNCIL**

## **PAY POLICY STATEMENT 2024/25**

### **Introduction**

Epping Forest District Council is located adjacent to three outer London boroughs and on the Central Line into the City of London. Residents have easy access to major motorway routes as both the M11 and M25 run through the district. There is a high incidence of commuting from the district which impacts on the local labour market and levels of pay, particularly for jobs that require skills that are in relatively short supply.

There are some long standing recruitment difficulties and retention issues in key skill areas and the Council is making every effort to manage skill shortages with apprenticeships, including higher level apprenticeships, introducing a new recruitment strategy and streamlined processes, working with Public Practice to encourage planners, designers working in the private sector to work in the public sector.

The situation is not static and can change very rapidly, but the Council continually considers steps regarding pay and allowances that are designed to assist with recruitment and retention.

This Statement reflects the Council's current pay, pension and leave policies and strategies which will be amended over time to deal with changing circumstances. These documents play an important role in attracting and retaining the best people to the Council.

All decisions on pay and reward for Chief Officers will comply with the Council's current Pay Policy Statement.

### **Legislation**

Section 38 (1) of the Localism Act 2011 requires English and Welsh Councils to produce a Pay Policy Statement for 2012/2013 and for each financial year thereafter.

The Council's Pay Policy Statement;

- Must be approved formally by the Council;
- Must be approved each year;
- May be amended during the financial year; and
- Must be published on the Council's website.

The Pay Policy Statement must include;

- The level and elements of remuneration for each of the Chief Officers;
- The remuneration of its lowest paid employees (together with its definition of 'lowest paid employees' and the Council's reasons for adopting that definition);
- The relationship between the remuneration of its Chief Officers and other Officers; and
- Other aspects of Chief Officers' remuneration; remuneration on recruitment, increases and additions to remuneration, use of performance-related pay and bonuses, termination payments and transparency.

Remuneration is defined widely, to include not just pay but also charges, fees, allowances, benefits in kind, increases/enhancements of pension entitlements and termination payments.

All salaries and calculations are based on full time equivalent (fte).

## **Publication of the Pay Policy Statement**

The Policy has been made available on the Council's website.

## **Effect of this Policy Statement**

Nothing in this Policy Statement enables unilateral changes to employee's terms and conditions. Changes to terms and conditions of employment must follow consultation and negotiation with individuals and recognised trade unions as set out in other agreements and in line with legislation..

## **Pay Arrangements**

The Council operates under a local pay agreement via a Collective Agreement which was effective from 1<sup>st</sup> October 2019. The local pay scales can be found at Appendix 1 (pay rates are as at 1 April 2023).

Employees are paid at a spot salary within their grade which is made up of a Growth, Core and Exception zone salary range. Placement within the respective Grade Zones is in accordance with pay policy.

Grades for roles will continue to be determined by the NJC Job Evaluation Scheme implemented through our Job Family Framework.

## **Pay Awards**

For the future, Epping Forest salary ranges will be benchmarked against the Public & Not for Profit Market, and NJC pay awards will no longer apply, although the Council has agreed that annual pay awards will be no less than the NJC Award.

The Council will consider pay awards annually, and any award agreed will be applied at 1 April.

## **Remuneration of Chief Officers**

The Council will not agree any pay arrangement which does not reflect the correct employment and/or tax/NI status of a Chief Officer or employee.

It will be the responsibility of Council to agree the initial salaries for Chief Officers following external advice/evaluation/benchmarking. At Epping, Chief Officers are determined as the Chief Executive, Strategic Directors and Chief Operating Officer.

## **Chief Executive**

The Chief Executive is paid a spot salary of £154,140 which includes compensation for all other allowances that might normally apply (i.e. evening meeting payments). The Chief Executive may also benefit from a performance payment of up to £5,000 (non-consolidated) if targets and objectives, set by the Leader of the Council and Chair of the Overview and Scrutiny and Committee, together with an independent facilitator, are met.

The Chief Executive is also the Council's Head of Paid Service and the Returning Officer (for which additional fees are paid).

## **Strategic Directors**

The role of Strategic Director and Chief Operating Officer are paid a spot salary of £123,227 together with the opportunity of flexibility of benefits. This figure includes all statutory responsibility payments.

## **Termination Payments**

On ceasing to be employed by the Council, individuals will only receive compensation:

- in circumstances that are relevant (e.g. redundancy), and
- in accordance with our published Pension Policy on how we exercise the various employer discretions provided by the Local Government Pension Scheme (LGPS), and/or that complies with the specific term(s) of a compromise agreement.

All employees with contracts of 3 months or more are automatically enrolled into the Local Government Pension Scheme (LGPS), which is administered by Essex County Council. Payments on grounds of Redundancy are covered by the Council's Redundancy and Efficiency Payments Policy.

All employees are treated in the same way regarding the calculation of severance payments in situations of redundancy.

## **Statutory Roles**

The statutory roles of Monitoring Officer and 'Section 151' Officer are currently carried out by the Head of Legal Services and the Strategic Director with Finance responsibility. These positions do not need to be held by Chief Officers. The Monitoring Officer role will receive an additional £5,000 supplement for these statutory responsibilities. The 'Section 151' Officer has this in their base salary.

## **Definition of Lowest Paid Employees**

For the purpose of this Policy Statement, employees on grade A are defined as our lowest-paid employees.

At 1 April 2023, the fte annual value of the lowest paid employee was Grade A – salary for role rate £23,428.

The exceptions to the lowest grade are Apprentices who are paid £5.28 per hour. When apprentices move into year 2 of their placement, they receive the hourly minimum wage for their age.

## Pay Multiples

The Hutton Review raised concerns about multiples in the order of 20 or higher between the lowest and the highest paid employees in local authorities. However the Interim Report noted that the most top to bottom pay multiples in the public sector are in the region of 8:1 to 12:1. The Council is therefore content that having due regard for the level of responsibilities and personal accountability between the lowest and highest paid roles, the current multiple of 6.57 seems to be both justifiable and equitable.

The council does not set the remuneration of any individual or group of posts by reference to a multiple. However, as suggested by the Hutton Review the Council will monitor multiples over time to ensure they are appropriate and fair and will explain significant changes in pay multiples. The multiples are as following;

Role	2023/2024	
	Multiple	Salary
Chief Executive compared to lowest salary	x 6.57	£154,140
Strategic Directors compared to lowest salary	x 5.25	£123,227
Average salary compared to Chief Executive	x 3.75	£39,978
Average salary compared to lowest salary	x 1.70	£39,978

- The average salary is based on fte and has not been pro-rata'd for part-time employees
- The average salary calculation is based on Grades A to K only.

## Other Payments

Market Supplements may be paid in accordance with the Council's Local Pay guidance (although where necessary to secure or retain the employment of essential staff, other means may be applied to achieve the same outcome).

Other payments will be paid in accordance with our Local Pay Guidance.

The Council does not currently apply performance related pay or bonuses (except for in the case of the Chief Executive), but this could be considered at a future date, and may be applied as part of a personal contract of employment if required to secure the employment and retention of essential employees. Under local pay arrangements, the Council may consider the award of a Council wide or Team bonus at any point, paid on the basis of agreed targets/outputs. Such bonus will take the form of an unconsolidated payment and will not affect substantive pay.

These policies are applied consistently to all employees.

**APPENDIX 1**

<b>Grade</b>	<b>Growth Zone £</b>	<b>Salary for Role £</b>	<b>Exception Zone £</b>
<b>A</b>	22871 – 23328	23428	23438 - 24133
<b>B</b>	24134 – 24191	24291	24391 - 25373
<b>C</b>	25473 - 25915	26015	26115 – 27848
<b>D</b>	28018 – 28712	28812	28912 – 30284
<b>E</b>	30384– 32658	32758	32858 – 35742
<b>F</b>	35842 – 36815	36915	37015 – 39815
<b>G</b>	39915 – 41807	41907	42007 – 44713
<b>H</b>	44813 – 46930	47030	47130 - 49508
<b>I</b>	49533 - 52181	52285	52389 - 57130
<b>J</b>	57235 - 59458	59562	59666 - 64071
<b>K</b>	64175 - 66653	66756	66860 - 72545

# Agenda Item 9

## ***Report to the Cabinet***

***Report reference:***                   ***C-046-2023/24***

***Date of meeting:***                   ***18 March 2024***



**Epping Forest  
District Council**

**Portfolio:**                   **Housing and Strategic Health Partnerships (Cllr Holly Whitbread)**

**Subject:**                   **Condensation, Damp and Mould Policy**

**Responsible Officer:**                   **Surjit Balu, Interim Director for Housing  
([sbalu@eppingforestdc.gov.uk](mailto:sbalu@eppingforestdc.gov.uk))**

**Democratic Services Officer:**                   **V Messenger ([democraticservices@eppingforestdc.gov.uk](mailto:democraticservices@eppingforestdc.gov.uk))**

---

### **Recommendations/Decisions Required:**

To adopt the proposed Condensation, Damp and Mould Policy.

### **Executive Summary:**

Condensation, damp and mould in homes can create risks to health due to increased prevalence of house dust mites, mould or fungal growths. Young persons aged 14 years or under are one of the most vulnerable groups impacted by the health risks associated with condensation, damp and mould, but all people can be at risk.

in December 2020, two-year old Awaab Ishak died from a respiratory condition caused by extensive mould in the one-bedroom flat in Rochdale where he lived with his parents. The failings that led to Awaab's death has highlighted the importance of managing and preventing condensation, damp and mould effectively.

Amendments to the Social Housing (Regulation) Act 2023 introduced 'Awaab's Law'. This requires landlords to fix reported health hazards within prescribed timescales (yet to be confirmed) and provides greater powers to the Regulator of Social Housing to ensure housing providers are managing condensation, damp and mould effectively.

Landlords were already under obligations to ensure the homes they let are free from the hazards created by damp and mould. This includes The Housing Act 2004, The Landlord and Tenant Act 1985 and the Decent Homes Standard.

Fuel poverty is exacerbating the problem as tenants on low incomes reduce heating, or even turn their heating system off altogether. As the landlord, we need to do all we can to support our tenants in keeping their homes warm and dry. This will include improving the energy efficiency of homes through measures such as insulation and installing energy efficient heating and ventilation. We can also support with advice on managing humidity levels within their home.

This policy follows the advice of Housing Ombudsman Spotlight Report: It's Not Lifestyle (October 2021). The central theme of this report is that landlords must take responsibility for the issue.

*"It is crucial that landlords avoid paternalistic attitudes, automatically apportioning blame or using language inferring blame on the resident"* Housing Ombudsman  
Spotlight Report: It's Not Lifestyle (October 2021)

### **Report:**

The proposed policy is attached to this paper. The key features of the policy are that:

- We will provide dry, warm, healthy, and safe homes for our tenants.
- We will investigate the cause of any condensation, damp and mould and carry out remedial repairs.
- We will take responsibility for proactively diagnosing and resolving condensation, damp and mould in a timely and effective way.
- We will deal with the cause, not just the symptoms.
- We will enhance our understanding of our assets in relation to condensation, damp and mould and have proactive programmes for managing this issue.
- We will take every opportunity to check for condensation, damp and mould and promote ways our residents can report condensation, damp and mould.
- We will treat tenants reporting condensation, damp and mould with empathy and respect and will not prejudge the reason for any issue.
- We will promote and provide general advice and guidance to tenants on how to manage damp and condensation in their homes.
- We know that some residents cannot afford to heat their homes adequately due to fuel costs and their income levels. We will work with residents to ensure that they are receiving the income to which they are entitled, engaging with third party support groups and organisations as appropriate.
- Where homes are overcrowded, humidity will tend to be higher, and this increases the likelihood of condensation. We will work with the resident and explore solutions available in EFDC's Housing Allocations Scheme which may include moving to a more suitable home if this is available and appropriate.
- We will track cases of condensation, damp and mould to ensure that they are resolved effectively.

### **Scrutiny Comments**

The Condensation, Damp and Mould Policy was considered by the Communities Scrutiny Committee on 16<sup>th</sup> January 2024. The Committee asked:

- Will additional resources be required? Confirmed that no additional resources will be required to implement the policy.
- Will there be additional costs for leaseholders? In most cases work to treat condensation, damp and mould will be within tenanted homes. Work to remedy or prevent penetrating damp, e.g. from a communal roof or rainwater goods, may be recharged to leaseholders in accordance with their lease.
- Do we intend to use systems such as positive input ventilation? In most cases trickle ventilation in windows together with extract fans in kitchens and bathrooms is sufficient. However, in some cases we install positive input ventilation which can be very effective in serious cases.
- Will we use Housing News for advice on managing moisture levels? We will continue to use Housing News for tips on how to manage humidity and condensation and to encourage tenants to report problems. We will also use other means of communication including noticeboards, leaflets with rent statements and service charges and articles on EFDC's website.
- Will we comment on the government consultation on proposed regulatory timescales for responding to cases of condensation, damp and mould? The Chair of the Tenants' and Leaseholders' Panel promised to share a link to the consultation document. Comments to go to the Director of Housing and Property for collation.

### **Resource Implications:**

This policy will be implemented within the existing budget and staffing resources.

### **Legal and Governance Implications:**

Adherence to the recommended policy will provide assurance that EFDC are compliant with our statutory obligations under the Landlord and Tenant Act 1985, the Environmental Protection Act 1990 and the Housing Act 2004

The Social Housing (Regulation) Act 2023 provides the Regulator with powers to set strict time limits for social landlords to fix reported health hazards within specific timeframes. It also provides greater powers to the Regulator of Social Housing to ensure housing providers are managing condensation, damp and mould.

Implementation of this policy will reduce the potential liability of EFDC from claims of legal disrepair brought by tenants of EFDC.

### **Safer, Cleaner and Greener Implications:**

This policy will assist the prevention of health issues caused by condensation, damp and mould in the homes provided by EFDC.

### **Consultation / Scrutiny Undertaken:**

The Tenant's and Leaseholders' Panel reviewed the proposed policy on 2<sup>nd</sup> January 2024. Comments included:

- Section 8.2 – The Panel noted that more complex cases will need Housing Officers, Surveyors or Specialists to inspect to correctly diagnose the problem and specify the solution. This is incorporated in the latest version of the policy (attached).
- Fuel poverty - The Panel asked whether there is anything more we could do about fuel poverty. The proposed policy covers our energy efficiency retrofit programme and working with tenants to help them access income they are entitled. They discussed the possibility of establishing a hardship fund (e.g. from income generated from exporting excess energy generated from solar panels). This may be considered for a subsequent version of the policy or our strategy for energy efficiency retrofit.
- Overcrowding – The Panel asked if overcrowded households would be prioritised for rehousing. EFDC's Housing Allocations Scheme allows applicants to be prioritised to band B if they are 'occupying insanitary or overcrowded housing which poses a serious health hazard'.
- Preventative maintenance – The Panel emphasised the point in section 8.1 concerning planned works to prevent water ingress.
- Communications – The Panel asked officers to ensure messages about preventing condensation and mould also targeted leaseholders and sub-tenants. As well as including leaflets with rent statements, they should go with service charge statements and be displayed on noticeboards. We should also use social media.
- Progress reporting – The Panel asked to be updated on progress in tackling condensation, damp and mould every six months.

### **Background Papers:**

Proposed Condensation, Damp and Mould Policy.

### **Risk Management:**

Implementation of this policy will reduce the risk of health issues caused by condensation, damp and mould.



**Equality:**

An Equality Impact Assessment was carried out and there was no adverse impact on any equality group.

# Condensation, Damp and Mould Policy



<b>Name</b>	Condensation, Damp and Mould Policy
<b>Owner</b>	Director of Housing
<b>Last Review</b>	January 2024
<b>Next Review</b>	January 2026
<b>Resident Consultation</b>	Tenants' and Leaseholders' Panel 2 January 2024
<b>Equality Impact Assessment</b>	Completed - no adverse impact on any protected characteristic group
<b>Board Approval</b>	TBC

<b>Strategic Lead</b>	<b>Director of Housing</b>
<b>Sign</b>	_____
<b>Date</b>	_____
<b>Chair of Board</b>	<b>CLlr Chris Whitbread</b>
<b>Sign</b>	_____
<b>Date</b>	_____

**Contents**

1.0 Introduction and Objectives .....2

2.0 Scope .....3

3.0 Causes of and risks from damp, mould and condensation .....4

4.0 Roles and Responsibilities.....6

5.0 Legislation, Guidance and Regulatory Standards.....6

6.0 Obligations .....7

7.0 Statement of Intent.....8

8.0 Dealing with damp, mould and condensation.....9

9.0 Data and Records .....12

10.0 Resident Engagement and Support.....12

11.0 Competent Persons .....13

12.0 Training.....13

13.0 EFDC Performance Reporting .....14

14.0 Quality Assurance .....15

15.0 Significant Non-Compliance and Escalation.....15

16.0 Glossary .....16

Appendix 1 - Additional Legislation .....17

Appendix 2 - Related Policies .....17

## 1.0 Introduction and Objectives

- 1.1 Epping Forest District Council (EFDC) is committed to maintaining our homes to a high standard and to make sure our residents stay safe, healthy, and well in their homes. Condensation, damp and mould are issues which can have a serious impact on the health and well-being of our residents and can cause damage to both our assets and to items stored within them.
- 1.2 This policy sets out our approach to dealing with reported cases of damp and mould in our tenanted homes and all communal areas within the EFDC portfolio. It covers the services we provide to customers who rent their home under a tenancy agreement and those who occupy under a licence. Different properties, often of different ages, need to be managed differently by EFDC and by those in occupation. For leaseholders, we will meet the responsibilities as set out in terms of the individual lease.
- 1.3 Our objectives in respect of condensation, damp and mould are to:
- Actively identify cases of unreported (silent data) condensation, damp and mould through standard visits supported by all departments of EFDC and partner organisations.
  - Actively identify properties at risk using data analysis, including silent data, from repairs and other visits.
  - Manage all identified cases of condensation, damp and mould in a fair and consistent way and treating all tenants with respect and dignity in all communications.
  - Work in partnership with residents and leaseholders to resolve identified issues and understand how to reduce condensation, damp and mould issues so that residents are better able to manage their home effectively themselves, including the communication of concerns.
  - Work with EFDC's partner, Qualis Property Services, to undertake effective investigations and implement all reasonable remedial repair solutions and improvements to eradicate condensation, damp and mould, including managing and controlling condensation.
  - Ensure that tenants have access to and/or are provided with comprehensive advice and guidance on managing and controlling condensation, damp and mould by way of effective communication.
  - Use the data collected, by way of a tracker of reported cases to continually improve our service provision.
  - Design our energy efficiency retrofit programme to resolve existing problems of condensation, damp and mould. Retrofit works are to be designed to minimise the likelihood of future problems through improved insulation, cost-effective heating and adequate ventilation.
  - Comply with statutory requirements and deliver best practice.

- Maximise the available budgets and ensure that they are used effectively and efficiently to deal with damp and condensation problems, including appropriate resources and training for employees.
- Ensure that the fabric of our properties is protected from deterioration and damage resulting from damp, condensation and mould.

## 2.0 Scope

- 2.1 This policy has considered and incorporated the recommendations made in the Housing Ombudsman Service Report – Spotlight on: Damp and Mould – October 2021 and the key success factors outlined in their update report published in February 2023.
- 2.2 This policy outlines EFDC’s approach to identifying and managing condensation, damp and mould, including proactive and reactive investigations; planning of resources in anticipation of periods of higher demand; budget management to reduce instances of condensation, damp and mould; ensuring staff have the correct competence and equipment to assess cases; and our resident engagement and complaints procedures.
- 2.3 The scope of this policy covers how the council’s Property team, Tenancy & Estates team and partners, can jointly control, manage, and eradicate condensation, damp and mould with our tenants. This includes:
- All EFDC residential tenanted properties, including emergency and temporary accommodation.
  - How we identify, diagnose and eradicate the various types of damp (including rising, penetrating and condensation damp, including traumatic dampness from internal water leaks etc).
  - Identifying both EFDC and tenant’s responsibilities for dealing with condensation, damp and mould.
  - Offering guidance, advice, and assistance throughout the process to all tenants living in EFDC homes.
  - In situations where the Council will not be able to undertake works to rectify condensation damp and will look at alternative policies and procedures as appropriate, including occupancy and temporary decanting of tenants to carry out complex works. We will continue to offer advice, support and education if condensation is a contributory factor as well as actionable treatments or improvements, including additional ventilation, insulation and mould wash treatments as appropriate.
- 2.4 This policy will be made available and will be published as required to be transparent. The policy will apply to Qualis Property Solutions (EFDC’s housing repairs partner), all EFDC employees, contractors, subcontractors, consultants, and staff.

### 3.0 Causes of and risks from damp, mould and condensation

- 3.1 Condensation, damp and mould can create risk to health due to increased prevalence of house dust mites, mould or fungal growths resulting from dampness and/or high humidities. The government's guidance on the Housing, Health and Safety Rating System states that the hazard of condensation, damp and mould includes threats to mental health and social well-being which may be caused by living with the presence of damp, damp staining and/or mould growth.
- 3.2 Young persons aged 14 years or under are one of the most vulnerable groups impacted by the health risks associated with condensation, damp and mould, but all people can be at risk. Both the detritus from house dust mites and mould spores are potent airborne allergens. Exposure to high concentrations of these allergens over a prolonged period will cause sensitisation of atopic individuals (those with a predetermined genetic tendency to sensitisation) and may sensitise non-atopic individuals. Once a person is sensitised, relatively low concentrations of the airborne allergen can trigger allergic symptoms such as rhinitis, conjunctivitis, eczema, coughs and wheezes. For a sensitised person, repeated exposure can lead to asthma, or respiratory distress and it appears that the severity of the asthma, or distress intensifies with increased humidity, house dust mite and mould levels.
- 3.3 Both house dust mites and moulds flourish in damp or humid conditions, and their growth is also influenced by temperature. Where relative humidities are within the optimum range (ranges between 30 – 50%), increasing temperatures results in reduction in the dust mite population. However, where there are high humidities, outside the optimum range, increasing temperatures can result in increased mite populations and mould growth. Moulds can grow when the indoor relative humidity persistently exceeds 70%.
- 3.4 Mould is a category of fungus. It spreads through spores, which are invisible to the naked eye but are in the air around us all the time and can quickly grow on surfaces where dampness persists, or water has formed into a visible covering.
- 3.5 Dampness is an excess of moisture that cannot escape from a structure or material, which can escalate to cause significant damage to the building resulting in collapsed ceilings, rotten timber elements such as windows and doors and other structural deficiencies.
- 3.6 There are four main causes of dampness in homes in England. It is important to understand the difference between them as they each require different solutions:
- 3.7 **Water leaks** from defective supply and waste pipework (especially in bathrooms and kitchens) can affect both external and internal walls and ceilings. The affected area looks and feels damp to

- 3.8 the touch and stays damp regardless of the prevailing weather conditions. It is the result of a problem or fault with the home or building, which requires repair. Who is responsible for the repair depends on where and why the leak happens. Responsibilities are detailed within the Tenants Handbook, given to every tenant at sign up and available on the EFDC website. EFDC's usual approach will be to resolve the leak, to prevent a risk to the resident or others, and to recover the costs if the leak is found to be outside of the EFDC responsibility.
- 3.9 **Rising damp** is caused by water rising from the ground into the home or building. Water gets through or around a defective damp proof course (DPC) or passes through the masonry that was built without a DPC. Rising damp will usually only affect basements and ground floor rooms. It will be present all year round but can be more noticeable in winter. It is generally the result of a problem or fault with the fabric of the property, which requires remedial works. This will be EFDC's responsibility.
- 3.10 **Penetrating damp** is usually found to be a defect in the structure of the home or building, such as damaged brickwork, missing roof tiles, loose flashing or leaking rainwater goods to name a few. Defects allow water to pass from the outside of the property to the internal floors, walls, or ceilings. Penetrating damp is far more noticeable following a period of rainfall and will normally appear as a well-defined 'damp-patch' which looks and feels wet or damp to the touch. It is the result of a problem or fault with the property, which requires a repair. Who is responsible for the repair depends on identifying what the fault is and the cause. EFDC's approach will be to resolve the penetrating dampness, either through direct action or through working with others if a third party is causing the problem. We will do this to prevent a risk to the resident or others and will seek to recover the costs if the cause of the dampness is not our responsibility following the investigation process.
- 3.11 **Condensation** is a common contributory factor in the diagnosis of dampness and is caused by internal excess moisture in the air (water vapour) meeting a colder surface, such as a window or wall. The drop in temperature causes liquid to form on the surface and then soak in. It is predominantly found in kitchens, bathrooms, corners of rooms, on north facing walls and on or near windows – all places that either tend to attract a lot of moisture in the air or are colder generally. It is also found in areas of low air circulation such as behind wardrobes and beds, especially when they are pushed up against external walls. Condensation can be caused in several ways, and we will investigate and aim to find the root cause to identify actions to resolve or eradicate the issues.
- 3.12 All homes in England can be affected by condensation because the climate is often cool and wet. Normal household activities also constantly release moisture into the air. Ventilating the home (through extractor fans, trickle vents or opening windows) reduces condensation, and in many cases will prevent it causing dampness and persistent

mould. However, on occasion the root cause can be a problem that requires an EFDC repair or an improvement to the property. In others, a different solution may be needed (for example, in cases of severe overcrowding), which will require the involvement of other teams or third-party organisations.

- 3.13 The occupation of the property will be considered, including the make-up of the residents when carrying out any evaluation or assessment of the property. Vulnerabilities, if identified, such as long term or short-term disabilities, illnesses or medical conditions will be assessed for assistance with remedial works, if the risk is found to be outside of EFDC's liability. Financial vulnerability will be identified and assistance offered as appropriate; this may be via third party organisations or support groups.

## **4.0 Roles and Responsibilities**

- 4.1 EFDC's Cabinet has overall governance responsibility for ensuring this policy is current and fully implemented to ensure full compliance with relevant legislation, regulatory standards and the requirements of other stakeholders such as the Housing Ombudsman Service. As such, the Cabinet will formally approve this policy and review it every two years (or sooner if there is a change in legislation or regulation).
- 4.2 For assurance that this policy is operating effectively in practice, the Cabinet will receive regular updates on its implementation, condensation, damp and mould performance and any non-compliance. The Cabinet will support with financial requirements to meet the policy, which may include approval for resources or approval for improvement projects based on collected data and requirements.
- 4.3 The Senior Leadership Team (SLT) will receive monthly performance reports by way of data tracking, including trend analysis, in respect of condensation, damp and mould and ensure compliance is being achieved effectively. They will also be notified of any non-compliance issue identified with recommendations for improvement.
- 4.4 The Director of Housing holds strategic responsibility for the management of condensation, damp and mould, and for ensuring compliance is achieved and maintained. They will oversee the implementation of this policy.
- 4.5 The Head of Asset Management holds operational responsibility for the management of condensation, damp and mould cases and will be responsible for overseeing the operational delivery of remedial programmes.
- 4.6 Housing teams will provide support where gaining access to properties is difficult and will assist and facilitate any support or other tenancy management processes as necessary.

## **5.0 Legislation, Guidance and Regulatory Standards**

- 5.1 **Legislation** - The principal legislation applicable to this policy is:



- The Housing Act 2004
- The Landlord and Tenant Act 1985 as amended by The Home (Fitness for Human Habitation) Act 2018
- Social Housing (Regulation) Act 2023
- This policy also operates within the context of additional legislation (see Appendix 1).

5.2 **Guidance** – The principal guidance applicable to this policy is:

- The Decent Homes Standard 2006.
- The Housing Health and Safety Rating System (HHSRS) – September 2023
- Housing Ombudsman Spotlight on Damp and Mould: It’s not lifestyle - October 2021 and February 2023 update.

5.3 **Regulatory standards** – We must ensure we comply with the Regulator of Social Housing’s regulatory framework and consumer standards for social housing in England; the Home Standard is the primary one applicable to this policy. The Social Housing (Regulation) Act 2023 changes the way social housing is regulated and may result in future changes to this policy.

5.4 **Sanctions** – Failure to discharge our responsibilities and obligations properly could lead to sanctions, including prosecution by the relevant local authority under the Housing Act 2004, the Health and Safety Executive (the HSE) under the Health and Safety at Work Act 1974 and the Construction (Design and Management) Regulations 2015; prosecution under the Corporate Manslaughter and Corporate Homicide Act 2007; and via a regulatory notice from the Regulator of Social Housing.

## 6.0 Obligations

6.1 The Housing Act 2004 requires that properties must be free from Category 1 HHSRS hazards, including damp and mould, and excess cold. Category 1 hazards (band A-C) mean a property does not meet the legal minimum standard for housing condition, and action must be taken to reduce the risk to that which would be expected of a property of that age and type. The government has directed local authorities in November 2022 to have regard to ‘high scoring Category 2 hazards (band D and E) for damp and mould when considering enforcement action.

6.2 The Landlord and Tenant Act 1985 as amended by the Homes (Fitness for Human Habitation) Act 2018 requires that properties must be fit for human habitation, including being free of dampness prejudicial to the health of occupants, and category 1 HHSRS hazards.

6.3 The Decent Homes Standard requires that for a home to be considered ‘decent’ it must:

- Meet the current statutory minimum standard for housing.
  - Be in a reasonable state of repair.
  - Have reasonably modern facilities and services.
  - Provide a reasonable degree of thermal comfort.
- 6.4 Amendments to the Social Housing (Regulation) Act 2023 to introduce ‘Awaab’s Law’ received Royal Assent becoming law in July 2023, this provides powers for the Regulator to set timescales for landlords to fix reported health hazards. The timeframes have not been published at the time of writing this policy but are suggested to be: 14 days to investigate and 7 days to complete urgent repairs.

## **7.0 Statement of Intent**

- 7.1 We will provide dry, warm, healthy, and safe homes for our tenants which are free from any serious hazards.
- 7.2 We will investigate the cause of any damp, mould and condensation and carry out remedial repairs and actions in accordance with the tenancy agreement and the principles within this policy.
- 7.3 We will build a data profile of our stock to enhance our understanding of our assets in relation to condensation, damp and mould and have proactive programmes for managing this issue. This will include taking every opportunity to check for condensation, damp and mould and promoting ways our residents can report condensation, damp and mould. We will analyse stock condition data to identify at risk homes and monitor these through inspections and, where appropriate, remote sensors. This will enable silent data to be collected and proactively actioned to reduce the risk within the EFDC stock portfolio.
- 7.4 We will ensure the fabric of our homes is protected from deterioration and damage resulting from damp. Proactive cyclical inspections and programmes based on collected data, ad hoc inspections, visits and reports.
- 7.5 We will ensure our homes have effective and affordable heating and insulation, and that they are maintained in good condition, to meet the requirements set out in the Decent Homes Standard. Identifying through collected data any properties that would benefit from inclusion in upcoming retrofit programmes.
- 7.6 We will take responsibility for proactively diagnosing and resolving condensation, damp and mould in a timely and effective way. Including the training of staff to appropriate levels to support the policy.
- 7.7 We will ensure our retrofit programme includes measures to prevent condensation, damp and mould.

- 7.8 We will ensure our reporting systems and processes are accessible and treat residents reporting condensation, damp and mould with empathy and respect and will not prejudge the reason for any issue.
- 7.9 We will diagnose the cause of damp correctly and deliver effective solutions based on the ethos of dealing with the cause of the damp not just the symptom and wherever possible 'fixing first time'.
- 7.10 We will operate an open and transparent complaints process which is proactively and effectively communicated to residents and stakeholders.
- 7.11 We will ensure our tenant engagement strikes the right tone and provides support to residents to help them to avoid condensation, damp and mould in properties.
- 7.12 We will promote and provide general advice and guidance to tenants on how to manage damp and condensation in their homes.
- 7.13 We will maximise available budgets to deal with condensation, damp and mould issues.
- 7.14 We will ensure our staff are trained to identify potential issues with condensation, damp, mould, and condensation, so they can advise residents, diagnose problems and provide solutions.
- 7.15 We will inform the tenant of the findings of the investigations following a home visit or inspection. This will include identifying the possible causes of damp, recommending effective solutions and all necessary remedial works, actions or enhancements and the estimated timescales to complete the works or measures. This will be communicated to the tenant, and we will keep them up to date with their enquiry through the process from identification to completion.
- 7.16 We will ensure that only competent contractors are employed to carry out works, and that tenant's possessions are adequately protected during any works.
- 7.17 Where properties may be earmarked for disposal, we will take steps to ensure that they do not regrade to an unacceptable condition and regularly engage with tenants living in them.

## **8.0 Dealing with damp, mould and condensation**

- 8.1 We will take a proactive, data led approach to dealing with condensation, damp and mould and proactively manage risk through external cyclical surveying of stock, reactive repairs, planned preventative investment and providing advice and guidance to residents. We will ensure data from other teams (e.g. through tenancy visits) is incorporated into our knowledge of condensation, damp and mould.
- 8.2 We will continue to promote resident reporting of any issues to us as soon as possible after noticing a problem. When we receive a report, an operative will attend the property to determine the cause and seek to resolve the immediate issue. In some

- cases, they may need to further diagnose the problem. Finding out what's causing condensation, damp and mould isn't always straightforward and it could be due to a combination of factors. A Housing officer, Surveyor or a Specialist may attend where required. Any required repairs will be dealt with in accordance with our Responsive Repairs Policy or within a programme of work led by the Asset Team.
- 8.3 Where damp is as a result of condensation, we will work with our residents to take appropriate measures to eradicate the damp and mould occurring. This may include advice about how to control moisture levels or increase ventilation or heating, so that relative humidity is kept within the optimum range for comfort and prevention of dust mites and mould spores. Remedial repair works will be undertaken as appropriate.
- 8.4 When we are satisfied, following engagement with the tenant, that all reasonable efforts in managing condensation, damp and mould have been undertaken and this has not been successful, we will visit the property and investigate further involving other teams as appropriate; this may include Housing Allocations, Tenancy & Estates to discuss available options or action.
- 8.5 We will keep residents informed of the outcome from any property inspections, diagnosis of issues and the timetable of works, where these are required. This includes an explanation why work is needed and what work might will be done. If any changes to the programme of works are needed, we will keep the tenant informed. Where work is not required, residents will be informed, and we will explain the reason why no further work is needed and the steps that can be taken.
- 8.6 We will undertake necessary reasonable and practicable improvement works to assist in the management and control of condensation, damp and mould, for example by the installation of mechanical ventilation or fitting additional insulation. We will have regard to any constraints of the existing building design and structure and will take a pragmatic approach to finding appropriate solutions.
- 8.7 When a severe or recurring condensation, damp or mould issue is identified we will undertake a comprehensive risk assessment; this may result in a range of actions to support the resident depending on their circumstances. This may include the provision and funding of dehumidifiers; the installation of positive pressure, mechanical or passive ventilation systems; dry lining walls or applying mould resistant coverings – these measures will be used as appropriate, on a case-by-case basis.
- 8.8 For more complex cases, and especially where more intrusive building work is required and/or there is a serious health risk to the resident or a member of their household, we may require them to move out of their home either on a temporary or permanent basis. We will consider the individual circumstances of the resident and engage with them as part of our decision-making process and provide appropriate support to find suitable alternative accommodation. We will ensure that appropriate checks are carried out at the alternative property to ensure it is suitable for the resident.

- 8.9 Our tenancy (and leasehold) agreements require customers to allow us (including appointed partners and contractors) access to their home to carry out works at the agreed appointment time. If we are unable to gain access and the integrity of the property, its fabric and/or the safety of the customer or those in the vicinity of the property is compromised, we will engage with the resident to identify the reasons for no access and if required take appropriate action should an alternative not be found. For example, this may include but is not limited to a reliable friend or family member being available, assisting the tenant to find a suitable advocate or obtaining an injunction for access as a last resort.
- 8.10 We will make good internal surfaces following any remedial work and will ensure that surfaces are prepared to a condition ready for the tenant to redecorate or provide assistance to bring the home back to the original decoration. This may be by providing decorating vouchers, approving a recharge to the tenants rent account to ensure that the works are completed.
- 8.11 We will carry out fungicidal / mould treatments in the following circumstances:
- To remove significant mould growth where this has been caused by a property defect or deficiency.
  - Where we have been at fault by not resolving a repair or defect in accordance with our repairs and maintenance policy, and the delay has enabled mould to grow.
  - Where:
    - we have established that the property is suffering from condensation which is not due to any property defect or required repair, or other issue for which we are responsible; and
    - we have exhausted options for heating and ventilation support; and
    - where the treatment is necessary to help the tenant to be able to then manage the symptoms of condensation.
- 8.12 Where we determine that remedial work is not necessary, we will provide additional support and advice to the tenant to help them manage and control dampness caused by condensation.
- 8.13 We will make reasonable attempts to access the property to inspect and carry out the works and will require the tenant to provide us with access in accordance with the terms of our tenancy agreement. We will engage with the tenant to find an alternative before resorting to legal recourse for access.
- 8.14 In line with our Compensation Policy, we will pay compensation if we fail to deliver the service we have committed to. This includes where furniture or belongings have been damaged, and/or distress and inconvenience has been caused, as a result of our service failure. Each case will be considered individually, taking into account the degree and impact of the service failure, and the individual circumstances of the resident and their household.

- 8.15 When a property becomes vacant, and prior to re-letting, we will identify and remediate any issues that may cause damp and any of the symptoms of or consequential damage arising from condensation, damp and mould. This may include ensuring doors and windows are serviceable and can effectively ventilate the property, ensuring extractor fans are working well, as well as applying mould treatments where necessary.
- 8.16 We will survey void properties to assess the suitability for inclusion in retrofit works or improvement works to future proof the EFDC stock. Ensuring that works completed will enhance the SAP rating to an acceptable level.

## **9.0 Data and Records**

- 9.1 We will ensure our approach to record keeping is accurate and robust.
- 9.2 We will maintain a core asset register of all properties we own or manage, with component and attribute data against each property.
- 9.3 We will operate a robust process to manage all changes to our asset holdings, including bought properties, property acquisitions and asset disposals.
- 9.4 We will keep all records, warning notices and remedial work records for at least six years and for the duration that we own and manage the property. We will have robust processes and controls in place to maintain appropriate levels of security for all repairs, inspection, condensation, damp and mould related data and records.

## **10.0 Resident Engagement and Support**

- 10.1 We will establish a resident engagement strategy and communication programme to support residents in their understanding of condensation, damp and mould, including how to report issues and our complaints procedure. The engagement will begin at tenancy sign up where expectations will be set as per our policies and procedures and will be communicated through electronic means and distributed materials throughout the course of EFDC's lifetime.
- 10.2 This will assist us in maximising access to assess risks and take remedial action, encourage, and support residents to report any concerns about condensation, damp and mould, and help us engage with vulnerable and silent residents.
- 10.3 We will share information clearly and transparently and will ensure that information is available to residents via regular publications and information on our website.
- 10.4 We will give residents advice on how to prevent condensation, damp and mould and what they should do to remove mild cases of mould and manage condensation. However, we recognise that not every resident will be able to resolve condensation, damp and mould themselves. We will provide appropriate support in such cases in relation to the specific circumstances and the individual resident's needs.

- 10.5 We know that some residents cannot afford to heat their homes adequately due to fuel costs and their income levels. We will work with residents to ensure that they are receiving the income to which they are entitled, engaging with third party support groups and organisations as appropriate.
- 10.6 Where homes are overcrowded, humidity will tend to be higher, and this increases the likelihood of condensation. We will work with the resident and explore solutions which may include moving to a more suitable home if this is available and appropriate.
- 10.7 We aim to resolve complaints as quickly as possible without residents needing to resort to disrepair claims and legal action. We will follow guidance in the Housing Ombudsman’s Complaint Handling Code to take action to put things right without waiting for the complaints procedure to be completed. We will engage with the Housing Ombudsman Dispute Support Team for guidance if required.
- 10.8 Where legal action is taken, we will follow the Pre-Action Protocol for Housing Conditions Claims so that we may resolve the dispute outside of court to help ensure issues are resolved quicker for customers. Where legal action has started this will not stop agreed actions or repairs from being carried out.

## **11.0 Competent Persons**

- 11.1 Our operational staff and contractors will have the appropriate skills and knowledge to identify and diagnose signs of condensation, damp and mould, and discuss with residents how to manage concerns. All visiting staff will be encouraged to look out for signs of condensation, damp and mould whenever they visit a tenants home.
- 11.2 The Head of Asset Management and Contracts will hold the relevant qualifications to manage the trained and qualified operational staff. If additional training is required this will be undertaken with the support of the Director of Housing and the approval of the Cabinet within their strategic roles, as set out in this policy.
- 11.3 We will check our contractors hold the relevant qualifications and accreditations when we procure them for the work that they are contracted to do, and thereafter on an annual basis.

## **12.0 Training**

- 12.1 We will deliver training on this policy and the procedures that support it, through appropriate methods including team briefings; condensation, damp and mould awareness training; and on the job training for those delivering planned maintenance and repair works as part of their daily job. All training undertaken by staff will be formally recorded.
- 12.2 We will share learning from complaints and the positive impact of changes made as a result within the organisation and externally, to promote a learning culture.

## 13.0 EFDC Performance Reporting

13.1 We will report robust key performance indicator (KPI) measures for condensation, damp and mould. These will be provided to EMT monthly and to the Board on a quarterly basis via the Audit and Assurance Committee. As a minimum, we will report:

### The Report will include:

- The total number of domestic properties within the EFDC Stock.
- Number of properties reporting condensation, damp and mould
- Of the reports of condensation, damp and mould how many surveyed
- Of the reports of condensation, damp and mould how many are confirmed category 1 HHSRS damp and mould hazards.
- Of the reports of condensation, damp and mould how many are confirmed category 2 (band D and E) HHSRS damp and mould hazards;
- Number of properties visited with potential HHSRS hazards (not Cat 1 or 2).
- Number of properties with live disrepair claims.
- Number of properties with works orders for condensation, damp and mould works.
- Completed works orders for condensation, damp and mould works.
- Number of properties with complaints for condensation, damp and mould
- Number of complaints for condensation, damp and mould which have been closed with an 'upheld' status (partial or fully upheld);
- Number of properties subject to enforcement action for access to carry out inspections or works.

### Narrative - an explanation of the:

- Current position.
- Corrective action required.
- Anticipated impact of corrective actions; and
- Progress with completion of repairs works.

13.2 Partner Contractor Performance Monitoring

EFDC's partner repairs contractor will provide a Damp and Mould Tracker which will form the basis of the EMT and Board reports. The condensation, damp and mould tracker will include information on:

- Number of reports of condensation, damp and mould
- Number of condensation, damp and mould surveys carried out.
- Number of Properties surveyed that have Cat 1 Hazards
- Number of Properties surveyed that have Cat 2 Hazards
- Number of Properties surveyed / visited that have HHSRS hazards (not Cat 1/2)



- Number of Properties that have been referred to EFDC Property Assets for further survey.
- Number of raised works following condensation, damp and mould survey
- Number of completed works following condensation, damp and mould survey.
- Number of Properties with no access following condensation, damp and mould report
- Number of days from report of condensation, damp and mould to inspection
- Number of days from Inspection to Schedule of works
- Number of days from SOW to works completed.
- Number of properties identified with condensation, damp and mould with no initial condensation, damp and mould report following alternative repair visit.
- Number of post inspections carried out following condensation, damp and mould works.
- Number of properties where a 2<sup>nd</sup> report of condensation, damp and mould has been made.

## 14.0 Quality Assurance

14.1 We will ensure there is a programme of post inspections in place to ensure the quality of repair work that is carried out to address condensation, damp and mould. This will be:

- 100 per cent of repairs for works to address the root cause or symptoms of condensation, damp and mould;
- 100 per cent of all works carried out following complaints of condensation, damp or mould.
- 100 per cent of all works carried out to resolve disrepair claims.

14.2 We will also revisit residents who have had a confirmed case of condensation, damp and / or mould to ensure that our repairs has resolved the issue. This visit will take place between three and six months after the completion of the repairs undertaken for condensation, damp and mould. Contact may be made by telephone or email if only verbal advice or guidance was required to assess if a physical visit is required.

14.3 We will carry out an independent audit of our approach to identifying and addressing condensation, damp and mould at least once every two years prior to the Policy review, to specifically test for compliance with legal and regulatory obligations and to identify non-compliance issues for correction, or changes required to the Policy or Procedures.

## 15.0 Significant Non-Compliance and Escalation

15.1 Our definition of significant non-compliance is any incident which has the potential to result in a potential breach of legislation or regulatory standard, or which causes a risk

to health or safety. All non-compliance issues will be reported and escalated as soon as possible, and no later than 24 hours after the incident occurred, or of an EFDC employee becoming aware of it.

- 15.2 Any non-compliance issue identified at an operational level will be formally reported to the Director of Asset Management in the first instance, who will agree an appropriate course of corrective action with the Head of Asset Management and report details of the same to the EMT.
- 15.3 In cases of serious non-compliance, EMT and Board will consider whether it is necessary to disclose the issue to the Regulator of Social Housing as required by the regulatory framework, or any other relevant organisation such as the Health and Safety Executive.

## 16.0 Glossary

16.1 This glossary defines key terms used throughout this policy:

- **HHSRS:** the Housing Health and Safety Rating System. This is the Government’s prescribed approach to the evaluation of the potential risks to health and safety from any deficiencies identified in dwellings. There are 29 HHSRS hazards, including the hazard of damp and mould.
- **Category 1 HHSRS hazard:** the most serious hazards, which mean that the property fails to meet the legal minimum standard for property condition. Where a local housing authority becomes aware of a property with a category 1 hazard they have a duty to take enforcement action, for example by serving a notice to require the risk to be reduced.
- **Category 2 HHSRS hazard:** these are less serious hazards; the local housing authority has the power to take enforcement action but is not obliged to.

## **Appendix 1 - Additional Legislation**

This policy also operates within the context of the following legislation:

- Defective Premises Act 1972
- Health and Safety at Work Act 1974
- The Occupiers' Liability Act 1984
- Management of Health and Safety at Work Regulations 1999
- Management of Houses in Multiple Occupation (England) Regulations 2006
- Building Regulations 2010 (England and Wales)
- Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR)
- Construction (Design and Management) Regulations 2015
- Data Protection Act 2018
- Equality Act 2010

Guidance and other related information:

- Housing, Health and Safety Rating System (HHSRS) Operating Guidance, 2006
- Pre-action Protocol for Housing Condition Claims (England) 2021
- Housing Ombudsman Spotlight Report: It's not lifestyle (November 2021/ February 2023)

## **Appendix 2 – Related Policies**

- Compensation Policy
- Complaints Policy
- Decants Policy
- Disrepair Policy
- Diversity & Inclusion Policy
- Health & Safety Policy
- Maintenance of Empty Homes Policy
- Reasonable Adjustments Policy
- Responsive Repairs Policy

# Agenda Item 10

## ***Report to the Cabinet***

***Report reference:***                    ***C-047-2023/24***

***Date of meeting:***                    ***18 March 2024***



**Epping Forest  
District Council**

**Portfolio:**                    **Housing and Strategic Health Partnerships (Cllr Holly Whitbread)**

**Subject:**                    **Update on the Housing Asset Management Strategy**

**Responsible Officer:**                    **Surjit Balu, Interim Director for Housing and Property  
([sbalu@eppingforestdc.gov.uk](mailto:sbalu@eppingforestdc.gov.uk))**

**Democratic Services Officer:**                    **V Messenger ([democraticservices@eppingforestdc.gov.uk](mailto:democraticservices@eppingforestdc.gov.uk))**

---

### **1. Recommendations/Decisions Required:**

1. To approve the outline EFDC 2024-2029 Housing Asset Management Strategy – attached at Appendix 1

### **2. Executive Summary:**

Our Asset Management Strategy sets out seven main interrelated priorities and sets of actions for the effective management of the Council's housing assets.

The document provides an over-arching framework for how we will carry out all aspects of our work, from day-to-day repairs, to works required to keep our homes safe, to planned programmes of component replacement, through to estate management and regeneration.

Our arrangements with Qualis Group - a wholly owned multidisciplinary company of the Council, are fundamental to us being able to deliver the range of well designed, expertly informed, high-quality services our residents need and that we want to provide.

In October 2023 the Council appointed Ark Consultancy to assist us with the development of our Housing Asset Management Strategy.

The deliverables of the project are:

- A **Position Statement** setting out the strengths, weaknesses, and areas of focus for the management of EFDC's housing assets
- A **Strategy Document** that sets out the position we aim to achieve by the end of the five-year strategy period and what we need to do to get from our current position to our target position.
- An **Action Plan** with timescales to deliver the asset management strategy.
- **12 Monthly Reviews** of our progress for the duration of the asset management strategy and updates to the action planned as required.

The Position Statement is based on research including:

- A stock tour to provide Ark with a general understanding of the characteristics and issues of EFDC's housing stock
- A survey of tenants on their priorities

- Focus group sessions with staff in the Asset Management team, internal customers within EFDC (Peers) and staff at Qualis Property Services
- Benchmarking of EFDC's asset management data
- One-to-one interviews with EFDC officers on their specialist areas

Ark Consultancy have supported EFDC to draft an outline asset management strategy which is attached at Appendix 1. EFDC and Ark will continue to work jointly to develop a more detailed asset management strategy and supporting action plan.

### 3. Report:

#### 3.1 Drivers for Change

To develop this strategy and to build a **better and stronger** approach to asset management, we have considered the following set of drivers for change for social housing providers:

- Building safety & compliance – addressing new rules through new roles and new relationships and meeting the requirements of enhanced levels of regulation.
- Zero carbon 2050 – putting in place retrofit programmes that incorporate energy efficiency and renewable technology, supported by new skills & supply chains.
- Increased focus on existing stock quality & desirability – tackling damp & mould, other hazards, disrepair & meeting a set of fit for the future standards.
- Customer excellence – developing a culture of openness and respect, reflecting the tenant 'voice' with genuine involvement and input and effective management of complaints and redress.
- New homes delivery – supporting the delivery of additional homes for affordable/social rent through our asset management work.
- Placemaking – taking a broader view of home & neighbourhood to deliver better opportunity and address physical & mental health (green spaces, walkability, crime & ASB)
- Asset performance - understanding stock condition, using data-driven active asset management practices to evolve the housing portfolio.

The strategy has taken into consideration key data including; stock type and profile, responsive repairs, planned programmes, compliance, stock turnover and spend to mention but a few of the headlines.

#### 3.2 Challenges

- Designing a whole organisation approach where Qualis and the Council work together to meet shared objectives
- Providing safe homes that meet regulatory requirements
- Repairs and investment
- Improving the quality and suitability of the homes and services we provide
- Improving the quality and success of the places and neighbourhoods we manage
- Effective use of data
- Energy efficiency
- Dynamic portfolio management
- Improving the Customer Experience
- Effectively resourcing our work

### 3.3 Asset Management Strategy - Strategic Priorities

The draft outline asset management strategy is aligned to the EFDC Corporate Plan and the Housing Strategy. The proposed priorities for the housing asset management strategy are:

1. Stronger voices.
2. Better data and decision-making.
3. Better repair and maintenance.
4. Better homes.
5. Better places.
6. Better value for money.
7. Stronger teams, partnerships, and resources.

Each priority is described in more detail in the attached outline strategy and, the key actions/deliverables are set out in each of the seven sections.

These actions are to be further refined following comments from Scrutiny Committee and Cabinet. These actions will then form part of a detailed and time-scaled action plan that Officers will develop with Ark during February/March 2024.

#### **4. Scrutiny Comments**

The draft outline housing asset management strategy was considered by the Communities Scrutiny Committee on 5 March 2024. The Committee were supportive of the strategy. The Committee requested that the detailed Housing Asset Management Strategy incorporates the following:

- Correction of typographical errors and clearer captioning of figures
- Description of the functions of the Strategic Asset Management Group and the Future Homes Group
- Addresses tackling anti-social behaviour
- Addresses the service we provide to leaseholders

The Communities Scrutiny Committee asked to review the action plan once it is prepared, and to be updated on the subsequent 12-monthly reviews.

#### **5. Resource Implications:**

Strategy development - Stakeholders attended workshops, completed surveys and other activities to develop a co-created strategy. This was provided within existing resources.

The final draft of the strategy will recommend the resource requirements for its implementation and for maintaining services to the required levels.

#### **6. Legal and Governance Implications:**

It is good practice to have a strategy, and the Regulator of Social Housing is likely to view favourably housing providers with a sound asset management strategy. However, there are no legal or governance requirements for EFDC to have a housing asset management strategy.

#### **7. Safer, Cleaner and Greener Implications:**

Safe and clean environments, together with energy efficient homes, will be key objectives in ensuring the homes we provide are places where people want to live and want to stay.

## **8. Consultation / Scrutiny Undertaken:**

There has been consultation of tenants and staff in the development of the strategy so far.

### **Background Papers:**

None.

### **Risk Management:**

The major risk is that the strategy is ineffective in enabling us to make the changes needed to ensure EFDC's housing stock performs at the best possible level. This has been mitigated through detailed briefing, thorough the selection process to appoint a consultant that has a good track record as specialist skillset. The co-creative approach to the strategy development has enabled ownership by staff, thus providing us with the best opportunity for successful implementation and delivery of the strategy.

### **Equality:**

An Equality Impact Assessment will be carried out prior to the adoption of the Housing Asset Management Strategy.



# *Better homes, stronger services*

**Housing Asset Management Strategy**

**2024/25 – 2028/29**





# Contents

## Introducing our Strategy

### Key facts about our homes

### The challenges we face

### Our asset management strategy priorities

1. Stronger voices
2. Better data and decision making
3. Better repair and maintenance
4. Better homes
5. Stronger places
6. Better value for money
7. Stronger teams, partnerships, and resources

Page 49

## Delivering our strategy



# Introducing our strategy

Our Asset Management Strategy sets out seven main interrelated priorities and sets of actions for the effective management of the Council's housing assets. The document provides an over-arching framework for how we will carry out all aspects of our work, from day-to-day repairs, to works required to keep our homes safe, to planned programmes of component replacement, through to estate management and regeneration.

In developing the strategy, we have sought out, listened to, and acted on customers' views. People's priorities are that they want their homes to be kept in good repair, wind and watertight, to be safe and have up-to-date facilities such as kitchens and bathrooms. We now need to build on this consultation and engagement to grow and increase the contribution of residents across all our activities.

Our arrangements with Qualis Group - a wholly owned multidisciplinary company of the Council - are fundamental to us being able to deliver the range of well designed, expertly informed, high-quality services our residents need and that we want to provide. To be successful, we will be reconfiguring the services we receive so they are based on a set of shared business objectives that optimise value for money for the Housing Revenue Account, whilst also delivering a sustainable operating model for Qualis.

To build a **better and stronger** approach to asset management, we need to have reference to a set of drivers for change for social housing providers:

- Building safety & compliance – addressing new rules through new roles and new relationships and meeting the requirements of enhanced levels of regulation.
- Zero carbon 2050 – putting in place retrofit programmes that incorporate energy efficiency and renewable technology, supported by new skills & supply chains.

- Increased focus on existing stock quality & desirability – tackling damp & mould, other hazards, disrepair & meeting a set of fit for the future standards.
- Customer excellence – developing a culture of openness and respect, reflecting the tenant 'voice' with genuine involvement and input and effective management of complaints and redress.
- New homes delivery – supporting the delivery of additional homes for affordable/social rent through our asset management work.
- Placemaking – taking a broader view of home & neighbourhood to deliver better opportunity and address physical & mental health (green spaces, walkability, crime & ASB)
- Asset performance - understanding stock condition, using data-driven active asset management practices to evolve the housing portfolio.

## Our approach to asset management

'Asset Management' is the term used to describe the range of activities we need in place to make best use of resources to maintain & improve our asset portfolio, support our corporate ambitions & reflect residents' future needs & aspirations.

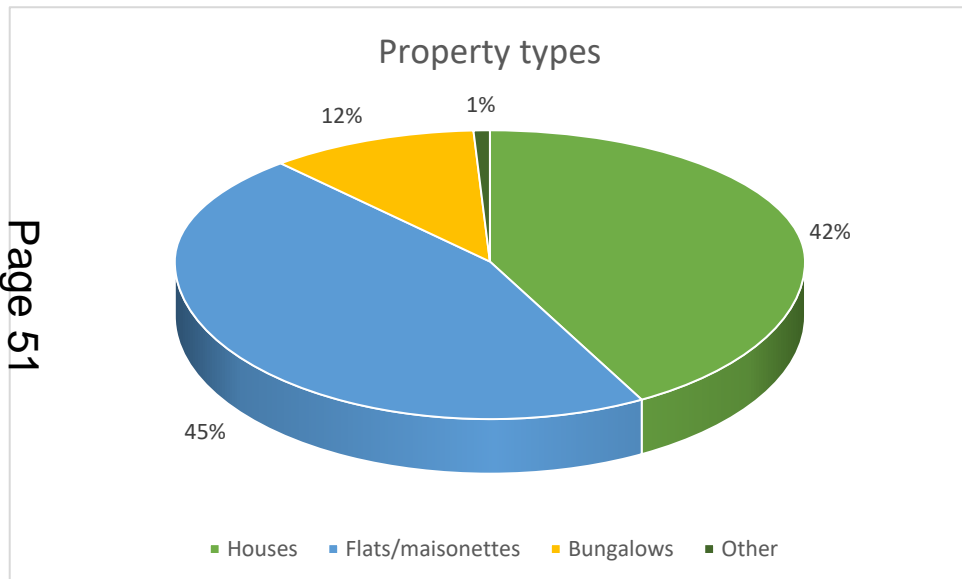
Whilst asset management includes repairs and maintenance, it is about much more than this. It includes updating, improving, and investing in properties and estates so they provide good quality homes in places people want to live.

Our Asset Management Strategy therefore includes a wide range of work and activities including maintaining safe and healthy homes that are in good repair, carrying out energy efficiency works, and modernising and regenerating our properties and estates, all with a focus on the needs of residents.

# Key facts about our homes

Our housing portfolio contains around 6,200 social rented homes, around 200 affordable rented homes, and manage around 1,090 leasehold homes. All homes are within the Epping Forest District Council boundary, and we are the largest landlord in our area.

42% of our homes are houses, 45% are flats or maisonettes, and 12% are bungalows.



We spend around £4.75m each year carrying out day to day responsive repairs and minor works and around a further £2.2m carrying out servicing and checks of heating, electrical, fire safety systems, lifts, and other installations.

Every year, we relet around 390 of our properties, equating to a turnover of tenancies of around 6%. We spend around £2.8m a year on revenue works in preparing properties for reletting. This equates to around £7,350 per home.

We have an active development programme that is designed to provide more additional homes. Ideally, this will more than replace the number of homes we lose through Right to Buy so the overall number of homes should increase over time.

# The challenges we face

## 1. Designing a whole organisation approach where Qualis and the Council work together to meet shared objectives

- Developing a shared vision and delivery plan with the Council that maximises the role, benefits, and potential of Qualis as our principal contractor.
- Maximising partnership working within and across all teams to ensure everyone works collaboratively to a set of shared goals.

## 2. Providing safe homes that meet regulatory requirements

- Meeting the wide range of new and pre-existing legislation, regulation, and practice to ensure residents are safe in their homes, including meeting the current and future Decent Homes Standard.

## Repairs and investment

- Carrying out repairs more quickly and at lower cost, improving levels of satisfaction with the repairs service, so we meet the needs and expectations of our customers.
- Having better planned and managed, better value programmes of investment work, stretching resources to maximise impact.

## 4. Improving the quality and suitability of the homes and services we provide

- Maximising the benefits of works on empty properties and improving void standards, reducing expenditure levels so we let homes at a standard that supports sustainable tenancies at a cost we can afford.
- Modernising homes and services, so they better meet the current and future needs and aspirations of residents, including carrying out disabled adaptations.

## 5. Improving the quality and success of the places and neighbourhoods we manage

- Delivering joined up estate management services so people can live in well managed places about which they feel proud to call home.

- Putting in place effective partnership working with organisations and agencies where together we can secure greater combined outcomes.

## 6. Effective use of data

- Gathering and optimising the use of the best information and data through property surveys, inspections, and routine activities to develop a 'golden thread' to make properly informed decisions about how, when and where we spend money investing in homes.

## 7. Energy efficiency

- Fully understanding the range and cost of carrying out works to bring our homes up to Energy Performance Band (EPC) C by 2030.
- Upscaling plans and works programmes for retrofitting homes to raise levels of thermal insulation and to use renewable energy.

## 8. Dynamic portfolio management

- Understand property performance, effectively using the outputs of ARK ASAP - ensuring a proactive approach to the regeneration and disposal of properties so over time the stock of properties evolves to best meet the needs of residents and the Council.
- Regenerating properties and estates to unlock their potential, including an approach to the future of garage sites, and re-acquiring right to buy homes and facilitating the development of new homes.

## 9. Improving the Customer Experience

- Meeting the needs and expectations of residents for excellent standards of modern service delivery when repairs and investment work is carried out.
- Improving how residents are involved and engaged so views help shape and inform all asset management works and services.

## 10. Effectively resourcing our work

- Ensuring the optimum team structure with clear roles and responsibilities and the right skills, capabilities, and capacity to deliver all repairs, maintenance, and investment works.
- Having in place or accessing sufficient financial resources to fund all asset management activities.

# Our asset management strategy priorities

Our Asset Management Strategy is built around seven priorities. These have been designed to directly address the key challenges we face whilst also addressing the range of wider drivers for change for social housing providers.

By addressing these priorities, it will ensure we meet existing and emerging legislation around providing safe homes, take a solid approach to asset management over the next five years, as well as providing a strong foundation for the years beyond. Our Strategy will help us sustain a portfolio of homes that is **stronger and better**, homes that are *'safe, fit for purpose and fit for the future'*.

The detail within each priority has been designed to ensure we have the right blend of approaches and actions in place, so we target our financial resources and energies where they are most needed and to best effect.

We recognise how our seven priorities are all inter-linked and cannot be seen in isolation. For example, delivering better repair and maintenance programmes should also help drive the delivery of an improved customer experience. Likewise, delivering the best approach to planned investment relies on having an intelligent, data-led approach to asset management, whilst also raising the quality of our homes, places, and neighbourhoods.

Through the delivery of our seven priorities, we will strengthen the role and purpose of the Council in providing much needed, good quality affordable housing in our area, in places that people want to live and support successful lives. We will also ensure we meet the asset-related elements of the five new Consumer Regulatory Standards.

## Our asset management strategy priorities

1. Stronger voices.
2. Better data and decision-making.
3. Better repair and maintenance.
4. Better homes.
5. Better places.
6. Better value for money.
7. Stronger teams, partnerships, and resources.

The Social Housing (Regulation) Act 2023 received Royal Assent on 20 July 2023. This Act carries through many of the themes identified in Government's 2020 White Paper - The Charter for Social Housing Residents. This will see a strengthening of the Regulator of Social Housing's powers to enforce standards on all housing providers. This will involve a new proactive consumer regulatory regime including powers to inspect.

There will be five new Consumer Standards and a Code of Practice.

# 1. Stronger voices

## Listening, then acting on what our residents say

We will listen to our communities and work with them when making decisions, developing policies, and designing services. We will coordinate our consultation and engagement to ensure residents' views shape the services we provide.

It is important that we:

- Communicate effectively with residents about works and plans for their home, listening to what residents tell us about their needs and priorities and acting on what they say.
- Use the Resident and Involvement Strategy to engage with residents on decisions around the design and delivery of our repair service, maintenance and improvement works.
- Have suitable approaches in place to perform well against the 22 Tenant Satisfaction Measures (TSMs) within the new Regulatory Consumer Standards.
- Develop and enhance our repair and investment activities by inviting and incorporating inputs from key stakeholders, including Qualis, elected members, and other key partners.

In developing the Asset Management Strategy, we have sought the views and opinions of residents on their priorities for repair and investment over the next five years. The message is clear (pie chart), that we need to focus on the basics of getting repairs done, keeping people safe in their home, the importance of key facilities such as kitchens and bathrooms, improving the energy efficiency of homes so they are more comfortable and less expensive to run, and improving external areas. We now need to act on people's priorities and deliver against them.



## Our actions for delivering stronger voices in asset management:

1. Build on the work carried out with residents to help shape and inform the Asset Management Strategy, developing and refining our understanding of customers' needs and expectations for repairing, maintaining, and improving their home.
2. Take an active role in working with the resident engagement team to devise and coordinate our consultation and engagement to ensure residents' views shape the services we provide, including working with the Tenant & Leaseholders Panel, Community Champions and block and court ambassadors.
3. Measure and monitor performance and progress against the 22 TSMs, with a target of securing upper quartile performance.
4. Use the Asset Management Strategy to put in place improved structures and arrangements for Qualis, elected members and key partners to help inform and influence our repair service and investment planning work.

## 2. Better data and decision-making

### Improving the quality and use of data

We will continue to improve the quality of our data & use data to produce 'business intelligence' to inform how we design and deliver services. We will use our systems and data to capture and share learning across the Council to drive continuous improvement in what & how we do things.

It is important that we:

- Improve how we go about collecting and using data from our day-to-day operational activities to inform our performance management information and asset investment planning.
- Develop our knowledge and understanding on the condition of properties, including reference to the scope and cost of meeting future requirements and standards.
- Develop and embed a governance culture where data-led intelligence helps shape and inform both our day-to-day and longer-term decisions, ensuring data integrity and visibility in areas of activity.

Page 55

### Our actions for delivering better data and decision making:

1. Ensure we have suitable systems and processes in place for recording and analysing data and on our performance in carrying out day-to-day repairs and on void works/expenditure, so we can inform decisions on service improvements and asset planning.
2. Build on our Scorecard and Dashboard to implement our new Compliance 365 system for recording, monitoring, and reporting on our performance in meeting our statutory compliance work.
3. Continue to build up a full picture of our stock condition survey data through the carrying out of further surveys in 2024.
4. Work with our specialist consultants to develop and put in place a Strategic Asset Performance Tool (ASAP) to allow us to make informed decisions on future investment through robust option appraisals.
5. Use the analysis and reporting on energy performance and prospects from Parity Projects to help inform our strategic decisions around energy efficiency and wider retrofit works.
6. Establish a multi-disciplinary Strategic Asset Management Group that can support the delivery of the Asset Management Strategy, with membership drawn from across the Council, including elected members.

### 3. Better repair and maintenance

#### Repairs as a critical component of asset management

The delivery of well designed, reliable, customer focussed services must underpin all our asset management work.

It is important that we:

- Improve the efficiency and effectiveness of the repair service with an emphasis on meeting the needs and expectations of residents.
- Keep homes safe and free from significant hazards by ensuring we meet all statutory obligations and regulatory requirements.
- Let properties at a suitable standard to help sustain successful tenancies, containing costs to around the benchmark median.
- Have suitable processes and funding in place for carrying out adaptations in homes to meet people's needs.
- Have in place well designed programmes of planned investment that optimise the life and durability of building components.

Page 56

#### Our actions for delivering better repair and maintenance:

1. Put in place a new Repairs & Maintenance Policy covering all key aspects of the repairs and maintenance service, including day to day works, statutory compliance areas, and undertaking disabled adaptations.
2. Develop a suite of standard specifications for works that optimises quality and durability of work outcomes whilst minimising costs.
3. Agree and put in place a revised suite of key performance indicators (KPIs) focused on the outcomes we want to achieve, with a range of secondary indicators also monitored.
4. Have in place robust and regular reporting of landlord compliance performance (target 100%).
5. Embed the new Void Standard, process, and pricing to minimise the time homes are empty, contain the scope and cost of works to that required to meet agreed quality standards and let a sustainable tenancy.
6. Put in place a rolling 1 and 5 year programme of planned component replacement works to provide surety for budget profiling, whilst maintaining flexibility for extending component life where appropriate.
7. Commission planned programmes through for 2024/25 onwards through an appropriate combination of Qualis managed works and independently procured contracts.



## 4. Better homes

### Meeting current standards and future expectations

We must make sure all homes meet all current standards and requirements. In addition, the quality of properties must improve over time to meet and respond to the range of future facing issues and priorities.

It is important that we:

- Ensure all homes meet the Government’s Decent Homes Standard, the Regulatory Home Standard, are free from significant hazards, with a clear and transparent approach to tackling damp and mould.
- Improve the energy efficiency of the poorest insulated homes to at least Energy Performance Band C by 2030.
- Work with customers to continually develop our understanding of residents’ needs and requirements for homes that are modern and ‘fit for the future’, with reference to fixtures, fittings, and facilities.

Page 57

### Our actions for delivering better homes:

1. Have in place robust survey records and management information on how our homes meet the Decent Homes Standard and the Home Standard, including clear and transparent processes for proactively remedying non-decency and for dealing effectively with significant hazards, most notably on damp and disrepair issues.
2. Develop and put in place a Retrofit Energy Efficiency Strategy designed to meet our EPC and other related targets, prioritising a combination of ‘easy wins’ and the worst performing properties so all homes meet EPC C by 2030, with a plan for making the homes we provide ready for ‘net zero’ by 2050.
3. Set up a ‘Future Homes’ group to consider and devise future-facing property/home standards for the EFDC portfolio, comprising officers, residents, Qualis, other contractors, and elected members.

## 5. Stronger places

### Improving the quality and success of our estates

We know that health and other inequalities are focussed on our estates. We will therefore help drive stronger shared collaboration between Council services and other stakeholders to deliver a range of asset focussed initiatives.

It is important that we:

- Provide estates and neighbourhoods where people feel proud to live and that help support healthy lifestyles and wellbeing, so we meet the regulatory Neighbourhood and Community Standard and people can lead successful lives where they thrive and prosper.
- Regenerate properties and estates that suffer from poorer quality design, property conditions and neighbourhood management issues.
- Use our existing asset based to help support the delivery of new and additional good quality social and affordable rented homes across our area.
- Work effectively with teams from across the Council and with external stakeholders to improve existing spaces and create new places for people to live, play, gain skills and do business.

### Our actions for delivering stronger places:

1. Use our place on the Epping Forest Community Safety Partnership with Essex Police, County Council, Fire and Rescue, and community groups, to deal with emerging local threats and issues.
2. Work actively with colleagues in the development team and external partners to provide new affordable homes by increasing density within sustainable developments, served by transport, leisure, health, and other infrastructure to meet our residents' needs.
3. Put in place agreed neighbourhood standards, including well-specified and managed grounds maintenance arrangements, incorporating landscaping and environmental improvement works where we can, to help protect and enhance our green spaces for future generations while providing decent, safe homes to meet all our needs.

## 6. Better value for money

### Optimising the impact our of expenditure

To maximise the contribution and impact of our work it is crucial we extract as much value as we can from all our expenditure.

It is important that we:

- Use our scarce resources well to help reduce costs and make our expenditure go further.
- Make the best use possible of data and insight about the performance of our properties and services to help identify and drive the optimum outcomes for the money we spend.
- Leverage in as much external funding as we can to help support delivery of our retrofit and energy efficiency works programmes.

Benchmarking is important in demonstrating that our services represent good value for money. Our most recent benchmarking data shows that in many areas, services are not performing sufficiently well with some high 'outlier' benchmark costs that we need to understand further and reduce.

How we work with Qualis and other contractor partners will be important in delivering value for money services. We will work in partnership with them to procure effective delivery arrangements and to continuously improve performance through best practice contract management – based on a 'right first time' approach.

### Our actions for delivering better value for money:

1. Restructure the Service Level Agreement between the Council and Qualis so it is designed to deliver top quartile performance across all work streams. Delivering a minimum of year on year incremental improvement, at costs that consider benchmarking data and deliver best value for money.
2. Put in place an option appraisal process for 'high cost' and 'high value' voids to evaluate the relative merits of ongoing investment versus market sale with recycling of the capital receipt.
3. Act on the outputs from our Strategic Asset Performance Tool by actively bring forward poorly performing or unsustainable properties for option appraisal.
4. Ensure we have plans and programmes drawn up and in place for our retrofit energy efficiency works so we are 'funding and finance ready' for securing external resources to supplement our own monies, supported by having long term delivery partners in place.
5. Develop and put in place an HRA Procurement Strategy that looks holistically at obtaining best value, leveraging efficiencies to secure the optimum blend of price/quality, supported by effective contract management.

## 7. Stronger teams, partnerships, and resources

### Working better together to pool our resources

The quality of our people, the organisations we work with, and our access to finance and funding must all be channelled into tackling the challenges we face and seizing the opportunities for maximising the impact of our work.

It is important that we:

- Are a strong, efficient, and effective organisation with a culture that supports continuous learning and development and where our leaders motivate and support staff to be accountable for their decisions.
- Are a partner and employer of choice, where we can attract, retain, and develop people with the skills and knowledge we need for the future, working as One Council to deliver better shared outcomes.
- Maximise the potential and opportunities of Qualis as our principal contractor partner through the delivery of shared business objectives, supported by a range of complementary and supplementary contractor arrangements.
- Ensure our Asset Management Strategy supports - and is supported by - a strong Housing Revenue Account (HRA) Business Plan so we have the funding and capacity to deliver our objectives and priorities.

We will strive to be a 'strategic client', meaning that we are forward thinking and proactive in fulfilling our commissioning role and responsibilities for all our repair and investment work

### Our actions for delivering stronger teams, partnerships, and resources:

1. Put in place a new team, appropriately sized structure for the Council's Assets Team that maximises the contribution and value of individuals to meeting the wide range of shared objectives involved in delivering our repairs, maintenance, and asset management service.
2. Develop the role of the Council as a strategic client to Qualis and our pool of other contractors, with a new style of partnership working designed to support mature relationships where we provide mutual support, share successes, manage risks & learn from problems.
3. Ensure effective communication and co-ordination and sharing of knowledge between teams and with our key partners so there are no 'blurred areas' of responsibility.



# Agenda Item 11

## **Report to the Cabinet**

**Report reference:** C-048-2023/24

**Date of meeting:** 18<sup>th</sup> March 2024



**Portfolio:** Regulatory & Technical Services  
(Cabinet Portfolio Holder Cllr K Williamson)

**Subject:** EFDC Tree Policy (Updated) 2024 – 2029

**Responsible Officer:** M Thompson/Interim Service Director  
([mthompson@eppingforestdc.gov.uk](mailto:mthompson@eppingforestdc.gov.uk))

**Democratic Services Officer:** V Messenger ([democraticservices@eppingforestdc.gov.uk](mailto:democraticservices@eppingforestdc.gov.uk))

### **Cabinet Recommendations/Decisions Required:**

1. Cabinet agrees to adopt the proposed updated overarching tree policy for a 5-year period.

### **Executive Summary:**

The updated EFDC Tree Policy 2024 – 2029 (appendix A) defines EFDC's approach to the management of trees owned by District Council and the publicly owned highway under the stewardship of Essex County Council. We want to promote responsible tree management and provide clear guidance on responsibilities and expectations for residents within the district.

### **Reasons for Proposed Decision:**

The current policy, Trees, Information, Objectives and Policies was last reviewed in 2008 and does not reflect our approach today.

The current policy does not include a review plan to reflect changing priorities and practices.

### **Other Options for Action:**

N/A, The Council's current strategy was entitled "Trees, Information, Objectives and Policies" was introduced in August 2008 and requires updating.

### **Report:**

1. The Council has a responsibility to maintain Council owned trees within the district.
2. The Council's tree stock is the largest natural asset the Council owns and manages. Its' trees are the single biggest positive contributor to biodiversity, air quality and climate change mitigation in the district.
3. Trees are the common element that features across all its many and varied landscapes from the miles of tree lined streets and roads, parks and gardens, churchyards and cemeteries to woodlands and other sites managed for nature conservation. It should be noted that the Forest known as Epping Forest is managed by the City of London Corporation and is not covered by this policy.

4. EFDC carry out reactive tree maintenance as required on behalf of Essex County Council, regarding certain trees assets considered to be part of the public highway. This does not include trees assets located on Essex Property and facilities (EPF sites), or tree assets owned by the local Town and Parish Councils.

### **Scrutiny Comments**

The Committee held on 27<sup>th</sup> February 2024 noted and endorsed the report for the next Cabinet meeting.

### **Resource Implications:**

None

### **Legal and Governance Implications:**

The Council has a duty of care to take reasonable management measures to avoid foreseeable injury or harm in the case of trees wherever possible, where the public are using its land.

### **Safer, Cleaner and Greener Implications:**

Trees are effective in improving the quality of the environment, by modifying local climate and by controlling air pollution. An environment enriched with trees improves human health and lowers stress levels. Trees are also important for wildlife and can have historic and sentimental value. Trees are the single biggest positive contributor to biodiversity, air quality and climate change mitigation in the district.

**Consultation / Scrutiny Undertaken:** The draft policy has been circulated to

Planning Directorate

Legal Services

Insurance Officer

Housing Directorate

### **Background Papers:**

Trees, Information, Objectives and Policies 2008

### **Appendices:**

Appendix A: EFDC Tree Policy 2024 – 2029

### **Risk Management:**

A Tree Policy for the Council will help ensure a consistent approach to managing the trees on Council land that fall within the Council's responsibility whilst contributing to the Council's Climate Change initiatives.

The Council has a legal duty to take reasonable mitigating actions to avoid foreseeable death, injury or damage to property from trees on Council land for which it is responsible for.

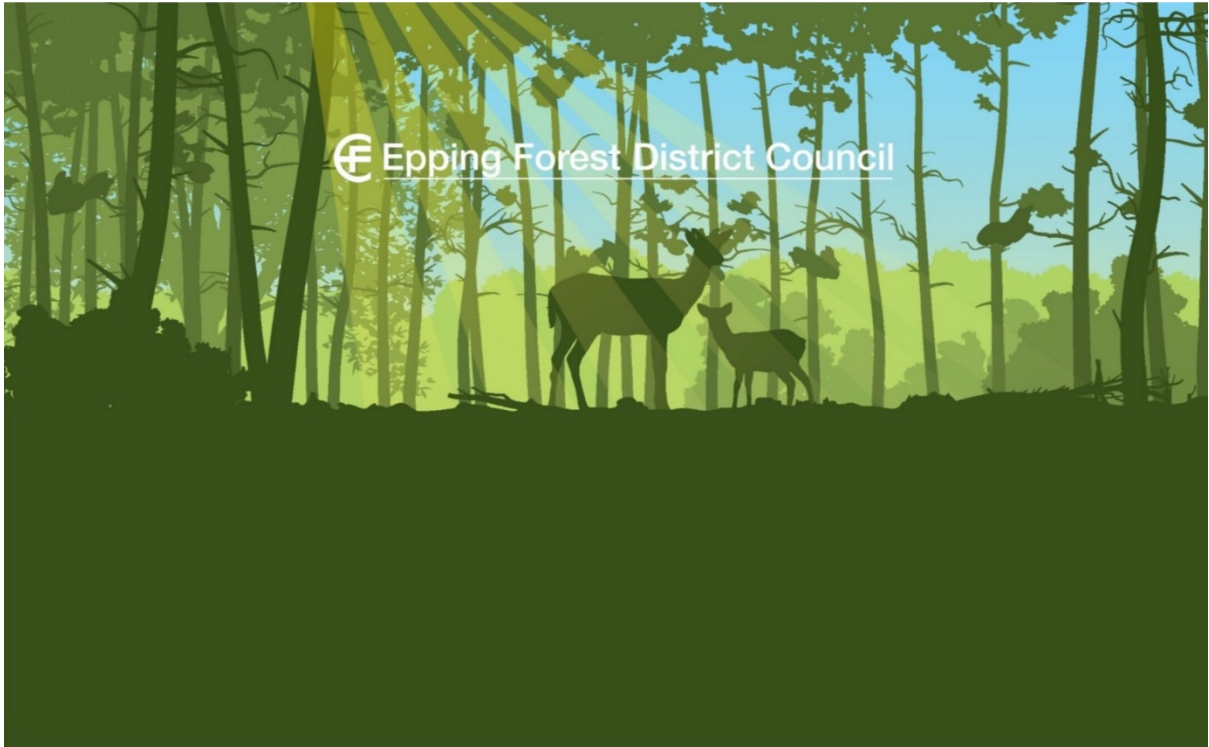
Failure to adopt this Policy could increase the risk of death, injury or damage to property and Trees that are in an obvious state of disrepair, and are classed as Dead, Dying or Dangerous must be managed in a prudent and timely manner to provide a safe environment for all.

### **Equality:**

An Equality Impact Assessment has been carried out and there is no significant impact, there is a positive impact.

# Epping Forest District Council

## Tree Policy 2024-2029



Version Control	Date	Review Date



## Contents

<b>1. Introduction</b> .....	3
<b>2. Scope</b> .....	4
<b>3. Responsibilities</b> .....	5
Open Spaces .....	5
Nature reserves .....	5
Planning Control and Advice.....	5
Town and Parish Councils .....	5
Essex County Council/ Essex Highway Trees .....	5
The Conservators of Epping Forest.....	6
<b>4. Tree Planting</b> .....	6
<b>5. Climate Change</b> .....	6
<b>6. Maintenance</b> .....	6
EFDC will undertake the following: - .....	6
Winter Works Programme.....	7
Nesting Birds.....	7
EFDC will not undertake works on trees for the following: - .....	7
<b>7. Tree Removal</b> .....	7
<b>8. Overhanging trees/ Root encroachment</b> .....	8
<b>9. Damage caused by trees to private property</b> .....	8
<b>10. Useful Contacts and Numbers</b> .....	9

## 1. Introduction

Epping Forest District Council (EFDC or The Council) manages a landscape in no small part defined by its' trees. The Council's tree stock is the largest natural asset the Council owns and manages. Its' trees are the single biggest positive contributor to biodiversity, air quality and climate change mitigation in the district.

EFDC comprises 133 square miles extending fan-shaped out from the edge of Northeast London. It has a population of approximately 135,000. Nearly half the population live in the south, within the urban areas of Chigwell, Loughton, and Buckhurst Hill. The market towns of Waltham Abbey and Epping, together with villages and hamlets are situated in the West and rural North of the District.

Trees are the common element that features across all its many and varied landscapes from the miles of tree lined streets and roads, parks and gardens, churchyards and cemeteries to woodlands and other sites managed for nature conservation. It should be noted that the Forest known as Epping Forest is managed by the City of London Corporation and is not covered by this policy.

Trees are universally recognised as vital to providing a healthy and safe future landscape that will be desirable to live in. Across the world societies that are serious about greening their cities and urban environments, look to trees as the major contributor. As a local authority we are proud and protective of our tree stock. We strive to maintain the existing stock to a high standard and replace and increase canopy cover for the future.

## 2. Scope

This policy defines EFDC approach to the management of trees owned by the District Council and the publicly owned highway, under the stewardship of Essex County Council.

Trees contribute many positive attributes throughout the district which include.

- Reduction of air temperature
- Shading
- Removal of air borne pollution
- Carbon sequestration
- Mental health benefits
- Flood mitigation.
- Increasing house prices

The Council recognises the importance of its role in the protection of the local and global environments, and the priority given to this role by those who live locally, work in or visit the Epping Forest district. The Council will, in all that it does, either through the direct provision of services or otherwise, give particular emphasis to environmental considerations.

There are few issues more important than the environment in which we all live. From Government down to the individual citizen, there are concerns about how we must change the way we live and behave to protect our environment, for us now and future generations.

Trees form a major part of the environment. They bring character to towns and villages and soften the hard edges of buildings. They enhance gardens, local streets, and the countryside.

It has been estimated that a substantial street tree will, over its lifetime, contribute an equivalent value to the community of up to £100,000. Trees are not only of visual amenity value, they are also effective in improving the quality of the environment, by modifying local climate and improving air pollution.

They are effective in improving the quality of the environment, by modifying local climate and by controlling air pollution. An environment enriched with trees improves human health and lowers stress levels. Trees are also important for wildlife and can have historic and sentimental value.

Obviously, there can also be problems, but these should be outweighed by the general benefits. The presence of trees significantly increases land and property values.

The Council will use its power to protect and increase public respect for our countryside and wildlife. The Council is playing a leading role at local level by:

- Setting an example by its own actions and practices.
- Working in the community to educate and influence about the need to protect and manage the environment.
- Offering guidance on community environment initiatives.
- Using its powers in a positive way to guide and control the activities of others.

### 3. Responsibilities

EFDC are responsible for the maintenance of all tree assets on EFDC land.

- EFDC owned trees will be inspected and managed adopting a risk-based approach.
- Trees in high footfall areas will be inspected at a higher frequency.
- EFDC tree work is also dealt with on a reactive basis.

#### Open Spaces

EFDC manage trees within Open Spaces, they are managed adopting a risk-based approach.

#### Nature Reserves

EFDC own and manage nine sites that have been designated as Local Nature Reserves.

- Linder's Field, Roughtalley's Wood, Chigwell Row Wood, Church Lane Flood Meadow, Home Mead, Thornwood Common Flood Meadow, and Weald Common Flood Meadow.

Countrycare assists with the management of privately, parish or town council owned sites but the responsibility with these sites reverts back to the landowner. For instance, Nazeing Triangle Local Nature Reserve is owned by Nazeing Parish Council.

Use the link below, to access the Epping Forest Country Care website and further information.

[Epping Forest Countrycare](#)

#### Planning Control and Advice

EFDC Planning team is responsible for serving and processing applications regarding T.P.O.s and any trees within a Conservation area, as well as considering requests for a new TPO to be made. The service is a statutory consultee for planning applications and provides pre-application advice to customers, for which there may be a fee.

Please use the link [Planning Control & Advice](#) to access the Epping Forest District Council webpage, regarding TPO and Trees within a conservation area.

#### Town and Parish Councils

Town/Parish Council are responsible for trees on their land.

Please use the link [Council Services - who does what](#) to access the EFDC webpage for information on Town and Parish Councils.

#### Essex County Council/ Essex Highway Trees

EFDC carry out reactive tree maintenance as required on behalf of Essex County Council for certain trees assets considered to be part of the public highway. This does not include trees assets located on Essex Property and facilities (EPF sites), or tree assets owned by the local Town and Parish Councils.

EFDC carry out reactive maintenance of Highway tree assets includes works to dangerous and fallen trees which present a high risk to the public highway. Any fallen trees reported within normal working hours will be undertaken by EFDC.

## The Conservators of Epping Forest

The District Council do not have responsibility for Epping Forest, and all enquiries should be addressed directly to The Conservators of Epping Forest. [Please use the link Tree strategy - City of London](#) for more information.

## 4. Tree Planting

Planting is undertaken on an annual basis in locations that are appropriate, within budget provision, for the following reasons:

- to replace dead or dying trees or ones that have been removed.
- New sites (EFDC owned land).
- Donation planting [Tree donation scheme](#)

Planting schedules incorporate 'The right tree for the right place'.

The tree planting list is compiled from 1<sup>st</sup> August to 30<sup>th</sup> June the following year. Trees will be planted from the November of that year to April of the following year while the trees are in their dormant state. In all cases the onus being on 'The right tree for the right location'.

## 5. Climate Change

Epping Forest District contains Epping Forest itself and remnants of further ancient woodland. Although land use in the district only captures a small amount of carbon emissions (2%), trees, hedges, and nature in general help to increase our resilience to the impacts of climate change (such as overheating and flooding), improving air quality, and providing wildlife habitats which help maintain and increase biodiversity.

Use the link below for more information on how you can enhance the natural environment in your home, organisation, or business.

[Climate Change - Natural Environment](#)

## 6. Maintenance

EFDC will undertake the following: -

- Fell or undertake remedial works to trees in high footfall areas that are deemed as an unacceptable risk to the public.
- Prune back a tree that is physically touching an EFDC owned building to a maximum of 30% of the crown volume where it is feasible to do so.
- Undertake emergency tree works.

- Prune/Reduce the size of the tree on a regular maintenance regime where documentary evidence supports it has historically caused damage to private property and/or is currently causing damage to property.

Where the tree requires works which is beneficial for the health and amenity value of the tree.

### Winter Works Programme.

Except for reactive works, planned maintenance works will be undertaken only in the Autumn/ Winter period while the trees are dormant, when the nesting season is over. Pruning at this time of the year is also more beneficial to the trees rather than to prune while the tree is in full leaf.

### Nesting Birds

It is illegal to disturb a nesting bird as part of the Wildlife and Countryside act 1981. We will only undertake light works to trees in the nesting period, such as lifting of low branches, pruning back from street furniture, and felling trees in cases where there is a risk to the public.

EFDC will not undertake works on trees for the following: -

- Leaf fall on footway or private land.
- Fruit fall on footway or private land
- Flower fall on footway or private land
- Right to light or light issues.
- Perception of tree height
- Perception of future damage
- Oak Processionary Moth situated on private land
- Television or satellite reception
- Allergies or medical complaints
- Lifting or damage to Highways (See Highways)
- Improvement of sightline
- Wasp, Bee or animal use or infestation.
- Bird droppings.
- Interference with telephone lines
- Mitigation of the growth of moss or mould.
- Encroachment of the boundary line.

## 7. Tree Removal

Trees are classed as an asset, and under normal EFDC Stewardship a healthy tree will not be removed. However, there are some exceptions which are listed below: -

- If the tree is inspected by an EFDC Tree officer, and defined as either, Dead, Dying or Dangerous
- Accordance with Council procedures when damage is occurring to property.

## Illegal damage to EFDC owned trees.

In cases where there has been intentional or accidental damage to Council owned trees, we will prosecute and seek full cost of the Capital Asset Value for Amenity Trees (CAVAT) of the tree before the tree was damaged or felled.

## 8. Overhanging trees/ Root encroachment

In cases that a tree branch or root encroaches the boundary line of a piece of land or residence the landowner is within their right in 'Common Law' to remove the offending branch, up to and not past their boundary line, from their side of the boundary. Under these terms pruning is legal and permissible. If the tree is found to have been pruned in any way other than specified, the person or persons undertaking the work may be prosecuted for trespass, and criminal damage.

## 9. Damage caused by trees to private property

Where it is alleged that tree roots are causing damage either directly or indirectly to privately owned property, the following information will be required to satisfy the Council on causation and/or that any tree work will mitigate the alleged damage.

- 12 Months of Crack monitoring data ideally at 2 monthly intervals.
- 12 Months of Level Monitoring Data ideally at 2 monthly intervals.
- Year the property was originally built and date of erection of a subsequent extension.
- Engineers report including description, photos, plans of damage and site plan showing layout including position of trees, drainage runs, vegetation within the boundary of the property.
- Site investigations to include soil and root analysis (which may include DNA analysis), and depth of foundations.
- Arboriculturist report.

All information should be sent to [Insurance@eppingforestdc.gov.uk](mailto:Insurance@eppingforestdc.gov.uk).

## 10. Useful Contacts and Numbers

### i) Countrycare

Nature reserves

Tel. 01992 788203

Tel 01992 564000

[CountrycareTeam@eppingforestdc.gov.uk](mailto:CountrycareTeam@eppingforestdc.gov.uk)

### ii) Planning Services

Trees in Relation to New Developments, Parish Tree Strategies, Tree Warden Scheme, Tree Preservation Orders, Trees in Conservation Areas, Tree Advisory Service (garden trees)

[Contacttrees@eppingforestdc.gov.uk](mailto:Contacttrees@eppingforestdc.gov.uk)

Tel: 01992 564117

### iii) Tree Team

Council-Owned Trees (General Enquiries), Tree Donation Scheme

Tel. 01992 564562

Tel. 01992 564000 (out of office hrs)

[Trees@eppingforestdc.gov.uk](mailto:Trees@eppingforestdc.gov.uk)

### iv) Epping Forest

EFDC are not responsible for the Epping Forest, and all enquiries should be addressed directly to: -

The Conservators of Epping Forest

City of London Corporation

Tel: 020 8532 1010

Email: [EppingForest@cityoflondon.gov.uk](mailto:EppingForest@cityoflondon.gov.uk)

### v) Essex County Council

Potentially dangerous trees on private land adjacent to the highway, trees protected by ECC.

ECC, Area Highways

Tel. 01279 624500



## Report to the Cabinet

**Report reference:** C-049-2023/24

**Date of meeting:** 18 March 2024



**Epping Forest  
District Council**

**Portfolio:** Place (Cllr Nigel Bedford)

**Subject:** Endorsement of the Latton Priory Strategic Design Code

**Responsible Officer:** Nigel Richardson / Krishma Shah  
([kshah@eppingforestdc.gov.uk](mailto:kshah@eppingforestdc.gov.uk))

**Democratic Services Officer:** V Messenger ([democraticservices@eppingforestdc.gov.uk](mailto:democraticservices@eppingforestdc.gov.uk))

---

### Recommendations/Decisions Required:

- (1) To note the process undertaken and the outputs from the public consultation on the Draft Latton Priory Strategic Design Code undertaken between October 2023 and January 2024.
- (2) To agree that the Draft Latton Priory Strategic Design Code (Appendix A) be formally endorsed in order for it to be taken into account as an important material consideration in the determination of future planning applications, and to inform pre-application advice, assessing planning and any other development management and implementation related purposes relating to the site.
- (2) To agree that the Planning Services Director, in consultation with the Place Portfolio Holder, be authorised to make minor amendments to the Latton Priory Strategic Design Code prior to publication.

### Executive Summary:

EFDC were awarded £120,000 by the Department of Levelling Up, Homes and Communities (DLUHC) to produce a design code for the Latton Priory Strategic Masterplan area; one of the three Harlow and Gilston Garden Town (HGGT) communities within, or part of, the District. The Council's adopted Local Plan (Policies SP2 Placeshaping and SP3 Development and Delivery of Garden Communities in the Harlow and Gilston Garden Town) requires '*Design Codes to be produced which accord with the principles established by the endorsed Strategic masterplans*' for Strategic Masterplan sites. The strategic masterplan framework (SMF) for Latton Priory was produced by site promoters' consultants and endorsed at Cabinet on 10.07.2023.

Building on the mandatory spatial principles established in the SMF and the site-specific requirements set out in the Local Plan (Policy SP4 Garden Communities), the strategic design code establishes site-wide strategies and requirements under key themes, including nature, movement, public spaces, built form, identity and resources. The design code focuses particularly on strategies to encourage sustainable movement and create a high-quality public realm with the aim of realising a vibrant and resilient new neighbourhood in line with the Garden Town Vision. As well as supporting Policies SP2 and SP3, The Latton Priory Strategic Design Code supports other policies within the adopted Local Plan, including those relating to green and blue infrastructure (Policies SP6 and DM5), sustainable transport choices (Policy T1) and high-quality design (Policies DM9 and DM10).

The formal public consultation on the design code comprised public events in Epping and Harlow, a digital platform and survey and the opportunity to email or discuss the scheme by phone. Hard copy surveys were made available and hard copies of the design code were placed at key locations in Epping and Harlow. Workshops were held with Epping Youth Council and Harlow Youth Council. A member briefing and workshop was held with HGGT and partner authority Members, local Ward and Parish Councillors, the local MP and North Weald Bassett Parish Council invited. Whilst the formal public consultation period ran for 6 weeks until 11<sup>th</sup> December 2023, the consultation remained open for contributions until 12<sup>th</sup> January 2024.

Alongside consultation with the public, statutory consultee feedback was sought, including ECC county and national authorities. Feedback from developers/ site promoters was sought via a design code workshop at a HGGT developer forum and through ongoing collaboration with the site promoters and their consultants. Usability and deliverability of the code was also tested through a testing exercise with an architectural practice and a testing workshop with Frame QRP panel members. A design code testing report is appended to this report (Appendix D) as well as a Highways technical response undertaken in response to comments from Essex Highways (Appendix E).

Since the consultation period ended, the design code has been reviewed and amended to incorporate and respond to the consultation responses, where appropriate. Key points raised during the consultation, and responses to these, are outlined in the report below and set out in more detail in the Consultation Report, which is appended (Appendix B). Statutory consultee responses are covered in more detail in the Consultee response report (Appendix C).

Following this review and amendments to the design code, officers are of the view that meaningful public consultation has been undertaken, and the Strategic design code can now be formally endorsed to support high-quality development proposals to come forward.

#### **Reasons for Proposed Decision:**

- To ensure that future development proposals for Latton Priory meet the District and Garden Town ambitions for high-quality, sustainable development. The Strategic design code has undergone extensive development by EFDC officers and specialist consultants and changes have been undertaken where appropriate. This has included review of the emerging Strategic Masterplan by EFDC's Quality Review Panel (QRP) and following receipt of responses to formal public consultation. The Strategic design code is considered to be suitable for endorsement as an important material consideration in the determination of any planning applications and will be taken into account as such. It will also be used to inform the provision of pre-application advice and other development related purposes
- To ensure that members are kept fully up to date on the progress of Masterplans and Concept Frameworks and other major proposals being promoted within the District.
- To comply with the Council's general obligations as a local planning authority and the requirements set out in national planning guidance.

#### **Other Options for Action:**

- Not to agree the Latton Priory Strategic Design Code can be endorsed, which would mean that there would be no authority-led design code to guide the delivery of development on the Latton Priory Masterplan Area and help to achieve the Garden Town ambitions and Local Plan objectives of high-quality and sustainable growth.

## Report:

### Introduction

1. Following a successful bid, EFDC were one of 25 authorities that were awarded funding to produce local design codes by the Department for Levelling Up, Homes and Communities (DLUHC) under the Pathfinder Pilot Programme. This followed the publication of the National Model Design Code (NMDC) and an update to the National planning Policy Framework (NPPF) in 2021 that requires that *'all local planning authorities should prepare design guides or codes consistent with the principles set out in the National Model Design Code, and which reflect local character and design preferences'*.

2. The funding was used to produce a design code to set design standards for the Latton Priory Strategic masterplan area, allocated in the Local Plan as one of three new Harlow and Gilston Garden Town (HGGT) communities within, or part of, EFDC. The intention is for the strategic design code to be endorsed to have material weight as a planning consideration for future developments proposals within the Latton Priory masterplan area.

3. The draft strategic design code establishes site-wide strategies and requirements in line with the Garden Town Vision and Local Plan Policies including those relating to Strategic Masterplans and Garden Communities (Policies SP2, SP3 and SP4), green and blue infrastructure (Policies SP6 and DM5), sustainable transport choices (Policy T1) and high-quality design (Policies DM9 and DM10).

### Context

4. The Latton Priory Masterplan Area is located to the south of Harlow immediately outside the urban area, within the administrative area of EFDC. It is located in Hastingwood, Matching and Sheering Village Ward and North Weald Bassett Parish.

5. The Local Plan Policy SP4 (Garden Town Communities) envisages that the Latton Priory site will deliver a minimum of 1,050 homes, 1ha of employment land, up to 5 traveller pitches and a range of infrastructure and facilities including, amongst others, a primary school, a secondary school (or an all-through school), sustainable drainage systems, suitable alternative natural greenspaces (SANGs), a local centre, and a sustainable transport corridor connecting the site to Harlow centre and beyond.

6. The Council's Local Plan (Policies SP2 Placeshaping and SP3 Development and Delivery of Garden Communities in the Harlow and Gilston Garden Town) requires *'Design Codes to be produced which accord with the principles established by the endorsed Strategic masterplans'* for Strategic Masterplan sites.

7. The strategic masterplan framework (SMF) for Latton Priory was produced by site promoters' consultants with input and scrutiny from EFDC officers and HGGT partners. The Latton Priory SMF was endorsed at Cabinet on 10.07.2023. The strategic design code has been produced by the EFDC Planning Implementation Team and builds on the mandatory spatial principles established in the SMF and the site-specific requirements set out in the Local Plan.

8. Whilst it is intended that the strategic design code informs all future proposals, an outline application for most of the site area is expected to be submitted in the first half of 2024. Whilst the strategic design code may help to inform design discussions on the outline application, it will be used to guide future Reserved Matters Applications.

## Design code aims and Objectives

9. Through the funding received and the opportunity to produce an authority-led design code, the primary aim is to embed high-quality, sustainable and coordinated design into the strategic development framework, consistent with the principles set out in the National Model Design Code (NMDC), National Design Guide (NDG), local and national policy and HGGT principles.

10. Within this is an objective to embed community and stakeholder aspirations into the development framework and provide clarity about design expectations for communities and stakeholders, which should help to smooth the planning process at later stages and accelerate housing delivery.

11. The design code is intended to be a clear and straightforward tool for those preparing future planning applications and for those assessing future planning applications. It is intended to put in place key strategic principles that are essential to meet the keys aims for the new Garden Community whilst also providing flexibility and inspiring creativity and innovation in future proposals.

12. By producing the design code predominantly in-house and through utilising best-practice in the design code process, it is envisaged that in-house design and engagement skills will be enhanced and that the learnings and outcomes will be used to improve the quality of processes and output on other Strategic Masterplan sites and Garden Communities.

## Design Code Process

13. The design code process has largely followed the guidance set out in the 'National Model Design Code Part 1 – The Coding Process', which describes the stages of Analysis, Vision and then Code. In the context of the Latton Priory Strategic Masterplan Framework development by the site promoters' consultants, some of the stages were adapted to reflect the existing baseline information available and the opportunity to coordinate with the emerging masterplan framework.

14. Baseline analysis included a review of relevant policy and guidance documents for the District and the Garden Town as well as key national policy and guidance. The following documents helped to inform the vision, scope and content of the strategic design code:

- EFDC Local Plan
- HGGT Vision including 'principles for healthy growth'
- HGGT Design Guide
- EFDC Green Infrastructure Strategy
- EFDC Latton Priory landscape character assessment
- EFDC/ HGGT Sustainability Guidance
- HGGT Transport Strategy
- HGGT Healthy Garden Town Framework
- HGGT Latton Priory Access Study
- HGGT Measures to achieve mode share
- HGGT Transport Strategy
- HGGT Sustainable Transport Corridor placeshaping principles
- HGGT draft stewardship charter
- HGGT quality of life survey recommendations

15. Existing information on the site held by EFDC and gathered as part of the allocation and SMF process informed the understanding of the existing place. This was supplemented by officer site visits and helped to inform a site-specific vision and design code.

16. To avoid duplication of previous consultations, community views were incorporated at analysis stage through a review of the previous consultations undertaken as part of the Latton Priory SMF process. This included feedback from themed workshops held in 2019 on ‘Sustainable movement and transport’, ‘nature, green and open spaces, landscape and water’, ‘community hub and stewardship’ and ‘homes and living’. Emerging Neighbourhood Plan’ policy ideas for the ‘North Weald Basset Neighbourhood Plan’ were also reviewed to understand local priorities and aspirations.

17. Officers were engaged at the analysis through online workshops to help inform the project scope and priorities. These were attended by a variety of EFDC teams, such as Community and Wellbeing and Homes and Communities as well as officers from the Garden Town and partner authorities including Harlow, Essex and East Herts.

18. The baseline information analysis informed a set of design ambitions to be achieved at Latton Priory through the strategic design code work. The design ambitions are intended to be site-specific, concise and shaped to fit in with NMDC themes. For each design ambition, a set of objectives and strategies were established to describe how those ambitions can be achieved, and these inform the strategies and rules that follow in the code. Baseline analysis and resulting strategies and objectives are collated in a Stage 1 report.

19. Specialist transport consultants were appointed to reviewing the site-wide strategies and produce code for street and junction types to help support the Garden Town target for 60% of journeys starting in the new Community to be via active or sustainable modes.

20. In order to ensure that the emerging design code addressed the needs of residents who might be otherwise under-represented, a series of public-realm focused design workshops were held with primary and secondary school children in Epping and Harlow as well as Harlow Youth Council members. A workshop was also held with a group of older people through Voluntary Action Epping Forest. The workshops were organised by Rainbow Services and jointly facilitated by EFDC officers and Rainbow Services.

21. The draft strategic design code has been produced through partnership working in the context of its location and Garden Town status. Regular input has been provided by the HGGT Placeshaping and engagement workstream and there has been liaison with the HGGT quality of life monitoring and stewardship charter development teams. Regular workshops were held with officers from Essex County Council Highways and Harlow Council. Workshops were also held with the site promoters’ consultants to facilitate coordination between the SMF and the emerging code.

22. The development of the design code has been supported and monitored throughout by DLUHC and the Office for Place. This has included two design reviews with specialist expertise at the Design Council. In line with EFDC requirements for strategic sites, the draft design code has also been reviewed twice by the EFDC/ HGGT Quality Review Panel to ensure that it is successfully addressing the key aims of the District and the Garden Town. The latest QRP report is attached as an appendix to this report (Appendix F).

23. A HGGT Member Briefing took place on Thursday 31<sup>st</sup> August, with invites to HGGT Board Members, EFDC and HDC Cabinet members and relevant local ward and parish councils in both Epping Forest and Harlow Districts. The Design Code Project team presented the draft Strategic Design Code and consultation plan. Members were then invited to ask questions or provide comments on the presentation. These included queries/ comments on:

- securing timely delivery of public assets and infrastructure,
- strategies for encouraging active travel and the use of car barns to reduce the impact of car parking on the public realm,

- accessibility of streets including shared surfaces and the design of open spaces,
- accessibility of the consultation including the use of digital and in-person engagement,
- provision of healthcare facilities,
- the use of modal filters to create quiet streets and a permeable street network for walking and cycling,
- legibility of the coding plans,
- EV charging,
- cycle parking,
- separation of cycle lanes and footpaths,
- wider road and transport infrastructure including potential closing of Rye Hill Rd south of the proposed access to cars and STC layout.

These have been addressed within consultation clarifications and amendments as noted in the Consultee Responses Report (Appendix C). Where applicable, these will also be addressed in the HGGT strategic transport work that is ongoing.

### Formal public consultation

24. A formal public consultation on the draft Strategic design code took place between October 2023 and January 2024. This represented an extended 10-week period of consultation.

25. The consultation was promoted through EFDC and HGGT websites, press releases (e.g Epping Forest Guardian), newsletters and targeted social media campaigns to Harlow and Epping residents and stakeholders. Emails were sent to registered email addresses, EFDC and Harlow Councillors, the local MP and North Weald Parish Council. Posters were provided to the Civic offices and the Discover Harlow Community Hub as well as other community locations.

26. The formal consultation comprised public events in Epping (Thornwood Village Hall) and Harlow (Latton Bush Centre) at weekends and evenings, a digital platform and survey and the opportunity to email or discuss the scheme by phone. Hard copy surveys were made available and hard copies of the design code were placed at key locations in Epping and Harlow. Workshops were held with Epping Youth Council and Harlow Youth Council.

27. Alongside consultation with the public, statutory consultee feedback was formally sought, including ECC county and national authorities.

28. Feedback from developers/ site promoters was sought via a design code workshop at a HGGT developer forum on 5<sup>th</sup> December 2023 and through ongoing collaboration with the Latton Priory site promoters and their consultants. Usability and deliverability of the code was also tested through an exercise with an architectural practice and a testing workshop with Frame QRP panel members. The report from this testing work, including key recommendations is attached as an appendix to this report (Appendix D).

29. The following key themes emerged from the public consultation (See Appendix B for details):

- Integration with surrounding area, including borders, connections and existing infrastructures. This ranges from area-wide considerations such as public transport networks, to treatment of borders and the continuation of landscaping from the new development into existing streets
- Ensuring high quality of design and construction of the new buildings
- Impact on views from existing homes on the edge of Harlow, which currently look out over fields, and the enjoyment of people who currently go for walks there. It was suggested by respondents that putting lower buildings on the Harlow boundary, or a green buffer might mitigate this.
- Concerns over the location of the travellers' site allocation, which was thought to be too central
- Maintenance of green and public spaces was a priority, with questions asked about who would

be responsible for funding and managing this.

- Strong support for measures to address climate change, including using green streets
- Nature and green space – especially fields, hedgerows and woodland - is part of the local identity. Minimising impact on existing natural habitats while including greenery and green spaces in new streets and public spaces were therefore strongly supported.
- Safety and security in public spaces. Good lighting and surveillance are considered paramount on streets, cycle routes, car barns and other public spaces. However, people still favour cctv over natural surveillance provided by overlooking.
- Variety of built forms is important, with many people disliking what they see as characterless 'slabs'

30. The following key themes emerged from the stakeholder consultation and design code testing (See Appendix C consultation comments tracker, Appendix D design code testing report and Appendix E Highways technical report for details):

- Clarifications on servicing or technical requirements e.g. for waste or SANG
- Comments about suitability of streets for adoption. Further work commissioned in response, to address these concerns, particularly around street widths and corner radii (Appendix E).
- Alignment with County standards such as Essex Design Guide or draft Essex Parking standards.
- Suggestions to improve usability, including graphics and editing to reduce text.
- General support for principles, particularly around green infrastructure, active travel and sustainability.
- Suggestion to review extents of coding on building typologies and building line to ensure sufficient flexibility.
- Suggestion to review the number of rules to ensure priorities are clear
- Suggestion to provide a compliance tracker to aid enforcement of the code.
- Suggestion to further explore the identity of Harlow, Epping and Thornwood.
- Security is a key concern and opportunities to address it in the code should be taken.
- Ensuring public spaces and streets are accessible, e.g. for those with mobility or sight issues.

31. Across the public consultation and some stakeholder consultation, strong concerns were raised about the impact of development beyond the scope of the Design Code, which are to be addressed through the wider planning process. These included:

- The impact of increased traffic on local roads, in particular Rye Hill Road and the B1393. Respondents said roads were already congested and that more households moving into the area would exacerbate the problem.
- Pressures on social infrastructure, particularly healthcare and schools, and the provision of these facilities at the same time as homes, rather than later.
- Pressures on water – reservoirs and sewage – as well as increased risk of flooding
- Local disruption during construction.

32. Since the consultation period ended, the design code has been reviewed and amended to incorporate and respond to the consultation responses, where appropriate. Details on the points raised during the consultation, and responses to these, are described in the following documents:

- Appendix B - Consultation report
- Appendix C – Consultee response report
- Appendix D – Design code testing report
- Appendix E - Highways technical report

33. A member briefing and workshop was held on 11<sup>th</sup> January 2024. Invitees included HGGT Board and partner authority Members, local Ward and Parish Councillors, the local MP and North Weald Bassett Parish Council. EFDC officers presented the design code including a recap of the context of the Latton Priory Masterplan Area site and relationship between the strategic design

code, the endorsed Strategic Masterplan Framework and how these two documents will inform future planning applications. This was followed by an overview of the way the code is structured and the section headings of 'nature', 'movement', public space', 'built form', 'identity' and 'resources'. The presentation included an anticipated timeline to endorsement and a summary of the public and stakeholder consultation that was undertaken as well as feedback from the HGGT developer forum and how the design code has been tested by to help refine usability and deliverability.

34. Following the presentation, Members recognised the efforts of the design code team and wider HGGT partnership in delivering the code and the potential for positively influencing placeshaping in the District and the Garden Town. It was requested that the design code should be presented at EFDC Place Scrutiny Committee to ensure that a wider range of Members were given the opportunity to feedback prior to Cabinet.

35. The Place Scrutiny Committee considered the Latton Priory Strategic Design Code on 27th February 2024. The Committee received assurance that public and stakeholder consultation had been undertaken and feedback from that consultation was being incorporated into design code amendments or addressed through the wider planning process as appropriate. Frequently Asked questions (FAQs) would be developed to address some of the issues raised and these will be made available on the design code engagement website along with a comments and response tracker. Infrastructure and high-speed broadband requirements were addressed in the Local Plan and would form part of the planning process. The Committee commended the report to Cabinet for approval.

#### Latton Priory Strategic Design Code

36. The final draft Latton Priory strategic design code proposed for endorsement is enclosed at Appendix A and is summarised as follows:

37. The strategic design code addresses the public-realm and the structure of the development at Latton Priory to help deliver a place that is high-quality, coordinated and integrated in its context. By focusing on strategic infrastructure, opportunities of the site and best practice design principles for promoting health, community and social vibrancy and sustainability, the design code seeks to embed foundations of a place where people and nature can thrive, whilst leaving scope for innovation, creativity and variety in future applications and detailed design codes.

38. The scope focuses on those key aspects of the NMDC that strongly relate to the public realm and the design ambitions of the code including 'nature', 'public spaces', 'movement', 'built form', 'identity' and 'resources'. There is a particular emphasis on design that encourages sustainable movement to help meet the modal shift target of 60%. The movement section explores strategies to build in a culture of active and sustainable travel at every scale of design. This is supported by the other sections with the objective of realising a vibrant and resilient new neighbourhood in line with the Local Plan and the Garden Town vision.

39. Each section starts with a site wide strategy diagram or set of site wide strategies setting out the key components of that strategy and accompanied by principles and rules. The components are then described or illustrated. Wording includes general principles followed by a series of 'must', 'must not', and 'should', 'should not' rules and recommendations. The intention is that 'musts' are always followed and 'shoulds' followed unless deviation is justified through technical reasoning or because an alternative approach better achieves the design ambitions. The format is intended to be legible, straightforward to understand and enforceable.



40. The design code addresses the following strategic topics:
- i. Strategic framework. Includes stewardship strategy building on draft HGGT stewardship charter and sets out requirements for the process of planning, designing and maintaining community assets.
  - ii. Nature. Sets out the overall green and blue infrastructure strategy and requirements such as minimum 'urban greening factor' score. Also sets out key design principles of various components of the green infrastructure such as the greenway and street trees.
  - iii. Movement. Sets out site-wide strategies that help to achieve the objectives of a high-quality, safe and healthy place where active travel is encouraged. This includes strategies for an active travel network, vehicular movement and a street type hierarchy as well as approaches to parking design, but not parking numbers.
  - iv. Public space. Sets out the key requirements for streets and spaces forming the public realm. This includes typical sections and key requirements for different types of streets and key open spaces, such as the community plaza.
  - v. Built form. Sets out an approach to typologies and locations for density as well as rules around the building line along various streets to support street hierarchy and character.
  - vi. Identity. Sets out requirements for achieving variety in frontages that support wayfinding and local distinctiveness by drawing on aspects of the built form of Harlow and Epping.
  - vii. Resources. Sets out key site-specific requirements for climate resilience, mitigation and futureproofing at the masterplan stage such as the need for blocks that work with solar orientation for energy efficiency in use.

## Conclusion

41. As part of the HGGT partnership agreement the development of the Latton Priory Strategic Design Code has been developed by EFDC officers in consultation with ECC and HDC. Officers consider that the Strategic Masterplan Framework fulfils the intentions of the EFDC Local Plan in enabling meaningful public consultation, and will lead to high quality development, supporting national policy and the following EFDC Local Plan strategic and transport and development management policies:

- Policy SP1 – Spatial Development Strategy 2011 – 2033
- Policy SP2 – Place Shaping
- Policy SP3 – Development and delivery of Garden Communities in the Harlow and Gilston Garden Town
- Policy SP4 – Garden Communities
- Policy SP5 - Green Belt and Local Greenspace
- Policy SP6 – The Natural Environment, Landscape Character and Green and Blue Infrastructure
- Policy T1 – Sustainable Transport Choices
- Policy DM5 – Green and Blue Infrastructure
- Policy DM9 – High Quality Design
- Policy DM10 – Housing Design and Quality
- Policy DM11 – Waste Recycling Facilities in New Development

### **Resource Implications:**

As set out in the 18 October 2018 Cabinet Report, the successful delivery of the Garden Town and the other strategic sites within Epping Forest District will require considerable commitment of officer time from EFDC. The noting of the contents of this report do not give rise to additional resource implications.

### **Legal and Governance Implications:**

The work on design codes has been developed in accordance with Government policy (NPPF and NPPG) and Planning Law.

### **Safer, Cleaner and Greener Implications:**

The design code builds on policies in the Local Plan and principles of the HGGT Sustainability Guidance that support sustainable development, to help deliver a place that mitigates contribution to climate change and is designed to withstand a changing climate. Key measures include well considered blue and green infrastructure, strategies to promote and encourage a shift to sustainable modes of travel, site layout principles in line with passive solar design for reduced energy use. Safety is also addressed in public realm design, with the promotion of compact walkable neighbourhoods, maximising natural surveillance and minimising potential clashes between different road users, particularly around play spaces.

### **Consultation / Scrutiny Undertaken:**

Presented at Place Scrutiny Committee on 27<sup>th</sup> February 2024.

- Appendix B – Consultation report
- Appendix C – Consultee response report
- Appendix D – Design code testing report
- Appendix E - Highways technical report
- Appendix F – Latest Quality Review Panel report

### **Background Papers:**

N/A

### **Risk Management:**

The production and use of a design code as a material planning consideration will support the Council's objectives of achieving high quality and sustainable design at Latton Priory and reduce the risk of design that fails to meet the objectives.

### **Equality:**

An Equality Impact Assessment was carried out and there was no significant impact.

# LATTON PRIORY DRAFT STRATEGIC DESIGN CODE COMMUNITY ENGAGEMENT REPORT

DECEMBER 2023

**Table of Contents**

**About this report ..... 4**

**Executive summary..... 4**

**Introduction..... 8**

**Engagement strategy ..... 8**

    Workshops/exhibitions ..... 8

    Youth workshops ..... 9

    Older residents..... 9

    Website ..... 9

    Survey..... 10

    Mitigating digital exclusion..... 10

    Testing practical application ..... 10

    Statutory consultees ..... 10

    Land agent’s concurrent consultation ..... 11

**Communications..... 12**

**Context..... 13**

    Where is the Latton Priory site? ..... 13

    Who owns the land and who will develop it? ..... 13

    What is the purpose of the Latton Priory Strategic Design Code? ..... 13

    What is in the Latton Priory Strategic Design Code? ..... 13

    Who will benefit from development at Latton Priory? ..... 14

**What we heard: Detailed feedback on the draft Strategic Design Code by chapter..... 15**

**DESIGN AMBITIONS ..... 15**

**LAND USE ..... 16**

**STEWARDSHIP ..... 16**

**NATURE ..... 17**

**MOVEMENT..... 18**

**PUBLIC SPACE ..... 20**

        Local centre ..... 20

**PLAY ..... 21**

**BUILT FORM..... 21**

**IDENTITY..... 22**

**RESOURCES..... 23**

**USING THE DOCUMENT ..... 23**

**OTHER ISSUES ..... 23**

**Appendices ..... 26**

**Events details ..... 27**

## Latton Priory Draft Strategic Design Code – Engagement Report

Version	date	author
V1	20.12.23	JCT
V2	06.03.24	KS updates

## About this report

This report contains the findings of the statutory consultation and community engagement for the Latton Priory Draft Strategic Design Code, carried out from October – December 2023. It has been prepared by Jessica Cargill-Thompson, community engagement consultant, on behalf of Epping Forest District Council (EFDC), a Harlow and Gilston Garden Town (HGGT) partner. Although the survey was kept open past the initial finish date of 11 December 2023 at the request of Robert Halfon MP, results included here are to 17 Dec for the purposes of reporting and taking comments on board in a refined version of the design code ; submissions after this date will be addressed in any further refinements.



## Executive summary

A Strategic Design Code is being prepared by Epping Forest District Council (EFDC) as part of the Harlow and Gilston Garden Town (HGGT) partnership, using Pathfinder funding from the Department of Levelling Up, Housing and Community (DLUHC).

An eight-week period of statutory public consultation was carried out on the draft document from 20 October to 11 December 2023.

Members of the public were invited to attend in person discussions, workshops and exhibitions about the code, arranged in both Harlow and Thornwood, close to the site.

Notes were taken at these sessions and people were invited to submit responses to the draft code via an online survey ([engage.hggt.co.uk](https://engage.hggt.co.uk)), email, or Freepost. Two bespoke workshops were also held with the Harlow and Epping Forest Youth Councils. The outcomes of this community engagement is contained in this report.

Publicity for the consultation and events used social media to target postcodes closest to the site, in both Harlow and Epping. Printed posters were also displayed in public venues and email newsletters sent.

EFDC officers also contacted statutory consultees, the HGGT Developers Forum, and Harlow and Epping Forest members for feedback; these are reported separately.

Overall there was general consensus from the local community on the core design ambitions and requirements set out in the Draft Strategic Design Code, with some themes emerging as priorities.

## Latton Priory Draft Strategic Design Code – Engagement Report

The key themes that emerged were:

- Integration with surrounding area, including borders, connections and existing infrastructures. This ranges from area-wide considerations such as public transport networks, to treatment of borders and the continuation of landscaping from the new development into existing streets
- Ensuring high quality of design and construction of the new buildings
- Impact on views from existing homes on the edge of Harlow, which currently look out over fields, and the enjoyment of people who currently go for walks there. It was suggested by respondents that putting lower buildings on the Harlow boundary, or a green buffer might mitigate this.
- Concerns over the location of the travellers' site allocation, which was thought to be too central
- Maintenance of green and public spaces was a priority, with questions asked about who would be responsible for funding and managing this.
- Strong support for measures to address climate change, including using green streets
- Nature and green space – especially fields, hedgerows and woodland - is part of the local identity. Minimising impact on existing natural habitats while including greenery and green spaces in new streets and public spaces were therefore strongly supported.
- Safety and security in public spaces. Good lighting and surveillance are considered paramount on streets, cycle routes, car barns and other public spaces. However, people still favour cctv over natural surveillance provided by overlooking.
- Variety of built forms is important, with many people disliking what they see as characterless 'slabs'

It was also suggested that the Latton Priory Strategic Design Code could be used to guide other local developments.

However, strong concerns were raised about the impact of development beyond the scope of the Design Code. These were:

- The impact of increased traffic on local roads, in particular Rye Hill Road and the B1393. Respondents said roads were already congested and that more households moving into the area would exacerbate the problem.
- Pressures on social infrastructure, particularly healthcare and schools, and the provision of these facilities at the same time as homes, rather than later.
- Pressures on water – reservoirs and sewage – as well as increased risk of flooding
- Local disruption during construction.

Several visitors to the in-person events and respondents to the survey used the opportunity to protest against development on the site. These objections came largely from Harlow residents whose homes abut the Latton Priory site.

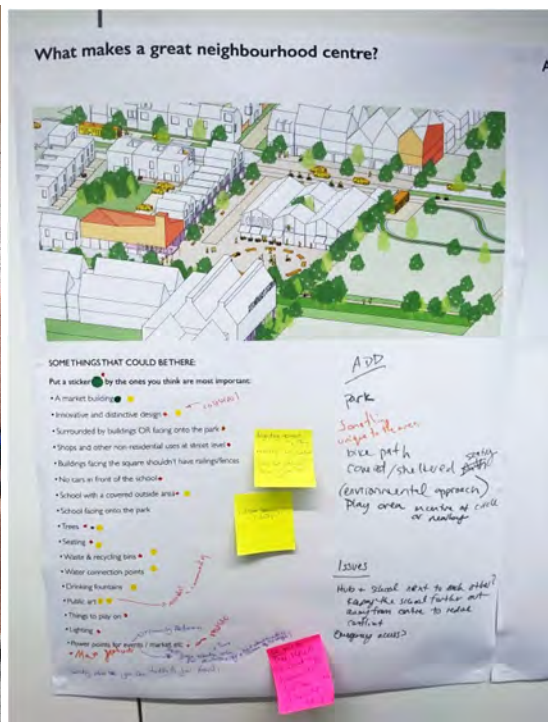
Officers have also collected feedback from statutory consultees and tested the practical application of the document with independent architects.

All responses are being considered by officers and refinements made to the draft Strategic Design Code where appropriate.



Drop-in exhibition at Thornwood Village Hall





Workshops with Harlow and Epping Forest Youth Councils

## Introduction

In 2022 Epping Forest District Council won Pathfinder funding from the Department of Levelling Up, Housing and Communities (DLUHC) to develop a Strategic Design Code for a site at Latton Priory, part of the Harlow and Gilston Garden Town plan, to the south of Harlow, but also within the boundary of Epping Forest District.

The purpose of the Autumn 2023 engagement strategy was to carry out statutory consultation on the Draft Strategic Design Code for Latton Priory.

Development of the draft document has been informed by engagement previously carried out by both EFDC in Spring 2023, and the land agents, CEG and Hallam Land in 2019 and 2023 during preparation of a Strategic Masterplan Framework for the site (endorsed by EFDC in July 2023). It also learns from what was heard during engagement on modifications to the EFDC Local Plan (July-September 2021), and other specialist reports such as transport.

### What we wanted to know at this stage

- Is it a practical tool that will be straightforward to use?
- Are there any issues arising from what's proposed so far?
- Any 'musts' that need to be 'shoulds'?

### What respondents could / couldn't influence at this stage

- The Strategic Masterplan Framework elements are fixed
- The Strategic Design Code has to comply with other district and national policies

Feedback on all aspects of the design code was welcomed.

This was also a chance to raise local awareness of the development and wider HGGT.

It was important to reach residents of all ages and representing all communities.

Statutory consultees were also contacted by officers; these responses have been reported separately.

## Engagement strategy

A seven-week consultation period was agreed from Friday 20 October to Monday 11 December, targeting communities in both Harlow and Epping, but open to anyone.

The main methods for collecting feedback were:

- In person public exhibitions/workshops
- A website and online survey

### Workshops/exhibitions

To allow a forum in which people could understand and discuss what is a fairly technical planning document, local in-person exhibitions / discussions were considered the best format.

## Latton Priory Draft Strategic Design Code – Engagement Report

Four general public sessions were held: two at the Latton Bush Centre in Harlow, and two at Thornwood Village Hall, Epping. Sessions were open to all, with one weekend session and one evening in each location to cater to as many people's lifestyles as possible.

These were advertised by the EFDC and HGGT comms team using social media (see below) as well as posters in Epping Library, Civic Offices, and Latton Bush Centre. Members were also informed and invited to share with their networks.

Sessions were typically two hours long and included clear exhibition boards (see appendix), printed copies of the draft code and a short presentation that distilled the key points of the design code into clear, accessible highlights. EFDC officers were on hand to discuss issues and provide clarifications.

Notes were taken at all sessions and logged as qualitative data. Participants were also encouraged to visit the online survey to leave more structured comments relating directly to the design code. Paper versions of the survey were also available, returnable by Freepost.

### Youth workshops

To ensure the voices of young people were well represented in the consultation, bespoke interactive workshops were held with both Epping Forest and Harlow youth councils.

These drilled down into topics that had been identified during engagement with young people in early 2023 as being particularly important to this group: public space, nature, and movement.

### Older residents

A bespoke session was also arranged with residents of Leonard Davis House retirement housing, North Weald. However this was cancelled by the home due to double booking. As residents were also invited to nearby public sessions, and had a busy schedule, a replacement session was not scheduled.

### Website

A project website was set up using CitizenLab and hosted on the HGGT engage.hggt.co.uk website. This hosted:

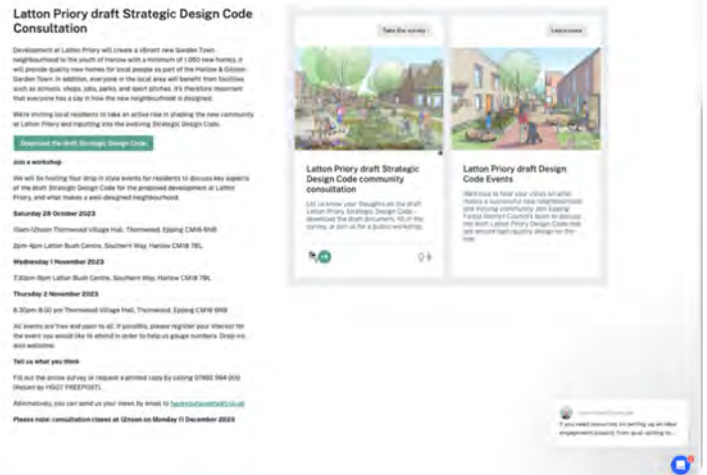
- Easily digestible information about the draft Strategic Design Code
- Details of public events
- A public survey
- Answers and clarifications to Frequently Asked Questions

# Latton Priory Draft Strategic Design Code – Engagement Report

## Survey

The survey was flagged on the HGGT website and advertised through social media and QR codes on posters for the most locally targeted reach.

The survey was structured to map onto the chapters of the design code and test agreement. The relevant chapter was linked to in each section, and the full design code available to download from the website.



Screenshot of Latton Priory CitizenLab website

To keep the survey completion time below 10 minutes, sliding scale questions were used ('On a scale of 1-5, how important is...') to test specific aspects of the code. So potential respondents were not deterred or overwhelmed by the length of the survey, participants could answer as many or few questions as they wanted to. There was also the option for all sections to provide other comments.

A project email address was also widely advertised for anyone who wished to provide their response as a freestyle written submission instead.

The full survey questions are available in the appendix.

## Mitigating digital exclusion

In order to mitigate digital exclusion, paper copies of both the survey and the draft Design Code were available at EFDC offices and the Discover Harlow engagement hub, which opened part-way through the consultation period.

## Testing practical application

Independent architects were commissioned to test how usable the code would be in practice. This has been reported separately.

## Statutory consultees

All statutory consultees were emailed with a copy of the Statutory Design Code and invited to submit feedback by 11 December 2023. The following responded:

- Canal and River Trust
- Historic England
- National highways
- North Weald Basset Parish Council
- Persimmon Homes
- Place Services
- Sport England

These are reported separately.

Land agent’s concurrent consultation

It is worth noting that this consultation overlapped with a separate consultation carried about by CEG and Hallam Land from 10 November-8 December via their website [lattonpriory.co.uk](http://lattonpriory.co.uk). As CEG and Hallam Land were reluctant to delay their consultation until after the design code consultation, measures were taken to clearly message the difference between the two consultations and mitigate any public confusion.

## Communications

Publicity of the events and the consultation survey was carried out by HGGT and EFDC communications teams.

The main method was through existing newsletters and social media that could target Harlow and Epping residents by postcode.

In total, more than 700 people visited the CitizenLab consultation website, showing effective reach across the area. Only a small percentage chose to leave comments / objections on the survey, it can be assumed that there was general consensus for the code.

Social media data is as follows:

### Facebook

- Impressions – 42,162
- People reached – 9517
- Most Engaged Audience – **1.** 35-44 year olds; **2.** 45-54; **3.** 55-64 **4.** 25-34
- Click throughs to CitizenLab – 563
- Click through rate percentage – 1.34% (above Facebook average of circa 0.9%)
- Cost per click – 37p

### Instagram

- Reach – 4082
- Click throughs to CitizenLab – 145

In addition, posters were displayed in civic venues in Epping and at the Discover Harlow engagement hub in the Harvey Centre.

Members were also contacted and asked to publicise to their constituents and networks.

## Context

Where is the Latton Priory site?

Latton Priory sits to the south of Harlow, and lies within the administrative area of Epping Forest District. It is 1.7 miles from Harlow Civic Centre (10 minute cycle) and approximately 3.5 miles (20 mins cycle) from Epping town centre. It is bordered by Rye Hill Road to the west.

Who owns the land and who will develop it?

The land is privately owned and the promoters of the site are CEG and Hallam Land Management. Epping Forest District Council and Harlow and Gilston Garden Town are working with the site promoters to help develop high-quality proposals that achieve the aims and vision of the District and the Garden Town.



Map showing Latton Priory site outlined in red

What is the purpose of the Latton Priory Strategic Design Code?

The Latton Priory Strategic Design Code sets out design standards and requirements to be met by developers in future planning applications. These standards seek to ensure that the development is high-quality, sustainable and well-integrated.

The design code is part of the planning process for the Latton Priory Masterplan Area. It follows the endorsement by EFDC of the Strategic Masterplan Framework (SMF) for the site. The SMF includes mandatory spatial principles for the site and these form the basis of the layout shown in the design code.

Once endorsed, the design code will be a material consideration in future planning decisions, along with the SMF. Neither of these documents are planning applications and neither of them give permission to build.

When planning applications are submitted in the future, for the Latton Priory masterplan area, they will need to take account of the mandatory spatial principles in the SMF and the standards set out in the design code.

What is in the Latton Priory Strategic Design Code?

The design code sets out key design ambitions for the site and then sets out strategies and requirements for several different themes to help meet these ambitions. The themes are:

- **The Strategic Framework** (including land use and stewardship)
- **Nature** (including green infrastructure and water management)
- **Movement** (including parking design, movement strategies)
- **Public space** (including street design, open space, play and recreation)
- **Built form** (including density, building typologies, building lines and heights)
- **Identity** (including wayfinding, sense of place and local character)
- **Resources** (including energy use, adaptability and future-proofing)

Site-wide strategies are accompanied by diagrams and written rules of mandatory requirements ('must's) and flexible requirements or recommendations ('should's). Illustrations and supporting text is used to show the intention of the requirements. The requirements reflect relevant policy, guidance, community views and site analysis.

By focussing on the strategic elements of the development the code leaves scope for innovation and variety in future proposals whilst fixing those elements that are necessary to achieve a high-quality place where people and nature can thrive.

#### Who will benefit from development at Latton Priory?

Development at Latton Priory will create a vibrant new neighbourhood on the edge of Harlow with a minimum of 1,050 new homes. It will provide quality new homes for local people as part of the Harlow & Gilston Garden Town. In addition, the new neighbourhood will include new schools, usable green spaces including pitches and a new park, play spaces, a local centre and retail and community facilities, which will also serve residents in the wider area. It's therefore important that everyone has a say in how the new neighbourhood is designed.



## What we heard: Detailed feedback on the draft Strategic Design Code by chapter

This is an overview of all feedback is collated from all public engagement methods – in person events, online/paper survey, email responses and youth workshops. It does not include responses from Statutory consultees. Details of responses collected through each form of engagement can be found in the Appendices.

### DESIGN AMBITIONS

In the survey, there was general agreement with the Design Ambitions, with the following considered most important:

- A lively core of schools, amenities and shops supports a thriving and resilient community
- An integral network of green routes and spaces connects surrounding landscape and enhances the Green Wedge into Harlow
- A variety of uplifting and safe streets and spaces encourage year-round active and healthy lifestyles for all ages
- Active and sustainable travel is the most appealing way to get around, including travel into Harlow and Epping
- The climate emergency is addressed with buildings and spaces that can withstand the changing climate and minimise impact on the environment
- There is flexibility to adapt to future needs, anticipating changes in travel, work and lifestyles

Less of a priority, but still agreed, were:

- Compact, human-scale built form nestles comfortably into the hillside overlooking Harlow
- The art and innovation of Harlow, the market town and pastoral character of Epping inform a distinctive identity

Additional comments called for:

- Quality design, materials, and construction
- Attractive architecture
- Integration with the surrounding area
- Questions were also asked about the benefits to Harlow itself.

#### COMMENTS:

*'Please don't destroy this one time opportunity to build something good, don't try to cut costs on architecture or design'*

*'Whilst this addresses a new development, there is no framework for integration with existing infrastructures'*

*'It's all very well doing the design code but it's all about the site and not enough about the wider area, connections and interfaces'*

*'Referring back to the November 2022 Latton Priory SMP draft report consultation, one of the key policies of particular relevance to Latton Priory was noted to be: Policy SP3 Place Shaping - ensure positive integration with adjacent rural and urban communities. This KEY policy is still not met within the Latton Priory Draft Design Code, in terms of the impact that the proposals will have*

*upon the residents in the Rye Hill Road area, and those of many other Harlow roads that will be affected by Latton Priory.'*

*'The amount of work that has gone into this design code is exemplary and should guide all other developments in the EF district. Well done to all those involved.'*

## LAND USE

There are concerns about the impact on the view both from the neighbouring part of Harlow, and from Epping. These are linked to the position of the site on a ridge and existing planning stipulations surrounding this. The raised location was also thought to have the potential to be a windswept location; using trees as buffers was suggested.

In-person events highlighted a need to consider the impacts on the neighbouring area of Harlow, and to give further consideration to the site boundary.

There is concern about where the travellers' site is located within the development ie close to the neighbourhood centre. Many people expressed concerns that antisocial behaviour and crime associated with an existing site at Fernhill Road might be exacerbated. It was acknowledged that these issues were particular to this site and not to traveller communities in general. Consultation is taking place with Design Out Crime and other relevant services to help address this.

The need for social infrastructure – particularly schools and healthcare – was highlighted, as well as concerns about the impact on roads and additional population.

## COMMENTS:

*'The area proposed is too close to existing homes and Schools and the Roads and access routes just cannot take the extra chaos the build will bring. The proposed new homes will take away beautiful land that is used by 1000s of people for walks and to take their children.'*

*'The site should be moved northwards so it lies beneath the ridge as would fit with Sir Frederick Gibberd's design standards - not to dominate the skyline. The rooflines should be hidden from views from the south.'*

*'A protected barrier of trees and shrubs should also be in place, setting the new buildings away from these borders, again minimising any disturbance.'*

*'It is IMPOSSIBLE for up to an extra 3600 Harlow residents to positively integrate into Harlow's existing local healthcare provision, which is already stretched beyond capacity.  
A design code for Latton Priory with ZERO local healthcare facilities included in it is NOT APPROPRIATE'*

## STEWARDSHIP

Maintenance was a concern in workshop conversations and the survey, and of particular importance to young people.

This also aligns with the HGGT stewardship charter, which is undergoing separate consultation.

Due to the location of the site – adjacent to Harlow but within the district of Epping Forest – several people said that maintenance should be funded through EFDC council tax. There should be minimal (financial and managerial) onus on homeowners.

COMMENTS:

*'Please provide adequate funding for training opportunities for staff involved in this essential aspect of the development.'*

## NATURE

Green space, fields, woodland and hedgerows are an important part of the local identity and culture. People therefore felt strongly about both conservation of / reducing the impact on existing wildlife and woodland, as well as incorporating greenery into new streets.

Climate resilience was acknowledged as a key consideration for a green space strategy – choosing climate resistant species, and using planting to provide shade and purify air.

There was a unanimously positive response to green streets, partly as attractive places, but also to boost biodiversity.

In conversations at events with Harlow residents, the idea of a green buffer between Harlow and the new development was also raised by residents who would be losing green space behind their homes and were concerned about having the new homes right behind their's.

More than half of survey respondents supported the following aspects of the Design Code:

- A greenway for walking, cycling and other non-car-based travel
- Green fingers of land penetrating the site
- A new park
- A wetland area
- Connecting with and extending Harlow's Green Wedge
- A new park
- Sustainable Drainage (SuDS)
- Allocation of a Suitable Alternative Natural Greenspace (SANG)
- Supporting biodiversity and climate change

There was less interest from survey respondents and in-person discussions around:

- Allotments and food growing – although Youth Councillors identified these as facilities that would be well used by older people and Asian families.
- Sports pitches were identified as something of particular importance to young people; further details of the activities they would like provision for can be found under 'Play'.
- Concerns around existing natural habitat centred on
- Destruction of existing hedgerows and trees

## Latton Priory Draft Strategic Design Code – Engagement Report

- Impact on existing wildlife habitats and routes
- Loss of existing countryside
- Safety around ponds / blue infrastructure
- Hayfever from certain plant species
- Smells from stagnant water in attenuation ponds

### Specific questions included

- Whether the existing deer route from Latton Woods across the site had been taken into account
- Will the oak trees along Riddings Lane be preserved?

### COMMENTS:

*'I love Harlow because of the trees!'*

*'I think having modern houses next to the colourful green space looks good'*

*'We have an attenuation pond near us and it stinks!'*

*'Will the developers landscape the Harlow side, as the public generally have a distrust of developers and if not written into a design code as a mandatory action will probably not be a consideration due to costs.'*

*'Harlow's green wedge should not be imposed upon. There should be a clear and big enough wedge between the new site and Harlow.'*

*'There are currently huge problems with water run off from the green wedge at the north end of the LP site, across and down Rye hill Rd and into Longwood. Currently surface water runs into housing gas supplies causing major issues. All proposed land drainage for LP must have capacity to resolve these problems.'*

*'A greenway connecting to Epping to encourage active travel to underground network [would be good].'*

*'I wouldn't really use community gardens, but older people might and it would be good to have things for all ages.'*

### MOVEMENT

The impact on existing roads and traffic congestions was a major concern for residents in Harlow and Epping / Thornwood, as well as online respondents. Much of this is the remit of the Transport Strategy rather than the Strategic Design Code, and there was a strong call for the Transport Strategy to be shared before the Design Code is endorsed. Detailed comments received on this subject will be shared with the transport consultant team.

More information was requested on entrance and exit points to the Latton Priory site, particularly with reference to potential impacts on Rye Hill Road.

The example of Low Traffic Neighbourhood interventions in Bruce Grove, Haringey, North London were suggested by one respondent as a successful model for preventing rat-running.

**Safety and security** – The safety of roads, streets, walkways and cycleways is one of the chief concerns. It was regarded by survey respondents as one of the most important factors in encouraging people to walk and cycle, and it was one of the key topics in both Youth Council workshops. Safety means both road safety (eg separating cycle lanes from cars) but more importantly personal safety (eg mugging).

**Good lighting** was one of the most important things for making people feel safe; many also cited CCTV, clear lines of sight and places with activity as deterrents to crime and antisocial behaviour.

**Active travel** – Bike security was seen as something that would promote cycling, with approval for communal street bike sheds and the request for secure bike parking near activities (eg play, sport) and neighbourhood centre.

**Places to sit**, good signposting and the attractiveness of routes also encourage people to walk/cycle. It was noted that equestrianism is also a popular activity in this area.

**Bus provision** would need to be reliable, frequent and supported even if not viable for a private operator. There are concerns a service would not continue. Real time information was seen as essential, rolled out across the network.

**Parking** – the issue of how to most effectively design parking drew mixed responses from the survey and in-person sessions, with some wanting to see on site /on street provision restricted to one space per house, and others insisting there should be no limit to car ownership with adequate parking off road.

Thornwood residents were concerned that restricted parking provision at Latton Priory might push it on to them; Harlow residents that people would park further into Harlow.

There was much interest in car barns. It was asked that security, surveillance, management, maintenance and disabled access be considered in their design and operation.

EV provision was met with approval, although one respondent thought it would be outmoded within 10-15 years and replaced with hydrogen technology.

People liked the idea of car-free play streets, but commented on some of the detail and wanted assurances of emergency vehicle access.

COMMENTS:

*Not everyone can cycle, please look at opportunities for wheelchair users or electric buggies*

*More than one parking space per household for parking minimum of 2 vehicles off road*

*Buses need to be good for people to use them. Need to build people's trust and build in a culture of reliable and convenient public transport. This includes real-time information and buses that run at all times, including to serve those on night-shifts. Plus is there anything to prevent bus operator from closing the route if they don't think it makes them enough money?*

*Plan cycle paths where cyclists / pedestrians will not feel vulnerable in remote areas  
Please ensure that there is real security and round the clock monitoring of car barns - all too often  
tools etc are stolen from parked up vehicles.*

## PUBLIC SPACE

Essential things for public space were:

- Good lighting – considered hugely important in order to make streets and public spaces feel safe.
- Accessibility of streets for all
- Bins (including dog poo) and recycling
- Maintenance – in general, people want their streets and public spaces to look attractive and cared for. Young people said bins next to seating would help reduce litter.
- Plants and greenery
- Trees and shade
- Places to sit – to rest, socialise, keep an eye on children playing
- Accessible public toilets (although opinion was divided in survey, it was thought v important by young people)
- Spaces to play close to home (more than half of survey, and youth council)
- Digital connectivity (more than half of survey, and young people]

Much discussion of public space was had in workshops with Harlow and Epping Forest Youth Councils. Young people want places to look (and feel) attractive. They like colour, street art, greenery, flowers, things that appeal to all the senses. Maintenance is important (especially planted areas and playgrounds), and the provision of bins to discourage littering. They also wanted to ensure that Latton Priory offered something to people of all ages.

### Local centre

Workshops with Youth Councillors examined in detail what a neighbourhood centre could be like. Their collective vision was of an active, safe, accessible, welcoming place that reflected the diversity of Harlow. Somewhere people could come together, meet friends, sit and chat, but where you can have fun without having to spend money.

They saw it as somewhere with independent shops/businesses and a market (creating character and local opportunity); car-free but with a drop off area; providing the infrastructure to host events and music; using public art to reflect different communities.

Practical considerations included : drinking fountains, waste & recycling bins, seating (sheltered), lighting, PowerPoints for markets and performances.

### COMMENTS:

*Pavements need to be wide enough for people to walk and for pushchairs / wheelchairs  
I like the idea of residents sitting outside their house and getting to know their neighbours*

*Art pieces in the neighbourhood centre could reflect different types of communities, which gives  
the chance of them being involved in their creation – if they want to be*

*Good lighting is insanely important!*

*The neighbourhood centre should not be boring; [it should have] lots of things to do, with lots of people, the hub of the community*

## PLAY

Popular recreational activities mentioned (by Youth Councillors and survey respondents) were:

- Bike pump track
- Equestrian
- Walking
- Places to sit and chat
- Cycling routes
- Sports centre/ pitches
- Local shops
- Food/drink venues
- Music venue
- A natural running track
- Swings
- Tennis
- Basketball
- Netball
- Badminton
- Football

Key considerations:

- Maintenance
- Safety (Street boulders for climbing on were thought dangerous rather than adventurous by Youth Councillors)

Youth Councillors stressed that not all activities should be outdoors, or sport-based, and that indoor provision should be made for music, indoor sports, and cultural activities. They also said that seating would be needed for parents near play.

COMMENT:

*The car-free play street is the best thing about it – it creates a space for people to hang out and spend time in.*

*Games for kids in the street would be good*

## BUILT FORM

Variety of built form is seen as a positive aspect of local identity and of Harlow. ‘slabs’ of building blocks are particularly disliked.

Low rise is seen as most appropriate, in keeping with neighbouring housing.

Homes should have generous proportions.

Survey responses all considered the following aspects of the code important:

- Minimising energy use
- Variety
- Robust edges and enclosure to streets and spaces
- Built form that maximises overlook and minimises blank frontage to the street

COMMENTS:

*‘I don’t like the development at New Hall; it looks cheap and nasty and I can’t see it maturing into anything nice’*

*‘I don’t mind density, but I don’t want it right by us’*

*You can imagine that, if your property has been overlooking green fields and hedgerows then the prospect of having the possibility of a three-story building is a depressing outcome. What will the developers do to ensure that the views from Harlow are as pleasant as those offered to the new development?*

## IDENTITY

Nature and green space is seen as a fundamental aspect of local character; woodland, hedgerows and a farming typology are particularly pertinent on the Latton Priory site.

Attractiveness and quality of architecture, materials and construction are all important factors in whether people like a place.

The youth councillors see diversity and multiculturalism as an important part of Harlow’s identity and said they wanted to see that represented in the public spaces.

Comments from workshops:

*‘I don’t like the pale brick [of the new Cambridge vernacular]; it’s not very Essex. I do like black boarding though, that does feel very Essex.’*

*‘Art pieces in the neighbourhood centre could reflect different types of communities, with the chance of them being involved in their creation if they want to be’*



## RESOURCES

The need to design with climate change, reduced energy / carbon use, and responsible management of resources is recognised as important.

In the survey responses, there was agreement with all of the measures, with those directly relating to biodiversity and green / blue infrastructure given the highest importance, suggesting that nature and the natural landscape is of particular importance in the Harlow / Epping Forest area.

At the public events, there was support for green roofs, solar panels, EV charging,

Futureproofing of new development was also seen as important to survey respondents, with the inclusion of digital technologies considered very important.

Many people expressed concerns about the impact of extensive new development on water management, flooding and sewage treatment, and more detail was requested on what would happen to water from Latton Bush after it had passed through permeable paving / SuDS.

### COMMENTS:

*Homes need to be well insulated from the start, with heat pumps etc. It is much easier than trying to retrofit a decade later*

*There's an opportunity to build eco homes that address climate-change measures. We need to force builders to incorporate them. Things like solar panels, grey water usage, etc*

## USING THE DOCUMENT

TNote that the useability of the design code is being tested separately on potential end uses – including architects and planning officers. These will be reported on separately.

Comments from survey respondents and event attendees were that:

- it's too wordy
- it has too many abbreviations
- the maps should be clearer
- keys are needed

## OTHER ISSUES

Most of the issues raised at in-person sessions, and several submitted by email and via the survey, were concerned with matters beyond the remit of the Strategic Design Code.

### **Infrastructure delivery, including healthcare and traffic**

## Latton Priory Draft Strategic Design Code – Engagement Report

Many people – in person and online – raised concerns about the pressures of new development at Latton Priory on local infrastructure, and the timings of its delivery. These included:

- Pressure on social infrastructure – specifically schools and healthcare – which is perceived as already overstretched. There was a positive response to the inclusion of a reference to healthcare in the latest draft of the design code.
- Joined-up thinking eg that the healthcare strategy for locations of new provision ties in with the sustainable transport strategy
- Need to provide new infrastructure at the same time as (not after) homes – especially schools and healthcare, but also other community facilities – to serve people when they move in
- Worsening of traffic congestion and road safety. Rye Hill Road, B1393, and routes to Epping and the M11. More details can be read in email responses and event feedback.
- Additional commuters using Epping Tube station, and busses/roads to reach it
- Who would operate the bus routes, whether they would remain viable and in operations, reliability and frequency, and the need for area-wide real-time information
- Pressure on sewage and reservoirs

It was explained in public sessions that some of these concerns would be dealt with through the separate transport strategy and Infrastructure Development Plan; it is recommended that these are shared with those who signed up for email updates when available.

### **Development delivery**

At the in-person events, more information was requested about the timescales of delivery and which parts of the site would be developed first.

Harlow residents in particular would like to be informed of any planning applications coming forward and the channels through which they can comment.

Both Epping / Thornwood and Harlow residents expressed concern about local disruption during the construction period.

### **Boundary**

Residents living adjacent to the Latton Priory site said they did not want their view out over fields spoiled by the new homes. They requested that more consideration be given to the boundary treatment – for example the use of a green buffer between the new homes and existing, and placing lower-rise buildings on the edge of the site nearest to existing homes.

### **Anti-development sentiment**

The situation of the development – on the edge of Harlow – has provoked much opposition to any development happening on the site. This is not something that is within the purview of the Strategic Design code, but is noted here as it was a core sentiment raised by Harlow residents who attended the in person sessions at the Latton Bush centre, and by a small number of Harlow residents lodging official responses by email or online. (It should be noted, that this was not the case at the in-person sessions in Thornwood.)

**Politics**

Many Harlow residents see this development as EFDC pushing their housing needs onto Harlow. As the site sits within the district of Epping Forest, but adjoined to Harlow, questions were raised over

- Local council and parliamentary representation (which ward or constituency would cover it)
- Where council tax would go and which council would be responsible for providing services
- If EFDC are the planning authority, how much representation Harlow and its residents have when planning applications come forward

# Appendices

Events details

Event	Date	Venue	Attendees
Event 1:  Epping Forest Youth Council  Workshop	<b>Tuesday 24 October</b>  <b>3-4pm</b>	Epping Forest District Council Civic Offices 323 High Street Epping CM16 4BZ	7
Event 2:  General public drop-in exhibition and discussion	<b>Sat 28 Oct</b>  <b>10-12am</b>	Thornwood Village Hall, North Weald Bassett, Thornwood, Epping CM16 6NB	20
Event 3:  General public drop in exhibition, discussion, presentation and Q&A	<b>Sat 28 Oct</b>  2-4pm	Griffin Suite, Latton Bush Centre, Southern Way, Harlow CM18 7BL	21
Event 4:  Public exhibition, presentation and discussion	Weds 1 Nov  7.30-9pm	Griffin Suite, Latton Bush Centre, Southern Way, Harlow CM18 7BL	12  (some repeated from previous session)
Workshop 5:  Public exhibition, presentation and discussion	<b>Thurs 2 Nov</b>  6.30-8pm	Thornwood Village Hall, North Weald Bassett, Thornwood, Epping CM16 6NB	13

## Latton Priory Draft Strategic Design Code – Engagement Report

Event 6:  Harlow Youth Council workshop	<b>Monday 20 November</b>  <b>6.30-8.30pm</b>	Latton Bush Centre, Southern Way, Harlow CM18 7BL	12
Meeting with HGGT board	5 December	Discover Harlow engagement hub, Harvey Centre, Harlow	Approx 20
Members' briefing	January 2024		tbc

An additional event for older residents scheduled for 1 Nov at Leonard Davis House was planned but cancelled by residents due to a timetable clash. Residents were invited to attend the other public sessions instead.

# LATTON PRIORY DRAFT STRATEGIC DESIGN CODE STAKEHOLDER FEEDBACK AND RESPONSES

MARCH 2024

## Contents

EFDC Teams Consultation Responses..... 1  
 Design Code testing Report Outcomes..... 3  
 Public Consultation Responses Summary..... 4  
 Essex County Council Consultation Responses inc Place Services..... 11  
 Essex Police Consultation Responses..... 19  
 National Bodies’ Consultation Responses..... 22  
 North Weald Bassett Parish Council Consultation Responses..... 26  
 HGGT Members’ Consultation Responses..... 29  
 HGGT Developer Forum Workshop Feedback..... 31  
 CEG/ Hallam Consultation responses..... 33

Key (note text in bold denotes amendments in design code)

Theme - key	Status - key
Design code usability and scope inc legibility/ clarity	1. Note - no further action at this stage
Nature - green and blue infrastructure	3. Wider planning matter. To be passed on to relevant team/ person. Respond and/ or include in FAQs
Movement inc parking and servicing Public Space - inc streets, junctions, open space and play	4. Response as follows. Straightforward change/ update to design code.
Built form inc block structure, typologies and frontages	
Identity inc wayfinding and local character	
Resources - energy use and adaptability/ futureproofing	
Wider infrastructure - health/ social/ education/ transport/ servicing	
Delivery inc land use, on-site infrastructure, phasing, and funding	
Process/ Policy inc Local Plan/ HGGT/ principle/ location of development	
Engagement	
Miscellaneous	



EFDC Teams Consultation Responses				
Event	Comment	Theme	Status	Note/ response/ action
Air Quality - Ana Ventura	Highlight opportunities to tap into renewable energy and more sustainable resource provisions (underground source heat, air source heat, solar, wind, grey water, rain water capturing, green roofs, etc) - to support EFDC commitment to carbon neutral by 2030.	Resources	Update to design code.	See rule 7.7 <i>The energy strategy must not include fossil fuel use. On-site renewable energy sources must be prioritised and opportunities for utilising waste heat across different uses should be explored. In the explanatory text, under climate mitigation, final paragraph amended to include renewable energy.</i>
Comms/ general	Require solar panels on south facing roofs (solar orientation of buildings). Can we insist on integrated solar panels?	Resources	Note - no further action	See rule 7.10: <i>Roof forms must be designed to consider optimum solar orientation for photovoltaic panels (PVs). PVs on sloping roofs must be carefully designed, particularly due to longer views from Harlow, with PV panels mounted flush with the roof finish .</i>
	Can we insist that battery storage for solar installations - and other solar energy infrastructure is considered in house design?	Resources	Update to design code.	<b>Rewording of rule 7.6 to: Plans must identify how renewable energy infrastructure e.g heat pumps or batteries will be sensitively integrated into the layout and buildings.</b>
	Should the design code require consideration of location of air source heat pumps to be considered in house design?	Resources	Note - no further action	See note above. Note that some of this is already covered elsewhere e.g. Green Infrastructure Guidance and checklist.
	Should ground source heat pumps be encouraged given installation would be easier on new-build compared to retro-fitting?	Resources	Note - no further action	Covered more broadly under requirements for renewable energy. It will be for the design team to ascertain whether ground source heat pumps are appropriate. Also potential overlap with the EFDC Sustainability Guidance and checklist
	Wheelie bins – we are likely to swap our remaining recycling sack collections for another wheelie bin in the new waste contract. Do we have provision of accommodation for several wheelie bins for each property as part of the design guide?	Movement	Note - no further action	See notes below following consultation with EFDC Waste Team.
Waste	There is no objection to the idea of not every part of the site being accessed by service vehicles as long as there are clear collection points that residents can bring their waste containers to and then collect them after collection has been made. The drag thresholds being longer than the maximum for residents is not an issue as long as it will be clearly raised when a property that falls within this criteria is due for occupancy the proposed resident/s are informed preferably in writing.	Movement	Note - no further action	Noted. Do not want to encourage excessive drag distances for residents therefore will not include this in the design code but this can be reviewed as detailed proposals come forward.
	Individual Assisted Collections from properties that are more than 25m from the collection point for collectors could be an issue as the HSE/trade unions do not like this especially with communal bins and this needs to be addressed. It could be achieved by a collection method (eg tailifts) that will cost above the average property collection cost for the district which the council would need to pick up the difference - this should be avoided.	Movement	Note - no further action	Design code requires a strategy to be developed for any proposals where collection points are within the 25m collection distance. Can include further clarification.
	I cannot find any reference to paid special collections for household items such as fridges, freezers, cookers etc – are residents expected to place these at collection points on their appointment day of collection?	Movement	Note - no further action	Detailed point - should be picked up at future stage(s).
	I was also confused by the terminology of “refuse” – does this relate just to refuse? Or does it relate to dry recycling and organics as well? If it is meant to cover all waste operations it maybe clearer to use Waste instead of refuse – but if it does not and the document is just referring to residual waste what are the arrangements for recycling and organics?.	Movement	Update to design code.	Draft DC uses term 'refuse' for all waste and recycling, this appears to be in line with Essex Design Guide, however, <b>for clarity, where recycling is not specifically mentioned, the term 'refuse' changed to 'waste and recycling' on pages 40 - 41.</b>
	3.84 – Communal bin points should only service up to 10 designated properties – this has been proved to enable control by the managing agent over the bin compound and the issue of dumped rubbish and waste outside the bins itself. The waste service does not clear bin compounds of dumped material and for us to do so would require additional payment which then can be recovered by the service charges from the designated residents.	Movement	Update to design code.	<b>Additional wording in rule 3.88 as follows: Any communal bin point should be well designed as part of the street scene and should not service more than ten designated dwellings.</b>
	3.88 – These rear courts that collections need to be made from will require adequate turning circles and bollards barriers etc to protect vehicles from damage that are parked there especially with communal bin which are much heavier and difficult to control.	Movement	Update to design code.	<b>Additional wording in rule 3.86 as follows: and the parking court must provide adequate turning circles and guarding to protect parked vehicles from damage.</b>
	3.90 - I am not sure about the terminology of reduce collections for waste? I would like to explore what this means and how it can be achieved especially with refuse collection likely to be mandated to be no more than a fortnightly collection and food a weekly collection? Green Garden waste is also falling under the mandated materials for collection with the ability to charge remaining.	Movement	Update to design code.	Can change wording slightly - on street bins will be reduced but frequency of collections may not. <b>Reference to reduced frequency of collections removed.</b>
	Underground systems can work but will require direct access to the bank for lifting/emptying purposes by specialist hiab vehicles so they can only be placed where service vehicles can access them. If a vacuum system is used then we need to make sure it has the power to bring the waste to a collection point that is accessible. I expect there could be a contamination issue as there is with all communal compounds because residents do not take individual responsibility for how they present their waste as it would be very difficult for the managing agents/enforcement to trace back to them – that’s why the comments in 3.84 are relevant here as well.	Movement	Response as follows.	Needs wider planning discussion as to potential benefits/ costs of providing alternative systems across the HGGT sites. Unlikely to be resolved through design code. Study into feasibility is being initiated.
	3.91 - The descriptions of the waste containers are missing clear recycling sacks/240 litre blue lidded bin and the use of small plastic type carrier bags for textiles, batteries and WEEE. Communal bin compounds can have a purple bin for these last materials. Can insist on wheeled bins for recycling for this development under council policy and the EPA 1990 section 46 – there is also legislation that allows for additional charges to make against managing agents/householders for excessive costs above the normal for certain problems. The collection points for households individual bins where residents bring their bins for collection and then take them back afterwards could be a flash point for missing containers etc – this could lead to issues especially as the majority of waste containers need to be paid for by the residents.	Movement	Update to design code.	<b>Update to rule 3.90 to note current waste and recycling containers for houses (not flats/ communal): Two 180-litre wheelie bins (one black lid, one green lid) One blue-lidded 240-litre wheelie bin for recycling 55-litre bin</b>
	3.92 - Community recycling/waste points can be a beacon for dumped rubbish and should be avoided with new developments. The setting of a suite of recycling materials that must be recycled under the Environment Act and the Waste Disposal authority push for reduction in residual waste does not agree with this statement if the term “refuse” just means refuse?. If community points are to be set up it should be for the refuse waste stream and not for the recycling or organics – these two waste streams need to be more accessible not less and the service provided should certainly not be less than refuse. The only exemption would have to be the medical bins in this situation because most medical bin recipients are Assisted collections as well and it would not be acceptable for such residents to have to arrange someone to take such waste to a communal point.	Movement	Update to design code.	<b>Noted. Have removed reference to community recycling or waste points.</b>
3 Officer	SANG 2.11 Provision of attractive walking routes with appropriately surfaced paths designed following Natural England’s SANG guidance (you can link it to this if needed) <a href="https://www.woking2027.info/supplementary/tbhspaspd/updated_sang_guidance_August_2021.pdf">https://www.woking2027.info/supplementary/tbhspaspd/updated_sang_guidance_August_2021.pdf</a>	Nature	Update to design code.	<b>Wording amended as suggested. Link not included.</b>

EFDC Teams Consultation Responses				
Event	Comment	Theme	Status	Note/ response/ action
SuDS & C	SuDS Strategy (p. 26) SuDS will alleviate flood risk on site, mitigating the impact of development and address issues of runoff from the site currently impacting neighbouring residents, as well as respond to the climate emergency by aiming to future-proof the site.	Nature	Update to design code.	Paragraph reworded to: SuDS will alleviate flood risk on the site, mitigating the impact of development and addressing issues of runoff from the site currently impacting neighbouring residents, as well as responding to the climate emergency through a future-proofing strategy.

Design Code Testing Report Outcomes

Event	Comment	Theme	Status	Note/ response/ action
Actions below are taken from the Latton priory Draft Strategic Design Code Testing Report dated February 2024				
Design Code Testing Actions	Reduce overall volume of text, focussing particularly on text-heavy pages.	Design code usability and scope	Update to design code.	Document has been edited to reduce text throughout, particularly on text-heavy pages in
	Review 'musts' and 'shoulds' – including the number of requirements to ensure that the design code priorities are understood. Consider visually differentiating 'musts' and 'shoulds' though noting that 'shoulds' should not be ignored and are not less important, but may just be more subjective than the 'musts'.	Design code usability and scope	Update to design code.	Musts' and 'shoulds' have been reviewed and edited throughout.
	Review strategic diagrams. Consider colour changes to aid clarity and/ or combining/ consolidating information to reduce the need to cross-reference between different parts of the design code.	Design code usability and scope	Update to design code.	Diagrams reviewed for legibility throughout. Frontage diagram and matrix was particularly confusing so this was removed and illustrative typology diagram added in. Other plans amended as
	Consider how to combine linked information/ requirements to reduce the need for cross-referencing, particularly around street requirements	Design code usability and scope	Update to design code.	This would require significant restructuring, which isnt feasible currently but there has been some rationalisation of where information is located and reducing repetition between sections.
	Expand on 'how to use' section to set out process for designing using the code. The process section should also include a process for deviating from the Code in certain circumstances, requiring designs to be reviewed by the QRP to demonstrate that they are an improvement.	Design code usability and scope	Update to design code.	How to' section updated with 6-step flow chart on 'how to use the design code'.
	Produce compliance tracker to aid document use and review of proposals.	Design code usability and scope	Response as follows.	To be produced following endorsement as a follow-on piece.
	Add more information about green infrastructure requirements e.g. green buffers at key edges or treatment beside existing hedgerows	Nature	Update to design code.	Additional rules added in 'Nature' section
	Reconsider the requirement around all mature trees from the outset to balance with longevity. A mix may be more appropriate.	Nature	Update to design code.	Following discussions with tree officers, rule changed to approximately 25% of trees to be semi-mature at outset.
	Review the requirements for building-line set-backs. These may be overly restrictive in places and may not allow for front garden bin/ bike storage where required.	Built form	Update to design code.	Building line set backs moved to typology matrix as additional information. Numbers of streets for which building line rules are set has been reduced and ranges have been increased for greater flexibility.
	Review 'frontage/ building line' requirements to allow more flexibility and make code easier to understand/ less complex. The principle of maximising frontage is positive but its extent should be reduced to allow more gaps in the built form. Gaps should be a minimum of 2-3m.	Built form	Update to design code.	See note above. Plus additional rule added around size of gaps between buildings.
	Sections showing how buildings relate to the street would be beneficial.	Built form	Note - no further action	Not achievable within timescales/ resources however the design code does give parameters and drawn sections may erode the flexibility required.
	Possible further coding around site perimeter roads and the character of these.	Public Space	Note - no further action	Not achievable within timescales/ resources and the character of perimeter roads does need to be developed in line with character areas and therefore may be more appropriate in the detained design code.

Public Consultation Responses Summary

Event	Comment	Theme	Status	Note/ response/ action
Comments and survey response summaries below are taken from the Latton priory Draft Strategic Design Code Community Engagement Report dated December 2023 (pages 15 - 25)				
Design Ambitions	In the survey, there was general agreement with the Design Ambitions, with the following considered most important:  <ul style="list-style-type: none"> <li>• A lively core of schools, amenities and shops supports a thriving and resilient community</li> <li>• An integral network of green routes and spaces connects surrounding landscape and enhances the Green Wedge into Harlow</li> <li>• A variety of uplifting and safe streets and spaces encourage year-round active and healthy lifestyles for all ages</li> <li>• Active and sustainable travel is the most appealing way to get around, including travel into Harlow and Epping</li> <li>• The climate emergency is addressed with buildings and spaces that can withstand the changing climate and minimise impact on the environment</li> <li>• There is flexibility to adapt to future needs, anticipating changes in travel, work and lifestyles</li> </ul>	Design code usability and scope	Note	Noted.
	Less of a priority, but still agreed, were:  <ul style="list-style-type: none"> <li>• Compact, human-scale built form nestles comfortably into the hillside overlooking Harlow</li> <li>• The art and innovation of Harlow, the market town and pastoral character of Epping inform a distinctive identity</li> </ul>	Design code usability and scope	Note	Noted.
	Additional comments called for:  <ul style="list-style-type: none"> <li>• Quality design, materials, and construction</li> <li>• Attractive architecture</li> <li>• Integration with the surrounding area</li> <li>• Questions were also asked about the benefits to Harlow itself.</li> </ul>	Design code usability and scope	Update to design code.	Some of these will need to be addressed further through the detailed design code and review of future planning applications. <b>Further information has been added on the content of detailed design codes in the 'anticipated planning process' section of the design code.</b> See FAQs for further information on the integration and wider benefits
	<i>'Please don't destroy this one time opportunity to build something good, don't try to cut costs on architecture or design'</i>	Design code usability and scope	Note	Design code is intended to maximise the opportunity as far as possible.
	<i>'Whilst this addresses a new development, there is no framework for integration with existing infrastructures'</i>	Design code usability and scope	Response as follows.	See FAQs regarding integration.
	<i>'It's all very well doing the design code but it's all about the site and not enough about the wider area, connections and interfaces'</i>	Design code usability and scope	Response as follows.	See FAQs regarding integration.
	<i>'Referring back to the November 2022 Latton Priory SMP draft report consultation, one of the key policies of particular relevance to Latton Priory was noted to be: Policy SP3 Place Shaping - ensure positive integration with adjacent rural and urban communities. This KEY policy is still not met within the Latton Priory Draft Design Code, in terms of the impact that the proposals will have upon the residents in the Rye Hill Road area, and those of many other Harlow roads that will be affected by Latton Priory.'</i>	Design code usability and scope	Response as follows.	See FAQs regarding integration and wider transport infrastructure.
	<i>'The amount of work that has gone into this design code is exemplary and should guide all other developments in the EF district. Well done to all those involved.'</i>	Design code usability and scope	Note	Noted.
Land Use	There are concerns about the impact on the view both from the neighbouring part of Harlow, and from Epping. These are linked to the position of the site on a ridge and existing planning stipulations surrounding this. The raised location was also thought to have the potential to be a windswept location; using trees as buffers was suggested.	Framework masterplan/ stewardship	Update to design code.	<b>Following further analysis of any immediately neighbouring developments (primarily Sibneys Green and Corner Meadow) bounding the north of the site, there have been amendments in the height diagram to ensure heights are limited to two storeys close to the boundary in these locations, and changes to the density diagram to ensure density is limited to 'low density' in these locations. Combined with the existing tree and vegetation buffers, this should ensure views are not significantly impacted. Further wording has also been included about testing of built form through strategic views and also around micro-climate testing.</b>
	In-person events highlighted a need to consider the impacts on the neighbouring area of Harlow, and to give further consideration to the site boundary.	Framework masterplan/ stewardship	Update to design code.	See note above.
	There is concern about where the travellers' site is located within the development ie close to the neighbourhood centre. Many people expressed concerns that antisocial behaviour and crime associated with an existing site at Fernhill Road might be exacerbated. It was acknowledged that these issues were particular to this site and not to traveller communities in general. Consultation is taking place with Design Out Crime and other relevant services to help address this.	Framework masterplan/ stewardship	Response as follows.	See FAQs regarding Gypsy and Traveller site location.

Public Consultation Responses Summary

Event	Comment	Theme	Status	Note/ response/ action
	The need for social infrastructure – particularly schools and healthcare – was highlighted, as well as concerns about the impact on roads and additional population.	Framework masterplan/ stewardship	Response as follows.	See FAQs regarding infrastructure delivery.
	‘The area proposed is too close to existing homes and Schools and the Roads and access routes just cannot take the extra chaos the build will bring. The proposed new homes will take away beautiful land that is used by 1000s of people for walks and to take their children.’	Framework masterplan/ stewardship	Response as follows.	The area and delivery requirements have been allocated as Policy in the adopted Local Plan. See FAQs for further information.
	‘The site should be moved northwards so it lies beneath the ridge as would fit with Sir Frederick Gibberd’s design standards - not to dominate the skyline. The rooflines should be hidden from views from the south.’	Framework masterplan/ stewardship	Response as follows.	The site area is allocated for development. The rooflines will need to be sensitively designed and this will be reviewed as part of the wider planning process.
	‘A protected barrier of trees and shrubs should also be in place, setting the new buildings away from these borders, again minimising any disturbance.’	Framework masterplan/ stewardship	Response as follows.	That is the intention as shown in the SMF and the design code.
	‘It is IMPOSSIBLE for up to an extra 3600 Harlow residents to positively integrate into Harlow’s existing local healthcare provision, which is already stretched beyond capacity. A design code for Latton Priory with ZERO local healthcare facilities included in it is NOT APPROPRIATE’	Framework masterplan/ stewardship	Response as follows.	See FAQs regarding infrastructure delivery.
Stewardship	Maintenance was a concern in workshop conversations and the survey, and of particular importance to young people. This also aligns with the HGGT stewardship charter, which is undergoing separate consultation.	Framework masterplan/ stewardship	Update to design code.	Whilst maintenance has been addressed in the design code requirements, this will need to be reviewed in forthcoming proposals and in line with developing HGGT stewardship work. <b>The issue of adoption of roads has been considered in the highways technical report and subsequent amendments to the design code.</b> Again, this requires further discussion as the applications are submitted and details are received.
	Due to the location of the site – adjacent to Harlow but within the district of Epping Forest – several people said that maintenance should funded be through EFDC council tax. There should be minimal (financial and managerial) onus on homeowners.	Framework masterplan/ stewardship	Response as follows.	See FAQs
	‘Please provide adequate funding for training opportunities for staff involved in this essential aspect of the development.’	Framework masterplan/ stewardship	Response as follows.	Related to maintenance and stewardship. See note two rows above.
	Green space, fields, woodland and hedgerows are an important part of the local identity and culture. People therefore felt strongly about both conservation of / reducing the impact on existing wildlife and woodland, as well as incorporating greenery into new streets.	Nature	Note	Noted.
	Climate resilience was acknowledged as a key consideration for a green space strategy – choosing climate resistant species, and using planting to provide shade and purify air. There was a unanimously positive response to green streets, partly as attractive places, but also to boost biodiversity.	Nature	Note	Noted.
	In conversations at events with Harlow residents, the idea of a green buffer between Harlow and the new development was also raised by residents who would be losing green space behind their homes and were concerned about having the new homes right behind their’s.	Nature	Update to design code.	<b>See note above regarding amendments adjacent to the area adjacent Sibneys Green and Corner Meadow housing.</b> Elsewhere, there are generally retained buffers between existing and proposed development.
	More than half of survey respondents supported the following aspects of the Design Code: <ul style="list-style-type: none"> <li>• A greenway for walking, cycling and other non-car-based travel</li> <li>• Green fingers of land penetrating the site</li> <li>• A new park</li> <li>• A wetland area</li> <li>• Connecting with and extending Harlow’s Green Wedge</li> <li>• A new park</li> <li>• Sustainable Drainage (SuDS)</li> <li>• Allocation of a Suitable Alternative Natural Greenspace (SANG)</li> <li>• Supporting biodiversity and climate change</li> </ul>	Nature	Note	Noted.
Nature	There was less interest from survey respondents and in-person discussions around: <ul style="list-style-type: none"> <li>• Allotments and food growing – although Youth Councillors identified these as facilities that would be well used by older people and Asian families.</li> <li>• Sports pitches were identified as something of particular importance to young people; further details of the activities they would like provision for can be found und ‘Play’.</li> <li>• Concerns around existing natural habitat centred on</li> <li>• Destruction of existing hedgerows and trees</li> <li>• Impact on existing wildlife habitats and routes</li> <li>• Loss of existing countryside</li> <li>• Safety around ponds / blue infrastructure</li> <li>• Hayfever from certain plant species</li> <li>• Smells from stagnant water in attenuation ponds</li> </ul>	Nature	Response as follows.	Most of these are policy requirements or best practice to achieve the aims of the Garden Town and district. The issue of smells from stagnant water in ponds will need to be prevented in the new ponds through good design and engineering. This will be addressed once proposals have been progressed.

Public Consultation Responses Summary

Event	Comment	Theme	Status	Note/ response/ action
Z	Specific questions included <ul style="list-style-type: none"> <li>• Whether the existing deer route from Latton Woods across the site had been taken into account</li> <li>• Will the oak trees along Riddings Lane be preserved?</li> </ul>	Nature	Response as follows.	These will both need to be addressed as further detail emerges. As far as possible, existing trees and hedgerows will be retained.
	'I love Harlow because of the trees!'	Nature	Note	Noted.
	'I think having modern houses next to the colourful green space looks good'	Nature	Note	Noted.
	'We have an attenuation pond near us and it stinks!'	Nature	Response as follows.	See note above regarding careful design of the proposed attenuations ponds.
	'Will the developers landscape the Harlow side, as the public generally have a distrust of developers and if not written into a design code as a mandatory action will probably not be a consideration due to costs.'	Nature	Response as follows.	Developers will be responsible for the delivery of the whole of their application area, including the landscape proposals.
	'Harlow's green wedge should not be imposed upon. There should be a clear and big enough wedge between the new site and Harlow.'	Nature	Response as follows.	There is an aspiration to make the green wedge more inviting and usable and public consultation, particularly in workshops with young people, made evident that many of the green spaces in Harlow are not inviting or usable. The proposals seek to continue the green wedge with a new park that will benefit new and existing surrounding residents. The proposed route of a sustainable corridor partly through the green wedge will be resolved through the wider planning process. Also see FAQs.
	'There are currently huge problems with water run off from the green wedge at the north end of the LP site, across and down Rye hill Rd and into Longwood. Currently surface water runs into housing gas supplies causing major issues. All proposed land drainage for LP must have capacity to resolve these problems.'	Nature	Response as follows.	This will be addressed through a review of detailed proposals.
	'A greenway connecting to Epping to encourage active travel to underground network [would be good].'	Nature	Note	Noted.
	'I wouldn't really use community gardens, but older people might and it would be good to have things for all ages.'	Nature	Note	Noted.
	The impact on existing roads and traffic congestions was a major concern for residents in Harlow and Epping / Thornwood, as well as online respondents. Much of this is the remit of the Transport Strategy rather than the Strategic Design Code, and there was a strong call for the Transport Strategy to be shared before the Design Code is endorsed. Detailed comments received on this subject will be shared with the transport consultant team.	Movement	Response as follows.	The transport strategy will accompany an outline application (See FAQs). This has not yet been received but the sooner the design code is endorsed, the earlier it can influence proposals.
More information was requested on entrance and exit points to the Latton Priory site, particularly with reference to potential impacts on Rye Hill Road. The example of Low Traffic Neighbourhood interventions in Bruce Grove, Haringey, North London were suggested by one respondent as a successful model for preventing rat-running.	Movement	Response as follows.	See note above.	
Safety and security – The safety of roads, streets, walkways and cycleways is one of the chief concerns. It was regarded by survey respondents as one of the most important factors in encouraging people to walk and cycle, and it was one of the key topics in both Youth Council workshops. Safety means both road safety (eg separating cycle lanes from cars) but more importantly personal safety (eg mugging).	Movement	Update to design code.	<b>Design code has been updated with more robust requirements around various safety issues including 'Secure by Design' standards, CCTV potential in the local centre, sight lines and lighting. See also responses to Essex police comments.</b>	
Good lighting was one of the most important things for making people feel safe; many also cited cctv, clear lines of sight and places with activity as deterrents to crime and antisocial behaviour.	Movement	Update to design code.	See note above.	
Active travel – Bike security was seen as something that would promote cycling, with approval for communal street bike sheds and the request for secure bike parking near activities (eg play, sport) and neighbourhood centre.	Movement	Update to design code.	<b>Cycle parking requirements have been strengthened.</b>	
Places to sit, good signposting and the attractiveness of routes also encourage people to walk/cycle. It was noted that equestrianism is also a popular activity in this area.	Movement	Note	Bridleways are included in the SMF, not directly addressed in the design code. The design code does address seating, signage and attractive streets.	
Bus provision would need to be reliable, frequent and supported even if not viable for a private operator. There are concerns a service would not continue. Real time information was seen as essential, rolled out across the network.	Movement	Response as follows.	This has been addressed as requirements in the design code but will need to be reinforced and delivered through the wider planning process.	
Parking – the issue of how to most effectively design parking drew mixed responses from the survey and in-person sessions, with some wanting to see on site /on street provision restricted to one space per house, and others insisting there should be no limit to care ownership with adequate parking off road.	Movement	Response as follows.	The parking strategy in the design code has been designed to achieve the aims and targets set out, with an appropriate level of flexibility. Parking numbers will be addressed at future stages.	

ment

Public Consultation Responses Summary

Event	Comment	Theme	Status	Note/ response/ action
Move	Thornwood residents were concerned that restricted parking provision at Latton Priory might push it on to them; Harlow residents that people would park further into Harlow.	Movement	Response as follows.	Given the distance from Thornwood this is very unlikely to be an issue. Where there is proximity, there will need to be consideration at future stages, which will involve consultation with nearby residents.
	There was much interest in car barns. It was asked that security, surveillance, management, maintenance and disabled access be considered in their design and operation.	Movement	Update to design code.	<b>Security requirements for car barns strengthened in design code in line with Essex police recommendations.</b>
	EV provision was met with approval, although one respondent thought it would be outmoded within 10-15 years and replaces with hydrogen technology.	Movement	Note	Noted.
	People liked the idea of car-free play streets, but commented on some of the detail and wanted assurances of emergency vehicle access.	Movement	Update to design code.	<b>Servicing and emergency vehicle access has been addressed in the design code testing work and amendments made accordingly.</b> This will be further reinforced in the review of planning applications.
	Not everyone can cycle, please look at opportunities for wheelchair users or electric buggies	Movement	Note	The streets have been designed to accommodate wheelchair users and electrical buggies.
	More than one parking space per household for parking minimum of 2 vehicles off road	Movement	Response as follows.	The parking strategy in the design code has been designed to achieve the aims and targets set out, with an appropriate level of flexibility. Parking numbers will be addressed at future stages.
	Buses need to be good for people to use them. Need to build people's trust and build in a culture of reliable and convenient public transport. This includes real-time information and buses that run at all times, including to serve those on night-shifts. Plus is there anything to prevent bus operator from closing the route if they don't think it makes them enough money?	Movement	Response as follows.	This has been addressed as requirements in the design code but will need to be reinforced and delivered through the wider planning process.
	Plan cycle paths where cyclists / pedestrians will not feel vulnerable in remote areas Please ensure that there is real security and round the clock monitoring of car barns - all too often tools etc are stolen from parked up vehicles.	Movement	Update to design code.	There is a significant focus in the design code of providing a choice of cycle and walking routes that are well overlooked and do not feel remote. <b>See also note above about further security requirements for the car barns.</b>
	Essential things for public space were: <ul style="list-style-type: none"> <li>• Good lighting – considered hugely important in order to make streets and public spaces feel safe.</li> <li>• Accessibility of streets for all</li> <li>• Bins (including dog poo) and recycling</li> <li>• Maintenance – in general, people want their streets and public spaces to look attractive and cared for. Young people said bins next to seating would help reduce litter.</li> <li>• Plants and greenery</li> <li>• Trees and shade</li> <li>• Places to sit – to rest, socialise, keep an eye on children playing</li> <li>• Accessible public toilets (although opinion was divided in survey, it was thought v important by young people)</li> <li>• Spaces to play close to home (more than half of survey, and youth council</li> <li>• Digital connectivity (more than half of survey, and young people]</li> </ul>	Public Space	Note	Appears to reinforce main points of the public space section of the design code.
	Much discussion of public space was had in workshops with Harlow and Epping Forest Youth Councils. Young people want places to look (and feel) attractive. They like colour, street art, greenery, flowers, things that appeal to all the senses. Maintenance is important (especially planted areas and playgrounds), and the provision of bins to discourage littering. They also wanted to ensure that Latton Priory offered something to people of all ages.	Public Space	Response as follows.	Whilst the design code provides the basis for all these aspects being incorporated, it will be important that young people are involved throughout the planning process, especially as the detailed designs are developed.
	Local centre Workshops with Youth Councillors examined in detail what a neighbourhood centre could be like. Their collective vision was of an active, safe, accessible, welcoming place that reflected the diversity of Harlow. Somewhere people could come together, meet friends, sit and chat, but where you can have fun without having to spend money. They saw it as somewhere with independent shops/businesses and a market (creating character and local opportunity); car-free but with a drop off area; providing the infrastructure to host events and music; using public art to reflect different communities. Practical considerations included : drinking fountains, waste & recycling bins, seating (sheltered), lighting, PowerPoints for markets and performances.	Public Space	Response as follows.	See note above. This is also reinforced in the stewardship framework section of the design code.
	Pavements need to be wide enough for people to walk and for pushchairs / wheelchairs I like the idea of residents sitting outside their house and getting to know their neighbours	Public Space	Note	Noted.

Public Consultation Responses Summary

Event	Comment	Theme	Status	Note/ response/ action
Public Space	Art pieces in the neighbourhood centre could reflect different types of communities, which gives the chance of them being involved in their creation – if they want to be	Public Space	Update to design code.	<b>Additional requirement added to the community plaza for items that must be provided: <i>Integrated public art that has been designed with the community as part of a wider art strategy.</i></b>
	Good lighting is insanely important!	Public Space	Note	
	The neighbourhood centre should not be boring; [it should have] lots of things to do, with lots of people, the hub of the community	Public Space	Response as follows.	Whilst the design code provides the basis, it will be important that young people are involved throughout the planning process, especially as the detailed designs are developed. Note that vibrancy of the local centre also relies on high quality and attractive public realm throughout.
	PLAY  Popular recreational activities mentioned (by Youth Councillors and survey respondents) were: <ul style="list-style-type: none"> <li>• Bike pump track</li> <li>• Equestrian</li> <li>• Walking</li> <li>• Places to sit and chat</li> <li>• Cycling routes</li> <li>• Sports centre/ pitches</li> <li>• Local shops</li> <li>• Food/drink venues</li> <li>• Music venue</li> <li>• A natural running track</li> <li>• Swings</li> <li>• Tennis</li> <li>• Basketball</li> <li>• Netball</li> <li>• Badminton</li> <li>• Football</li> </ul>	Public Space	Response as follows.	See note above.
	Key considerations: <ul style="list-style-type: none"> <li>• Maintenance</li> <li>• Safety (Street boulders for climbing on were thought dangerous rather than adventurous by Youth Councillors)</li> </ul>	Public Space	Note	Noted.
	The car-free play street is the best thing about it – it creates a space for people to hang out and spend time in.	Public Space	Note	Noted.
	Games for kids in the street would be good	Public Space	Note	Supported by the integrated play and 'play on the way' strategy in the design code.
	Variety of built form is seen as a positive aspect of local identity and of Harlow. 'slabs' of building blocks are particularly disliked.	Built form	Note	Noted.
	Low rise is seen as most appropriate, in keeping with neighbouring housing.	Built form	Update to design code.	The development is generally low rise to preserve strategic views but there are positive aspects of height and density for creating attractive public realm. The design code promotes density and height in appropriate locations and this will also support the wayfinding strategy. <b>See amendments as noted below to density and height limits close to neighbouring housing.</b>
	Homes should have generous proportions.	Built form	Response as follows.	Local Plan requires Nationally Described Space Standards to be met. Additionally design code requires that homes are designed to adapt to changes in accessibility requirements, family structures and lifestyle changes, such as increased home working. This will be further reinforced through the wider planning process.
Built Form	Survey responses all considered the following aspects of the code important: <ul style="list-style-type: none"> <li>- Minimising energy use</li> <li>- Variety</li> <li>- Robust edges and enclosure to streets and spaces</li> <li>- Built form that maximises overlook and minimises blank frontage to the street</li> </ul>	Built form	Note	Noted.



Public Consultation Responses Summary

Event	Comment	Theme	Status	Note/ response/ action
	'I don't like the development at New Hall; it looks cheap and nasty and I can't see it maturing into anything nice'	Built form	Note	Noted.
	'I don't mind density, but I don't want it right by us'	Built form	Update to design code.	Following further analysis of any immediately neighbouring developments (primarily Sibneys Green and Corner Meadow) bounding the north of the site, there have been amendments in the height diagram to ensure heights are limited to two storeys close to the boundary in these locations, and changes to the density diagram to ensure density is limited to 'low density' in these locations. Combined with the existing tree and vegetation buffers, this should ensure views are not significantly impacted. Further wording has also been included about testing of built form through strategic views and also around micro-climate testing.
	You can imagine that, if your property has been overlooking green fields and hedgerows then the prospect of having the possibility of a three-story building is a depressing outcome. What will the developers do to ensure that the views from Harlow are as pleasant as those offered to the new development?	Built form	Update to design code.	See note above. This will also be addressed through the wider planning process through Landscape Visual Impact Assessments, for example.
Identity	Nature and green space is seen as a fundamental aspect of local character; woodland, hedgerows and a farming typology are particularly pertinent on the Latton Priory site.	Identity	Note	Noted.
	Attractiveness and quality of architecture, materials and construction are all important factors in whether people like a place.	Identity	Update to design code.	Noted and this will be developed further through the wider planning process, including requirement for a detailed design code. <b>Further information on this has been added to the planning process section of the code.</b>
	The youth councillors see diversity and multiculturalism as an important part of Harlow's identity and said they wanted to see that represented in the public spaces.	Identity	Response as follows.	Whilst the design code provides the basis for all these aspects being incorporated, it will be important that young people are involved throughout the planning process, especially as the detailed designs are developed.
	'I don't like the pale brick [of the new Cambridge vernacular]; it's not very Essex. I do like black boarding though, that does feel very Essex.'	Identity	Update to design code.	Noted and this will be developed further through the wider planning process, including requirement for a detailed design code. <b>Further information on this has been added to the planning process section of the code.</b>
	'Art pieces in the neighbourhood centre could reflect different types of communities, with the chance of them being involved in their creation if they want to be'	Identity	Update to design code.	<b>Additional requirement added to the community plaza for items that must be provided: <i>Integrated public art that has been designed with the community as part of a wider art strategy.</i></b>
ces	The need to design with climate change, reduced energy / carbon use, and responsible management of resources is recognised as important.	Resources	Note	Noted.
	In the survey responses, there was agreement with all of the measures, with those directly relating to biodiversity and green / blue infrastructure given the highest importance, suggesting that nature and the natural landscape is of particular importance in the Harlow / Epping Forest area.	Resources	Note	Noted.
	At the public events, there was support for green roofs, solar panels, EV charging, futureproofing of new development was also seen as important to survey respondents, with the inclusion of digital technologies considered very important.	Resources	Note	Noted.
	Many people expressed concerns about the impact of extensive new development on water management, flooding and sewage treatment, and more detail was requested on what would happen to water from Latton Bush after it had passed through permeable paving / SuDS.	Resources	Response as follows.	Further details regarding the Sustainable drainage proposals will need to be submitted by the applicant with any planning application. This can then be reviewed in detail.

Public Consultation Responses Summary

Event	Comment	Theme	Status	Note/ response/ action
Resour	Homes need to be well insulated from the start, with heat pumps etc. It is much easier than trying to retrofit a decade later	Resources	Response as follows.	The resources section of the code describes high standards that must be met for sustainable standards in housing and built form. This will need to be supported and reinforced through the wider planning process as the applications are reviewed. Note also that the HGGT/ EFDC Sustainability Guidance and checklist will need to be applied to any development proposals.
	There's an opportunity to build eco homes that address climate-change measures. We need to force builders to incorporate them. Things like solar panels, grey water usage, etc	Resources	Response as follows.	See note above.
Using the doc	<p>Comments from survey respondents and event attendees were that:</p> <ul style="list-style-type: none"> <li>•The doc's too wordy</li> <li>•The doc has too many abbreviations</li> <li>•The maps should be clearer</li> <li>•Keys are needed</li> </ul>	Design code usability and scope	Update to design code.	<b>Design code has been edited through, particularly reducing the quantity of text on the word-heavy pages. Graphics have been reviewed and updated for better usability/ clarity. Keys are provided and a glossary is included.</b>
Wider Issues	Most of the issues raised at in-person sessions, and several submitted by email and via the survey, were concerned with matters beyond the remit of the Strategic Design Code.	Wider infrastructure	Response as follows.	See FAQs for detailed responses to the recurring questions/ issues raised.
	<p>Infrastructure delivery, including healthcare and traffic</p> <p>Many people – in person and online – raised concerns about the pressures of new development at Latton Priory on local infrastructure, and the timings of its delivery. These included:</p> <ul style="list-style-type: none"> <li>-Pressure on social infrastructure – specifically schools and healthcare – which is perceived as already overstretched. There was a positive response to the inclusion of a reference to healthcare in the latest draft of the design code.</li> <li>-Joined-up thinking eg that the healthcare strategy for locations of new provision ties in with the sustainable transport strategy</li> <li>-Need to provide new infrastructure at the same time as (not after) homes – especially schools and healthcare, but also other community facilities – to serve people when they move in</li> <li>-Worsening of traffic congestion and road safety. Rye Hill Road, B1393, and routes to Epping and the M11. More details can be read in email responses and event feedback.</li> <li>-Additional commuters using Epping Tube station, and busses/roads to reach it</li> <li>-Who would operate the bus routes, whether they would remain viable and in operations, reliability and frequency, and the need for area-wide real-time information</li> <li>-Pressure on sewage and reservoirs</li> </ul> <p>It was explained in public sessions that some of these concerns would be dealt with through the separate transport strategy and Infrastructure Development Plan; it is recommended that these are shared with those who signed up for email updates when available.</p>	Wider infrastructure	Response as follows.	See FAQs for detailed responses to the recurring questions/ issues raised.
	<p>Development delivery</p> <p>At the in-person events, more information was requested about the timescales of delivery and which parts of the site would be developed first.</p> <p>Harlow residents in particular would like to be informed of any planning applications coming forward and the channels through which they can comment.</p> <p>Both Epping / Thornwood and Harlow residents expressed concern about local disruption during the construction period.</p>	Wider infrastructure	Response as follows.	See FAQs for detailed responses to the recurring questions/ issues raised.
	<p>Anti-development sentiment</p> <p>The situation of the development – on the edge of Harlow – has provoked much opposition to any development happening on the site. This is not something that is within the purview of the Strategic Design code, but is noted here as it was a core sentiment raised by Harlow residents who attended the in person sessions at the Latton Bush centre, and by a small number of Harlow residents lodging official responses by email or online. (It should be noted, that this was not the case at the in-person sessions in Thornwood.)</p>	Wider infrastructure	Response as follows.	See FAQs for detailed responses to the recurring questions/ issues raised.
	<p>Politics</p> <p>Many Harlow residents see this development as EFDC pushing their housing needs onto Harlow. As the site sits within the district of Epping Forest, but adjoined to Harlow, questions were raised over</p> <ul style="list-style-type: none"> <li>-Local council and parliamentary representation (which ward or constituency would cover it)</li> <li>-Where council tax would go and which council would be responsible for providing services</li> <li>-If EFDC are the planning authority, how much representation Harlow and its residents have when planning applications come forward</li> </ul>	Wider infrastructure	Response as follows.	See FAQs for detailed responses to the recurring questions/ issues raised.

Essex County Council Consultation Responses inc Place Services				
Event	Comment	Theme	Status	Note/ response/ action
	p6 (10 of 100) The Planning Context makes reference to the EFDC GI Strategy which is positive and demonstrate the link to HGGT. It would be to mention the HGGT GI Framework in the list of key HGGT documents.	Nature	Update to design code.	HGGT GI framework added in list of key HGGT docs on p20 and p10.
	p6 (10 of 100) ECC recommends reference to the Essex Green Infrastructure Standards (2022), which should be used as part of the Design Code evidence base and have been endorsed by Natural England and awarded Building with Nature Policy accreditation, 2023. The Essex GI Standards outlines nine principles and standards for the protection, enhancement, creation, and management of GI in Essex. The application of these principles and standards through development management and planning policy will ensure the delivery of multifunctional, accessible high-quality GI. Essex Green Infrastructure Standards   Essex Design Guide> The GI Standards can help to design codes to set the context for development to delivery good design and should be referred to for local development requirements.	Nature	Update to design code.	Reference added to 'Nature' section rather than planning context section. This should also be picked up at future planning stages.
	p6 (10 of 100) The National Green Infrastructure Framework includes national Headline Green Infrastructure Standards, which set out the ambition for green infrastructure in terms of quantity, quality, and type to enable everyone to benefit from good green infrastructure. Both these standards are voluntary and the national GI standards are referred to in the National Model Design Guide. It is noted that the National GI Design Guide has been referenced in Chapter 2 Nature/Green Infrastructure Framework section.	Nature	Note	In order to keep the design code usable, we are trying not to repeat information or repeat information that is found elsewhere in policy. This first section concentrates on the most high level, key documents. References added to Nature section as appropriate.
	Page 10 (14 of 100) See comment above regarding the list of documents listed under heading	Nature	Note	See note above.
	Page 12 – 13 (16-17 of 100) We welcome the ambition for an integrated network of green routes and spaces and for active travel routes. Although would encourage for attractive active travel routes. All these ambitions are people focused and there is no reference to achieve a better balance between people with nature. To support biodiversity net gain targets and links to local nature recovery. There is an opportunity to show case best practice, in that developments can also contribute positive impacts on the natural environment with the right design in the right location. Linking this to the requirements in Chapter 2. Nature and Green Infrastructure Framework section. There is a need to include a design ambition that is landscape – led ensuring that it is designed and managed for balancing people with nature, allowing for nature recovery based on considerations of local needs, opportunities, and constraints. The Design Code to support and encourage opportunities to enhance and establish green infrastructure along sustainable transport and PRoW networks to both encourage active travel and create a green corridor for wildlife. This could include, but not be limited to, the integration of nature focused SuDS; native hedgerows, tree, and shrub planting; incidental 'play on the way' features / trails; informal sport (outdoor gym/fitness trails); and areas for seating to stop and rest.	Nature	Note	We did previously have a much more extensive 'vision' but were encouraged to distill it right down by the Design Council and Department for Levelling Up however there is still a landscape-led design ambition - the network of green routes and spaces. This is not exclusively for people. This is then directly elaborated in the 'Nature' section of the design code with key strategies that include wildlife and ecology. Those other items mentioned in the comment are included in the Nature section.
	20 (page 24 of 100) See also section. There is no mention of the HGGT GI Framework in the list of key HGGT documents. Ideally would also like to see a reference to the Essex GI Standards.	Nature	Update to design code.	Given that the EFDC GI strategy and the HGGT Strategy consolidates other policy and guidance, further County and National guidance documents have not been included unless they provide information on specific issues that arent included in the local documents. <b>Have added HGGT GI framework to list of references on p20</b> .
	20 (page 24 of 100) Site-wide green infrastructure requirements 2.4 to include a reference to the requirements for delivering Biodiversity Net Gain and even wider Environmental Net gain. Also demonstrate the opportunity to contribute to the Greater Essex Local Nature Recovery Strategy. ECC as the 'Responsible Authority' for delivering the GELNRS but will work closely with the LNP to provide direction and ensure key stakeholders are engaged. The GELNRS is being prepared for completion by early 2024. The GELNRS will form the baseline for habitat information, which in turn will generate action to promote biodiversity management and improvement. BNG still relies on the application of the mitigation hierarchy to avoid, mitigate, or compensate for biodiversity losses. Should the Design Code support the BNG target? The Essex LNP Biodiversity and Planning Working Group are currently reviewing and exploring the feasibility for 20% Biodiversity Net Gain. In line with the aspiration of other Garden Communities, the Design Guide may wish to adopting the higher 20% figure than the minimum 10% requirement within the Environment Act (2021).	Nature	Note	BNG has not been included as it is now required by planning law. As it has not been sufficiently tested and there is not enough support in existing policy and guidance, we have not included an additional requirement for higher provision in the design code, however that does not preclude it being pushed for through other mechanisms in the planning process for Latton Priory and the other HGGT communities.

Essex County Council Consultation Responses inc Place Services				
Event	Comment	Theme	Status	Note/ response/ action
ECC - Green Infrastructure	<p>21 (page 25 of 100) The map shows the GI features and has a note that street trees are not included here. Although not listed within the GI key as GI we welcome the inclusion of the Suitable Alternative Natural Green Spaces (SANGs), sport pitches and allotments. As all these are also defined as GI asset type. As well as the potential from car free play streets, school grounds and local centres through incorporating GI in the design can contribute to the wider GI network.</p> <p>There was a note on page 20 that GI includes green and blue infrastructure, but there is no mention on the map. For clarity it might be worth referencing that blue infrastructure is covered under water management as extension to the footnote on page 20.</p> <p>As outlined in the Essex GI Strategy (2020), the following can be considered as Green Infrastructure: -</p> <ul style="list-style-type: none"> <li>- Parks and Gardens</li> <li>- Natural and semi-natural green spaces</li> <li>- Designated sites (SPAs, SACs, Ramsars, SSSIs, AONBs)</li> <li>- Reservoirs, lakes, and ponds</li> <li>- Waterways (watercourses)- Greenways (Public Rights of Way, footpaths, cycleways and tracks, bridleways, towpath)</li> <li>- Outdoor Sports Facilities (Sports pitches)</li> <li>- Amenity green space (provision for play facilities etc.)</li> <li>- Green spaces around premises (Educational premises open space and playgrounds)</li> <li>- Cemeteries and churchyards</li> <li>- Allotments, community gardens and city farms</li> <li>- Public Realm/Civic spaces (urban greening – urban and street trees, road verges, green walls, green roofs, Sustainable Drainage Systems and Natural Flood Management)</li> <li>- Productive Spaces (agricultural land and meadows)</li> <li>- Green Corridors (verges, green wedges, and green fingers)</li> </ul>	Nature	Note	Noted. No further note added at risk of making the page more busy and difficult to read/ consume.
	<p>22 (26 of page 100) Regarding the SANGS, New Park and Sport pitches it uses the terminology should for the design of these features rather than a must. Is this because the requirements listed are not essential and that there is flexibility in the design of these? It is noted that the guide distinguished between the terminology for Must and Should, and if should is used that the proposal has got to provide justification why these features have not been included. However, it is recommended that any elements of the design of these features listed are in fact essential to list as a separate must.</p> <p>For instance, SANGS must be large enough to provide a range of attractive circular walks. SANGS must seek to provide a rural and wild feel with a variety of habitats for visitors to experience (e.g., some of woodland, scrub, grassland, heathland, wetland, open water).</p> <p>Sport Pitches - sports grounds and other play areas must be designed flexibly to support the needs of a range of ages and in line with Sport England recommendations. And active design principles including active environments by Sports England and Active Essex - <a href="https://www.sportengland.org/guidance-and-support/facilities-andplanning/design-and-cost-guidance/active-design">https://www.sportengland.org/guidance-and-support/facilities-andplanning/design-and-cost-guidance/active-design</a></p> <p>It is also recommended that sport pitches are designed to be multipurpose which links in to 2.13 to ensure accessible and attractive to range of users and not just sport and dog walkers. Multifunctional spaces bring a wider spectrum of environmental, social, and economic benefits to urban areas, especially for small areas of open spaces and more cost-effective way of addressing many social, wellbeing, drainage and other hard infrastructure needs.</p>	Nature	Update to design code.	These requirements are shoulds because they are principles rather than objective requirements. <b>However, there has been a review of the 'musts' and 'shoulds' in the document. Where requirements are specifically covered in other guidance and policy they arent always repeated here.</b>
	<p>22 (26 of page 100) Allotments and food growing requirements. There are other food growing opportunities that could be considered such as community orchards and Food Forests.</p> <p>Food Forest are currently being piloted in 5 schools and parishes (as part of Liveable Neighbourhoods) across Essex. The East Anglia Permaculture Association C.I.C is working with partners seeking opportunities to help combat the climate emergency through the creation and management of food forests on pieces of land in communities. A food forest is an area of any size of purposely designed edible woodland. Taking inspiration from nature, it sustainably mimics the ecosystem of a forest (by having multiple layers, e.g., canopy, bush, ground cover) but replaces elements with food-producing trees and plants that communities and schools can get involved.</p>	Nature	Note	Whilst the design code does not go into such extensive detail, it does seek to ensure a number of food growing opportunities at different scales and in locations to support connections such as close to schools or other communities. This should be picked up further at future stages of the planning process.
	<p>Green finger/ node requirements</p> <p>2.27. regarding seating and street furniture to take into consideration sustainable design such as Green Roofs for cycling facilities: The provision of these features allows ecosystems to function and deliver their services by connecting urban, peri-urban and rural areas, alongside biodiversity habitat creation. Dual street furniture/seating (i.e., a bench including a planter): The design of the street furniture and bin stores can contribute to the landscape character, reduce clutter of an area or street and act as a green corridor/link to the wider landscape scale GI network.</p>	Nature	Update to design code.	<b>Additional requirements added to p23: Dual-function street furniture e.g. benches with planters, green roofs to bin or bike enclosures) should be used to contribute to street greenery, reduce clutter and provide green corridors and link s.</b>
	<p>23 (27of page 100) Street trees and greenery requirements</p> <p>Greening of the local centres should be considered too to make this an attractive ad visually pleasing places for people want to spend time and hopefully benefit the local retail areas with increase footfalls and spend. Create pocket parks, attractive seating areas and play, rain gardens/SuDs, planting to provide shading and wind breaks.</p>	Nature	Update to design code.	Feature trees or tree clusters shown in community plaza on GI framework diagram. Also noted as a requirement on p60 under 'Community Plaza' requirements. <b>Added requirements for SuDS/ rain gardens to this.</b>

Essex County Council Consultation Responses inc Place Services				
Event	Comment	Theme	Status	Note/ response/ action
	General Comment - All the GI features state that it should be native planting, which is supportive and understand the flexibility of planting needs to be able to suit the conditions i.e., soil type etc. Another consideration is climate resilient planting where appropriate that can adapt and mitigate though dry periods or saturate in extreme rainfall.	Nature	Note	Note requirement 2.33 under street trees that requires species selection to be diverse and to support climate resilience.
	26 (page 30 of 100) Fourth Paragraph to make reference how SuDs and water management can contribute to the Green and Blue Infrastructure network. Recommend additional wording: The northern part of the north-south green fingers is located on the steepest parts of the site and provide an opportunity to create an attractive and distinctive landscape that addresses topography and accessibility, biodiversity, and SuDS through the creation of hillside wetland parks. While connecting to the wider green and blue infrastructure network.	Nature	Update to design code.	Additional wording of 'whilst connecting to the wider green and blue infrastructure network' added to fourth paragraph on p26
	26 (page 30 of 100) SuDS infrastructure requirements In relation to 2.70 and 2.72 for the design of SuDs to follow the hierarchy for nature-based solutions as set out in the Essex SuDS Design Guide. Naturalised SUDs provide a high-quality environment for people, by providing amenity value, opportunities for environmental education, delivering safe surface water management systems and improving ecological connectivity. There is therefore a need for proposal to design to deliver the benefits of naturalised (GI) SUDs, and for SUDs to be integrated as aesthetic and accessible features within the GI of all developments.	Nature	Update to design code.	Essex SuDS design guide added to key reference documents on p20 at the beginning of the section. Additional wording added to requirement 2.70 to state: <i>A site-wide, coordinated SuDS strategy must be approved as part of a coordinated landscape and public realm strategy or design code before the approval of any detailed applications. This should follow the hierarchy for nature-based solutions set out in the Essex SuDS design guide.</i>
	28 (pages 32 of 100) With reference to Nature/ Green Infrastructure. To include reference to Nature/ Green Infrastructure especially links to greenways, green routes and street trees and greenery to ensure GBI is incorporated to the design of sustainable movement across the site. See below separate table for suggested GI for various street types – as potential examples of what could be considered This can also relate to 04 Public Spaces/ Street Design.	Movement	Update to design code.	Nature' added to signposting box
	42 (page 46 of 100) Key strategies for uplifting and safe streets and spaces. Fourth bullet point to include a reference to green infrastructure. GI and open space should be approached from a multifunctional perspective, combining uses such as sustainable drainage, public open space, green corridors/ walking and cycling routes shading through street trees and biodiversity conservation to combine functional uses with amenity benefits. Recommend wording changes: Make art, and innovative design and green infrastructure part of everyday life.	Public Space	Update to design code.	Wording changed to include green infrastructure in fourth bullet point.
	42 (page 46 of 100) Public space requirements In relation to 4.5 please see comments for Green finger/ node requirements under 02 Nature/ GI Framework - 23 (27 of page 100). In relation to seating and street furniture dual purpose design.	Public Space	Update to design code.	Requirement 4.5 additional wording: <i>Dual-function seating such as planters in benches should be considered to contribute to green infrastructure.</i>
	42 (page 46 of 100), 54 (page 58 of 100), 62 (page 66 of 100) Public space requirements - 4.7, S6 Car-free play streets - Movement and access requirements: 4.94 – 4.95 and the Play and Recreation- play strategy - all to encourage natural play. For this, we would expect play strategies to be formed by the character and function of the green spaces. It should be imaginatively designed using landforms, level changes and water, as well as natural materials such as logs or boulders, which create an attractive setting for play.	Public Space	Note	Considered sufficiently covered, particularly with text and requirements on p62. This can also be interrogated further as this moves through the planning process.
	61 (page 65 of 100) The diagram could include reference to pocket park in open spaces/ local centres with the ring of seating or planters/planting. Where there are flat roofs to include the potential for roof gardens or green/ bio solar roofs.	Public Space	Update to design code.	Notes indicating 'potential rain gardens or green roofs on flat roofs' and 'pocket parks' added to diagram.
	62 (page 66 of 100) General Comment, that this should include school grounds to ensure schools include the provision of outdoor green spaces. we would expect school playing field to be designed to ensure multipurpose and functional use and not just concrete grounds or sport field. To provide green spaces for natural play, sensory, areas that enhanced biodiversity and contribute to climate change mitigation and adaptation (flood and water mitigation, shading, air quality etc.) that all together can contribute to the curriculum, for example PE, science, English, maths, outdoor learning, and forest schools. It will improve staff and pupil health, wellbeing, learning and chances in life. In 2021, Department for Education announced a new initiative designed to put climate change at the heart of education, young people will be empowered to take action on the environment. By 2023, teachers will have access to a model science curriculum designed to teach children about nature and their impact on the world. In addition, children will be encouraged to get involved in the natural world by schools enhancing their school grounds for biodiversity.	Public Space	Update to design code.	This is a really important point however, given the school design will be developed through intensive consultation with Essex teams, not critical to include here, particularly given the need to reduce the text of the document and make it more usable. Therefore, this should be picked up further along the planning process. Additional wording added under destination play text: <i>School grounds will also provide multi-functional and multi-purpose play opportunities .</i>
	64 (page 68 of 100) See also: To include reference to Nature/ Green Infrastructure, Especially reference to green fingers and greenway.	Built form	Update to design code.	Nature' added to signposting box
	64 (page 68 of 100) General Comment - There is a need for identifying the types of green infrastructure that will best provide the required functions or benefits, as well as ensuring that the building blocks interact to form a multifunctional interconnected network. All green infrastructure elements can be included in the national Nature Recovery Network.	Built form	Note	Not included to avoid repetition of content from Nature section.

Essex County Council Consultation Responses inc Place Services				
Event	Comment	Theme	Status	Note/ response/ action
	78 (page 82 of 100) Environmental design requirements 7.10 to consider for commercial buildings with strong roof design to incorporate bio solar is explored. This can have dual benefits for energy and biodiversity. This includes biodiversity habitat creation, water storage capacity, flood alleviation and energy saving potential. Further information can be found here: <a href="https://livingroofs.org/introductiontypes-green-roof/biosolar-green-roofs-solar-green-roofs/">https://livingroofs.org/introductiontypes-green-roof/biosolar-green-roofs-solar-green-roofs/</a>	Resources	Update to design code.	Note that the design code is light on green roof content because of the nature of the site, there is ample space for biodiversity and green and blue infrastructure on the ground as part of the public realm (as opposed to a more dense urban site). There is also a requirement for a predominance of sloping roofs to suit the context and position of the site. Nevertheless, wording of 7.10 amended to 'Roof forms of all buildings must be designed to consider optimum solar orientation for photovoltaic panels (PVs) or bio solar green roofs .
	79 (Page 83 of 100) Another adaptability consideration is water-efficient landscaping and climate-resilient planting. Changes in weather patterns and more extreme events are impacting on our landscapes that are unprepared for these conditions, so resilient gardens that can adapt, survive, and recover are critical.	Resources	Update to design code.	Have included this in the Nature section (see note on species selection). Have amended wording of second paragraph under 'climate resilience' to: Minimising hard surfaces/ highways and maximising climate resilient green and blue infrastructure will help to reduce the urban heat island effect and reduce susceptibility to flooding and extreme weather.
	Pages 16 and 23 Reference to 'two new schools' should be clarified to say a new primary and secondary school (together with provision for Early Years and Childcare) or an all-through school.	Framework masterplan/ stewardship	Update to design code.	For brevity, on p16 have changed 'two new schools' to 'a new primary and secondary school or an all-through school'. Note that the wording of the design code will not change the allocation requirements.
	Page 32 para 3.27 Vehicular access to the school will not be taken from the north and therefore there is unlikely to be a need for pedestrian crossing of the Greenway.	Movement	Update to design code.	Wording about possible crossing over greenway for school access removed.
	Diagrams on pages 33, 35 & 37 et al: The school frontage (denoted in yellow) is shown as 'car free or limited car access school street'. Any vehicular access to this area, with the exception of emergency vehicles, is unacceptable and this designation should be amended to read 'vehicle free pedestrian only public realm'. • The school site is split in two by a 'Greenway'. The option of an allthrough school must be delivered. In any case, such a route would be a security risk and the divide between space for primary and secondary pupils is incorrect. The masterplan will need to be amended to remove any split between primary and secondary school sites. (see Strategic Masterplan Framework) • A main vehicular access from public highway needs to be shown on the western boundary of the education site and an emergency access point on the east. Note a fire engine also needs to be able to access the pedestrianised area to the north in the case of emergencies. • The north south 'secondary vehicular route' which meets the middle of the northern boundary of the education site will not be acceptable as an access to the school and should be removed to ensure the environment around the school entrance is entirely traffic free.	Movement	Update to design code.	Key changed to car-free school frontage. - green lightened to prevent any confusion that it is a greenway. Just indicating some green infrastructure on the school site. Vehicle access not shown as the detail is yet to be resolved but following wording added to p40: <i>The site-wide servicing strategy will need to address emergency and refuse and recycling collection from the local centre facilities and the new schools, through consultation with the relevant authorities and the end users, including Essex County Council as education authority . North-south secondary vehicle route shown has been pulled back slightly from east-west greenway, but will likely still be required for servicing the local centre buildings either side.</i>
	Page 38 para 3.54 Careful design will be needed as there must not be any car drop off bays close to the school entrance.	Movement	Note	This will need to be carefully considered in any future proposals.
	Page 60 para 4.143 The school cannot be expected to maintain any area of public realm. A covered external area which is not within the school's secure boundary is not in itself an issue, but the school cannot be expected to maintain the provision	Public Space	Note	Noted, this will need to be resolved as part of the stewardship and public realm maintenance arrangements. To be resolved through the wider planning process.
	Page 70: School Frontage - Although the school entrance can address the public realm, any other fenestrated parts of the building need to be set back and within a secure boundary (for security and safeguarding). • Staff parking is likely to be required on the western boundary but there will be no provision for vehicular 'drop-off' (except for disabled parking).	Built form	Note	Noted, this can be addressed as the design of the school develops. No 'vehicular drop-off' currently shown in the design code.
	General - While ECC Education welcome the design code as a good practice guidance, we will still have to assess / determine design details of new school(s) at planning application stage for respective school(s) on their own merit which could diverge from the design Code requirement	Process/ Policy	Note	Noted. There is intentionally significant flexibility around the design of the schools, only coding for the essential requirements. All other matters to be resolved through the wider planning process.
ECC - Education	Exec Summary (p 3) This states that 'By focussing on the strategic elements of the development, and prescribing only their key aspects, the code leaves scope for innovation, creativity and variety in future proposals while embedding the foundations of a place where people and nature can thrive.' This intention is supported in principle. Yet at 100 pages in length and with the level of detail / prescription involved on many specific matters, it is suggested to review how far the document as drafted achieves this objective and provides the appropriate balance. that allows sufficient scope for innovative and creative design approaches and solutions.	Design code usability and scope	Update to design code.	Noted. There will be a review of the content of the design code, however it should be noted that for a masterplan of this scale, 100 pages is on the shorter side of design codes. If there are any particular aspects that appear overly restrictive this feedback would be appreciated.

Essex County Council Consultation Responses inc Place Services				
Event	Comment	Theme	Status	Note/ response/ action
	<p>Planning context (p 6) This refers to EFDC GI Strategy and this provides an EFDC specific GI guide.</p> <p>To assist UDC in developing GI throughout the Design Code attention is also drawn to the Essex GI Standards, 2022 (developed through EPOA) which recommend under the “Mainstreaming and Integration Principle,” that schemes must show how GI is essential to the distinctiveness of place.</p> <p>Specifically, ECC would recommend that consideration is given to the advice and guidance provided on pages 15 and 20 of the GI Standards, which demonstrates that design can assist in achieving the vision and objectives resulting in the protection of local landscape, character, and heritage. It is important to note that the Essex GI Standards have been endorsed by Natural England and awarded Building with Nature Policy accreditation in 2023.</p>	Nature	Note	See comments above in response to ECC - Green Infrastructure.
	<p>Planning context (p 6) Although it is positive that this section references the Draft HGGT Healthy Town Framework (2019) providing positive and useful guidance on this matter the framework was not finalised, endorsed and rolled out for use</p> <p>As a key point, the Design Code would benefit from a specific reference to highlight the need for Health Impact Assessment (HIA). Accordingly, the comprehensive health and wellbeing guidance hosted on the Essex Design Guide webpages, developed and endorsed through EPOA, should be considered as a reference and guidance in this matter. The EFDC Public health Practitioner would be a key consultee in emerging development proposals for this site allocation, including planning applications</p>	Process/ Policy	Update to design code.	The planning proposals will, as part of the normal planning process, be required to submit a HIA. This should be picked up as part of the wider planning process. <b>Reference to HGGT Healthy Garden Town framework has been moved down to the list of draft documents on p6.</b>
	Design Ambitions (p 16) The stated design vision ‘The design code for Latton priory will help to deliver a healthy, vibrant place’ – as a concise headline statement – is supported	Design code usability and scope	Note	Noted.
	<p>Stewardship framework (p18), GI framework (p20), Site-wide sustainable movement (p28), Energy Use (p82) - As mentioned above, referencing the comprehensive health and wellbeing guidance would be helpful for reference sections across key themes in the design code:</p> <p>4) Stewardship framework (p18) ‘Support Communities’ section</p> <p>2) GI framework (p20) Essex Design Guide: Healthy Places Guidance, Access to Open Green and Blue Spaces</p> <p>3) Site-wide sustainable movement (p28): Essex Design Guide: Healthy Places Guidance, Active Environments and Sport England Active Design Principles</p> <p>4) Energy Use (p82): Essex Design Guide: Healthy Places Guidance, Environmental Sustainability</p>	Framework masterplan/ stewardship	Note	There is a need to reduce the amount of text and the references in the design code and avoid repetition, therefore Essex Design Guide references have generally not been specifically included but should be considered as part of any future proposals. Where there are specific requirements from the design guides that need to be reiterated in the design code these are included.
ECC as lead flood authority	P30 para 2.71 Should include “Surface water discharge rates will be equivalent to the 1 in 1 Greenfield rate for all events up to the 1 in 100yrs plus climate change.”	Nature	Update to design code.	<b>Requirement amended as suggested.</b>
	<p>General - The north of the site appears to be within a critical drainage area; however, this is not mentioned in the design code and when developments are within CDA’s we require all areas of hardstanding to be permeable and all houses should have water butts installed. This is to reduce the risk of downstream flooding.</p> <p>Consideration should also be given to water re-use where appropriate, schools, community centres and commercial units may be candidates.</p>	Nature	Update to design code.	<b>Note that additional note has been added regarding SuDS hierarchy and reference to Essex SuDS Design Guide</b>
	P8 Site Location Plan Key – STC connection should be shown as indicative.	Framework masterplan/ stewardship	Update to design code.	<b>Note added below key re STCs: *Indicative routes shown. Final routes subject to further technical work.</b>
	P17 We need to secure potential future access point to the Harlow Dev site	Framework masterplan/ stewardship	Wider planning matter.	
	P17 why couldn’t the ‘car-free play street’ run along the wet boundary of the neighbourhood green in the north-eastern part of the development?	Framework masterplan/ stewardship	Note	Objective is to have car-free play streets well integrated with homes and overlooking on both sides.
	P22 – 2.15 What about bus?	Nature	Note	Buses are not discounted.
	P29 will there be sufficient cycle parking provision? Have we done any calculation? How many spaces are we allowing per dwelling? Not all new homes will have designed in cycle parking (e.g. flats) so some secured on-street cycle parking is likely to be necessary? This may link to stewardship arrangement as someone will have maintain these on street parking provision.	Movement	Note	No, calculations have not been undertaken but at this level it is diagrammatic and strategic. Cycle parking provision is required through the code and other policy and guidance and it be for designers of future proposals to design this in. Agreed that stewardship will be a consideration. Note that flats must also have designed-in parking.
	P30 this design is based on the alternative route for the STC connector and is unlikely to work with the HGGT preferred route option	Movement	Note	This route reflects one option. Given the final route has not been determined, it is presented here with the appropriate caveats.
	P30 do we need to allow a bigger turning cycle so that, if need be, some buses could temporarily park there? What about service facilities for bus drivers (maybe there can be an agreement for them to use the facilities in the community hub?)?	Movement	Note	The turning circle has been calculated and advised by PJA. Further work will be down to future proposals.
	P33 where do we stand on having two vehicular access onto Rye Hill Road?	Movement	Note	This is the current strategy.

Essex County Council Consultation Responses inc Place Services				
Event	Comment	Theme	Status	Note/ response/ action
ECC - Transport and highway	P36 with the EPOA parking guidance under review, it would be helpful if the site wide car parking strategy were in line with the revisions proposed to the outdated EPOA parking standards.	Movement	Note	The design code is very much in line with the draft EPO parking standards (Part 2), particularly in relation to strategic planning e.g. limiting the access of vehicles, managing volume and speed in 'human scale' spaces and use of filtered permeability. The two documents also align in their preference for unallocated off-plot parking as a preference to on-plot and the need to future proof and build in adaptability. The design code has slightly more (site-specific) detail regarding what parking solutions are acceptable in different locations or relating to different building typologies. Parking numbers are not dealt with in the design code and therefore alignment will require further interrogation as the outline and detailed applications are reviewed. Also note that the EPOA parking standards for garden communities are currently in draft form and therefore this should be reviewed again once they have been updated.
	P36 have we taking into account need for on-plot PV charging? E.g., residents on the car-free frontage street?	Movement	Note	Homes without on-plot parking will not have on-plot EV charging but this will be designed into street parking.
	P39 I thought car barns are not a priority in the Essex Parking Standard?	Movement	Note	They may not be a priority generally but are a critical component here in trying to achieve the mode shift targets.
	P44 trees and materials – ECC may not be able to commit to adopting nonstandard. We also may have view on the type and number of highway trees there are lots of trees in the photo	Public Space	Note	This will need to be resolved but street trees are an important aspect of the design strategy and green infrastructure of the site to help meet the Aims and Vision
	P45 street lighting – do we have anything to say about street lighting?	Public Space	Note	Street lighting is included in street design
	P48 street design, do we have a view on things like informal space, 4.44, corner radii 4.52, resident parking zone 4.57, drainage 4.60 etc. General – to achieve the quality of public realm and better than the standard accepted for adoption, this will require a stewardship body to maintain non adopted public realm spaces	Public Space	Update to design code.	<b>This has been reviewed separately with further PJA work and liaison with ECC Highways. A technical study was undertaken (available on request) and recommendations from this report have resulted in amendments to the design code. There are certain detailed points that will need to be discussed with Essex Highways at a future stage when detailed proposals are submitted.</b>
	General – where are we with the row of houses to the east of the school site?	Framework masterplan/ stewardship	Note	Don't understand the comment.
	ECC - Stewardship	Pg 18. We support the inclusion of a Stewardship section and recognise the mention of the HGGT Stewardship Charter; however, the requirements could be perceived as the developer only needing to seek community engagement, not that developer needing to establish a Stewardship Body to take ownership of community assets and their on-going maintenance. Would be beneficial to strengthen this.	Framework masterplan/ stewardship	Note
Pg. 19 ECC welcome the requirements to include an asset management plan however there should be a requirement for the developer to include a checklist of community assets that will be transferred over to the SB including detail on endowments, S106 and income generation streams. As this will impact viability and will be key to the SB providing on-going maintenance of such assets in future that deliver better than normal standards.		Framework masterplan/ stewardship	Update to design code.	<b>There is wording to this effect in rule 1.16. This has been expanded to: <i>Asset management plans must be provided for all public realm and community assets. These should include plans showing each element, the ownership, their use (i.e. significant social, ecological or economic value), maintenance status and detail on endowments, Section 106 and income generation streams that will allow for on-going maintenance of those assets. This will allow their impact and care to be monitored, prioritised and managed holistically to better than normal standards.</i></b>
	We welcome the general approach to the structure of the design code. Its reflection of the National Model Design Code in this way is considered to likely assist the end user. The reference to key policy and related design code sections is likely a helpful tool for all future users and interested parties. We also support the use of mandatory (musts) or recommended (should) requirements, which makes the requirements of the code clear and prescriptive to all users. The framework masterplan at the end of each section will also likely assist users in the implementation of many of the key considerations.	Design code usability and scope	Note	Note.
	It is considered that to help all users of the design code, including lay-persons, definitions of technical terms would assist. For example, terms like build-to-line, car-free streets, landscape led, could be unknown and confusing to certain users of the design code. Including definitions would assist in reducing term subjectivity and would ensure the code is as accessible to all parties as possible.	Design code usability and scope	Update to design code.	<b>Following terms added to glossary: car-free streets, demand responsive transport (DRT), landscape-led, build-to line.</b>
	Furthermore, in response to the aspirations of the National Model Design Code, which states 'a design code is a set of simple, concise and illustrated design requirements that are visual and numerical wherever possible', it would also help users of the design code if additional graphics and illustrative images could be included. Like the National Model Design Code, the images could demonstrate the expectations of the LPA and would assist in outlining how certain parameters would be expected to be delivered.	Design code usability and scope	Note	Unable to produce significant new visuals within available time/ resources, however the current level of description is considered to provide a degree of flexibility. It should also be noted that the National Model Design Code can be referenced in the assessment of future planning applications.



Essex County Council Consultation Responses inc Place Services				
Event	Comment	Theme	Status	Note/ response/ action
Place Services	<p>Site Context</p> <p>On page 11, it would be of assistance if the positive aspects of the Morley Grove example could be defined. The other precedent images in this section outline the positive features whereas this is not defined for Morley Grove. The context assessment could also be enhanced by graphically highlighting the architectural features present within the local area.</p>	Design code usability and scope	Update to design code.	<p><b>Morley Grove image caption updated to: <i>Strong composition and terraced rhythm at Morley Grove, Little Parndon, Harlow by Gibberd and partners.</i></b></p> <p>Further references have not been included but Harlow Design Guide SPD is referenced as well as local Conservation character area appraisals.</p>
	<p>Vision</p> <p>We are pleased to see the inclusion of a vision in the 'Design Ambitions' section, this relates well to the structure of the National Model Design Code and outlines the key design features of the masterplan. The illustrations will help to engage users of the code and aid in defining the ambitions.</p>	Design code usability and scope	Note	Note.
	<p>01 Strategic Design Code Framework</p> <p>The Framework Masterplan is aimed at illustrating the site-wide strategies and principles of the design code. This section sets out the features of the masterplan and the requirements which are facilitated by an illustration of the masterplan. Page 16 could be more engaging through the use of additional images as it is relatively text heavy.</p>	Framework masterplan/ stewardship	Update to design code.	<p><b>Text has been edited down</b>, however it should be noted that it is designed to be read as a double page spread and the opposing page on the spread is a full-page diagram.</p>
	<p>The stewardship framework should provide reference to ensuring spaces are designed for women, older people and those with reduced mobility. Points like widening pavements, having regular low kerbs for crossing and shelters and seating opportunities within public spaces may want to be included and/or considered. The Essex Design Guide and Make Space for Girls provide further information and guidance on this.</p>	Framework masterplan/ stewardship	Update to design code.	<p><b>Additional wording added to rule 1.8: <i>At each phase, community assets must be planned and designed through inclusive engagement with neighbouring residents and intended user groups and stakeholders; this should include under-represented groups, particularly young people, older people, women and those with reduced mobility . Make Space for Girls signposted in the 'see also' box.</i></b></p>
	<p>Page 26 paragraph 2.11 states that the "SANG should have appropriate surfacing materials". It is recommended that this is amended to require the surfacing materials be appropriate for all accessibility requirements including pushchairs and wheelchairs.</p>	Framework masterplan/ stewardship	Update to design code.	<p><b>Wording changed to: • <i>Provision of attractive walking routes with appropriately surfaced paths for accessibility.</i></b></p>
	<p>Page 26 paragraph 2.12 states that new parks should "engage and be accessible to people of all ages". It is suggested that reference "and to all genders" is added. This paragraph may also want to include the requirement for sensitive lighting strategies which are effective for safety without harming the landscape character and ecology.</p>	Framework masterplan/ stewardship	Update to design code.	<p><b>Suggesting wording added to this paragraph.</b></p>
	<p>03 Movement</p> <p>The site-wide sustainable movement strategy appears positive, including great levels of permeability. The use of car-free streets is supported and would be an attractive feature that would benefit the health and well-being of future occupants by prioritising pedestrian and cycle movements. It is questioned whether the primary active travel route would be slightly convoluted from the development to the east. In addition, it primarily runs parallel to the primary vehicle route. Ideally, this route should be located separately but in any case, a substantial buffer between the vehicle and active travel routes should be provided.</p>	Movement	Note	<p>Noted. The proposal is for a choice of types of travel routes for active travel however it is noted that site constraints inevitably mean that there are some compromises.</p>
	<p>The proposed use of car barns is positive for sustainability benefits and would remove cars from the public realm. The use of parking courts is largely supported, however, they must be provided with good levels of overlooking, active frontages and should be well landscaped with planting/trees breaking up every fourth space.</p>	Movement	Update to design code.	<p><b>Clarity added to rule 3.67; <i>Parking courts should contain no more than twelve spaces and should include green infrastructure, with planting/ trees breaking up every four spaces .</i></b></p>
	<p>Page 28 paragraph 3.5 requires that homes have front doors to the street. It may be necessary to also require front doors with direct street access to be provided with defensible space to ensure safety of users and separation from the public space.</p>	Movement	Update to design code.	<p><b>Added wording to rule 5.18 (in built form section) <i>Doors with direct street access should have some defensible space for separation from public space .</i></b></p>
	<p>Paragraph 3.90 discusses the support to site-wide underground vacuum and/or waste storage system. We would also be supportive of this as it reduced street scene clutter and can reduce in the reduction of street sizes which are positive towards addressing urban design principles. It should be noted that the authority must have refuse vehicles which are compatible with this collection method and therefore early discussions should take place with the Council to ensure the success of this refuse storage/collection method.</p>	Movement	Wider planning matter.	<p>Feasibility of this is being investigated with EFDC Waste team in case introduction of alternative system across all EFDC Garden Town sites makes the infrastructure investment worthwhile.</p>
	<p>04 Public Space Strategy</p> <p>The public space strategy sets out the expectations and requirements of the open spaces and network of streets within the development. It is positive that the public space strategy seeks to address both of these elements as per the National Model design Code. As above, the street network provides excellent levels of permeability for pedestrians/cyclists both internally and externally to the site. There is also a clear street hierarchy with established characters that will aid in placemaking and wayfinding.</p>	Public Space	Note	Noted.
	<p>To ensure women and girls are considered within the design of public spaces, the public space requirements should provide reference to Essex Design Guide Women and Girls Safety in the Public Realm and the Make Space for Girls guidance.</p>	Public Space	Update to design code.	<p>Both references added to 'see also' box' at the beginning of the public spaces section.</p>
	<p>Within the street design section, it is recommended that the code discusses visibility splays along adopted streets. It should require that visibility splays are considered at an early stage to ensure they are acceptable and do not require unnecessary or additional hardstanding, particularly at the expense of landscaping and good design practices. Further work could be done to outline how the development could employ active design principles at each street level and within the open spaces. It is recommended that on page 56 junction design, where car movements are required over pedestrian footpaths, dutch style kerbs are encouraged to support a levelled footpath.</p>	Public Space	Response as follows.	<p>Corner radii and visibility splays are being further revised currently in collaboration with Essex Highways and PJA. There may be the need for some flexibility within the design code for detail to be resolved at future stages.</p>
	<p>Page 60 public open space design, it may re-enforce the character of Harlow if the infrastructure/items for inclusion within larger nodes and the plaza include reference to the requirement for public art.</p>	Public Space	Update to design code.	<p>Integrated public art is already a requirement in the plaza but 'Art' added to neighbourhood node requirements too.</p>

Essex County Council Consultation Responses inc Place Services				
Event	Comment	Theme	Status	Note/ response/ action
	<p>05 Built Form</p> <p>This section outlines the block structure and density, building typologies, frontages and building lines and building heights of future development. The use of diagrams, illustrations and graphics aids the understanding of the requirements of this section. Further work could be done to encourage the use of high quality built form features in specific areas such as bay windows, porches, expressed gables, dormers etc.</p>	Built form	Update to design code.	This is a strategic design code and intended to inspire creativity and innovation. It would be expected that this level of information would come forward in a detailed design code where specific design features can be proposed in response to character areas and other factors. <b>Additional information on detailed design code requirements added to p7 under 'anticipated planning process'.</b>
	<p>Page 67 paragraph 5.10 states that buildings should not have flat roofs but one of the precedent images has a flat roof. Perhaps this could be re-phrased to discuss where flat roofs might be appropriate i.e. to address a key corner.</p>	Built form	Update to design code.	<b>The note is regarding flat roofs on larger buildings. For clarity, wording updated to: <i>Larger buildings must be carefully modulated to reduce the perceived bulk and extensive flat roofs on larger buildings should be avoided in order to prevent a dominant and bulky silhouette .</i></b>
	<p>On pages 70 and 71 (building line requirements) it would be helpful if graphics or illustrations demonstrating how each typology could be implemented would aid use of the code. If precedent images were to be used, it would be helpful to annotate these and show how they comply with the envisioned typologies/building lines.</p>	Built form	Update to design code.	<b>This section has been reviewed in response to CEG Hallam comments and design code testing and now focuses more on typologies than building lines.</b>
	<p>On page 73 where the site wide building heights strategy is provided, it may benefit the code to depict where height increases may be considered appropriate to distinguish corner buildings.</p>	Built form	Note	This was previously included but was considered too detailed and too confusing. Given the need for flexibility and a number of ways the design could come forward, this specific information has not need included.
	<p>06 Identity</p> <p>The identity section identifies how future development could employ wayfinding, sense of place and local character. The inclusion of this chapter is highly supported and the relevant sections set out clear requirements and expectations that will hold future development accountable to delivering high quality design that is anticipated by the NPPF.</p>		Note	Note.
	<p>On page 76 it would be good to understand why each precedent image has been selected. What is it about the images which creates the identity of Harlow Town Centre</p>		Note	This section is intended very high-level guidance to indicate the range of references that can be drawn from the context both in style and in terms of how these could influence proposals, from detailing through to the arrangement of built form around a space. It is anticipated that, with the appropriate expertise at future stages, there will be imaginative and creative responses that are not constricted by the design code. It should also be noted that there a number of existing references including the Essex Design Guide and the Harlow Design SPD.
	<p>On page 77 it is not clear how the high street image highlights focal points. There are also likely more images that could be shown to demonstrate the character of Epping.</p>	Identity	Note	See note above.

Essex Police Consultation Responses				
Event	Comment	Theme	Status	Note/ response/ action
	The DOCO would welcome further consultation on the new Master Plan. Essex Police considers that it is important that this specific development is designed incorporating the maximum achievable benefits of CrimePrevention Through Environmental Design (CPTED) for which Secured by Design (SBD) is the preferred enabler.	Framework masterplan/ stewardship	Wider planning matter	Design code developed to build in safety and security and specific points picked up below. Planning team to ensure that 'Secured by Design' (SBD) is achieved through the masterplanning process and later design stages. Strengthen DC points around SBD requirements as appropriate.
	At the appropriate stage of the process the DOCO would welcome the opportunity of working with the Developer/ Design Team to enhance the landscape and public realm spaces. It is important that such spaces should be designed with residents' and the community's safety in mind, whilst making all areas inclusive for all.	Nature	Wider planning matter	Refer to FAQs
	The DOCO would like to bring to your attention, the Home Office strategy of reducing 'Violence Against Women and Girls' (VAWG). The strategy aims to improve wellbeing and perception of crime for women and girls, thus ensuring their safety within their community. Therefore, it is recommended when designing new public realm and green spaces (inclusive of cycling, walking and play areas,) that consideration should be given to environmental design so that the community feel included, safe and comfortable using those spaces.	Nature	Note	Having reviewed the Home Office Strategy document, the design code is in line with therelevant spatial principles outlined in there (street lighting, safe transport etc)
	The DOCO welcomes the addition that play provision must be designed with the community in mind, (paragraph 4.154). This concept is supplemented in the Green Flag Safer Parks document: "Women and girls often do not feel safe in parks and so use them less. This is not just because they fear crime, whether that's rape, assault or harassment. They also feel uncomfortable, unwelcome and judged. Women are three times more likely than men to feel unsafe in parks during the day, and that gets worse after dark". Safer Parks Improving access for woman and girls (Safer Parks Executive Summary (greenflagaward.org)	Nature	Note	Note that 'safer parks' document is referenced on p62 under play and recreation.
	Allotments and food growing requirements are good for community (paragraph 2.19), involving residents will bring a sense of ownership and community cohesion. However, it is advised that these spaces are well maintained and looked after to prevent against crime and antisocial behavior.	Nature	Note	Noted.
	Walking and cycling access should be a prioritised with good cycle provision however It is advised the new routes are designed to be well lit, straight, and as wide as possible maximising on the opportunities for natural surveillance. Well-designed spaces will allow users to feel safe and secure while using the space throughout different times of day. Applying the methods of CPTED will support this	Nature	Note	Noted.
	Road Design and Layout: Consideration is requested to use the "Safe system approach" when designing local roads in and around the community. This will take into consideration the various road user groups who wish to access these roads. Essex Police would request that thought is given for the provision of Emergency Service Access throughout the Garden village (Paragraph 3.21) It is essential that emergency vehicles can gain rapid access to any incident occurring within the village and surrounding neighbourhoods.	Movement	Note	There is a balance to be struck between ease of access for emergency vehicles and limiting priority of vehicles over other users of the public realm. The movement strategy has been developed to ensure that an emergency vehicle can get within 20m of any building entrance. This is in line with building regs requirements that a fire tender must be able to get within 45m of the furthest point in any dwelling.
	20mph speed limits: Many local authorities are introducing 20mph limits to reduce road risk (Paragraph 3.32), and encourage active travel, and improve air quality. Essex Police would recommend liaison with our Roads Policing colleagues regarding this matter. It is vital that any enforcement strategies (such as parking enforcement and low speed limits) are self-policing and enforceable. Emergency Services should not be overburdened to overcome inadequacies in safety management, access control or enforcement.	Movement	Response as follows.	Detailed point - should be picked up at future stage(s). Noted that collaboration between Roads Policing and Highways is critical.
	Community mobility hubs (Paragraph 2.16) A sustainable transport infrastructure will be critical to the success and longevity of the new community at Latton Priory. We note the Mobility hub has indicated different requirements such as cycle maintenance, public toilets, and a café. The facilities will require a detailed management and maintenance plan in place prior to development. Mobility hubs need to be designed with the use of monitored CCTV, natural surveillance, and lighting to promote a safe and secure environment. Essex Police advocates the use for Secure By Design (SBD) Commercial as the preferred enabler to mitigate against crime. SBD Commercial provides a practical level of risk commensurate and sustainable security measures. Consideration is given to for the parking provision to achieve the British Parking association- Park Mark accreditation. A Park Mark is awarded to parking facilities that have met the requirements of a risk assessment conducted by the Police, meaning the operator has put in place measures that deter criminal activity and anti-social behaviour.	Movement	Update to design code.	<b>Have added wording to rule 3.19: Operation and long-term management of the community mobility hub must be considered at the early stages in order to ensure that the facilities are designed to meet operational requirements. This should include Secure By Design (SBD) Commercial accreditation . Rule 3.80 updated to: Security should be well considered including good lighting, motion-detection lighting and CCTV as appropriate. The facility should achieve British Association Parking 'Park Mark' accreditation.</b>
	Electric vehicle and cycle charging points (Paragraph 3.17) New technology surrounding this agenda brings new types of criminal activity, for example, theft of core cabling and anti-social behavior. Specially in relation to providing EV charging capability, it is advised that crime prevention measures for such provision are implemented at the earliest stages to mitigate opportunities for crime. The DOCO would recommend adopting the BPA Park Access Scheme. Park Access is a brand new accreditation that aims to provides safe and inclusive parking (via the Park Mark process) alongside electric vehicle charging facilities.	Movement	Response as follows.	Detailed point - should be picked up at future stage(s).
	Car Barns (Paragraphs 3.57 and 3.80) We welcome the inclusion that Car Barns should be overlooked with uniformed lighting and considerations for monitored CCTV and Security. As part of the process, we would welcome discussion regarding the Security specification of doors and what would be suitable for this site. It is imperative that all physical security components adopt industry approved standards are used to prevent against theft and damage to vehicles.	Movement	Response as follows.	Detailed point - should be picked up at future stage(s).
	Refuse and recycling requirements (Paragraph 3.84) We welcome the inclusion that bin stores for flats and non-residential premises should have integrated facilities, however the security will need to be to the same standard as the main entrance stores to prevent against anti-social behavior and arson.	Movement	Response as follows.	Detailed point - should be picked up at future stage(s).

Essex Police Consultation Responses				
Event	Comment	Theme	Status	Note/ response/ action
Essex Police	Neighbourhood Nodes, Pocket Parks and Community Plaza The design of these spaces will be crucial for safety vibrance and inclusivity for the new community. It is advised to take into consideration the reference to developing a safe and inclusive place for women and girls (VAWG as detailed in section 2). Neighbourhood nodes should aid wayfinding, this should supported by uniformed lighting and surveillance to allow users to feel safe using the facilities. Pocket parks should be well maintained and designed for their intended user to mitigate against opportunities for anti-social behavior. Careful consideration regarding the materials used for external furniture and aesthetics such as seating, planters, and play equipment, to ensure they are risk commensurate and fit for purpose i.e., vandal, graffiti, and arson resistant. Essex Police would propose that materials used for street furniture reflects the crime risk assessment and consider where appropriate additional security, risk commensurate measures. This will ensure that any street furniture can withstand multiple crime types and anti-social behaviour inclusive of anti-skateboarding measures.	Movement	Response as follows.	Detailed point - should be picked up at future stage(s).
	Community Plaza (Paragraph 4.146 and 4.147) The Community Plaza and multi purposes market space needs to be 'innovative and distinctive', however the building needs to be safe and secure using the CPTED principles and the Secure By Design Commercial guide. In the event of a critical incident, CCTV will be imperative and therefore welcome early discussions concerning the use, operational requirements, and accessibility. This will need to be embedded within contingency plans and overall policies and procedures.	Movement	Response as follows.	Detailed point - should be picked up at future stage(s).
	Public toilets (Paragraph 4.6) It is recommended that when designing public toilets that there are separate facilities for women and men rather than the unisex option, this is supported by Government research which has illustrated the following regarding the impact of unisex toilets in public buildings. "It is extremely important women can feel comfortable when using public facilities, so we are taking action to restore dignity and privacy at the centre of all future provision. These proposals will mean separate toilets for men and women, as well as self-contained toilets for those that need them, become a requirement for every new building across England. New building requirements for separate male and female toilets - GOV.UK (www.gov.uk)We would welcome consultation with the developer regarding the design and layout of public toilets.	Public Space	Response as follows.	Detailed point - should be picked up at future stage(s) - as part of inclusive and accessible design.
	Lighting (Paragraph 4.97) Lighting plays a pivotal role in deterring criminal activity, but also promotes a feeling of safety within that space. When designing both public and private space, (and when applied and designed correctly), lighting can reduce the potential for crime. It is imperative that the lighting provision must provide uniform illumination with due consideration given to the spill of light and ecological considerations. To evidence such requirements, we would recommend inclusion of detailed lighting design, evidencing current relevant standards and or relevant industry standards. Please note the DOCO does not advocate the use of bollard lighting as it does not provide a uniformed lighting source and should only be used for wayfinding. It is important that the landscape architect and lighting designers coordinate their plans to avoid conflict between lighting, planting strategies, CCTV, tree canopies and conservation. A sensitive approach is required to ensure that the lighting is incorporated in such a way that it does not impact on security, such as ensuring lighting does not provide any glare to the CCTV cameras. Light fittings should be protected where vulnerable to vandalism. Essex Police are cognisant of the proposed phased construction of the site, however, a project of this size and magnitude will require the lighting to be effective from the start, and not considered in isolation of various stages.	Public Space	Response as follows.	Detailed point - should be picked up at future stage(s), including through detailed design codes. Refer to draft EFDC Design code briefing note.
	Car free play (paragraph S6) Car free play spaces are advised to have a detailed management and maintenance plan (inclusive of landscape) in place prior to the development, this is to prevent against crime antisocial behavior. The space should also be designed for the intended use.	Public Space	Response as follows.	Detailed point - should be picked up at future stage(s), including through detailed design codes. Refer to draft EFDC Design code briefing note.
	Constructing well designed places, buildings and communities that promote both sustainable communities and health and wellbeing is an objective that the Essex Police DOCO widely supports; however, it is imperative that they must also be safe, secure, and accessible. Having a safe place to live with good community cohesion will have a positive effect on health whilst also building sustainable communities. Incorporating the principles of CPTED within the built form will allow for safer homes and community facilities which residents will feel secure living in.	Built form	Note	Noted.
	To support the opportunity for 'good quality homes' within Latton Priory, the Essex Police DOCO would advocate that all new development seeks to achieve SBD Homes accreditations. Security hardware (such as doors, windows, locks and cycle storage) should be risk commensurate and in line with industry approved security standards. Essex Police advocates the use of SBD Police Preferred specification status. Member companies / products have not only been tested to the relevant security standards but are also fully certified by an independent third-party certification, therefore proven to deter criminal activity and reduce crime.	Built form	Update to design code.	<b>Wording added to rule 1.23: Secure by Design accreditation should be achieved where relevant.</b>
	It is important to avoid the creation of windowless elevations and blank walls immediately adjacent to public spaces; this type of elevation, commonly at the end of a terrace, tends to attract graffiti, inappropriate loitering and potential anti-social behaviour. The provision of at least one window above ground floor level, where possible, will offer additional surveillance over the public area.	Built form	Note	Active frontages already included as a requirement.
	Where there is insufficient room to create defensible space between public and private space, an appropriate (non-destructive) climbing plant should be planted adjacent to the wall, or a finish applied to the wall that will allow easy removal of graffiti.	Built form	Update to design code.	<b>Rule added to p68: Where there is an absence of, or minimal defensible space between public and private space, anti-graffiti measures should be included, which may be through window placement, material selection or non- destructive climbing plants.</b>
	Flats and apartment are advised to have compartmentalisation fitted throughout the building; this will prevent non-residents entering the building unless invited whilst preventing crime and anti-social behavior. Connectivity across the development will require careful consideration to ensure the appropriate permeability and connectivity without infringing or compromising resident's security. Access and audio control is required for the flats, this will enable residents to see who they are letting into the building as well as monitoring if there was an incident. Essex Police do not advocate the use of Tradesperson or timed-release mechanisms on communal developments as they can facilitate unlawful access to developments. For further information regarding access control please see the Secure By Design Guide	Built form	Response as follows.	Detailed point - should be picked up at future stage(s).

Essex Police Consultation Responses				
Event	Comment	Theme	Status	Note/ response/ action
	We acknowledge the vision for creating variety, vibrancy and wayfinding into streets and open spaces. Creating a sense of place will enhance the community and promote a feeling of safety and security.	Identity	Note	Noted.
	The development is recommended to have good signage to allow residents and non-residents easy access to locations. Developments that promote intuitive wayfinding and enhance the passive surveillance of the street by residents within their homes and high levels of street activity are desirable as they have both been proven to deter criminal behaviour. Routes for pedestrians, cyclists and vehicles should be integrated and assist easy, intuitive wayfinding through the application of inclusive design by increasing activity and therefore natural surveillance, proven deterrents for crime and anti-social behaviour.	Identity	Note	Noted. This section and the movement and built form section all promote intuitive wayfinding and natural surveillance and activity. Signage is noted in public space requirements.
	Planting should not impede the opportunity for natural surveillance and wayfinding and must avoid the creation of potential hiding places.	Identity	Note	Noted. Detailed point - should be picked up at future stage(s).
	Bollard lighting is purely for wayfinding and can be easily obscured or damaged. It does not project sufficient light at the right height making it difficult to recognise facial features and as a result causes an increase in the fear of crime.	Identity	Note	Noted. Detailed point - should be picked up at future stage(s).
	Pathways should be as straight as possible, well lit and have natural surveillance.	Identity	Note	Noted.
	Academic research suggests that they Police Preferred Products support sustainability agendas as they are proven to last longer (due to the robustness of the product), and therefore reduce the developments carbon footprint. Products will have a longer life span and minimal maintenance whilst supporting the sustainable homes vision and objectives of the Latton Priory Garden village.	Resources	Response as follows.	Detailed point - should be picked up at future stage(s).
	The DOCO acknowledges the concept for future proofing housing and being able to adapt to future needs and lifestyles. Good design can help support future proofing and is crucial for housing longevity, however creating safe and secure homes will enhance the lifespan allowing homes to be designed for the future and not just for present day.	Resources	Response as follows.	Detailed point - should be picked up at future stage(s).
	Health and Wellbeing (Paragraph 7.13) Embedding 'Designing out Crime' principles can evidence Sustainability Objectives and Health Impact Assessment requirements, as developments that have mitigated against potential crime can see increased community engagement.	Resources	Update to design code.	Added as an amendment to Stewardship section as this ties in with the community engagement aspect. <b>P18, new rule 1.23 'Designing out Crime' principles should be embedded into the layout to mitigate against potential crime and increase community cohesion and engagement.</b>
	Adaptable spaces (Paragraph 7.15 and 7.16) Buildings and public realm spaces should be adaptable, however its critical to consider if the different functionalities will suit all of the buildings. There are mitigation methods available using the principles of CPTED to allow this function to work and to adapt to prevent crime and anti-social behavior.	Resources	Response as follows.	Detailed point - should be picked up at future stage(s).

National Bodies' Consultation Responses				
Event	Comment	Theme	Status	Note/ response/ action
Canal River	The trust have no waterways, assets or land interests within the area covered by the document and as such we have no comment to make.	Nature	Note	Noted.
	Given that there are no Main Rivers on site, and the development is within Flood Zone 1 in its entirety, we don't have any major flood risk or proximity to main river concerns. We would however like to emphasise and echo what is stated in the Strategic Design Code and ensure that SuDs are incorporated as much as possible. Retaining water onsite is important to ensure that flood risk to Main Rivers downstream of the site and those living near them is not increased and where possible, reduced.	Nature	Note	Noted.
Environment Agency	<b>Sustainable Drainage</b> It is good to see that run off rates will be reduced by 60% of present-day conditions. We would want to see this replicated across the whole site if possible. We are pleased to see that options to harvest rainwater such as rain gardens and SuDS tree pits are being looked at. We are also happy to see the incorporation permeable paving across the site, including for highways.	Nature	Note	Noted.
	<b>Future Schemes</b> Harlow, Kingsmoor Pluvial Flood Alleviation Scheme is to the west of the site. If hydraulically and hydrologically linked, drainage and surface run off from the site must work in tandem with this and other schemes and not compromise their function.	Nature	Wider planning matter.	This should be picked up at outline application stage.
	<b>Biodiversity</b> We are pleased to see that "the development proposes to deliver a minimum 10% Biodiversity Net Gain with the promotion of biodiversity to be explored at every opportunity".	Nature	Note	Noted.
	<b>Water Efficiency</b> The Epping Forest local plan also requires that new homes meet the 110 litres per person per day efficiency standard (Policy DM19, page 111). Policy SP2 in the Epping Forest Local Plan further states that any development proposals must positively respond to sustainable water management (paragraph xiv, page 33). The need and requirement for Latton Priory buildings to use water efficiently is clear. We would therefore expect to see explicit strategies for achieving this water use standard, or a more efficient value, in the HGGT masterplan. Strategies could include commitments for all new dwellings to have efficient water fittings and the installation of water butts, or installation of building- and/or neighbourhood-level SuDS schemes which increase the retention and/or recycling of rainwater. We would add that a project on the scale of HGGT represents a great opportunity for each new home to be built with greywater recycling systems, as such systems can be difficult to retrofit at an individual dwelling level. We would expect this to be integrated into Section 7 and potentially other sections too, as appropriate.	Resources	Note	There is a need to limit the scope of the design code in order to promote usability and focus. The nature section refers to the drainage hierarchy within the Essex SuDS design guide, which notes re-use as the highest priority. This information is also in the EFDC and HGGT Sustainability Guidance and checklist and therefore not repeated here.
	<b>Groundwater quality</b> This site is situated in a vulnerable groundwater area on a secondary bedrock and superficial aquifer and so any proposal will need to be dealt with in a way which protects the underlying groundwater. Please therefore take note of the following advice. Any potential developers should refer to the following (non-exhaustive) list of sources of information and advice in dealing with land affected by contamination, especially with respect to protection of the groundwater beneath the site (further details of comment not included here)	Nature	Wider planning matter.	This is detail that should be picked up separately at outline application stage.
	<b>Water Efficiency</b> The Epping Forest local plan also requires that new homes meet the 110 litres per person per day efficiency standard (Policy DM19, page 111). Policy SP2 in the Epping Forest Local Plan further states that any development proposals must positively respond to sustainable water management (paragraph xiv, page 33). The need and requirement for Latton Priory buildings to use water efficiently is clear. We would therefore expect to see explicit strategies for achieving this water use standard, or a more efficient value, in the HGGT masterplan. Strategies could include commitments for all new dwellings to have efficient water fittings and the installation of water butts, or installation of building- and/or neighbourhood-level SuDS schemes which increase the retention and/or recycling of rainwater. We would add that a project on the scale of HGGT represents a great opportunity for each new home to be built with greywater recycling systems, as such systems can be difficult to retrofit at an individual dwelling level. We would expect this to be integrated into Section 7 and potentially other sections too, as appropriate.	Resources	Note	There is a need to limit the scope of the design code in order to promote usability and focus. The nature section refers to the drainage hierarchy within the Essex SuDS design guide, which notes re-use as the highest priority. This information is also in the EFDC and HGGT Sustainability Guidance and checklist and therefore not repeated here.
Historic England	We welcome the production of this draft design code to inform the development and design as set out in the Latton Priory Masterplan. We do not wish to comment in detail on the design aspects of the code as it addresses the themes of the National Model Design Code. We have noted and are pleased to see the design code consider the positive aspects of Harlow New Town and surrounding areas to reinforce positive locally distinctive characteristics.	Identity	Note	Noted.
	However, we do wish to comment upon the emphasis placed on heritage and the historic environment within the document. We refer back to previous responses from Historic England (dated 26/01/23 and 17/03/23) which remains relevant and comprehensively set out the significance, setting and archaeological importance of both Latton Priory and Rye Hill Moat, as well as presenting heritage risks and opportunities for enhancement. As the document currently reads, we believe the significance and the contribution setting makes to the significance of the designated heritage assets has been downplayed. This presents a missed opportunity to incorporate the historic environment into the design of the new neighbourhood in a way that maximises the opportunities to enhance its character and the significance of the scheduled monuments, and avoids, mitigates or minimises any harm to their significance. For example, we note brief reference to these sites within the 'Site Context' chapter but believe this could be strengthened by providing an assessment of their significance and what they represent to the landscape and character. This could if necessary be included as an appendix.	Identity	Note	We have had to limit the scope of the design code to promote usability and focus, and it should also be noted that some of this information is contained elsewhere - e.g. in the EFDC Green Infrastructure Guidance. There is scope to include some specific information as noted below.
	We do recommend that the draft design code is therefore revised to reflect the significance of the scheduled monuments, for example preserving or enhancing key views and/or associated open spaces or watercourses. For example, in section 4 'Public Space', reference could be made to these sites to promote the importance of setting, management potential, and the rich heritage it has to offer the new neighbourhood character and landscape. We note in particular the designation of a play area in close proximity to the Rye Hill moated site and suggest that this offers an opportunity to intertwine play and heritage, and encourage the design of any play equipment to consider its setting.	Public Space	Update to design code.	<b>There are references to integration of heritage and this will be also explored as the proposals progress through the planning process. Additional wording has been added to rule 4.156: <i>The design of play equipment and the area around it must be positive, purposeful, bespoke and characterful. Design should draw on the site or more unexpected creative elements. Play areas close to heritage assets should explore the intertwining of play and heritage and equipment should be designed with consideration of the asset.</i></b>
	We also note that both the designated assets are shown as sited outside of the design code's red line boundary. We would recommend that the red line boundaries are consistent between the design code, masterplan, and any outline planning permission to ensure consistency and clarity for policy makers and developers.	Framework masterplan/ stewardship	Update to design code.	<b>Red line in diagrams is now consistent with site allocation.</b>

National Bodies' Consultation Responses				
Event	Comment	Theme	Status	Note/ response/ action
	In a broader point, we suggest researching examples of how scheduled monuments can be incorporated into development for betterment of the scheme, for example the moated site in Whomerley Wood, Stevenage or Priestly Wood, Alconbury.	Identity	Note	These are helpful references and will be useful in the review of proposals at future stages. Due to a need to limit the length and scope of the design code for usability, further references have not been included here.
National Highways	In relation to this proposed SDC, our principal interest will include safeguarding the operation of the Strategic Road Network (SRN) SRN routes within Essex, specifically within the Epping Forest DC area, these include M11 and M25, both of which run through the district council and provide access to the largest settlements in the area. The key themes of interest for National Highways will include the importance of Movement related to this document. The EFDC Local plan policy SP4 related to garden communities makes reference to the site – Latton Priory (SP4.1) which includes a number of set out criteria's including; (not listed here). National Highways is interested in the potential impact of the planned communities on the SRN network within the vicinity of the neighbourhoods and to what extent this has been considered.	Wider infrastructure	Wider planning matter.	This is a key issue and should be addressed in the wider planning process.
	The document provides a significant focus on sustainability in promoting new development and housing design as well as maximising the effectiveness of sustainable strategies by applying them early in the development process. Similarly, focuses on the importance of reducing the amount of car parking spaces and integrating sustainable and active modes of travel. National Highways supports the promotion of sustainable modes of travel within new developments as it reduces the impact of new developments within the vicinity of the SRN to have a significant impact on the local SRN network. Similarly, we support the promotion of the user hierarchy and the importance of prioritising sustainable modes of travel at the very top and reducing the reliance on motor traffic with the key to permeability being achieved through new developments in a way to minimise the need to travel and encouraging sustainable modes of travel that are easily accessible.	Movement	Note	Noted.
	Furthermore, National Highways supports the promotion of mixed-use developments and developments close to existing facilities as it reduces the impact of new developments within the vicinity of the SRN to have a significant impact on the local SRN network by reducing the potential trip generation.	Framework masterplan/ stewardship	Note	Noted.
	We would have liked to have seen more consideration into the interaction with the SRN when considering the movement and links into the local network and considerations of potential mitigations to be included at the design stage. We would like to be included in further discussions related to the Latton Priory development to understand the potential impacts of such a large development in close proximity to the SRN.	Wider infrastructure	Wider planning matter.	This is a key issue and should be addressed in the wider planning process.
	General The design code is welcomed by Sport England as it has embedded the principles in Sport England's (supported by Active Travel England and OHID) Active Design guidance <a href="https://www.sportengland.org/guidance-and-support/facilities-and-planning/design-and-cost-guidance/active-design">https://www.sportengland.org/guidance-and-support/facilities-and-planning/design-and-cost-guidance/active-design</a> which seek to create environments that encourage physical activity. It is also consistent with the current Essex Design Guide which has also embedded the Active Design principles. The majority of the content of the code is therefore supported and is considered to be an example of good practice. The following requests for amendments focus on how the design code could be enhanced further.	Design code usability and scope	Note	Noted.
How to Use the Design Code The clarity provided through the guide on what must or should be required provides clarity to developers and will help avoid potential misunderstandings about what is expected. The expectation that a compliance tracker should be completed by applicants is specifically welcomed as this is considered to be needed to transparently demonstrate that the design code has been fully considered by the applicant. Without this, there will be more onus on the local planning authority to interpret whether the design code has been fully considered which is difficult in practice given the resource requirements.	Design code usability and scope	Response as follows.	Compliance tracker will be produced to accompany the design code, as a follow-up piece of work.	
Planning Context Given that the detailed content of the code is considered to be consistent with Sport England's Active Design, it is requested that the Planning Context section of the code (or another suitable section) refers to the design code being aligned with the Active Design guidance. It is also suggested that the Active Design guidance be signposted to provide users of the code with detailed advice about how to ensure the development is designed to encourage physical activity.	Design code usability and scope	Update to design code.	<b>Reference to Sport England Active Design Guidance added on p18, p28, p62 (stewardship, movement and play and recreation)</b>	
Design Ambitions The design ambitions are welcomed as they would all contribute towards creating an environment which should encourage physical activity and thereby accord with the Active Design principles.	Design code usability and scope	Note	Noted.	
Framework Masterplan <ul style="list-style-type: none"> <li>Support is offered for ensuring Latton Priory is a walkable neighbourhood.</li> <li>The framework masterplan requirements are supported as they would support mixed use development and co-location of community facilities which encourages physical activity as well as supporting active travel routes to and from existing and new destinations.</li> <li>The framework masterplan layout is supported in principle due to the co-location of community facilities in a central location supported by a mobility hub, the neighbourhood nodes, the active travel route connections and the range of open space that is integrated into the layout and connected to the residential areas and community facilities. For consistency it is requested that "Sustainable transport corridor" is defined as "Sustainable Transport Corridor (Bus Rapid Transit/walking/cycling) as it has been in other diagrams in the document as this broader definition is more helpful.</li> <li>As well as showing the active travel routes that would link the development to the existing urban area of Harlow it is requested that the framework plan also show the opportunities for providing access by active travel modes to the countryside outside of the development for leisure purposes.</li> </ul>	Framework masterplan/ stewardship	Update to design code.	<b>Suggested clarification added to STC description in key</b>	

National Bodies' Consultation Responses				
Event	Comment	Theme	Status	Note/ response/ action
Sport England	<p>Stewardship Framework</p> <ul style="list-style-type: none"> <li>The focus on community engagement is welcomed as this is consistent with the Active Design guidance (See page 13 of the guidance about community engagement in relation to inclusive and equitable spaces and facilities).</li> <li>Community development initiatives are supported as these are needed to activate spaces for physical activity but this is often overlooked in practice after new developments are occupied. This is consistent with Principle 10 of the Active Design guidance which provides advice on this in relation to assets that support physical activity..</li> <li>The emphasis on designing to support future maintenance is welcomed as this will support the sustainability of the assets. This is consistent with Principle 9 of the Active Design guidance which provides advice on this in relation to assets that support physical activity.</li> </ul>	Framework masterplan/ stewardship	Note	Noted.
	<p>Green Infrastructure Framework</p> <ul style="list-style-type: none"> <li>Support for the emphasis in the site wide requirements for the focus on green infrastructure being multi-functional, safe and connected with active travel networks. These would all accord with the Active Design principles.</li> <li>Particular support for green infrastructure being designed to support access for all (section 2.8). However, it is requested that the examples include spaces that encourage use by women/girls and the elderly as well as dementia/neuro-diversity friendly spaces as the needs of these groups are often overlooked in the planning of green infrastructure.</li> <li>The expectations for the SANG in section 2.11 are welcomed as they would all support pedestrian access for recreational purposes.</li> </ul>	Nature	Note	Make space for girls and the need to design for all ages is addressed elsewhere.
	<ul style="list-style-type: none"> <li>The expectations for the new park in section 2.12 are welcomed as they would encourage informal physical activity. However, it is requested that section 2.12 makes it explicit that a pavilion will be required to be provided in the park. As well as being consistent with the proposal for this on the Framework Masterplan layout, a pavilion is needed to support the objectives set out in section 2.12. In particular, a pavilion can provide the necessary refreshment, toilet and meeting space that can provide a focal point for the community in the park and will influence whether some user groups visit the park and how long they will stay there.</li> </ul>	Nature	Update to design code.	<b>Wording for new park requirements updated to: The new park will extend the green wedge and will serve to attract visitors and provide social infrastructure that benefits new and existing communities, including a new pavilion .</b>
	<ul style="list-style-type: none"> <li>The sports pitch requirements in section 2.13 are generally supported including the requirement for shared facilities at the school to be explored as this is considered essential to help avoid potential duplication of facilities and to support their sustainable operation. However, it is requested that reference be made to facilities being designed in accordance with sports governing body (e.g. The FA, the ECB etc) recommendations as well as Sport England recommendations.</li> </ul>	Nature	Update to design code.	<b>Rule 2.13 updated to: Community sports grounds should be designed flexibly to support the needs of a range of ages and in line with Sport England and sports governing body recommendations.</b>
	<ul style="list-style-type: none"> <li>It is also requested that it is made explicit that a pavilion must be provided to support the pitches rather than reference being made to 'facilities may benefit from the provision of a sports pavilion'. A sports pavilion will be an essential ancillary facility to support the use of the pitches which must be provided by the developer. A pavilion would provide the changing rooms, toilets, equipment storage and refreshment facilities that would allow the pitches to be fit for purpose for community use and should not be considered as an option.</li> </ul>	Nature	Update to design code.	<b>2.16 reworded to: A sports pavilion must be provided, including publicly accessible toilets, changing, refreshment and storage facilities. This must be designed to minimise impact on views from the south.</b>
	<ul style="list-style-type: none"> <li>While maximising the opportunity for users of the sports pitches to access the site by active travel is welcomed it needs to be acknowledged that unlike the other open space typologies proposed in the development, the pitches will be formal in nature and will be used by people from outside of the local area especially 'away' teams and officials during times when public transport will be limited. Therefore there will be a need for car parking to be provided as part of the sports pitches to avoid parking overspill issue arising within the adjoining residential areas. It is therefore requested that there is an acknowledgement that an appropriate level of parking will be required to support the sports pitches to avoid a misinterpretation that parking will not be required if they are designed to be accessible by active travel modes.</li> </ul>	Nature	Update to design code.	<b>2.15 reworded to: Walking and cycling access must be prioritised, with ample cycle parking provision. An appropriate level of car parking should also be sensitively incorporated .</b>
	<ul style="list-style-type: none"> <li>It is queried why walking and cycling access to the sports pitches should be prioritised rather than must be prioritised in section 2.15 given the importance attached to prioritising active travel throughout the design code. It is therefore requested that this be reviewed.</li> </ul>	Nature	Update to design code.	<b>2.15 reworded to: Walking and cycling access must be prioritised, with ample cycle parking provision. An appropriate level of car parking should also be sensitively incorporated .</b>
	<ul style="list-style-type: none"> <li>In relation to boundary treatments around the sports pitches, it is requested that opportunities are explored for encouraging informal recreation around the periphery of the sports pitches and that the landscape is designed to support the use of the pitches e.g. gradients/bunds designed as natural viewing platforms.</li> </ul>	Nature	Note	In order to limit the scope and detail of this strategic design code, this can vbe picked up at future stages of the planning process.
	<ul style="list-style-type: none"> <li>The greenway and green finger requirements are supported especially the requirements to incorporate organic/natural play equipment and include focal amenity areas such as pocket parks as these will all support physical activity. The requirement in section 2.27 for green fingers to be supported by seating, cycle parking and lighting is welcomed. However, it is requested that these supporting facilities also be an explicit requirement of the greenways to avoid misinterpretation that they are not necessary for the greenways.</li> </ul>	Nature	Note	Greenway requirements covered in 'public space' section, p58.
	<ul style="list-style-type: none"> <li>The expectations in sections 2.39 and 2.42 that the wetland park should incorporate multi-functional uses such as play or recreation when dry and be designed to support access by active travel modes is welcomed as this would maximise the recreation potential of the park when appropriate.</li> </ul>	Nature	Note	Noted.
	<ul style="list-style-type: none"> <li>The expectation that SuDS will be integrated with other activities such as play and recreation is welcomed as SuDS can play an important role in providing a destination for people to walk/cycle to view or for informal play.</li> </ul>	Nature	Note	Noted.



National Bodies' Consultation Responses				
Event	Comment	Theme	Status	Note/ response/ action
	<p>Site-wide Sustainable Movement</p> <ul style="list-style-type: none"> <li>The soft measures are welcomed as activation of walking, cycling etc is often overlooked after the infrastructure is in place especially for groups that may not have the confidence to use these travel modes without support.</li> <li>The active travel network requirements are supported especially the measures to support safety and minimise gradients as these will support access to the network for all potential users.</li> <li>The site wide strategy plan for active travel is supported as this integrates active travel routes with all of the residential areas, community facilities and green infrastructure which will encourage physical activity in practice. For clarity, it is requested that the 'neighbourhood nodes' be shown on the key and that the mobility hub in the local centre is more clearly shown.</li> <li>The mobility hub requirements are supported especially the services and facilities proposed at the community hub as this would support use by all groups in the community.</li> </ul>	Movement	Update to design code.	Neighbourhood nodes, gateway spaces and community plaza added to key and mobility hub made clearer
	<p>Site Wide Vehicular Movement</p> <ul style="list-style-type: none"> <li>The proposal to limit vehicular crossings over the greenway and to limit vehicular access to the sides is welcomed on the basis that this would encourage walking/cycling.</li> </ul>	Movement	Note	Noted.
	<p>Site Wide Car Parking</p> <ul style="list-style-type: none"> <li>As set out above, it is requested that there is acknowledgement that car parking will be required to support the sports pitches and therefore advice on car parking requirements for the sports pitches should be considered to provide clarity of expectations for developers.</li> </ul>	Movement	Update to design code.	Further requirement added to site-wide parking as follows: <i>Destinations</i> Key destinations such as the SANG and sports pitches must provide appropriate levels of car parking that is sensitively integrated, with consideration for shared facilities to minimise provision .
	<p>Parking Design</p> <ul style="list-style-type: none"> <li>The on-plot and off-street cycle parking requirements in sections 3.46 and 3.54 are supported especially the requirement to make them more convenient and accessible than car parking.</li> </ul>	Movement	Note	Noted.
	<p>Public Space Strategy</p> <ul style="list-style-type: none"> <li>The public space requirements are welcomed especially sections 4.4-4.6 which require lighting, seating and public toilets to be provided to support public spaces as well as the requirement for active lifestyles and play-on-the-way to be embedded into the public space network.</li> </ul>	Public Space	Note	Noted.
	<p>Street Design</p> <ul style="list-style-type: none"> <li>The requirement in section 4.4 for seating to be incorporated at regular intervals and for cycleways to be 2 way and continuous on Latton Avenue is supported as this will encourage active travel along this strategically important travel route.</li> <li>Support is offered for play, recreation and SuDS being required to be integrated into the design of the Greenway as this will make the greenway more attractive for informal recreation.</li> <li>Car free play streets are welcomed especially as they provide space for seating, landscaping and social interaction as well as play and therefore would encourage use by all groups not just children.</li> </ul>	Public Space	Note	Noted.
	<p>Public Open Space Design</p> <ul style="list-style-type: none"> <li>The neighbourhood node and community plaza requirements are supported especially the infrastructure listed for the larger nodes in section 4.148. However, it is requested that the larger nodes and community plaza include a space that is suitable for informal play (and community events) that is unobstructed by landscaping, street furniture etc which may inhibit such physical activity.</li> </ul>	Public Space	Update to design code.	Additional point added under 4.14: <i>Area for informal play and community events unobstructed by fixed street furniture or landscape elements.</i> Additional element added under 4.148: <i>Space for informal play</i>
	<p>Play and Recreation</p> <ul style="list-style-type: none"> <li>The play strategy requirements are welcomed especially the expectation to integrate the play strategy with blue/green infrastructure and active travel, promoting connectivity with the wider community through new/improved links and requiring provision to be diverse. However, it is requested that a strategy for sport is incorporated into the play strategy given the need to consider the role of the community playing pitches and school facilities in meeting the development's sports needs and their contribution to the site wide public realm and green infrastructure.</li> </ul>	Public Space	Update to design code.	Requirement 4.152 reworded to: <b>A site-wide play, recreation and sport strategy must form part of the site-wide public realm strategy or design code. This must include play/ sport infrastructure shown on the play strategy diagram.</b>

North Weald Bassett Parish Council Consultation Responses				
Event	Comment	Theme	Status	Note/ response/ action
	However, there is one prevalent matter which will undoubtedly have an impact on our entire parish, and that is the matter of traffic. Whilst this response addresses a number of points within the Design Codes document, the Parish Council wish to emphasise that our main focus is that of traffic, and that without two fundamental key elements of the development being absolutely secured (those being the Sustainable Transport Corridor and a frequent, reliable, bus service to Epping), the knock on effect to neighbouring residents in Thornwood, North Weald, and Epping, will be both insufferable and inexcusable on the part of those involved.	Wider infrastructure	Wider planning matter	Refer to FAQs
	1. The 'Proposed Site Area' as referenced on page 8 of the draft codes (and subsequently throughout the document) differs to the Allocated Masterplan Area SP4.1 included within the Local Plan, and the Strategic Masterplan area detailed in the Strategic Masterplan Framework which has been adopted by EFDC (See Appendix 1). There is no explanation as to why this is the case, and this will cause confusion without either a full explanation being included within the Design Codes document, or consistent mapping.	Design code usability and scope	Response as follows.	Site boundary has been updated throughout the document to reflect the boundary shown in the adopted Local Plan site allocation, with clarification below key on opps and constraints page noting: * Reflects boundary of masterplan area allocation in adopted Local Plan 2023. This does not preclude improvements outside of the boundary shown.
	2. The Location Map key on page 8 uses some ambiguous wording as follows: <ul style="list-style-type: none"> <li>• It is unclear what the word 'Headquarters' is supposed to signify. The headquarters of what?</li> <li>• The word 'Community' sits just after 'Town Hall' which suggests the icon is supposed to reference the location of Town and Community halls, however the map on page 8 locates neither the Queens Hall Community Centre at the top of School Green Lane, nor the Hastingwood Village Hall located in Glovers Lane.</li> <li>• The key includes 'District parks/ nature reserves', however there are at least three nature reserves that are not identified on the map – Roughtalleys Wood, Church Lane Flood Meadow, and Weald Common Local Nature Reserve.</li> <li>• They key includes a thicker blue dashed line for 'New/improved infrastructure for enhanced cycling', however the extent of this line goes right down to The Plain junction in Epping, and it is our understanding that there will not be any improved cycling infrastructure along this route.</li> </ul> Furthermore, it includes a route cited on the map as being a 'potential future link to the North Weald Airfield Masterplan'. The thinner blue dashed line suggests 'Potential cycle connections on shared roads', which then adds to the confusion. These points all need clarifying, as at present they are confusing.	Design code usability and scope	Response as follows.	<b>Headquarters' is accompanied by 'significant employment areas'. Queens hall community centre and Hastingwood village hall added to map. Roughtalleys Wood, Church Lane Flood meadow and weald common nature reserve all now have labels and nature reserve icon.</b> Design code is advocating for improved cycling. If some improvements here, such as closure to through-traffic are made, then the whole route is improved. The wider cycle network is being explored separately to the design code work.
	3. The Opportunities and Constraints map on page 9 seems to have lost some of the topography lines on the northern edge of the masterplan area, specifically two parcels of land. These should be added. This also occurs on various other maps throughout the document. Furthermore, there is a yellow dot and dashed line on this map, however the key does not reference what this is.	Design code usability and scope	Response as follows.	Sun path added to key
	4. Page 8 includes an aerial view of Latton Priory strategic masterplan area, however the area marked in red is not the same as the strategic Masterplan Area set out within the Strategic Masterplan Framework. This needs to be rectified.	Design code usability and scope	Response as follows.	Site boundary has been updated throughout the document to reflect the boundary shown in the adopted Local Plan site allocation.
	5. The following paragraphs on page 16 are unclear. <b>Notes</b> included within this extract in red are added by the Parish Council to identify what parts are unclear and why. Purpose of the framework masterplan The framework masterplan ( <b>Does this mean the Design Codes Framework Masterplan?</b> ) illustrates the site-wide strategies and principles of the design code. It has been developed alongside the strategic design code ( <b>but it is included within, and as part of, the strategic design code so what does this mean?</b> ) and incorporates the mandatory spatial principles of the Strategic Masterplan Framework (see Appendix A) and site allocation. While this framework masterplan ( <b>presume this means the Design Code Framework Masterplan, or is does this mean the Strategic Masterplan Framework?</b> ) should be a consideration for future proposals, there is flexibility for detailed proposals to respond to technical analysis and employ innovative design to meet or exceed the design ambitions and other policy requirements. This is further confused by paragraph 1.6 on the same page which suggests that that 'Framework Masterplans' would accompany any future planning applications, without actually saying so. But then on the next page it shows the Framework Masterplan. It is, therefore, entirely unclear what the Framework Masterplan is / isn't. Further clarity is needed so this can be clearly interpreted.	Design code usability and scope	Response as follows.	<b>Wording amended in relevant paragraphs and rules on p16 to address these comments and provide further clarity.</b>
	6. Page 16 includes a paragraph which states that 'The masterplan could provide approx 1,500 dwellings across the site'. Where has this information come from, and why has it been included on the Design Codes document? The Local Plan does not reference this number of homes, nor does the Strategic Masterplan Framework. The only time we have seen this figure, is when it has been suggested by the developer. Therefore, without any evidence to back this up, this paragraph should not be included, and should be removed.	Framework masterplan/ stewardship	Response as follows.	<b>Wording to be changed to minimum of 1,050 homes with a note saying that densities should support sustainable transport infrastructure and other services. Additional site capacity would need to be assessed for environmental and infrastructure impact.</b>
	7. The maps on page 17 and 73 show a single proposed location for the gypsy and traveller site, however the Strategic Masterplan Framework provides for three possible site locations. Does this mean the Strategic Design Codes document now sets this as the final location, as there is also a note on the same page that says the location of the site is yet to be agreed. The map on page 85 and supporting text on page 84 states that all three locations are still a possibility. This needs to be clarified.	Framework masterplan/ stewardship	Wider planning matter	There are still three possible locations but one has been chosen to for the purposes of showing how the site-wide strategies could work. Final location is subject to detailed review and advice from relevant authorities.

North Weald Bassett Parish Council Consultation Responses				
Event	Comment	Theme	Status	Note/ response/ action
NWBPC	8. The map on page 17 also shows the Sustainable Transport Corridor (STC) simply leaving site and joining Fern Hill Road, which is an extremely narrow road. The HGGT Infrastructure Delivery Plan states under paragraph 3.5.2 that: 'The STC network will provide dedicated routes for public transport as well as cycling and walking.....These modes of travel are key interventions necessary to achieve the 60% modal split for the Garden Town communities . In the HIF bid to Homes England, sections of the STC network have been identified as forming part of the network to support the comprehensive and sustainable growth of the Garden Town. The Design Codes documents is proposing to place this route on road which simply cannot provide a dedicated route for public transport as well as cycling and walking. There is also no clear plan identified as to where the STC goes from that point forward. Does it simply adjoin existing routes? If so, this does not support the fundamental principle of the Garden Town in terms of providing a sustainable transport corridor.	Framework masterplan/ stewardship	Wider planning matter	Refer to FAQs
	9. The Framework Masterplan Key Map on pages 17, 27, 29, 41, 43, 63 and 75 does not include a reference to the yellow star, which it is presumed is a 'site feature', as detailed on the map on the same pages. In fact some of the stars have been removed from the map on page 27, 41 and 43, and the stars on the map on page 75 have no details next to them at all. This needs to be altered to ensure consistency.	Framework masterplan/ stewardship	Note	This is to reduce the amount of information on these pages for legibility. Given that these are noted in the key on earlier diagrams, the labels have not been added.
	10. Page 20, paragraph 2.1 sets out that Detailed design codes for site-wide coordinated green infrastructure and public realm must be provided and endorsed for the whole masterplan area in advance of, or at the same time as any full planning or Reserved Matters Application. However, it is understood there are a number of landowners for the site, and as such it is unclear how the requirements of the paragraph can be met. It is also unclear what is meant by 'full planning' application – does this refer to an Outline planning application too?	Process/ Policy inc Local Plan/ HGGT/ principle/ location of development	Response as follows.	Regardless of who is producing it, the EFDC planning process for Strategic Masterplan Areas requires design codes to be produced. Due to the government Pathfinders funding and support, part of that task on Latton Priory has been undertaken by EFDC, however the outstanding design code matters still need to be undertaken in the same manner they would have been had there not been an authority-led design code. This could happen in a number of ways, most likely by the site promoter's consultant team prior to any reserved matters applications. <b>A design code briefing note has been produced to provide further information and there may be further detail added in to the strategic design code regarding requirements for more detailed code elements.</b>
	11. It is suggested that there should be a change of wording in Paragraph 2.7 on page 25, detailing that 'Development must not 'extend south' of the ridgeline'.	Nature	Response as follows.	<b>Wording changed as suggested.</b>
	12. The document makes numerous references to 'key destinations', however there is no map included that identifies where these are located, both within and outside the development site. This results in some ambiguity on certain requirements within the document, specifically the active travel network requirements, as it will be essential for public transport to reach these 'key destinations'.	Design code usability and scope	Note	Key destinations outside the site shown on the map on p8. Within the site, noted on the plans as the local centre, schools and major facilities such as sports pitches and allotments.
	13. Paragraph 3.15 on page 30 states that bus stopping and waiting environments must be provided at neighbourhood mobility hubs, however the map on page 29 does not show a bus stop being located at the eastern mobility hub location. Is it intended that there should be a bus stop at this mobility hub?	Movement	Response as follows.	<b>Wording changed to: <i>Waiting environment and real time information, where the mobility hub is co-located with a bus stop.</i></b>
	14. The information on mobility hubs also on page 30 is quite confusing. Reference to is made to 'mobility hubs', 'neighbourhood mobility hubs', 'community mobility hubs', and later in the document 'mini mobility hubs'. Whilst this is clarified to some degree on page 84, this is 54 pages after mobility hubs are first introduced to the reader. Furthermore, the map keys simply refer to them as 'mobility hubs', and it is not until the map on page 91 that you understand where the different types of hubs are proposed. This is confusing.	Movement	Response as follows.	<b>Further clarity provided on p30, with neighbourhood mobility hubs renamed 'mini mobility hubs' for consistency and the following wording added: <i>A main community mobility hub will be located in the local centre. This will be supplemented by smaller 'mini mobility hubs' at key nodes as shown indicatively on the active travel strategy diagram on the previous page'.</i></b>
	15. The 'Neighbourhood node and other local social spaces' key reference / icon seems to be missing on pages 29, 33, 35 and 37, although it is marked on the maps.	Design code usability and scope	Response as follows.	<b>Icons added to key.</b>
	16. The Parish Council does not support the use of Car Barns. Car barns are said to be designed to locate parking remote from the home and to discourage car use over more sustainable modes of travel. Firstly, it should be noted that an electric car is a sustainable mode of travel. Secondly, they are a hub for both anti-social behaviour and crime, a matter that is accepted under page 39 paragraph 3.80. The Design Codes document suggests that car barns can more easily accommodate larger vehicles such as vans, however most van owners need their vehicles for work, and wish for the vans to be parked outside their homes for reasons of added security. Whilst it is acknowledged that the Latton Priory development is being designed in such a way to discourage car use, Car Barns would inevitably create their own problems, and we believe would not be used.	Movement	Note	Car barns are a critical component here in trying to achieve the mode shift targets. It is acknowledged that the design of them need to be very carefully considered to encourage use and ensure safety of people and the vehicles.
	17. The Parish Council has concerns regarding the prevalence of proposed rear parking courts. The Secured By Design Homes 2023 documents identifies under paragraph 16.3 that 'Rear parking courtyards are discouraged for the following reasons: • They introduce access to the vulnerable rear elevations of dwellings where the majority of burglary is perpetrated • In private developments such areas are often left unlit and therefore increase the fear of crime • Ungated courtyards provide areas of concealment which can encourage anti-social behaviour There is no reference within the draft design codes for the need to ensure Security By Design is considered and evidenced as part of any planning application, and this should be included as a 'Must'.	Movement	Note	The intention is to provide a balanced strategy to ensure that there is a variety of parking solutions and that the public realm is not overly dominated by vehicles. The risk posed by rear parking courts are minimised in the following ways: blocks are kept small and therefore parking courts will be small. Parking courts need to be overlooked and designed to minimise the fear of crime or anti-social behaviour. There are many examples of successful rear parking courts. E.g. Nansledan, Cornwall

North Weald Bassett Parish Council Consultation Responses				
Event	Comment	Theme	Status	Note/ response/ action
	18. Page 60 focuses on the Public open space design, however it is noted that there is no requirement to provide infrastructure for CCTV to be installed at these locations. This should be a mandatory requirement, and should be listed under paragraphs 4.148 and 4.145 to ensure adequate security measures are in place to support the community from the outset.	Public Space	Note	Further wording added around security of community plaza in line with Essex Police recommendations. It will not necessarily be practical or beneficial to have CCTV at all neighbourhood nodes as these would need monitoring. CCTV can also have a negative effect on spaces because it makes people more aware of the prospect of criminality and can make spaces feel more hostile. This can be reviewed at the detailed stages when the design of these spaces is reviewed.
	19. It is noted that the Local Character sections on page 76 and 77 make no mention of Thornwood Common, a small village located between the Latton Priory site and Epping. In fact, Thornwood Common is only identified once throughout the entire document on the map on page 8. It seems strange that no design inferences have been taken from Thornwood, given it is closer to the site than Epping. Is this correct?	Identity	Note	The local references are not necessarily related to proximity. Given that there is some distance between the Latton Priory site and Thornwood, it would make sense that Latton Priory has its own identity that draws on the best of Epping (as a District) and Harlow (as a District). References from Epping Town Centre are because they are characterful and distinctive examples in the District, just as Harlow references are not necessarily those areas closest to the site. These references are for inspiration and it will be down to designers to look at references and context in more detail.
	20. Paragraph 7.1 on page 78 regarding Energy Use states that 'Sustainability must be embedded at the earliest stage and that a sustainability consultant must be part of the project team from the masterplan stage.' Once again this use of the word 'masterplan' is confusing, as it is not clear what masterplan is being referred to. Can this be clarified?	Resources	Response as follows.	<b>Wording changes to: a sustainability consultant must be part of the project team at all stage s.</b>
	21. Whilst the draft design codes document frequently references 'play', there is very little, if any, wording focussed on ensuring activities and safe spaces / areas are provided for youths. The word 'play' seems illogical when referring to the activities of older teenagers, and we suggest some specific wording should be included to ensure this demographic are considered.	Public Space	Response as follows.	Play and recreation is intended to be aimed at all ages, not just very young children. This is indicated in the title 'play and recreation', plus wording around catering for all ages. <b>Further wording/ clarification added to rule 4.157: Provision must be diverse, ranging in scale, formality and user groups including differing abilities and neuro-diversity. The needs of women and girls and older children/ teenagers must be specifically considered.'</b>
	There are some very positive elements in the Design Codes document, and we hope that you find the comments above of some use. However there are also elements of the document that are quite confusing and hard to read / understand. The mapping is quite complex, with many elements overlaid on each particular map, making it quite hard to decipher. The Design Codes are very specific, which may be a good thing, however it is not clear what further design codes are required to be produced if these are so specific. However much of what is included does not address the current concerns of the Parish Council, those being: <ul style="list-style-type: none"> <li>• The quantum of extra traffic that will be generated by this development alongside all the other developments in both the Harlow and Epping Forest Local Plans, and the affect on our residents due to traffic congestion</li> <li>• How all this traffic will affect The Plain junction in Epping, given its surrounding constraints, and the resultant effect on both the B1393 and B181.</li> <li>• The current lack of a firm plan for when and where additional public transport (buses) will be coming through Thornwood.</li> <li>• What the plan is for Rye Hill Road, and if this includes 'stopping up', what does that mean for traffic going through both the new Latton Priory Development and/or Epping Upland / Upland Road.</li> <li>• Uncertainties around the route of the Sustainable Transport Corridor, and when this will be implemented.</li> </ul>	Wider infrastructure	Wider planning matter	Refer to FAQs

HGGT Members' Consultation Responses				
Event	Comment	Theme	Status	Note/ response/ action
	We have seen problems in Old Harlow and Newhall with developers failing to provide the public assets that they promised to install. What strategy are you planning to implement to ensure that the public services infrastructure (School, Surgeries, pharmacy etc) will be provided early on in the project. Sticking bits in as almost an afterthought is not acceptable under any circumstances.	Delivery	Wider planning matter	Agree that we want to avoid that, that is why we have an up to date adopted Local Plan, an endorsed Latton Priory Strategic Masterplan, and are discussing the Design Code as well. We also have an Infrastructure Delivery Plan, working with Essex County Council and other HGGT partners and stakeholders to ensure we bring infrastructure along and ensure it is delivered at the right time; the Garden Town partner authorities are ambitious about modal shift, and bringing around developments that we can be proud of. The Design Code is also focused on ensuring that there is policy and devices that can be used to hold applicants and developers to account on design and placeshaping quality, and deliver in a timely and relevant fashion.
	Control of vehicular movement sounds good; car barns is a novel idea. What evidence exists to show that drivers are likely to be enthusiastic?	Movement	Response as follows.	In the wider context, what we are aiming for on all the Garden Town sites, does require ambitious design at every scale in order to embed a culture that is different to the status quo. So if people are used to having cars outside their home window, then car barns will require a slight shift in mindset in that regard. Car barns will provide protection from the elements, and we do think that they can help to be a design solution for a number of issues where car parking design may be detrimental to placeshaping, and where we are not seeking for cars to be the most convenient. option and yet recognise that people do still need them. There are examples in Europe and it is becoming more prevalent in this country, and we think there is scope for them to be an important contributor to the scheme and overall modal shift strategy
	Interested in personal accessibility issues, e.g., those in wheelchairs or using sticks, or those who are deaf etc. I notice there is nothing specific on this in document apart from p.15 of presentation which notes movement network that is accessible to all and in relation to site topography. So my comments include: Shared surfaces are an issue, for guide dogs for example. Clear spaces on pavements and squares and shopping areas, in the document there are illustrations showing trees, benches, tables and chairs, which are good providing they are in managed areas and there is clear space for those with visual impairments or other to access. You have mentioned topography and gradients are extremely important, avoiding stairs.	Public Space	Response as follows.	The public space section looks at various aspects of accessible and inclusive places and was partly informed by consultation with a group of older people. This includes measures such as continuous pavements without vehicle crossovers to at least one side of the street on key routes. These comments are helpful in further informing this aspect eg reviewing the requirement for shared surface when it may be more appropriate to introduce a low kerb. <b>Where shared surfaces are utilised, these are on low traffic streets. For neighbourhood streets, wording has been amended to: 4.42 Neighbourhood streets should be level surface with a change of material for pedestrian footways and shared-surface crossing zones to indicate pedestrian priority. Kerbs should be detectable by people with impaired vision. This will be considered further once detailed proposals are received.</b>
	Sustainable transport and modal shift is a key feature for the Garden Town, however most public buildings will require vehicle access for people who are disabled. Need short distances and accessible parking/ drop off for those who are disabled, and need to consider this for school buildings	Movement	Response as follows	This will be considered in conjunction with the updated EPOA parking standards at the planning application stage when parking quantum is proposed based on assessed need including blue badge holder spaces.
	Open space and streets require landmarks for legibility for those with access issues. The consultation document also needs to be available in different and accessible formats. 17% of the population of Harlow do not have access to IT, so also need to consider non-digital forms of consultation.	Identity	Response as follows	landmarks for wayfinding, legibility and character/ placemaking are addressed in the Identity and Public Space sections. The comments on consultation are also welcome – we will be undertaken a hybrid consultation (both digital and in person access) and will be learning from successes and challenges of previous consultations too. However, if there are further specific accessibility points which can be built into our consultation plan then we welcome these too.
	What has been noted on health facilities such as surgeries, pharmacies is important, but won't be in the gift of developers. An early assessment of how they will be provided will be necessary, the developers can build the building for you, but they won't be able to provide the staff, the doctors etc. So early discussion with the health authority is needed.	Delivery	Wider planning matter	In terms of health facilities and provision, that conversation is ongoing with the West Essex and Herts ICB, and we will continue to provide updates on this once we have further confirmation on requirements and need from the ICB.
	Like the idea of the car barns, but we mustn't forget elderly people in their late 80s who still drive a car. They may not be able to walk to a car barn or be fit enough to go on public transport but the use of a car parked next to their house enables them to travel and carry on with their lives. If we are building housing for all ages, then we need to consider the elderly too.	Movement	Response as follows	Car barns are not intended to be the sole parking provision, however they may help to deal with households that require more than one parking space (they may have on street, and one in car barn) or for oversized vehicles rather than creating bigger spaces on the street. But we acknowledge the need for cars, and the intention is not to get rid of them but accommodate them in a way that is balanced. The other side of the coin is that there are a number of elderly people who can't drive any more for various reasons and actually the dominance of cars may preclude them from making trips safely and comfortably so we believe we need to find the balance and be sensitive to these different needs.
	You noted that individual parts will have access to the main avenue; cul-de-sacs which tend to be separated don't have good local feeling within them as they don't have access to other roads and neighbouring properties to give them a sense of community. So I think it's important to look at how a sense of community is established on smaller roads, and how these may link to the main avenue.	Movement	Note	We are not looking to build in cul-de-sacs into the development – that diagram is showing car movement, but on the active travel diagram there is permeability right through and we are hoping that helps to foster community as there will be streets where neighbours can come out and engage with each other without cars speeding through every street. This was a key point that the QRP picked up on, bringing the cul-de-sac feeling of not having vehicles running through but having a permeable network for walking and cycling (active travel).
	Thank you for the good presentation, and I want to draw us back to the document that is before us tonight. Page 15 the drawing is a bit confusing, with the coloured dots and the keys for different elements. I think we should show the Sustainable Transport Corridor clearly on these diagrams. On p16 the primary bus route is shown as going to Rye Hill Road, but I thought this road was likely to be closed off, around the access to Dorrington Farm? Without having the Sustainable Transport Corridors on there, it's not clear if the bus is ending there, looping around, where this route is going etc	Movement	Response as follows.	Two separate types of bus service, the rapid service which uses the STC and there will be other buses serving the development which may use Rye Hill Road to link in with existing neighbourhoods much like an ordinary service bus. ECC are looking at closing Rye Hill Road to the south of the development so that it is not a through road anymore, otherwise it would attract a large number of vehicles going out onto an unsuitable road (B1393). <b>Graphics of drawings have been updated to promote clarity/ ease of use.</b>
	EFDC has around 97% connectivity to broadband across the district. Part of the design strategy is to ensure that new developments are linked in to the most up to date fibre broadband infrastructure that can be provided.	Delivery	Note	
	Will car barns facilitate EV charging? Will they be shared space, will you need to book a space to access them?	Movement	Response as follows	Yes EV charging is included, with access to EV charging for all parking spaces and the car barns offer an opportunity to provide EV charging in a consolidated way. EV charging is also incorporated into the street design in a way that doesn't block other functions or create accessibility issues.

HGGT Members' Consultation Responses				
Event	Comment	Theme	Status	Note/ response/ action
	It isn't clear to me how the road network here is going to work, it appears that most of the traffic from the development is going to be going north into Harlow via Rye Hill Road, when we know this road network is already at capacity. Can more work be done to design road layout to push traffic towards London Road (B1393) to relieve Harlow's road network?	Wider infrastructure	Wider planning matter	We have a parallel piece of work underway in regard to transport and travel related infrastructure, within the context of this proposed new garden neighbourhood. This evening is an opportunity to look at the design code, so I suggest that rather than discuss in detail the transport and wider road network conversation this evening, we can capture those comments and when we reconvene on sustainable transport corridor, those challenges and questions and observations are responded to. The access points onto Rye Hill Road, and the connection onto London Road are spatial design fixes as per the Latton Priory Strategic Masterplan Framework. The Design Code doesn't look to amend those, and so it may be more applicable to address in the wider transport forum. The main route in and out of the site for cars is considered will be via London Road, and sustainability is key in getting people out of their cars and helping people to make sustainable transport choices into and around Harlow. The closure of Rye Hill Road will mean this is no longer a feasible shortcut out of Harlow, and those people doing that will now need to travel via the main road network. The developer for the site will also be undertaking a transport assessment which will identify much more clearly the traffic and capacity points.
	Plans suggest the STC link simply goes onto Fern Hill Lane - will this be correct, and should the plans detail a little more about what the STC will look like and what, if any, improvements will there be to the road network? If this could just be clarified please.	Wider infrastructure	Wider planning matter	This will be picked up during the further detailed design discussions/ Member briefing on the Centre – South STC due to take place in the coming months. Refer to FAQs.
	On p.12, there are 6 variations of the colour green, and it is difficult to read with the key. Also on that page, the wetland park edge, it doesn't seem to link up to anything and what exactly is the wetland park edge?	Nature	Response as follows	Point taken on the clarity of diagrams, we will look to review. The wetland park edge is where the attenuation basins for the SuDs are located, and what we are trying to ensure through the design code is that those are multi-functional in that they are also used as amenity and to inform character, and better biodiversity and work with the play strategy. To note, the presentation that we are referring to today shows extracts of the design code, it is not the full design code document, which does go into detail about what is contained within these areas. <b>Graphics of diagrams have been reviewed to promote legibility and usability.</b>
	We have concerns around the separation of cyclists and walkers, if you get lots of people travelling actively you end up with hundred of bikes, including fast electric bikes and e-scooters, and there is risk of conflict between pedestrians and cyclists. So there needs to be consideration of this in the design of these streets. This is also the case for play streets being made, but we need to think carefully about how cyclists move through these spaces for safety reasons. Have you also considered parking for cycles? Will there be special areas, for example in the car barns?	Movement	Response as follows	Within the Design Code itself we have street design for all the main street types, and Latton Avenue itself, the main route through, will have separate cycle lanes (from pedestrians and cars) which follows government guidance LTN 1-20 which requires separation. This is also the case on the Greenway. On the smaller streets there are instances where cyclists and walkers are sharing a space, but that is calculated on the basis of how busy that street is likely to be. There is also a balance that needs to be struck between overall street widths and placeshaping at a human scale: if you put separated two way cycle lanes on each side of a road you end up with very wide streets, and as building height is limited on this site (due to visibility of the site because of its topography) you achieve a less proportionate space. On cycle parking, this is discussed as a requirement for homes and in shared facilities and also visitor cycle parking in the public spaces as well.
	Is Rye Hill Road closure a done deal? your comment was rather concerning, who has agreed to closing it?	Wider infrastructure	Wider planning matter	With the level of growth the development will generate keeping it open as a short cut to Epping and the tube will be unacceptable from transport terms due to width/alignment and the poor junction onto London Road alongside as I mentioned existing use. It will need a TRO, so it's not a done deal in that sense, but from at least a highways perspective it's considered necessary - note walkers and cyclists would be able to use it as a safe route. Obviously happy to discuss further.

HGGT Developer Forum Workshop Feedback				
Event	Comment	Theme	Status	Note/ response/ action
	It could be that the good practice in the design code also has better viability returns, in which case it could be a win-win scenario.	Miscellaneous	Note	Note
	Support for active travel and wider benefits (e.g. reduced costs to NHS)	Movement	Note	Note
	Lots of great measures shown such as modal filters and car barns, One key principle is how can you fit everything in that you might need to fit in? Do you think anything should be left out? When land is money, what should you prioritise when you need to prioritize? Another instance of flexibility changing ideologies over time is Cuthley, where monies were secured for overloaded junctions. The funds were then reviewed after three years and determined to be best used for active travel. Conducting an annual review of the code as it progresses through the development cycle and different phases will be beneficial to determining whether it remains fit for purpose.	Process/ Policy	Response as follows.	The design code is designed to be sufficiently flexible, but also in promoting a compact, sustainable form of development, increases space available for more extensive green infrastructure etc. There will be timelines/ mechanisms put into place for review of the design code as the masterplan continues through the planning process and through delivery. This will be part of a 'design code briefing note' separate to the Latton Priory Strategic Design Code'.
	Developer concerns – will they sell if less parking provision? Smaller blocks need play street and a parking court. Does it work?	Public Space	Response as follows.	Typical or historic parking provision does need to be addressed in order to build sustainably and achieve the modal shift targets. The design code aims to provide balance as well as adaptability for changing mobility trends in the future. It also seeks to ensure that the benefits of reduced space for cars is identified in a much higher quality of public realm that is focused on people and nature.
	Good to see school right by mobility hub so kids can get the bus. Will reduce car use. Mixed-use and schools reduces trips and encourages internal trips by active travel.	Movement	Note	Note
	Will the code consider any changes to reflect the recent EPOA parking consultation? Everyone needs to be on the same page regarding parking, and that the code doesn't conflict with new regulations.	Movement	Response as follows.	The design code is very much in line with the draft EPO parking standards (Part 2), particularly in relation to strategic planning e.g. limiting the access of vehicles, managing volume and speed in 'human scale' spaces and use of filtered permeability. The two documents also align in their preference for unallocated off plot parking as a preference to on-plot and the need to future proof and build in adaptability. The design code has slightly more (site-specific) detail regarding what parking solutions are acceptable in different locations or relating to different building typologies. Parking numbers are not dealt with in the design code and therefore alignment will require further interrogation as the outline and detailed applications are reviewed. Also note that the EPOA parking standards for garden communities are currently in draft form and therefore this should be reviewed again once they have been updated.
	Having primary and secondary education on site might lead you to think you're internalizing trips. There might be a wider catchment for the secondary school than just the people living on that site. It's therefore important to consider options to promote healthy living, including strategies that are more wide-ranging, like a built environment planning approach.	Movement	Response as follows.	The SMF and design code seek to ensure high quality modal choice throughout
	Some local employment – more walking, may encourage others to walk.	Delivery	Note	Note
	Need to restrict parking by school and shopping centre.	Movement	Response as follows.	Parking quantum will need to be evidence based and reviewed through the planning process.
	With regard to the guidance, we discussed, in particular, aspects like the fact that it provides certainty, but it also needs to strike the right balance between the number of musts or shoulds because if there are too many shoulds, it won't have enough bite, it might not have enough bite. A developer is almost in a straight jacket if there are too many musts. As a result, we acknowledged the importance of striking the right balance.	Design code usability and scope	Response as follows.	<b>Musts and shoulds have been reviewed to ensure that the design code focus and priorities are clear and that appropriate flexibility is built in.</b>
	Could be helpful to have a contact list for who to get in touch with for more information.	Design code usability and scope	Response as follows.	As this may change and the design code may be in use for many years, this can be dealt with through the planning process.
	Would the likelihood of a planning application being approved be higher if this code is followed to the letter? Is there member buy-in? Again, this has to do with certainty, and will following this code result in a promotion that is approved by members at a later stage?	Process/ Policy	Response as follows.	The intention is that the design code makes the planning process smoother at latter stages by clearly setting out aspirations and expectations that reflect local policy and guidance. Member consultation has been a part of the process of developing the code.
	How does the work around this code flow through to the later stages of applications so all members of the planning departments are on board?	Process/ Policy	Response as follows.	The use of the design code will be supported by the production of a compliance tracker. As the design code use commences in the assessment of schemes further training or tools will be considered.
	The unforeseen implications that can arise when rules are applied is interesting. Someone mentioned that there was a rule in another code somewhere else in Bishop's Stortford where there were unintended consequences of a particular requirement. My understanding is that there was a coding that prevented cars from reversing on public highways. A result was an increase in parking courtyards, which wasn't necessarily a good thing.	Process/ Policy	Response as follows.	There will be timelines/ mechanisms put into place for review of the design code as the masterplan continues through the planning process and through delivery. This will be part of a 'design code briefing note' separate to the Latton Priory Strategic Design Code'.
	Design code testing by architects is a really positive thing.	Miscellaneous	Note	Note
	We've discussed whether we could use one of these forums to do a trip around Harlow to see how some of the new developments and how some of the older developments have been built and how they relate to the code.	Engagement	Response as follows.	This should be arranged by HGGT in future.
	Looking at the design code documents, we were pleased to see that it includes a guide on how to use this document, which we think is very important since not everyone is a professional. The document outlines how you should proceed through it in a very helpful manner.	Design code usability and scope	Note	Note
	The size of the design code document isn't off-putting. Design code documents matter in terms of size. There are a lot of used to store stops collecting dust, and this is one I think is usable. You can pick it up, flick through, use it, and put it back on the shelf at 90 pages.	Design code usability and scope	Note	Note

HGGT dev Forum workshop transcript and post-it-notes

HGGT Developer Forum Workshop Feedback				
Event	Comment	Theme	Status	Note/ response/ action
Persimmon Homes (partner developer at Water Lane Masterplan Area)	Overall, Persimmon Homes supports the use of Design Codes in delivering Strategic Sites; and have recently assisted East Herts District Council in preparing a Design Code to guide development in Bishops Stortford (though we would perhaps caveat that, in our recent experience, it is preferable for Design Codes to allow a degree of flexibility overall in terms of design). The approach taken in the draft Design Code will ensure a high-quality, sustainable and coordinated design is delivered. However, we would welcome the opportunity to identify some areas of concern, which if applied to the Water Lane Design Code, we would challenge and where implementation could become difficult.	Design code usability and scope	Note	Note
	Urban Greening Factor It is noted that one of the requirements of the Green Infrastructure Framework is that "Public realm proposals must demonstrate how the Urban Greening Factor (UGF) has been maximised and how development areas will meet or exceed a UGF score of 0.5." Persimmon Homes supports this principle; however, we would suggest changing the "must" to "should" to allow for discrepancies in assessment, with the comfort that mandatory BNG requirements will ensure that a 10% net gain is achieved in any event. We note that London Plan Policy G5 sets the standards at 0.4 for predominantly residential development, so whilst aiming for 0.5 is admirable, it should be a target rather than a requirement, to ensure development is viable and to prevent barriers to development.	Nature	Response as follows.	UGF is becoming increasingly common as a way of measuring quality and quantity of green infrastructure. Natural England have developed an urban greening factor for England and local authorities are encouraged to positively set standards and promote delivery. Their recommendation is a UGF of 0.5 for residential greenfield development. Given that on top of this being a greenfield development, it is also part of a Garden Town with Green Infrastructure and sustainability at the heart of its principles, this requirement is entirely appropriate at the strategic and detailed scale. More information can be found here: <a href="https://designatedsites.naturalengland.org.uk/GreenInfrastructure/downloads/Green%20Infrastructure%20Standards%20for%20England%20Summary%20v1.1.pdf">https://designatedsites.naturalengland.org.uk/GreenInfrastructure/downloads/Green%20Infrastructure%20Standards%20for%20England%20Summary%20v1.1.pdf</a>
	Vehicular access should be limited to three sides of any development block or two sides plus a rear parking court: Persimmon Homes welcomes the Council's aspirations for a modal transition to sustainable transport and understands the responsibility as a housebuilder to encourage the shift in attitudes towards integrating sustainable transport into everyday journeys. However, it is important to ensure that the requirements accord with Chapter 11 of the NPPF "Making efficient use of land" by ensuring that the layout requirements do not result in less than optimum densities being delivered. It is therefore suggested that the "should" is amended to "could".	Movement	Response as follows.	It is unclear how the design code will result in less than optimum densities. The design code encourages compact walkable blocks that maximise density whilst providing for a high-quality public realm in line with the Garden Town and District Vision for the new community. To clarify, it is expected that all side of the development block will have housing (where it is a residential block), however some homes will not have car parking or car movement directly outside their front doors.
	Car Barns: It is noted that Car Barns are referred to in the National Model Design Code that was recently endorsed by the Levelling-up and Regeneration Act 2023 Chapter 5 26th October 2023. However, this is just one of many solutions, and should not be relied on too heavily. In practice, implementing car barns are difficult, and our concern is that with less natural surveillance, they have the potential to increase criminal activity and therefore be less attractive to prospective purchasers. We therefore look forward to working with the Local Authority during the production of the Water Lane Design Code and identifying successful measures that we have incorporated on our developments elsewhere which, in our opinion, represent a better solution than Car Barns.	Movement	Response as follows.	Parking barns are proposed for extra vehicles where households have more than one space or larger vehicles to accommodate. This is part of a balance and future-proofed adaptable parking strategy. The design code sets out key requirements for ensuring that the parking barns are designed in such a way to mitigate concerns.



CEG/ Hallam Consultation Responses				
Event	Comment	Theme	Status	Note/ response/ action
	The draft Design Code varies from the SMF in a number of places and we consider there needs to be greater consistency between the endorsed SMF and the draft Design Code. The two documents should work in tandem and not conflict/contradict each other and it should be clear that the Code is building on the Mandatory Spatial Principles set out within the SMF. This is particularly important to ensure it can deliver on its intent to be a clear and accessible design tool for all those involved in the development of planning applications for the site.	Process/ Policy	Note	See responses below to detailed comments
	Clarity on the role and purpose of the Code and other steps in the planning process is key for future developers. Currently, the anticipated planning process is depicted in a diagram on p7. This is showing the Strategic Design Code feeding sequentially into the Outline Planning Application and Detailed Design Code(s), as parallel processes and for those two outputs to feed into Reserved Matters Applications. Whilst the outputs of those exercise(s) will feed into Reserved Matters Applications, the timing of the preparation of any future Code(s) will take place subsequent to any outline application approval. Moreover, the existence of a Strategic Design Code, with the detailed content as included in the draft version will also inform the RMAs (not currently clear in the flow chart), and more importantly, should help minimise the need for further and additional steps in the design process/future Design Code(s). This will then allow RMAs to come forward in a timely manner to enable the delivery of much needed houses in the district in accordance with the anticipated trajectory for completion of the development within the Plan period (by 2033).	Process/ Policy	Response as follows.	The diagram is intended to show process not just for Latton Priory but also for other Strategic Masterplan Sites. As noted, it is an anticipated planning process and there are a number of ways that codes/ planning applications could come forward. The diagram does not preclude a detailed code being produced subsequent to an outline approval or after it. A point of clarification has been added to the diagram noting that* approval of outline application is not dependent or reliant on the prior endorsement of the strategic or any detailed design codes. Whilst the the strategic design code does contain some detailed points, these are strategic points. There is still a requirement for coordination of detailed elements such as lighting, public realm material palettes, play and planting prior to the approval of any reserved matters applications. An explanatory note will be produced to clarify this point. <b>Clarification added to p7</b>
	The SMF includes an illustrative masterplan framework and the draft Design Code also includes a number of illustrative plans. There is a note on p5 of the Design Code which advises that: "All diagrams and images, unless stated otherwise, are illustrative and depict how the requirements of the code could [our emphasis] be brought forward on the site". We, therefore, understand from this that the plans and diagrams in the document are not "set in stone" and have a degree of flexibility in how they are interpreted, followed and ultimately implemented. We also note (on page 3) that the Design Code will "allow for creativity, variety and innovation in future proposals". Furthermore, the glossary states that "The framework masterplan is diagrammatic and illustrates the site-wide strategies and principles of the design code. It illustrates how the design code requirements can be delivered whilst allowing flexibility for innovation and creativity in detailed design proposals". This statement needs to be clear and upfront in the Design Code document.	Design code usability and scope	Response as follows.	<b>Exact wording from glossary as noted here added again on p4 under 'content of the code' and framework masterplan/ land use.</b>
	The document contains a number of "musts". In many cases, this is acceptable and to be encouraged to ensure a high quality design. However, there are a number of areas where it is considered that the "musts" should be changed to "should" to allow a greater degree of flexibility, particularly when the design goes to greater detail and to make the users understand the true priorities.	Design code usability and scope	Response as follows.	DLUHC and the National Model Design Code is very clear on the purpose of design codes and the terminology that should be used. The terminology has been carefully considered to ensure that the design code has the required robustness and avoids vagueness. It should also be noted that 'should' requirements are still requirements. There is scope for diverging from these for technical reasons or because an alternative proposal would better meet the aims but this would need to be robustly justified. <b>Wording has been added to the first section to clarify that. That said, the number of requirements overall has been reduced.</b>
	The draft Design Code shows requirements for street typologies (eg. Play streets, quiet active travel routes, car free streets alongside green corridors) as well as detail on parking solutions (eg. rear parking courts and car barns). Whilst some of these approaches are supported in principle, this is an area where a degree of flexibility is needed to ensure deliverability by housebuilders and once all the constraints are understood and further detailed design has taken place.	Design code usability and scope	Note	See responses below to detailed comments
	We understand that Jas Bhalla Architects have been appointed to undertake testing to help refine the usability/deliverability of the code and requirements within it and which is of key importance, particularly where the Code is currently providing significant detail. We welcome the invite to the workshop on Friday 15th December 2023, and Jeff Nottage at Turley who is leading on the design work for the applicants consultant team will be attending. CEG and HLM would also recommend that the Code is tested with housebuilders to ensure the delivery of the site and useability of the Code.	Design code usability and scope	Note	There isn't scope for further testing prior to endorsement however housebuilder input has been sought through the HGGT developer forum and through inviting to participate in the online survey and consultation. There will be a process put in place to review the code as appropriate or at key milestones during the planning and delivery timeline.
	The prescriptive requirements provided on some topics such as 'at least 75% of dual aspect homes should have predominantly north-south facing aspects' is starting to make policy assertions beyond those required in the Local Plan and in contradiction with other existing advice. The HGGT Design Guide advises that aspects/rooelines facing north to Harlow should avoid creating a 'wall of development' in an east-west direction which could be visually prominent (p36) (particularly on the ridgeline). Essex Solar Design Guide (p5) also explains that elevations facing +/-30degrees south is an appropriate range so that designers can make an informed judgement whilst still achieving useful solar gains. Balancing and considering these requirements will be part of future design considerations and which will also still be drivers of the detailed layout of this site. Therefore, having a specific target is not particularly helpful or beneficial in reconciling competing requirements. In a similar way, prescribing house types in certain parts of the site is also concerning and does not allow for creative or innovative solutions which could be used and which could still sensitively address the eastern ancient woodland edge for example.	Design code usability and scope	Note	See responses below to detailed comments
	The SMF included a play strategy which had a clear play hierarchy and even distribution of provision and which was designed to Fitwell standards. The draft Design Code is showing a different approach and which requires further information and justification.	Public Space	Note	See responses below to detailed comments

David Lock Associates letter Dec 2023 (Additional appended detailed comments with page references)

CEG/ Hallam Consultation Responses				
Event	Comment	Theme	Status	Note/ response/ action
	CEG and HLM are keen that high-quality, sustainable and equitable design principles are followed in the delivery of the development of Latton Priory but that there remains appropriate flexibility in how these are applied to ensure its successful delivery. The detail provided and to be followed in the planning process also needs to be commensurate with the relevant stage of the planning process. CEG and HLM would request the above summary of comments along with the detailed tracker of comments are given proper consideration to inform the finalisation of the Design Code and we would welcome the opportunity to discuss these comments in detail. We look forward to working collaboratively with the Council to discuss the best way of resolving issues and to ensure that the guidance produced is adaptive and clear for developers and avoids duplication or contradiction with the SMF and other guidance.	Process/ Policy	Note	See responses below to detailed comments
Exec S.	Exec summary 2nd para: Text says it "draws on the SMF". Wording should say "It accords with the principles established by the Strategic Masterplan Framework..."	Process/ Policy	Note	Design code goes further than the principles in the SMF and in some cases does not accord e.g. block configuration in response to solar orientation and topography, therefore the proposed statement would be wrong. The code does draw on the SMF and aligns with the mandatory spatial fixes within it.
2	p2 plan: To help with the context, suggest either more detail is added and greater colour variation (e.g. Harlow urban area should be a stronger colour) or do a greyscale Google Earth image with the key features on the plan highlighted.	Design code usability and scope	Response as follows.	This plan is only intended to indicate strategic location within Epping district and bordering Harlow - level of detail is in line with equivalent in Local Plan. More detailed context plan is provided later in the section. <b>Nevertheless more detail added: all major roads in the District, stations labelled and Thornwood, North Weald Bassett and Hastingwood Roundabout noted to help with orientation.</b>
4	p4 2nd column, last para; Text states that future planning applications will need to be accompanied by detailed design codes. Wording should be changed to say "future detailed and reserve matters planning applications should be accompanied by detailed design codes".	Process/ Policy	Response as follows.	<b>Wording changed to 'It is expected that future reserved matters, detailed or hybrid planning applications will be accompanied or preceded by detailed design codes that address the other themes of the NMDC.'</b>
7	p7 The flow diagram suggests that a detailed design code should be done in parallel with an outline planning application. The diagram should show how the strategic design code informs the outline planning application, whilst any detailed design codes inform future reserved matters planning applications. An amended version of this diagram, showing this alteration, was sent by DLA in September. We would be happy to provide this again	Process/ Policy	Response as follows.	The diagram is intended to show process not just for Latton Priory but also for other Strategic Masterplan Sites. As noted, it is an anticipated planning process and there are a number of ways that codes/ planning applications could come forward. The diagram does not preclude a detailed code being produced subsequent to an outline approval or after it. A point of clarification has been added to the diagram noting that* approval of outline application is not dependent or reliant on the prior endorsement of the strategic or any detailed design codes. Whilst the the strategic design code does contain some detailed points, these are strategic points. There is still a requirement for coordination of detailed elements such as lighting, public realm material palettes, play and planting prior to the approval of any reserved matters applications. An explanatory note will be produced to clarify this point. <b>Clarification added to p7</b>
9	p9 opps and cons plan: The views shown differ to those set out within the SMF Mandatory Spatial Principles page 10. Some of these views might not be deliverable due to existing intervening obstructions but given the Design Code notes that the diagrams show one way development 'could be brought forward' this should provide sufficient flexibility at detailed design stage. The colours of the arrows are difficult to decipher and there is also no yellow arrow in the key so suggest further clarification is provided. Suggest wording of accompanying bullet text be altered to say - "Expansive views of Harlow to the north and countryside to the south should be capitalised where practicable through the site layout and positioning of key open spaces and vistas".	Design code usability and scope	Note	As noted in previous feedback to CEG/Hallam comments: <i>There are additional views because we have considered design that makes the most of the opportunities the site offers in order to promote character, placemaking, wayfinding and integration with the surroundings. These 'additional views do not terminate at buildings but open spaces or nodes. The view lines have been clearly labelled (on spread 6 of the coding plans document), with strategic views differentiated from additional views that will aid wayfinding/ character/ integration. Strategic HGGT views are a minimum and do not preclude other views to be integrated. The views that are noted in the second image below as additional are just relocated views as the HGGT design guide diagram shows an outdated Latton Priory local centre location (see RHS of p6 of coding plan doc). No change to text regarding 'capitalised' as clearly this would not happen where it is not possible. Most people will understand that a solid yellow circle and associated line indicates the sun path, nevertheless a label has been added to the diagram, next to the sun.</i>
p12-13	Suggest that the document includes the jointly agreed vision statement that is in the SMF - so these design ambitions can relate back to that vision..	Design code usability and scope	Note	As noted previously the design code vision has been refined as a result of Design Council and DLUHC review and now closely relates to the structure of the document. It is a more refined/ concise version of the vision in the SMF and does not contradict it.

CEG/ Hallam Consultation Responses				
Event	Comment	Theme	Status	Note/ response/ action
16	Strategic framework requirements– para 1.1: The text states that “development proposals must include the components shown on the diagram opposite”. This should be changed to “should include the components shown” to reflect the intent of the intro paragraphs and whilst it is one thing to set ambitions and principles, these have not all been tested and therefore the wording should allow for the flexibility. This relates to certain aspects such as the location of the car barns	Framework masterplan/ stewardship	Note	The requirement is that the components must be provided, i.e play streets must be provided, car barns must be provided. It specifically notes that ' <i>The precise quantity, geometry and alignments of components can be modified to suit technical requirements or best-practice to achieve the Vision and ambitions of the Garden Town community.</i> ' That clearly leaves flexibility e.g. in quantity, location of car barns, to refine the proposals through design development and testing. However, the framework plan does address the various design code requirements.
16	Strategic framework requirements – para 1.3: Text states that “the local centre must be supplemented with smaller nodes that support the more immediate surrounding residents”. It also adds that “where viable, these should include retail that helps people meet their day to day needs conveniently”. This does not accord with the SMF which seeks to ensure that all retail is in the local centre. Further retail outside of the local centre will weaken it. This paragraph should be deleted.	Framework masterplan/ stewardship	Response as follows.	There is a concern around meeting daily needs within an easily walkable distance, particularly on the eastern portion. However, if design for active travel is maximised in every way between homes and services/ amenities that meet daily needs, inside and outside of the site, then this can be mitigated. <b>Paragraph removed.</b>
16	Strategic framework requirements – para 1.4 Text states that “sustainable and active travel routes to and from new and existing key destinations must be shown alongside strategies for delivery where these are outside of the site boundary. Suggest that the word “must” is changed to “should”	Framework masterplan/ stewardship	Note	This is a must.
17	The strategic framework plan differs from the SMF masterplan in certain places and the illustrative block structure / parameters for development also differ. It is noted on page 5 of the Draft Design Code that “All diagrams and images, unless stated otherwise, are illustrative and depict how the requirements of the code could be brought forward on the site”. So we assume there is flexibility here (as per the paragraph on p 16).	Framework masterplan/ stewardship	Note	It has always been understood that the illustrative masterplan in the SMF is an illustration of how a scheme might come forward (hence 'illustrative') but the detail of it has not been tested, including block structure. In its current form it would not meet some of the requirements of the design code. There is flexibility both in the illustrative masterplan and the strategic framework plan.
17	The plan shows a number of streets designated as “Quiet active travel route – low car movement”. Whilst we support this in principle, we cannot at this stage agree with the locations shown on the plan as they have not been tested and some of the streets shown do not accord with the SMF masterplan document. Could this not be explained as a principle, rather than marked on a plan?	Framework masterplan/ stewardship	Note	Removing the quiet active travel routes from the plan may weaken the requirement and/or understanding of them. Showing them on the plan shows how they can be brought forward in line with the various requirements.
17	Car barns are shown on the plan in two locations. There is no information about the exact size or parking capacity of these two car parking barns. Nor indeed if these are the right locations and work with any phasing. Could this be explained as a principle rather than marked on a plan? Also, we assume that the car barns are for second cars only.	Framework masterplan/ stewardship	Note	This is all subject to design development. The design code does not deal with parking quantum so the size and location of them can be refined. The sizes shown on the diagram are comparable to other car barns.
17	Car free play streets are shown on the plan. Whilst we support this in principle, we cannot at this stage agree with the locations shown on the plan as they have not been tested and some of the streets shown do not accord with the SMF masterplan document. Could this not be explained as a principle, rather than marked on a plan?	Framework masterplan/ stewardship	Note	Removing the car free play streets from the plan may weaken the requirement and/or understanding of them. Showing them on the plan shows how they can be brought forward in line with the various requirements, including car free frontage requirements as part of a site-wide strategy.
p18/19	Stewardship arrangements will evolve over time and depending on the scale and delivery arrangements as there is no 'one size fits all' approach. Latton Priory will be delivered by housebuilders/developers not yet known so there needs to be some flexibility in the approach rather than just the statement that applications must provide information on proposed models. Suggest this is reworded to say applications should indicate a commitment to the Charter and high level principles set out only rather than detailed requirements and para 1.23 should be reworded to advise that detail provided should be proportionate and commensurate with the stage of the planning process. There is also a lot of detail of assets marked on the Plan which is misleading – it needs to be clear throughout that the plans are illustrative.	Framework masterplan/ stewardship	Response as follows.	Good community management/ development from the very start will be critical to the stewardship and success of the development. The wording is for 'Development applications' to include information and it is unclear why this is problematic'. <b>'Illustrative' added to the title of all site-wide plans and diagrams.</b>
20	Green infrastructure framework – para 2.1: Text states that “detailed design codes for site-wide coordinated green infrastructure and public realm must be provided and endorsed for the whole masterplan area in advance of or at the same time as any full planning or Reserved Matters Application. How would this work? Who would prepare this? Is there a need for another design code to cover this? Does the first developer to submit a reserved matters application need to do a detailed site wide design code? This wouldn't work as a) it will not affect their parcel and b) they may have alternative ideas to other developers later in the phasing.	Nature	Response as follows.	Regardless of who is producing it, the EFDC planning process for Strategic Masterplan Areas requires design codes to be produced. Due to the government Pathfinders funding and support, part of that task on Latton Priory has been undertaken by EFDC, however the outstanding design code matters still need to be undertaken in the same manner they would have been had there not been an authority-led design code. This could happen in a number of ways, most likely by the site promoter's consultant team prior to any reserved matters applications. <b>A design code briefing note has been produced to provide further information and there may be further detail added in to the strategic design code regarding requirements for more detailed code elements.</b>
20	Green infrastructure framework – para 2.2: The text states that “proposals must be aligned to the EFDC Green Infrastructure Strategy and Natural England’s Green Infrastructure Design Guide”. The EFDC GI strategy section 3 refers to various off-site initiatives under the heading ‘Latton Priory and Water Lane Garden Town Communities’ (references to the STC and enhancement of offsite habitats and green spaces to which the developer has no control over). Suggest wording change to address as follows - “Proposals for the site should be aligned to the EFDC Green Infrastructure Strategy and Natural England’s Green Infrastructure Design Guide”	Nature	Note	Most of the proposals and recommendations within the EFDC GI Strategy (Part 3) for Latton Priory are site-specific recommendations for within or immediately around the site. Given that the EFDC Green Infrastructure Strategy is a key document within the policy framework, it is necessarily a key driver for Green Infrastructure proposals. It is considered that there is sufficient flexibility in the word 'aligned'.
20	Green infrastructure framework – para 2.3: Text states that “proposals must be developed iteratively with the Council and other stakeholders. Engagement with the Council’s review panel must be sought at key stages of design development”. What is this review panel? Is it the QRP?	Nature	Response as follows.	Yes, the Quality Review Panel. <b>Wording changed to: Engagement with the Council’s quality review panel (QRP) must be sought at key stages of design development.</b>

CEG/ Hallam Consultation Responses				
Event	Comment	Theme	Status	Note/ response/ action
20	Green Infrastructure framework - para 2.4: Text states that “proposals must demonstrate how neighbouring communities and wildlife will be included and connected with. This should include details of enhancements outside the site boundary as well as mapping of the ecological network”. The developer has no control over enhancements outside the site boundary other than by enhancing connections across the site to peripheral communities and habitats.	Nature	Note	Connectivity is a key component of green infrastructure at should be at the fore of any proposals. Improvements outside of the site can be negotiated through planning discussions either through direct improvements or contributions.
20	Green Infrastructure framework – para 2.5; Text states that “green infrastructure should comprise the components and general alignments shown on the diagram opposite”. Some green finger alignments differ from the SMF, but it is noted that the plan is illustrative. Note that the diagram shows existing tree belt / hedgerow / field boundary incorrectly. Hedgerows shown within the SANG and surrounding the ‘allotments’ are not existing, and existing tree belts are shown as solid green hatch.	Nature	Response as follows.	It should be noted again that the illustrative masterplan in the SMF is purely illustrative and will not meet some design code requirements in its current form. Precise green finger alignments have not been agreed and they will need to be tested alongside various other design factors including block size and/or geometry. <b>Key changed to remove the word 'existing' from tree belt/ hedgerow/ field boundary and additional item added 'existing woods' in solid green.</b>
20	Green infrastructure framework – para 2.7; Text states that “public realm proposals must demonstrate how the Urban Greening Factor (UGF) has been maximised and how development areas will meet or exceed a UGF score of 0.5”. This forms one of Natural England’s Green Infrastructure Standards and is referred to in their new GI Design Guide, which states that this a voluntary standard. It isn’t widely used except across the London Plan urban areas. Please confirm what is defined as public realm and if this is a detailed design stage matter?	Nature	Note	UGF is becoming increasingly common as a way of measuring quality and quantity of green infrastructure. Natural England have developed an urban greening factor for England and local authorities are encouraged to positively set standards and promote delivery. Their recommendation is a UGF of 0.5 for residential greenfield development. Given that on top of this being a greenfield development, it is also part of a Garden Town with Green Infrastructure and sustainability at the heart of its principles, this requirement is entirely appropriate at the strategic and detailed scale. More information can be found here: <a href="https://designatedsites.naturalengland.org.uk/GreenInfrastructure/downloads/Green%20Infrastructure%20Standards%20for%20England%20Summary%20v1.1.pdf">https://designatedsites.naturalengland.org.uk/GreenInfrastructure/downloads/Green%20Infrastructure%20Standards%20for%20England%20Summary%20v1.1.pdf</a>
21	Green infrastructure framework – plan; Plan shows a section of Latton Avenue alongside the green finger. The SMF sought to keep pedestrian and cycle links away from the main vehicular corridors to create better walking and cycling environments and also to prevent the corridors from becoming too wide and lacking in enclosure. This comment does, however, recognise that the text earlier in the document refers to such plans being illustrative, depicting how the site “could “ be brought forward	Nature	Note	Latton Avenue itself will have provision for cycling and walking regardless of whether there is a green finger alongside so we do not understand this comment. It should be noted again that the illustrative masterplan in the SMF is purely illustrative and will not meet some design code requirements in its current form.
22	Green infrastructure framework – para 2.16; Text states that “publicly accessible toilets must be provided. Suggest change of wording to say, “Should a pavilion building be provided it must include publicly accessible toilets.	Nature	Response as follows.	Publicly accessible toilets are a key component of genuinely accessible and inclusive place, regardless of whether a pavilion is provided. The ongoing maintenance of this needs to be a stewardship consideration. <b>'Must' changed to 'should'.</b>
23	Green infrastructure framework – para 2.23; The text states that the greenway should vary in width as well as character along its length but there should be a minimum of 20m between frontages and a minimum width of 8m of soft landscape or SuDS throughout. The East-West Green Corridor ranges from 25m to 14.5m in the endorsed SMF document, so suggest that the Design Code aligns with the parameters set out in this document.	Nature	Note	The width of the green corridor has never been interrogated, tested or fixed with EFDC through the SMF process and therefore is not defined in this way in the spatial fixes plans in the SMF. There is scope for block dimensions to change in order to ensure that the Greenway has meaningful and continuous green infrastructure along its whole length.
23	Green infrastructure framework – para 2.26; The text states that the green fingers should vary in width but must incorporate a minimum width of 8m of soft landscape or SuDS throughout and should widen to accommodate green nodes for functions such as play, seating, socialising and community growing. The Green Fingers largely align with this, though there should be flexibility to allow pinch points to allow for greater variation.	Nature	Response as follows.	There is sufficient flexibility within these parameters to provide variety, <b>however, the minimum has been changed to 5m.</b>
23	Green infrastructure framework – 2.28; Text states that “the use of boundary barriers such as railings or fences must be avoided”. Change wording from ‘must’ to ‘should’ be avoided – there may be occasions where they are necessary	Nature	Note	Fenced off green fingers would defeat the object. Good design should mitigate any requirement for fences and railings e.g. the use of bollards or street furniture to prevent vehicles entering these areas.
23	Green infrastructure framework – para 2.31; The text requires that “to provide equitable benefits of tree planting, every home should have a view of at least three decent-sized trees in the public realm”. This appears to be overly prescriptive and not always possible with any development. Would also require agreement from Essex County Council in terms of the adoption of street trees. Suggest that this is removed	Nature	Note	Street trees are a requirement of the NPPF. This is not an overly prescriptive requirement given that properly integrated green infrastructure will be properly embedded into the development in line with Garden Town principles. These will provide many benefits and will have a significant impact on the wellbeing of residents and the community.

CEG/ Hallam Consultation Responses				
Event	Comment	Theme	Status	Note/ response/ action
23	Green infrastructure framework – para 2.32; The text requires that “street trees should be mature from the outset to ensure the quality and benefits they provide can be enjoyed from initial occupation”. Please clarify what ‘mature’ means. It is not practical or advisable to plant mature trees especially given the uncertain climatic conditions. In periods of dry weather, they will be more prone to die before roots are established than smaller specimens. Mature trees are also very costly and more difficult to source than standard sized trees. Suggest this is removed.	Nature	Response as follows.	Agreed that this needs to be more nuanced and the immediate impact needs to be balanced with lasting impact, however this cannot be removed entirely as some semi-mature trees will be required to ensure this is a high-quality place from the outset. Also note that the guidance 'trees in hard landscapes' by the Trees and Design Action Group (tdag) is noted in the key references box at the beginning of the section and this provides guidance on this matter. Definition of semi-mature trees is provided in BS3936-1 and would be understood by the appropriate consultant. <b>Paragraph amended to: Approximately 25% of trees should be semi-mature from the outset to ensure the benefits and character they provide can be enjoyed from initial occupation. Additionally, 'semi-mature tree' has been added to glossary defined as 'An established tree but one which has not reached its potential ultimate height and has significant growth potential. British Standards Institution definition: "Trees with an overall height in excess of 4 metres and or a stem girth measurement (circumference) of 20 centimetres or larger."</b>
25	Green infrastructure framework – para 2.47; Text states that “development must not go beyond the ridgeline, shown as the build-to-line in the mandatory spatial principles in the SMF”. We agree with this principle, though it should be caveated to enable ancillary works in relation to the sports fields (e.g. school fences, any future sports pavilion building).	Nature	Response as follows.	<b>Wording added to the requirement: The exception to this may be ancillary works in relation to the sports fields, which would need to be sensitively designed .</b>
26	Water management – para 2.64: Text states that “Swales should be used to aid water movement along green fingers and the greenway. Rain gardens should be used on Latton Avenue and secondary streets to collect Highways drainage and contribute to the overall attenuation. Opportunities for rain gardens or SuDS tree pits on other streets should also be maximised. Whilst these are reserved matters details, we would be happy to include these in the FRA as ‘toolbox options’ for SuDS solutions. They have no volume storage properties at all, they are purely for conveyance or to water plants. Essex to support rain gardens in streets and they are adopted on other developments in the county.	Nature	Note	No action or response required.
28	Site wide sustainable movement – para 3.3: Text states that “the street network must incorporate designated quiet active travel routes to key destinations that are car-free or have low car movement through filtered permeability. These routes must be well lit and natural surveillance should be maximised through reduced street widths and enclosure and overlooking on both sides” Whilst we support the principle of quiet active travel routes, we cannot at this stage agree with the locations shown on the plan as they have not been tested and some of the streets shown do not accord with the SMF masterplan document. Suggest the text is changed from “must” to “should”. One of these routes looks like it crosses the drive way to Dorrington Farm which is not deliverable.	Movement	Note	It has always been understood that the illustrative masterplan in the SMF is an illustration of how a scheme might come forward (hence 'illustrative') but the detail of it has not been tested, including block structure. The mandatory spatial principles are the mandatory elements of the SMF. In its current form the illustrative masterplan in the SMF would not meet some of the requirements of the design code. There is flexibility both in the illustrative masterplan and the strategic framework plan. The site-wide sustainable movement shows how the street network can work in line with the design code requirements. The link across Dorrington Farm access shows that the framework has been planned to allow connectivity should the circumstances permit in the future.
28	Site wide sustainable movement – para 3.8: The text states that “the active travel network must incorporate car-free play streets”. Whilst we support this in principle, we cannot at this stage agree with the locations shown on the plan as they have not been tested and some of the streets shown do not accord with the SMF masterplan document.	Movement	Note	See note above.
29	Site wide sustainable movement plan: Overall, the plan is very busy and quite difficult to read. Plan needs to be stripped back or differentiate routes by using different colours.	Movement	Response as follows.	<b>Graphics of diagram has been reviewed. It is a balance between separating information out into several different plans or showing how it all coordinates on a single plan.</b>
29	Site wide sustainable movement plan: Key incorrect for sustainable transport corridor. Correct the key.	Movement	Note	The sustainable transport corridor line is overlaid on a key active travel route line so the key is correct. As noted above the graphics of this will be reviewed.
29	Site wide sustainable movement plan: Plan shows car free play streets. Whilst we support this in principle, we cannot at this stage agree with the locations shown on the plan as they have not been tested and some of the streets shown do not accord with the SMF masterplan document.	Movement	Note	It has always been understood that the illustrative masterplan in the SMF is an illustration of how a scheme might come forward (hence 'illustrative') but the detail of it has not been tested, including block structure and tertiary streets. The mandatory spatial principles are the mandatory elements of the SMF. In its current form the illustrative masterplan in the SMF would not meet some of the requirements of the design code. There is flexibility both in the illustrative masterplan and the strategic framework plan. The site-wide sustainable movement shows how play streets can work in line with the design code requirements.

CEG/ Hallam Consultation Responses				
Event	Comment	Theme	Status	Note/ response/ action
29	Site wide sustainable movement plan: Additional NEAPs, LEAPs and LAPs shown which is different from the SMF. See our comments below on the Play and Recreation Plan.	Movement	Note	The play strategy has been developed in line with the Vision and Graden Town aims of a healthy and uplifting neighbourhood by better integrating play into the development, close to homes and along travel routes so that it is part of everyday life, accessible, safe and well overlooked. The quantum is not vastly different to the quantum in the SMF but both the quantum and the locations reflect aspirations for quality and Garden Town status that goes beyond the bare minimum for status quo development. Not all areas shown as play need to be intensive 'playgrounds' they can comprise a small set of incidental or naturalistic play elements as long as well-designed and intentional.
p30/31	Site wide sustainable movement – Mobility hub plan and section: This is quite a detailed design and hard to see without enlarging the page. It would be better if this was more diagrammatic showing the main principles, rather than a detailed design, to provide further flexibility for the operators of the facility when working up their plans.	Movement	Note	It is considered that this diagram helpfully shows the key elements and aids everyone's understanding of a mobility hub without being overly prescriptive.
32	Site wide vehicular movement – para 3.21: Text states that “public transport must be integrated to provide a direct connection to Harlow via the Sustainable Transport corridor and to Epping via the new B1393 connector” Suggest the text is reworded to say “Public transport should be integrated to provide a direct connection to Harlow and to Epping via the new B1393 connector.”	Movement	Note	Current wording reflects Policy.
32	Site wide vehicular movement – para 3.23: Text states that “vehicular loops must provide vehicle and service access to small low-traffic neighbourhoods with filtered permeability to prevent through-routes for vehicles”. Suggest that text is reworded to say “vehicular loops could provide vehicle and service access to small low-traffic neighbourhoods with filtered permeability to prevent through-routes for vehicles, where practical”.	Movement	Note	This suggested re-wording would weaken the strength of the design code in achieving a holistic site-wide strategy that designs for 60% modal shift by encouraging alternative modes of travel at every scale of design.
32	Site wide vehicular movement – para 3.25; Text states that vehicular access should be limited to three sides of any development block or two sides plus a rear parking court. This approach could be considered for the larger blocks where rear courtyard parking is practical Have these blocks been tested? If so, the Design Code should show how this can be achieved. We certainly would not want to see too many blocks with rear courtyard parking as this approach takes activity off the street and encourages people to enter the properties via their back doors	Movement	Note	The code is intentional in providing a balanced approach with some car parking on-street, some on-plot and some to rear courts. It is clear that rear courts are only to be used in limited circumstances. Generally, where there is car access to three sides of the block, testing has shown that the car parking for the 'fourth (car-free) frontage can be accommodated on perpendicular streets and will not require a rear parking court (based on on-to-one plus visitor parking quantum and assuming any homes with more than one car have space in a parking barn or on-plot. Rear parking courts can and have been designed successfully and the requirements set out in the design code around parking court design reflects this.
32	Site wide vehicular movement – para 3.26: Text states that “key green routes including the greenway and the north-south green fingers must not have vehicle access on both sides at any point”. We consider that this is too restrictive and unnecessary. If there was vehicular access on both sides, but it was accompanied by walking, cycling routes and an attractive green corridor, then it would not be a problem – particularly on low speed streets. Having vehicular access on both sides of a greenway encourages people to use their front doors to access their homes, rather than rear accesses, thus activating these green corridors and creating safer environments.	Movement	Note	There is a balance of car access to homes along the greenway and north-south green fingers in line with quality aspirations for the Greenway and the wider scheme and in line with modal shift targets. Vehicle access on both sides would significantly diminish the quality of the route and would make the Greenway overly hard and wide in relation to building heights.
32	Site wide vehicular movement – para 3.30: The text states that “green nodes and play spaces must have car free aspects on a minimum of two sides. Where possible, access from family housing to play spaces should not require crossing vehicular streets”. This is impossible to enforce as people may travel from other parts of the development to use such play spaces. Delete the last sentence.	Movement	Response as follows.	The requirement already states 'where possible'. <b>For clarity, sentence reworded to: The need for crossing vehicular streets between housing and play spaces should be minimised.</b>
33	Site wide vehicular movement – plan: Plan shows STC corridor alignment. STC should be shown as being an indicative route.	Movement	Response as follows.	<b>Note added under key to say 'STC route shown indicatively'.</b>
33	Site wide vehicular movement plan: Plan shows a bus stop by the eastern mobility hub /green space. This will not be a bus stop. Remove bus stop from the plan.	Movement	Response as follows.	<b>Bus stop moved to location shown on other plans.</b>
33	Site wide vehicular movement – plan: Plan shows a network of tertiary routes going round the edge of the development parcels along the edges of the scheme. We question if this is practical. Running tertiary streets around the edges of the development, rather than having quieter streets on the edge that create a better transition between the development and the adjacent green space, does not seem the right approach. We accept that the idea here is to allow, say, a play street in the centre of the block, but it assumes that play streets are in the locations as shown. We question, for example if a number of the blocks are deep / flexible enough to accommodate play streets in the locations shown. As noted on page 5 of the Draft Design Code “All diagrams and images, unless stated otherwise, are illustrative and depict how the requirements of the code could be brought forward on the site”, so we assume there is flexibility here.	Movement	Note	Do not agree that the tertiary streets will be less quiet than the 'quiet streets' shown on the SMF illustrative masterplan, which shows car access to every frontage regardless of whether it is on the green edge or not. As described in the design code the 60% modal shift target and other key aims of the Garden Town require a move away from the business as usual approach and that is what is defined in practical terms within the design code. Testing shows how these play streets can be accommodated even within the tightest blocks.

CEG/ Hallam Consultation Responses				
Event	Comment	Theme	Status	Note/ response/ action
33	Site wide vehicular movement – plan: The plan shows a number of blocks with parking courts. Whilst we agree with the principle of this being applied in certain locations, the precise location of these blocks cannot be determined at this stage. Furthermore, a number of blocks, shown to have parking courts, are likely to be too small to accommodate them. We suggest that the principles are set out in the document, but the locations should not be shown at this stage. As noted on page 5 of the Draft Design Code “All diagrams and images, unless stated otherwise, are illustrative and depict how the requirements of the code could be brought forward on the site”, so we assume there is flexibility here.	Movement	Note	The code is intentional in providing a balanced approach with some car parking on-street, some on-plot and some to rear courts. It is clear that rear courts are only to be used in limited circumstances. Generally, where there is car access to three sides of the block, testing has shown that the car parking for the 'fourth (car-free) frontage can be accommodated on perpendicular streets and will not require a rear parking court (based on on-to-one plus visitor parking quantum and assuming any homes with more than one car have space in a parking barn or on-plot. Rear parking courts can and have been designed successfully and the requirements set out in the design code around parking court design reflects this. The framework plan for parking shows how this could be applied across the site in line with the requirements of the design code. Not showing the locations/ possible solution would increase vagueness.
33	Site wide vehicular movement – plan: The plan shows car free areas (4x typologies). We suggest that the principles are set out in the document, but the locations should not be shown at this stage.	Movement	Note	The locations are intentionally shown because they respond to certain situations e.g. play spaces.
33	Site wide vehicular movement – plan: Additional NEAPs, LEAPs and LAPs shown which is different from the SMF. See our comments below on the Play and Recreation Plan.	Movement	Note	The play strategy has been developed in line with the Vision and Graden Town aims of a healthy and uplifting neighbourhood by better integrating play into the development, close to homes and along travel routes so that it is part of everyday life, accessible, safe and well overlooked. The quantum is not vastly different to the quantum in the SMF but both the quantum and the locations reflect aspirations for quality and Garden Town status that goes beyond the bare minimum for status quo development. Not all areas shown as play need to be intensive 'playgrounds' they can comprise a small set of incidental or naturalistic play elements as long as well-designed and intentional.
35	Site wide street network - plan: The alignment of Latton Avenue is different to the SMF. Latton Avenue also appears to extend to the north-east. Both the above do not reflect the SMF. As noted on page 5 of the Draft Design Code “All diagrams and images, unless stated otherwise, are illustrative and depict how the requirements of the code could be brought forward on the site”, so we assume there is flexibility here.	Movement	Note	It has always been understood that the illustrative masterplan in the SMF is an illustration of how a scheme might come forward (hence 'illustrative') but the detail of it has not been tested, including block structure and street alignment. We have always been assured that that level of detail had not been fixed. The mandatory spatial principles are the mandatory elements of the SMF. In its current form the illustrative masterplan in the SMF would not meet some of the requirements of the design code. There is flexibility both in the illustrative masterplan and the strategic framework plan. The site-wide street network shows how Latton Avenue can work in line with the design code requirements.
35	Site wide street network - plan: Whilst we support the principles of the streets set out in this plan, we cannot at this stage agree with the locations shown as they have not been tested and some of the streets shown do not accord with the SMF masterplan document.	Movement	Note	See note above - applicable to all streets shown.
36	Site wide car parking – para 3.33: The text states that “all parking must be on-street to provide continuous level footways on both sides of the street clear of turning vehicles” This is on Latton Avenue and local streets. This limits the flexibility to provide varied housing with on plot parking on both street types. Suggest that the word must is replaced with “should” or “could” Throughout the document there is too much detail on parking. Should the document not just reference the ECC standards that are currently out for consultation?	Movement	Response as follows.	Within the overall scheme this represents a very limited length of street and reflects the intended character of those key streets, as well as the need to maximise natural surveillance and enclosure (i.e. limit the width of those streets relative to building heights). It is possible within the requirements to provide a balance across the site and provide a clear character and street hierarchy. The parking requirements are site specific (unlike the County wide draft standards) and the strategy works with the other strategies in the design code. <b>However, some rules relating to parking removed or relaxed for further flexibility.</b>
36	Site wide car parking – para 3.40: Text states that on plot parking (on residential streets) must not be used on both sides of the street. We question what is wrong with having on plot parking on both sides of a street. We do not consider that this is the right approach and could impact the character / balance of certain streets within the development. It also restricts flexibility. Suggest that this sentence is removed.	Movement	Note	Where on-plot parking is provided, it necessitates a drop in kerb levels for vehicle crossovers. This requirement (3.40) ensures a mixed and balanced approach to the provision of parking without obstructing active travel for all, including those that may find it more difficult to negotiate level changes. Further more, on-street parking can reduce overall parking numbers because it does not have to be allocated to a specific house. It also follows the principles of making active travel options including cycling as convenient, if not more convenient than private vehicle use - in line with the modal shift targets. Also, see S3 street types. The street design relies on some on-street parking to provide street narrowings and on-plot on both sides would prevent this.

CEG/ Hallam Consultation Responses				
Event	Comment	Theme	Status	Note/ response/ action
36	Site wide car parking – para 3.43: Text states that in car free frontages dwellings must be served by rear parking courts or street parking on adjacent streets. We are not convinced that rear court parking is the best design solution. Furthermore, we need to see that this has been tested.	Movement	Note	The code is intentional in providing a balanced approach with some car parking on-street, some on-plot and some to rear courts. It is clear that rear courts are only to be used in limited circumstances. Generally, where there is car access to three sides of the block, testing has shown that the car parking for the 'fourth (car-free) frontage can be accommodated on perpendicular streets and will not require a rear parking court (based on on-to-one plus visitor parking quantum and assuming any homes with more than one car have space in a parking barn or on-plot. Rear parking courts can and have been designed successfully and the requirements set out in the design code around parking court design reflects this. The framework plan for parking shows how this could be applied across the site in line with the requirements of the design code. Not showing the locations/ possible solution would increase vagueness.
37	Site wide car parking – plan: Plan shows car free frontages. Has the car parking been tested in order to enable this approach to happen? The amount of car free streets appears to be excessive. This approach relies on rear court parking, an approach that we have (above) questioned.	Movement	Note	The car-free streets are not excessive, they follow the stated principle of car access to three out of four frontages of every block to have car access (or two frontages plus a rear parking court). Excessive relative to what? It needs to be acknowledged that a Garden Town scheme that is designed to achieve 60% modal shift will need to actually be designed differently to the status quo.
38	Parking design – para 3.50: Text states that “car parking spaces could be open or in car ports or garages only within a garage mews arrangement”. This prevents garages attached to other housing and prevents choice for residents. This should be deleted.	Movement	Response as follows.	Garages are often not used for cars and are often parked in front of instead of within. There are many examples of this on recent developments within Epping and Harlow, <b>however this requirement has been removed and the acceptability of garages will need to be assessed when proposals are submitted.</b>
39	Parking court requirements – para 3.65: Text states that “rear parking courts must only be used where necessary to accommodate parking for blocks with multiple car free frontages”. Noted, but high density blocks will also need to have parking courts (or at least the flexibility to do this).	Movement	Note	See comments above parking courts.
39	Parking court requirements – para 3.67: Text states that “parking courts should not contain more than twelve spaces...” The number of spaces should depend on the size of the block, so the wording is inflexible as it stands. This should be deleted.	Movement	Note	Given concerns above about the potential for poor parking court design, this requirement should be welcomed. It is possible to provide, for example, two smaller parking courts rather than one larger one.
39	Car barns requirements – para 3.70: Text states that “car barns should be used for extra spaces where homes require more than one space”. Have the car barns been tested to ensure they are large enough to accommodate the additional vehicles?	Movement	Note	The design code does not deal with parking quantum therefore we cannot say how many spaces the car barns will need to accommodate however there is flexibility to provide more parking barns if needed.
39	Car barns requirements – para 3.71: Text states that “car barns should be within 400m of homes served”. The location of the car barns on the plan in the document do not serve all the homes within a 400m catchment.	Movement	Note	There is no requirement for car barns to serve all homes. The scheme can be designed for car barns to serve all homes with the use of additional car barns or locating the car barns elsewhere. The code does not fix the number or the locations of the car barns.
39	Car barns requirements – para 3.73: Text states that “car barn size should typically start at around 50 spaces over two levels of parking (approx. 36 x 40m)”. Do the blocks on the plan accommodate this? Have they been tested? Do they provide for the quantum of cars that would need them as set out in para 3.70	Movement	Note	The design code does not deal with the quantum of car parking only the design of it. The areas shown have been checked at high-level to be comparable to good-sized car barns, however the framework plans are digrammatic and will need fully designing out include amendments to block sizes where required.
40	Refuse and recycling requirements – para 3.90: Text requires that “the feasibility of a site-wide underground vacuum and / or waste storage system should be explored at an early stage to reduce on-street bins and frequency of collections. If this is not found to be feasible at the outset, the layout should allow for this to be incorporated in the future”. Vacuum waste management is still relatively new in the UK and not yet a requirement through any policy or British Standards. This should be deleted	Movement	Response as follows.	Whilst it is not a policy requirement, all options should be explored at a strategic scale if they could benefit the new community and help to meet the innovation and placemaking aims and vision of the District and the Garden Town. The requirements is to explore the feasibility of it and this is in line with creating a modern neighbourhood utilising the best of modern systems and technology. Note, discussions are also being had with EFDC Waste team to explore the benefits and challenges of alternative waste collection systems. Note also Essex Design Guide: Refuse Collection states: <i>Progressive refuse disposal systems should be considered wherever possible. Where it is not feasible to incorporate such a system into a development, street design should allow for their introduction at a future date.</i> <i>Other refuse systems that reduce the visual and practical impact of large numbers of bins include large-capacity standalone in-ground waste stores shared by streets or neighbourhoods. These stores can be mounted, lifted and emptied by refuse-collection vehicles. Again, such infrastructure should be considered at an early stage to avoid the need to retrofit with its ensuing disruption and detrimental impact on the streetscape.</i>



CEG/ Hallam Consultation Responses				
Event	Comment	Theme	Status	Note/ response/ action
41	Site wide refuse collection strategy - plan: Refuse routes and rear parking court collection points are shown on the plan. This assumes that the street network / block typologies will follow this. However, as per our points on the site wide vehicular movement plan, we do not agree that taking tertiary streets around the edges of the blocks (that would accommodate refuse vehicles) is the correct approach. As noted on page 5 of the Draft Design Code "All diagrams and images, unless stated otherwise, are illustrative and depict how the requirements of the code could be brought forward on the site", so we assume there is flexibility here.	Movement	Note	See note above regarding tertiary streets and green edges. See also the block testing that has been undertaken to ensure that all homes can be serviced by refuse and emergency vehicles.
42	Public space strategy – para 4.1: Text states that detailed design codes for site-wide coordinated landscape and public realm proposals must be provided and endorsed for the whole masterplan area in advance of, or at the same time as any full planning application or Reserved Matters Application. How would this work? Who would prepare this? ? Is there a need for another design code to cover this? Does the first developer to submit a reserve matters application need to do a detailed site wide design code? This wouldn't work as a) it will not affect their parcel and b) they may have alternative ideas to other developers later in the phasing	Public Space	Response as follows.	Regardless of who is producing it, the EFDC planning process for Strategic Masterplan Areas requires design codes to be produced. Due to the government Pathfinders funding and support, part of that task on Latton Priory has been undertaken by EFDC, however the outstanding design code matters still need to be undertaken in the same manner they would have been had there not been an authority-led design code. This could happen in a number of ways, most likely by the site promoter's consultant team prior to any reserved matters applications. <b>A design code briefing note has been produced to provide further information and further detail added in to the strategic design code regarding requirements for more detailed code elements.</b>
42	Public space strategy – Para 4.4: Text states that "lighting must be provided on all streets and key open spaces. The type of lighting must be appropriate to the character and function of the space and coordinated with tree planting to avoid shadowing". Suggest wording change "lighting should be provided on all streets and key open spaces, ensuring that lighting is not placed where it conflicts with nature conservation mitigation measures."	Public Space	Note	Not clear on why amendments are required to this. Lighting can still be provided where there are nature conservation measures in place, but the type and placing of the lighting needs to be carefully considered, which is encompassed by 'appropriate to the character and function' of the space. Lighting is key to safety and perceived safety, particularly for active travel.
42	Public space strategy – para 4.6: Text states that "public toilets and bins (litter, recycling and dog waste) must be provided at the local centre, the SANG, Community Park and where the mini mobility hubs are located as a minimum" Text should say "could " and not "must". SANGs do not normally have on site toilet facilities. Mini mobility hubs are small facilities involving racks and bus stops and it was not envisaged that they would have such facilities.	Public Space	Response as follows.	Publicly accessible toilets are a key component of genuinely accessible and inclusive place, regardless of whether facilities are 'normally provided'. The ongoing maintenance of this needs to be a stewardship consideration. <b>'Must' changed to 'should' so that this needs to be provided unless there is a technical reason not to or if there is an alternative proposal that better meets the aims of accessibility and inclusivity.</b>
43	Public space strategy plan: Plan is difficult to read with pink dashes and dotted lines very hard to differentiate.. Different colours for the different routes would help the legibility of the plan.	Public Space	Response as follows.	<b>Graphics of diagram has been reviewed. It is a balance between separating information out into several different plans or showing how it all coordinates on a single plan.</b>
	Street design – para 4.4: Text states that "seating must be incorporated at regular intervals and at least at every 50m on both sides of the street". This is excessive and should be changed to "should"	Public Space	Note	Excessive compared to what? In Designing for Accessibility (Centre for Accessible Environments, 2004), it is recommended that "seats should be provided at intervals along long routes or where waiting is likely". In Inclusive Mobility (DfT, 2005), the UK Department for Transport suggests that "in commonly used pedestrian areas ... seats should be provided at intervals of no more than 50 metres". The design code needs to be clear and measurable, in line with best practice wherever possible.
44	Street design – para 4.7: Text states that "cycle lanes should be continuous and two-way on the south side of the street only, separated from vehicular movement. Cycle lanes should be highquality in line with LTN 1/20. We question why it should be on the south side of the street only?"	Public Space	Note	South side stipulated due to the linear green space on part of Latton Avenue and the Local Centre being mostly south of Latton Avenue.
44	Street design – para 4.16: Text states that "allocated car parking should be limited to blue badge spaces and car clubs". An earlier point (see response to para 3.33) says that you can only have on street parking on Latton Avenue, whilst this point says that any allocated parking will be blue badge spaces and car clubs. Where would residents of Latton Avenue park, other than in rear courtyards (and many of the blocks are not big enough to accommodate rear parking courts)?	Public Space	Note	As discussed at meeting, this just means on-street spaces are not allocated to specific homes but are dealt with through parking permits. The exception is blue badge spaces and car clubs. Therefore homes on Latton Avenue can park on-street subject to necessary permits.
46	Street design – para 4.26: Text states that "space for seating and social activity must be incorporated at regular intervals and at least at every 50m along the length of the street". This is excessive and should be changed to "should"	Public Space	Note	Excessive compared to what? In Designing for Accessibility (Centre for Accessible Environments, 2004), it is recommended that "seats should be provided at intervals along long routes or where waiting is likely". In Inclusive Mobility (DfT, 2005), the UK Department for Transport suggests that "in commonly used pedestrian areas ... seats should be provided at intervals of no more than 50 metres". The design code needs to be clear and measurable, in line with best practice wherever possible.
46	Street design – para 4.27: Text states that verges must incorporate SUDs on both sides. This may not always be required. So the word "must" should be removed and replaced with "should" or "could"..	Public Space	Note	SuDS on both sides, as shown on the accompanying street diagrams is part of the intended character of the street. No minimum length of SuDS is stipulated.
46	Street design – para 4.28: Reference is made to Latton Avenue . Text is wrong as this is about local streets, not Latton Avenue.	Public Space	Response as follows.	<b>Latton Avenue' changed to 'local streets'</b>

CEG/ Hallam Consultation Responses				
Event	Comment	Theme	Status	Note/ response/ action
47	Street design plan and section: The plan and section shows verge / parking on both sides of the street. We consider that tree planting only necessary on one side on such streets – to help differentiate it from Latton Avenue.	Public Space	Note	Local streets are small stretches of street that are very similar to Latton Avenue but a slightly smaller scale. In terms of street and public realm greenery the design of Local streets within the design code is intentional and sufficiently different in character from Latton Avenue and Neighbourhood streets.
48	Street design – para 4.45: Text states that verges must incorporate SUDs on both sides. This may not always be required. So the word “must” should be removed and replaced with “should” or “could”..	Public Space	Note	SUDs on both sides, as shown on the accompanying street diagrams is part of the intended character of the street. No minimum length of SuDS is stipulated.
48	Street design – para 4.49: Text states that there must be continuous footway on at least one side – free of crossovers. This is overkill and adding an unnecessary constraint to the masterplan. How many vehicles will really be crossing the footway throughout the day? Suggest it is deleted..	Public Space	Response as follows.	It is not about the number of vehicles crossing, it is about the provision of a continuous and level footway, without drops for car driveway access. This is part of practical and measurable actions to design for a healthy, accessible, sustainable neighbourhood. <b>However, given the flush levels street design, this requirement has been removed.</b>
54	Street design – para 4.58: Text states that where local streets run alongside a park or green finger, parking should only be on the residential side of the street. This should be tested to ensure that this is achievable.	Public Space	Response as follows.	<b>Requirement removed for increased flexibility.</b>
50	Street design – para S4: Text states that “spur streets have an ultra-low traffic residential character with a human scale and a strong sense of place. Spur streets have modal filters at one end to prevent through-movement of vehicles. Service vehicle access may or may not be required, however shared surface principles should be used to provide an informal and social environment”. This approach can be introduced where practicable. However, we cannot at this stage agree with the locations shown on the plan for these streets as they have not been tested and some of the streets shown do not accord with the SMF masterplan document.	Public Space	Note	It has always been understood that the illustrative masterplan in the SMF is an illustration of how a scheme might come forward (hence 'illustrative') but the detail of it has not been tested, including block structure and street alignment. We have always been assured that that level of detail had not been fixed. The mandatory spatial principles are the mandatory elements of the SMF. In its current form the illustrative masterplan in the SMF would not meet some of the requirements of the design code. There is flexibility both in the illustrative masterplan and the strategic framework plan. The site-wide street network shows how spur streets can work in line with the design code requirements.
50	Street design – 4.71: Text states that “spur streets must provide through access for pedestrians and cyclists but must not allow through access for vehicles. If not adopted, the street must remain publicly accessible and maintained by an appropriate company”. This approach can be introduced where practicable. However, we cannot at this stage agree with the locations shown on the plan for these streets as they have not been tested and some of the streets shown do not accord with the SMF masterplan document.	Public Space	Note	Same point as the one above? See response above.
52	Street design – para 4.84: Text states that the greenway must be a minimum of 20m wide between private thresholds. The East-West Green Corridor ranges from 25m to 14.5m in in the endorsed SMF document, so suggest that the Design Code aligns with this.	Public Space	Note	interrogated, tested or fixed with EFDC through the SMF process and therefore is not defined in this way in the spatial fixes plans in the SMF. There is scope for block dimensions to change in order to ensure that the Greenway has meaningful and continuous green infrastructure along its whole length. 14.5m would be narrower than Latton Avenue.
52	Street design – para 4.88; Text states that vehicle access must not be permitted along the greenway, but that residential and servicing access is allowed along one side. This requirement is inflexible and concerning given the width of the corridors proposed. Vehicular access on both sides (on slow and shared surface streets) provides movement, activity and surveillance of this space. This requirement also places a reliance on rear courtyard parking, thus removing the amount of people accessing their homes through the front door.	Public Space	Note	There is a balance of car access to homes along the greenway and north-south green fingers in line with quality aspirations for the Greenway and the wider scheme and in line with modal shift targets. Vehicle access on both sides would significantly diminish the quality of the route and would make the Greenway overly hard and wide in relation to building heights. Given the modal shift target, a rear parking court would not mean people entering their home from the rear as they would not be using their car for the majority of journeys if the design has successfully achieved this.
54	Street design – car free play streets: This approach can be introduced where practicable. However, we cannot at this stage agree with the locations shown on the plan for these streets as they have not been tested and some of the streets shown do not accord with the SMF masterplan document.	Public Space	Note	It has always been understood that the illustrative masterplan in the SMF is an illustration of how a scheme might come forward (hence 'illustrative') but the detail of it has not been tested, including block structure and tertiary streets. The mandatory spatial principles are the mandatory elements of the SMF. In its current form the illustrative masterplan in the SMF would not meet some of the requirements of the design code. There is flexibility both in the illustrative masterplan and the strategic framework plan. The site-wide sustainable movement shows how car free play streets can work in line with the design code requirements.
	Public open space design – para 4.146: The text states that “indicative locations for the largest nodes and gateway spaces must be provided as indicated on the public space network diagram at the beginning of this section”. The text is contradictory as it refers to “indicative locations for the largest nodes” which suggests they are not fixed but then states that they “must be provided as indicated on the public space network diagram”. The locations also do not accord with the SMF. Suggest that the text is amended to say “could” or “should”, not must.	Public Space	Response as follows.	See note above regarding fixes in the SMF. Notwithstanding this, <b>further flexibility has been added by rewording to: Larger neighbourhood nodes must be provided as focal points for every area of residential development of approx. 200 homes. Indicative locations are shown on the public space network diagram at the beginning of this section .</b>

CEG/ Hallam Consultation Responses				
Event	Comment	Theme	Status	Note/ response/ action
60	Public open space design – para 4.147: The text here refers to Neighbourhood Nodes including a play element. The supporting plan at page 43 shows neighbourhood nodes adjacent to proposed play spaces, thus doubling up on play provision in localised areas, with an absence of provision elsewhere. This contradicts advice on distribution of play in the FIT guidance. Please clarify the distribution of play provision on the play strategy plan at page 63– see notes on this plan below. Suggest the play element is removed and play is addressed holistically by the play strategy - not here.	Public Space	Note	The key on p43 notes that smaller neighbourhood nodes are not shown. The full text of requirement 4.147 states that ' <i>Neighbourhood nodes should aid wayfinding and the space and infrastructure provision should be appropriate to the scale of the node. At the smallest scale this could be shaded seating and a play element.</i> ' Clearly then the smallest neighbourhood nodes are not those shown on the plan on p43 and not necessarily adjacent to play spaces. This leaves ample flexibility for designers of future proposals to decide how best to identify and articulate smaller node spaces.
60	Public open space design – para 4.148: Same point as above. Suggest the play element is removed.	Public Space	Response as follows.	Whilst the larger node spaces are located close to play spaces the intention here, with the words 'play elements' is that the node spaces can still be activated by play, possibly as an extension of the main play space. This could be as simple as different or playful surface treatment to encourage a playful interaction with the space. <b>Therefore, wording of 4.148 changed to: 'Incidental or integrated playful elements'</b>
60	Public open space design – para 4.150: Text states that “node spaces should combine different uses to maximise activity, vibrancy and interaction between different groups”. Many of the node spaces are located in purely residential areas, so references to “different uses” should be deleted.	Public Space	Response as follows.	Different uses meaning different ways of using the public space i.e. growing, playing, learning, sitting, recreation etc etc <b>however, this sentence has been removed to edit and simplify.</b>
60	Community plaza paragraph: Numbering in this section is back to front in the 2nd and 3rd paragraphs. Amend the numbering	Public Space	Response as follows.	<b>Noted. Numbering amended</b>
60	Public open space design – para 4.144: Text states that buildings fronting the square must not have railings or threshold fencing facing the square. Whilst we support this principle, it is likely that the school buildings will need such threshold fencing. Request that this point be made in the document.	Public Space	Response as follows.	Threshold fencing on to the community plaza will not be acceptable as this will diminish the quality of this important public space. For these areas, boundaries will need to be high-quality e.g. brick walls that are coherent with the architecture. <b>However, must changed to should.</b>
61	Public open space design - image: Some buildings are shown as having 3 storeys plus a pitched roof. These buildings will need to have flat roofs due to the height parameters set in the SMF – relating to views from the north and south of the site. Suggest that the image is amended.	Public Space	Note	As noted elsewhere there may be opportunities for moments of height for wayfinding and placemaking over the blanket height established. See built form section. This would also help in long term views to promote a more granular appearance to the built form. In any case, this massing is not labelled or highlighted on the image.
62	Play and recreation – para 4.152: Text states that “a site-wide play and recreation strategy must form part of the site-wide public realm strategy or design code. This must include play infrastructure as listed and shown on the play strategy diagram. As explained on our comments on the play and recreation plan below, this is significantly more than the SMF is showing, without justification. The SMF justifies it.	Public Space	Note	See other notes on play strategy. It is not 'significantly more' but is designed in line with the stated Vision and aims for the new community.
62	Play and recreation – para 4.156: Text states that “Connectivity with the wider community must be promoted through new or improved links to existing play spaces in surrounding areas and provision of new play infrastructure along key routes”. Note that the developer will have no control over links and facilities outside of the site boundaries. Suggest this is reworded.	Public Space	Note	See other notes on play strategy. This point is about having the locations of play spaces align with connections with neighbouring communities, particularly given the proposal for two new schools on the site. This includes new play spaces on the site as well as potentially outside of the site. Improvements outside of the site can be negotiated through planning discussions either through direct improvements or contributions.
62	Play and recreation – para 4.160: Text states that “destination play and recreation must include convenient access to public toilets”. We consider the only 'destination' play facility is the one at Lutton Park. See comments below.	Public Space	Note	See other notes on play strategy and other notes on the importance of publicly accessible WCs for accessibility and inclusivity.
63	Play and recreation - plan: The plan shows a distribution of NEAPs, LEAPs and LAPs which isn't consistent with FIT guidance and the logic for the number/type of space proposed is also not understood. This is a significant divergence from the approved SMF. In contrast the SMF play strategy sets out (on page 99) a clear play hierarchy and an even distribution of provision; it proposes 1 NEAP (destination play) in Lutton Park, 3 LEAPs to serve each neighbourhood, and 25 'LAP' locations distributed with walking distances that accord with FIT guidance to provide accessibility for all residents. It allows for flexibility at detailed design for the 'LAP' to be formal or informal doorstep / play-on-the way / play incidents positioned as deemed appropriate within a clear spatial framework. Has the Design Code play strategy considered the distribution of play elements and play provision holistically? Suggest adjusting this plan to avoid conflicts with the SMF.	Public Space	Note	Yes, the Design Code play strategy is one of the core strategies and has been considered holistically alongside other strategies including active travel, street hierarchy, public space network and wayfinding. The play strategy has been developed in line with the Vision and Garden Town aims of a healthy and uplifting neighbourhood by better integrating play into the development, close to homes and along travel routes so that it is part of everyday life, accessible, safe and well overlooked. The quantum is not vastly different to the quantum in the SMF but both the quantum and the locations reflect aspirations for quality and Garden Town status that goes beyond the bare minimum for status quo development. Not all areas shown as play need to be intensive 'playgrounds' they can comprise a small set of incidental or naturalistic play elements as long as well-designed and intentional. It has always been understood that the illustrative masterplan in the SMF is an illustration of how a scheme might come forward (hence 'illustrative') but the detail of it has not been tested, including play strategy. the SMF concentrates play on the periphery, often not well overlooked and does not make any discernible attempt to make access to these spaces safe and accessible. In its current form the illustrative masterplan in the SMF would not meet some of the requirements of the design code.

CEG/ Hallam Consultation Responses				
Event	Comment	Theme	Status	Note/ response/ action
64	Block structure and density – 5.1: Text states that the overall layout must be based on a grid of small perimeter blocks. Certain blocks shown on the plans in the document (in particular, the south west of the site) are very tight and do not allow sufficient flexibility of housing choice.	Built form	Note	The block size requirements are intentional and in line with the aims of the Garden Town and the District in promoting walkable neighbourhoods, a human scale, a variety of streets, permeability, better balance between private amenity and public amenity etc. The tightest part of the site (at the south-west) has been tested to ensure it is deliverable. Moreover, the block structure shown on the plan shows a range of block sizes across the site.
64	Block structure and density – para 5.2: Text states that the “block structure should be in line with the block structure shown on the plan in the document, with flexibility in precise dimension and geometry of blocks. Blocks must not be combined to create larger blocks. Smaller blocks could be tested”. We strongly object to the requirement for blocks not to be combined to create larger blocks. The design code must allow flexibility, particularly in the early phases of the development.	Built form	Note	See note above.
64	Block structure and density – para 5.5: Text states that “the site layout must be planned to address steep gradients without the need for excessive retaining walls. Where it is shown that retaining walls cannot be addressed through alternative layouts, these should be no higher than 0.8m”. What is this 0.8m based on?	Built form	Note	0.8m is based on the height above which blank walls would become increasingly unfriendly and unappealing to children or people in wheelchairs, as well as impacting other users' experience of the public realm. Also above that height, the relationship between living spaces and public realm activity is weakened.
64	Block structure and density – para 5.6: Text states that “block size must be designed to encourage walking and cycling. Block dimensions should be as shown in the diagram opposite. Where density is higher, or site dimensions are particularly constrained, block sizes should be at the smaller end; where density is lower, blocks could be at the larger end of the scale to reflect the more dispersed character. We agree that blocks should encourage walking and cycling. However, we strongly disagree that they should be shown as in the diagram. This shows one way of laying out blocks, but this cannot be fixed. Blocks must provide flexibility, particularly in the early phases of the development.	Built form	Note	See note above regarding block sizes.
64	Block structure and density – para 5.7: The text states that at least 75% of the blocks should have predominantly northsouth facing aspects. No justification is given for this. We can only assume that this relates to solar / PV panels. However, this approach can cause other issues of a) overheating and b) poor quality urban design and streets with no frontage onto them. Indeed, a number of the neighbourhood streets that run north-south will have few / no houses fronting onto them resulting in dead streets and a very poor environment /place. They will certainly not achieve the design aspirations set out in the street design section. Solar power can still be generated on blocks with housing facing east-west as long as the roof pitches are north-south. This also contradicts the statement on page 72 ‘Local Landmarks’ which seeks “to avoid monotonous streetscapes and skylines” and “avoid the development appearing as a solid mass of built form”.	Built form	Response as follows.	Concerning that the comment here is querying why north south frontages are preferable for passive design. See LETI climate change guide to understand. <b>However, wording amended to: 'Proposals should aim for at least 75% of dual aspect homes to have predominantly northsouth facing aspects'. So that it is a strong driver without overly constraining.</b>
68	Block structure and density - plan: The page contains a density strategy. The density strategy does not line up with the SMF. Whilst it shows the lowest density on the eastern side (along the woodland), low density housing should also be sought along Rye Hill Road to respond to the housing density / character opposite. High density is also shown around the area north of Ridings House. However, caution needs to be applied here in terms of building heights	Built form	Note	The density largely aligns with the SMF with additional rationale included, though it should be noted that the SMF does not fix the precise density. The reasons for higher density along the key routes is provided in the SMF and those locations with better public transport connections should also have higher density. This will not impact on the character of Rye Hill Road given the green buffer at the site edge.
67	Building typologies – para 5.10: Text states that “larger buildings must be carefully modulated to reduce the perceived bulk and flat roofs should be avoided in order to prevent a dominant and bulky silhouette”. The site has height limits, as set out in the endorsed SMF, and in many circumstances larger buildings will have to have flat roofs to achieve these limitations. Text should be altered to address this point.	Built form	Note	Extensive flat roofs should be avoided. Where they cannot be, they still need to be treated carefully to avoid a dominant and bulky silhouette, especially on larger buildings.
68	Frontages and building line – para 5.19: Text states that “roof forms must vary to support character and wayfinding. More varied roof heights and forms should be used around key nodes and primary junctions whereas smaller streets should have more consistent roof lines”. We support this, but it must also be acknowledged that building heights must respect the parameters set out in the SMF.	Built form	Note	Noted that the SMF has some mandatory spatial principles. This requirement does not contradict those.
68	Frontages and building line – para 5.22: Text states that “roof form and orientation should consider optimum orientation for photovoltaic panels”. We acknowledge this. However, this does not mean that buildings need to be orientated the same way. The key design principle here should be the orientation of the roof pitch.	Built form	Note	Yes, that’s right. See different note about building orientation for passive solar thermal design.
69	Frontages and building line plan: Hard to distinguish between the colours on the plan. This, therefore, makes the associated table harder to read. Address the colours on the plan.	Built form	Response as follows.	<b>Frontages and building plan removed and replaced with 'illustrative site-wide typology strategy', which more closely relates to other strategy diagrams in the document and is therefore easier to understand.</b>
70	Frontages and building line – para 5.33: Text states that streets should: - have terraced typologies on at least one side of any residential street. - restrict large plot detached houses to the lowest density areas next to the woodland. On the first point, we consider that this is not only too restrictive, but also has the potential to create imbalanced streets if the other side of the street is another housing typology. This point should be deleted. On the second point, we consider that restricting large plot detached houses to the area next to the woodland is wholly unacceptable and limits choice and variety in the remainder of the development. This point should be deleted.	Built form	Response as follows.	Typologies are not arbitrary and are defined in order to support the aims for the new development of vibrancy, form factor and thermal efficiency and compact walkable development that promotes active modes of travel and a high-quality public realm. The section on typologies defines the typologies in certain area but does not preclude different typologies in other locations that are not described here, as explained in the meeting. <b>This has been clarified in the document.</b>
70	Frontages and building line – table. 2 Greenway: Table references roof terraces for overlooking. This also, again, seeks to limit detached or semi-detached housing to the area next to the ancient woodland. It cannot be expected that all properties provide roof terraces on the Greenway. Suggest that this reference is deleted. Limiting detached or semi-detached housing to the area next to the ancient woodland is not acceptable.	Built form	Response as follows.	See note above. Good overlooking of the greenway is vital to its function for active travel.

CEG/ Hallam Consultation Responses				
Event	Comment	Theme	Status	Note/ response/ action
70	Frontages and building line – table. 5 Latton Avenue Frontage: Table states that Latton Avenue should comprise terraces, broken terraces of apartments. This is considered too restrictive. It could also result in a “wall effect” and does not achieve some of the principles set out on page 129 of the SMF	Built form	Response as follows.	See note above. Good overlooking of Latton Avenue is vital to its function for a vibrant connection.
70	Frontages and building line – table. 7 Wetland park frontage: Seeks 80-90% building line. The text also limits semi-detached and detached housing to the eastern end, close to the woodland. 80-90% building line is considered to be too dense and could result in a feel of a wall of development around these wetland spaces. Suggest that it is reduced to 65%. Limiting detached or semi-detached housing to the area next to the ancient woodland is not acceptable	Built form	Response as follows.	See note above regarding typologies. <b>Building line requirements as percentages around wetland has been changed to medium - high, 70 - 90%. This reflects the need for good overlooking of this space and the open space beyond, the need to respond to the scale of the space in front and provide a robust and appropriate backdrop..</b>
71	Frontages and building line – table. 10 Woodland frontage: Again, the text limits semi detached and detached housing to the eastern end, close to the woodland. Again, this is considered unacceptable.	Built form	Note	See note above regarding typologies, as discussed and explained in the meeting.
71	Frontages and building line – table. 12 Green finger frontage: Only permits terraced and broken terrace. Again, this is considered unacceptable	Built form	Response as follows.	See note above. Good overlooking of green fingers is vital to their function for safe activity and active travel.
74	Frontages and building line – table. 13 Rye Hill Road frontage: Seeks 60-80% building line. The housing here should really be low density detached and semi-detached. This better reflects the form of the housing opposite. Suggest this is 45-65% building line.	Built form	Response as follows.	The Rye Hill road frontage does not need to reflect the form of the housing opposite given it is well set back behind trees and a belt of SuDS basins. As noted in the design code, it does need to reflect its location close to the main gateways into the site. <b>However, building line as a percentage requirement for Rye Hill road frontage has been removed and this requirement is now represented by the density diagram.</b>
72	Building heights – second para: Reference made to a ridgeline. This is not a ridgeline, but a high point within the site.	Built form	Note	The site sits on a ridge so 'ridgeline' is a straightforward term that most can understand.
72	Building heights – para 5.38: Text states that building heights must consider the micro-climate of the street and public spaces, including wind modelling and sunlight analysis. Agree with this paragraph, but wind modelling should be a “should” or “could”, not a “must” as this is not a common requirement of a planning application – particularly outline.	Built form	Response as follows.	<b>This can be assessed in the wider planning process so removed from the design code.</b>
72	Building heights – para 5.40: Text states that floor-to-ceiling heights at ground level must be at least 2.6m throughout and 3m in the local centre, or higher where required for nonresidential uses. We have worked on the following assumptions, based on schemes delivered elsewhere: Flats = 3m (floor to floor) Commercial = 4m (floor to floor) Parapets for roof top equipment = 1.5m So: 2 storey flats with flat roofs and parapets = 7.5m 3 storey flats with flat roofs and parapets = 10.5m 3 storey (2 storey flats with commercial ground floor) = 11.5m 3 storey (2 storey flats with commercial ground floor with minimal heights of 2.6m floor to floor) = 10.7m	Built form	Response as follows.	The minimum heights are to promote quality street-scene, activity, light and ventilation to ground floor dwellings. <b>The requirement has been changed to 5.27 'Floor-to-ceiling heights at ground level should be at least 2.5m throughout and higher where required for non-residential uses.'</b>
73	Building heights plan: Views indicated on the plan correspond to those shown on the plan at page 9. See earlier comments on views. Note that some may not be deliverable.	Built form	Note	See response to earlier comments on views.
75	Wayfinding and sense of place plan: The plan is difficult to read. Difficult to distinguish the colours. Also, some streets are identified as “landmark frontage to key open space” A couple of these relate to north south running streets that run past blocks that are very shallow and are unlikely to have much in the way of building frontage. Not sure how these can, therefore, be land mark frontages	Identity	Response as follows.	<b>Graphics of diagram has been reviewed. It is a balance between separating information out into several different plans or showing how it all coordinates on a single plan.</b>
78	Energy use – whole section: Paras 7.4-7.11. Downgrade ‘must’ to ‘should’.	Resources	Note	The design code needs to be robust. Changing these to 'should' could weaken the design code and clearly, particularly when it comes to resources and the climate, this is not in anyone's best interest.
79	Adaptability and futureproofing – para 7.12: Text states that “most car parking must be shared on street or in car barns, rather than within private curtilages”. The word “must” should be removed here as homes will still require cars in the early phases at the very least. On-plot car parking can be accommodated if it is pulled back off the street and behind the building line – without having a detrimental impact on the street scape. As mentioned earlier, the Design Code plans only show 2x car barns, which is unlikely to be sufficient or in the right locations to serve the needs of the whole development.	Resources	Note	Car barns are very good ways of dealing with the interim solution where earlier phases may not have full access to eventual Sustainable Transport solutions. It is also critical that the sustainable modal shift culture and infrastructure is baked in from the start as far as possible. Car barns do not have to be limited to the two shown on the framework diagrams.



LATTON PRIORY DRAFT  
STRATEGIC DESIGN CODE  
TESTING REPORT

FEB 2024

## Introduction and background

This report contains the findings of the design code testing that was undertaken between December 2023 and February 2024 to identify opportunities to improve the Strategic Design Code for Latton Priory Masterplan Area, which is being produced by officers in the Epping Forest District Council (EFDC) Implementation Team.

Epping Forest District Council (EFDC) were awarded funding by the Department for Levelling Up, Homes and Communities (DLUHC) to produce a strategic design code for the Latton Priory masterplan area. Latton Priory is allocated in the Local Plan as one of three new Harlow and Gilston Garden Town (HGGT) communities in the District. The site is located to the south of Harlow, but within the administrative area of Epping Forest District. It is allocated to provide a minimum of 1,050 new homes, two schools, a local centre with retail and community facilities as well as a rich and multi-functional network of green infrastructure.

The design code has been produced with specialist input for transport expertise and engagement. It follows on from the Latton priory Strategic Masterplan Framework (the SMF), which was produced by the site promoters' consultants and endorsed by EFDC. The SMF establishes key spatial principles for the site and the strategic design code builds on these and develops strategies in line with the aims and vision of the District and the Garden Town. Once endorsed, the design code will sit alongside the SMF with material weight in the decision making of future planning application for the Latton Priory site.



Figure 1 Draft Strategic Design Code cover

## Purpose of Testing

Testing was undertaken to test the usability and deliverability of the design code with architects, simulating how it would be used in practice. The testing outcomes, alongside consultation feedback, would inform updates to the design code prior to endorsement at EFDC Cabinet to form a material planning consideration.

Testing is intended to help refine the design code by answering the following questions:

- How usable/ legible is the design code and what would improve ease of use?
- How deliverable/ achievable are the requirements of the design code? Particularly around typologies, parking and bins and bikes. Is any further information/ clarification required?
- Are there significant loopholes that would allow poor design/ placemaking?
- Does the code inspire good design? How could it go further?
- What should be included on a compliance tracker to aid those designing and reviewing future applications.

## Testing Process

This was the first-time design code testing had been undertaken at EFDC and therefore there was no set format prior to the exercise being undertaken. The brief was relatively open, with a few key aspects identified as essential to test. The process evolved as required as the testing progressed.

An initial brief and fixed was sent to the architecture firm 'Jas Bhalla Architects' (JBA) as follows:  
*It is intended that an Architect or urban designer, possibly with input from a landscape architect, uses the code to design a portion of the masterplan (c. 200 homes) at high-level. This should include a range of street types and typologies as identified in the code. Plans can be in sketch/ CAD block form but should include indicative parking arrangements and bin and bike storage in line with the requirements of the code and based on a provisional ratio of 1 car per dwelling (with additional cars located in car barns as required). This would be undertaken remotely and does not require in-person attendance or site visit. A CAD site plan will be provided as well as mark-up of the testing area. Other necessary information can be found in the [SMF](#) and the [draft strategic design code](#).*

*Testing will be followed by a collaborative workshop with a small group of officers from EFDC planning team and industry peers where the consultant will informally present their findings to inform discussions around any issues arising.*

The initial testing period was 5 days followed by a further half day collaborative workshop at EFDC offices with EFDC officers, the testing Architects, industry peers from the EFDC/ HGGT Quality Review Panel and a CEG/ Hallam (site promoter) representative. JBA informally presented their findings at this workshop and this led to discussions around various aspects of the code and the requirements.

Due to limited time spent on the block testing aspect prior to the workshop, JBA were commissioned to continue with this following the workshop. This allowed further development and investigation of potential issues or questions raised during the workshop.



## 1. Block Testing

The initial testing area was approx. 200 homes as shown in red below. This was revised down to a smaller area as shown in blue to accommodate the limited timeframe for testing, noting that it was seen as more important to look at block testing in some detail, e.g. bin storage capacity and car parking rather than testing a larger area in less detail.

The testing area represents the tightest portion of the site due to the constraints of the distance between the southern build-to line and the access to Dorrington Farm. It is important to note that the typologies used to address the limited depth and the design code requirements for this part of the site may not be directly applicable to other parts of the site where site constraints allow more flexibility.



Figure 2 Design Code Illustrative masterplan with testing area mark-ups

It should also be noted that the testing layouts show just one way of meeting design code requirements in a very basic way to test deliverability. Detail, such as detailed street design or trees and green infrastructure has not been included for these purposes. There will be a variety of ways to meet the design code requirements, and this will need to be developed through a high-quality design process with appropriate specialists and consultants working collaboratively.

The following block testing diagrams illustrate how the four blocks can be delivered with associated street types, green infrastructure, car parking and bins and bicycle storage and other technical requirements such as emergency and refuse access.

An initial composite diagram was produced from the various strategic diagrams in the code and this was developed into simple block testing.

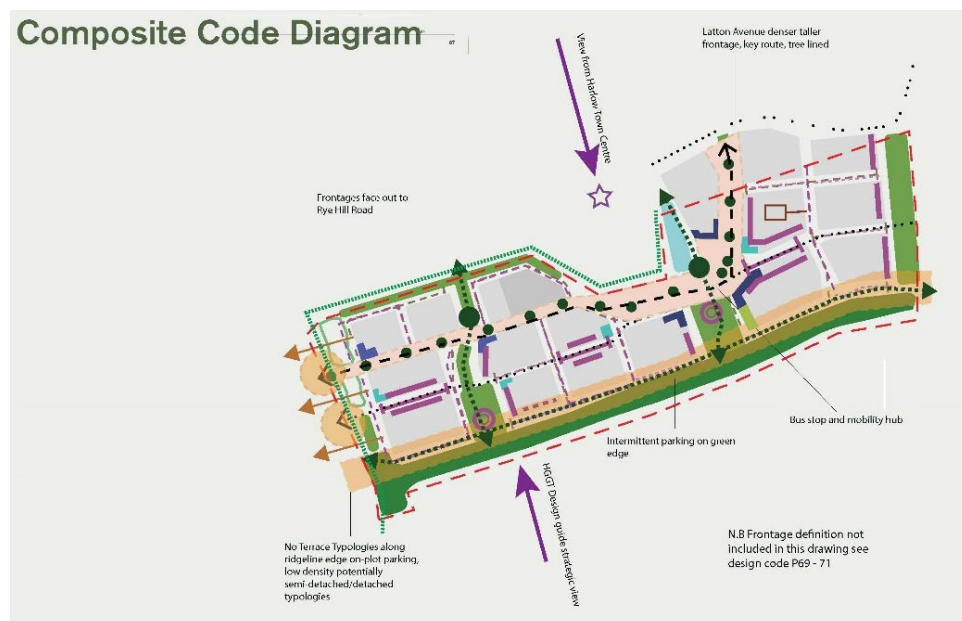


Figure 3 Composite code diagram (JBA)

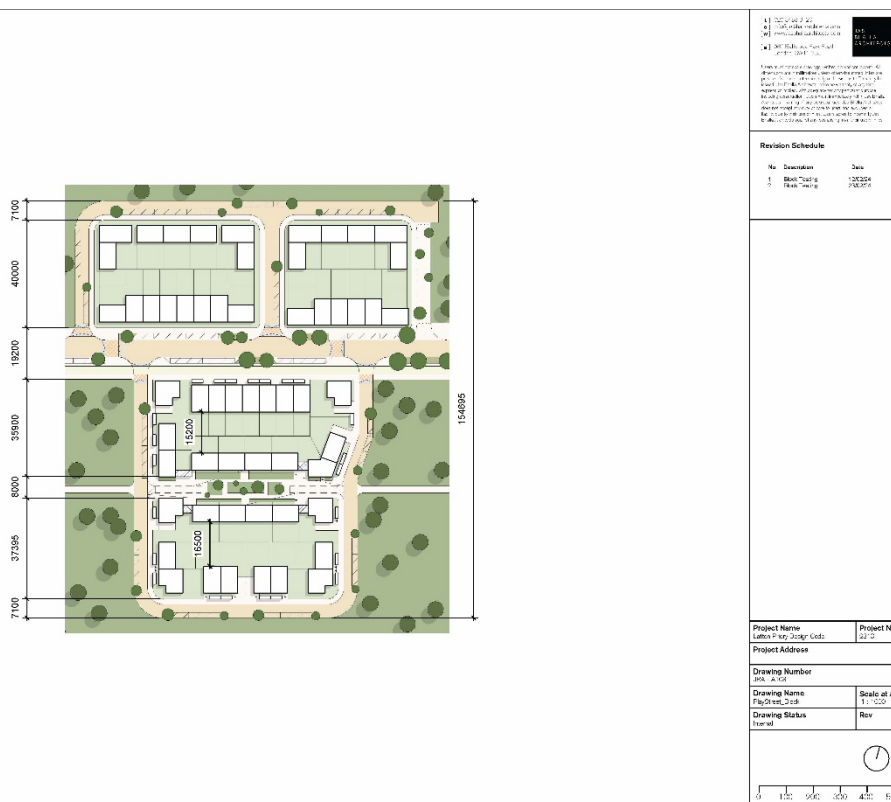


Figure 4 Block testing diagram (JBA)

Block Test diagram illustrates a depth of 154.7 m between the green buffer south of Dorrington farm to the green buffer to the pitches and allotments to the south can accommodate three blocks plus Latton Avenue, two local streets and a car-free play street.

Two options have been shown for the car-free play street. One option assumes that a refuse vehicle can turn into the end of the play street and individual bin stores are provided to the houses on the car-free play street. In the second option, communal bin stores are provided so that the refuse vehicle can collect from the local street without the need to turn in and reverse out.



Figure 5 Blocks around car-free play street, with individual bin stores (JBA)

- Individual refuse and bike store for all dwellings, resulting in all dwellings having a greater setback from the pavement line. In this test layout, the result is a minimum setback of 2.2m from the pavement edge. This conflicts with the Building Line and Threshold Requirements table on page 70, which states "Small setbacks: 0.5m - 1m." To mitigate this, all individual refuse positioned along the pavement edge, to read as a continuous building line.
- For visitor parking, we intend to have it on-street in line with Requirement 3.35, allowing an extra two spaces for visitor parking .
- On-plot parking for two dwellings on southern edge, with a minimum dimension of 6m by 3m.



Figure 6 Blocks around car-free play street, with communal bin stores (JBA)

- Option with 2 communal refuse areas, each large enough to contain 2 x 1100 Lt bins. Each refuse area services 4 units, with a maximum drag distance of 22m.
- In this current arrangement the drag distance from the front door to the Refuse is 22m and 15 – 15.5m from refuse to the main streets. This is an overall distance of 37m.
- Additionally, 2 communal bike stores, in total large enough to accommodate 10 Sheffield bike stands, providing 20 cycle spaces for the 8 units along the play street.
- In this option, a fire tender will still need to drive part way into either end of the street in order to be able to ‘get within 45m of the further part of any dwelling’, however this is showing the worst case and the extents of fire tender access may be shorter once actual dwelling layouts are tested. Furthermore, as access would only be required in an emergency, these spaces at the ends of the street could be landscaped in way that is not designed for vehicles but will not prevent vehicle access in an emergency.

## 2. Document Usability & Legibility

JBA provided the following feedback and suggestions on the overall document usability and legibility:

---

# Latton Priory Design Code Testing

## Structure and Useability Feedback

One aspect of our brief was to look at the code from a useability perspective, offering insights into the experience of working with the code having not had sight of it before. This note sets out the key strengths and weaknesses of the code structure and suggests a range of potential responses. These are organised by the intensity of effort/scale of change required and were refined via dialogue with design review panel members in a workshop held on 15<sup>th</sup> December 2023.

### Strengths

1. Comprehensive – the code establishes a comprehensive set of urban design principles across a wide range of themes that, taken together, should elevate user’s proposals far above that of a standard application.
2. Visually Engaging – the use of colour, maps, diagrams, visualisations and precedent imagery helps bring the principles of the code alive for the user.
3. Structured – there is a clear thematic structure set out in the contents, with colour coded chapters that clearly indicate which theme is being covered.

### Weaknesses

1. Volume of information: There are 14 strategic diagrams across different themes. This is useful in the ways highlighted above but challenging for a new user to figure out how they all layer up. For example, gaining a comprehensive understanding of movement requires the user to read across several different plans.
2. Hierarchy of importance: – “Musts and Should’s” – greater clarity could be given visually to help the user distinguish between what information is advisory vs mandatory and what is policy vs what is explanation.
3. Navigation: the user journey of the document could be improved with greater clarity about when certain guidance should be consulted and applied in what order and to which design stages. e.g. what information informs broad site principles at outline vs detailed plot design within a full planning application.

Level	Responses to Observations		
	Volume of Information	Hierarchy of Importance	Navigation
More time/capacity	Digitise strategic diagrams so layers can be overlaid, turned on/off and zoomed into		
	Edit to reduce volume of text	Colour code “musts” and “shoulds”.	Expand “how to use” section on page 4 to provide sequential set of steps  (see possible example below)
	Consider combining/consolidating some of the strategic diagrams	Colour code rule vs explanatory text.	Also use the above section to explain any additional colour coding (see Hierarchy of Importance)
	Consider combining linked pieces of information, e.g. road types and parking treatment	Order “musts” and “shoulds” so they are grouped together and “musts” come first.	
Less time/capacity	Include checklist for easy compliance/completeness	Add “illustrative” caveat to strategic diagrams.	

Possible approach to “how to use” section

- 1 Read the introduction and background section to understand context
- 2 Read the strategic design code section to understand the overall spatial approach
- 3 Read the key strategies and framework section of each theme to develop design principles
- 4 Read the detailed guidance to refine final design

Introduction and background information	
1	Introduction 3
	How to use the design code 4
	Planning context 6
	Site context 8
	Design ambitions 12
Strategic design code	
2	D1/ Strategic design code framework 16
	Framework masterplan 16
	Stewardship framework 18
3	D2/ Nature 20
4	Green infrastructure framework 20
	Water management 26
3	D3/ Movement 28
	Site-wide sustainable movement 28
	Site-wide vehicular movement 32
	Site-wide street network 34
	Site-wide car parking 36
	Parking design 38
4	Servicing 40



### 3. Opportunities and Actions

Opportunities that emerged during the process range from specific to general amendments and from those that are more critical and beneficial to the use and understanding of the code to those that would be helpful but could form part of the wider planning process. The actions noted below consolidate the results of the testing on the previous two pages as well as input from industry peers at the collaborative workshop on 15<sup>th</sup> December:

#### **Actions to improve usability/ legibility of the design code:**

- Reduce overall volume of text, focussing particularly on text-heavy pages.
- Review ‘musts’ and ‘shoulds’ – including the number of requirements to ensure that the design code priorities are understood. Consider visually differentiating ‘musts’ and ‘shoulds’ though noting that ‘shoulds’ should not be ignored and are not less important, but may just be more subjective than the ‘musts’.
- Review strategic diagrams. Consider colour changes to aid clarity and/ or combining/ consolidating information to reduce the need to cross-reference between different parts of the design code.
- Consider how to combine linked information/ requirements to reduce the need for cross-referencing, particularly around street requirements
- Expand on ‘how to use’ section to set out process for designing using the code. The process section should also include a process for deviating from the Code in certain circumstances, requiring designs to be reviewed by the QRP to demonstrate that they are an improvement.
- Produce compliance tracker to aid document use and review of proposals.

#### **Actions to improve design outcomes:**

- Add more information about green infrastructure requirements e.g. green buffers at key edges or treatment beside existing hedgerows.
- Reconsider the requirement around all mature trees from the outset to balance with longevity. A mix may be more appropriate.
- Review the requirements for building-line set-backs. These may be overly restrictive in places and may not allow for front garden bin/ bike storage where required.
- Review ‘frontage/ building line’ requirements to allow more flexibility and make code easier to understand/ less complex. The principle of maximising frontage is positive but its extent should be reduced to allow more gaps in the built form. Gaps should be a minimum of 2-3m.
- Sections showing how buildings relate to the street would be beneficial.
- Possible further coding around site perimeter roads and the character of these.

# Technical Note

**Project:** Latton Priory Design Code

**Subject:** Consultation Comments Technical Review

<b>Client:</b>	Epping Forest District Council	<b>Version:</b>	P1 DRAFT
<b>Project No:</b>	05784/01	<b>Author:</b>	DR
<b>Date:</b>	22/12/23	<b>Approved:</b>	JT

## I Introduction

1.1.1 This Technical Note considers verbal comments made by ECC at a meeting dated 11/12/23 as part of the Latton Priory Design Code consultation process. This technical note should be read in conjunction with the draft Design Code.

1.1.2 Analysis has been carried out on the following items to test the layout and provide further guidance on the proposals.

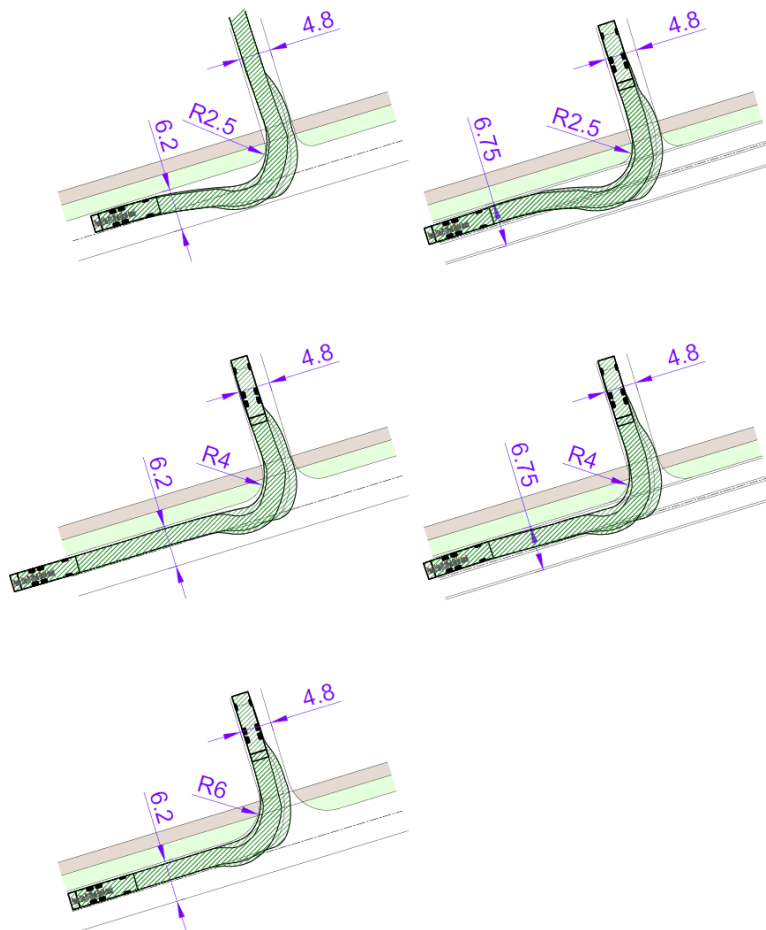
- Vehicle Tracking – testing refuse vehicle access requirements
- ‘Copenhagen’ Crossings – suitability and detailed design
- Carriageway Narrowing’s – technical requirements
- Latton Priory Street design typology proposals – Comparison with Essex Design Guide
- Relevant adopted street examples.



## 2 Tracking Analysis – Refuse Vehicle

### 2.1 Latton Avenue (S1) – left turn onto S2 Local / S3 Neighbourhood streets

2.1.1 The following swept paths consider the impact on vehicle turning and the detailing of pedestrian crossings at side street junctions off Latton Avenue. Current proposals show the Latton Avenue carriageway as 6.2m wide, side street carriageways as 4.8m wide, and a 2.5m turning radius. Edge buffers between the side street carriageway and private frontages have been ignored for purposes of the analysis.

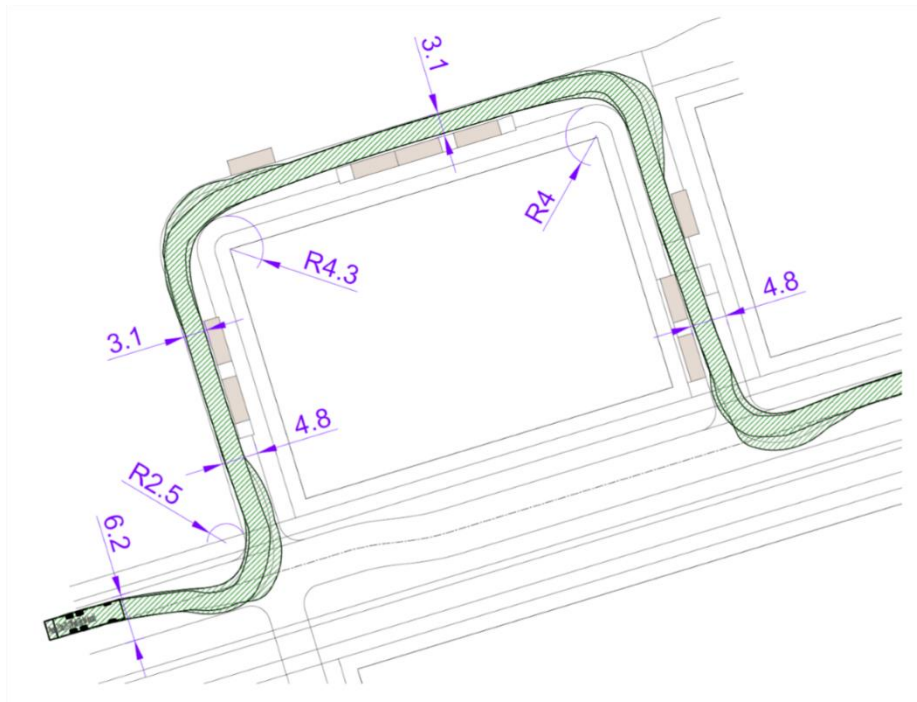


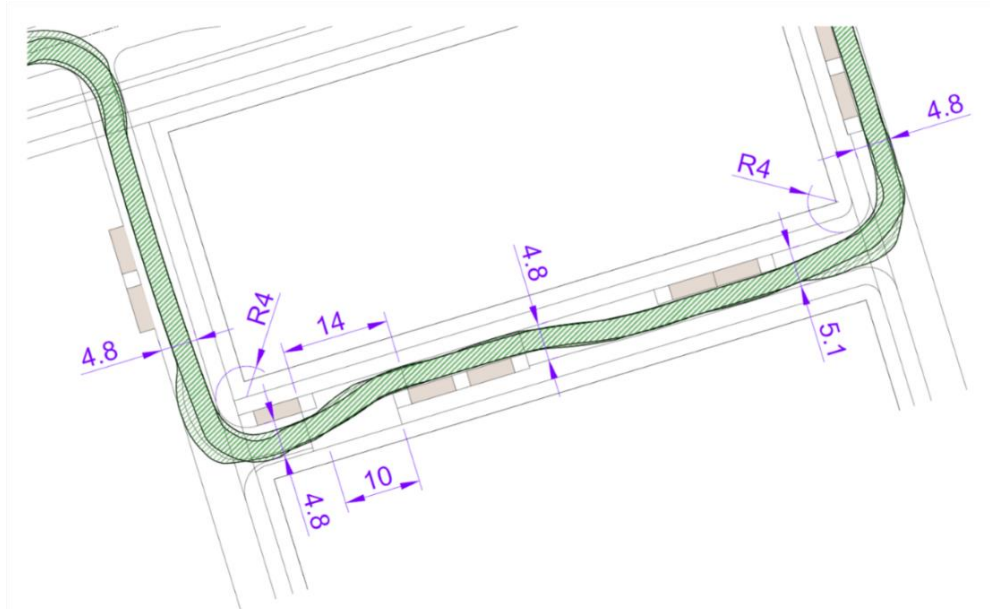
2.1.2 The analysis indicates that a refuse vehicle is able to manage the turn under all the geometric options tested. As is normal practise the vehicle uses the whole carriageway width where required but avoids encroachment onto the footway. This is consistent with the approach adopted in manual for streets. Para 6.8.1 states.

*...The design of local roads should accommodate service vehicles without allowing their requirements to dominate the layout. On the streets with low traffic flows and speeds it may be assumed that they will be able to use the full width of carriage way to manoeuvre...*

## 2.2 S3 Neighbourhood Street

2.2.1 Analysis of the neighbourhood street shows a minimum requirement of 10m between features at chicanes that use the full carriageway and parking bay width (6.8m total) (see bottom diagram). This separation distance will need to increase where the street is narrower (where only the 4.8m wide carriageway width is available for the manoeuvre) and would be subject to further swept path analysis.



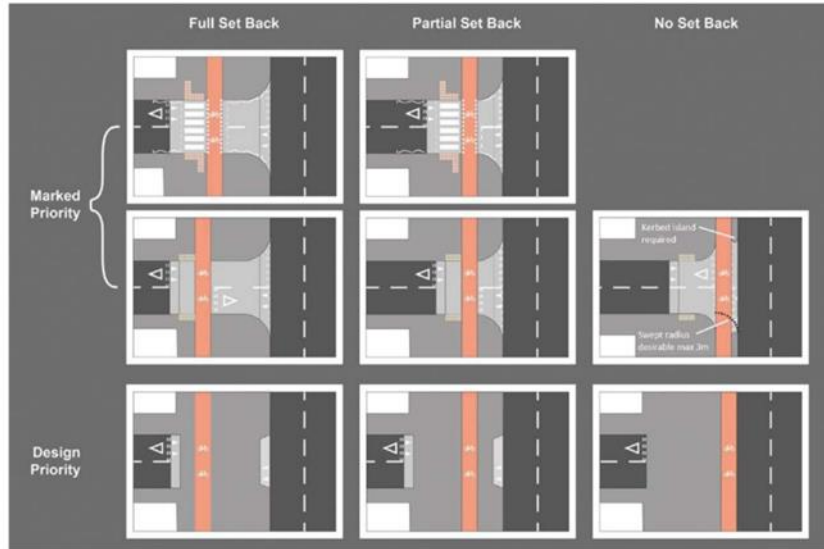


### 3 'Copenhagen' Crossings (also referred to as Continuous Footways) & Street Usage

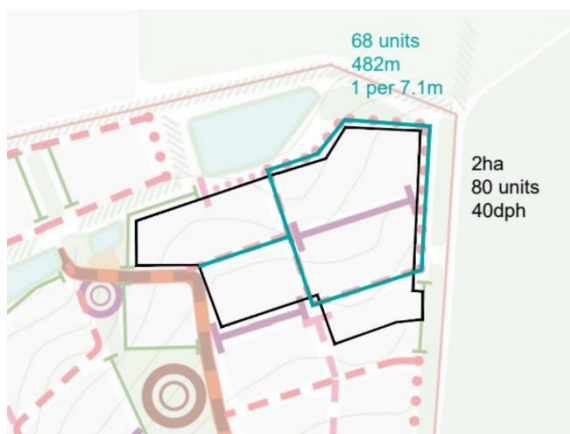
#### 3.1 Layout & Suitability

- 3.1.1 Two types of pedestrian / cycle crossing are typically used at side street junctions: Raised entry treatments and continuous footways (also referred to as continuous pavements or continuous crossings). Whilst a continuous footway may incorporate features found at a raised entry treatment, a continuous footway must provide continuity of the footway material over the junction, whilst being robust enough to cater for vehicle movements.
- 3.1.2 LTN 1/20 although focused on cycle requirements, recognises that a cycle crossing at a side junction will typically be combined with a pedestrian crossing. Where a partial setback arrangement is proposed as below (which is similar to the proposals along the Southern side of Latton Avenue), item 10.5.22 states that this arrangement 'should only be considered where traffic flows on the minor arm are very light, typically less than 2,000 PCU/day, and where there are frequent gaps in traffic on the major arm so that there is minimal queuing on the side road.
- 3.1.3 Note that the examples below show a combination of 'raised entry' and continuous footway treatments.

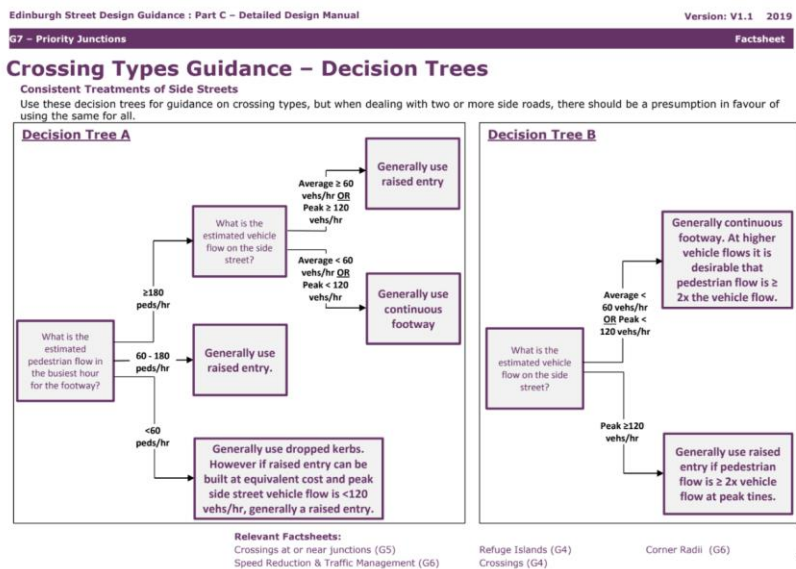
Figure 10.13: Priority crossings of cycle tracks at side roads\*



3.1.4 With reference to the Latton Priory layout, assuming some worst-case scenarios / rough estimations, one side street off Latton Avenue will serve up to approximately 75 dwellings. The masterplan extracts show an approximation of unit numbers based on the block testing carried out in the Southwest corner of the site by EFDC. It also assumes a proportion will be served by the Latton Avenue frontage. 75 dwellings equate to approx. 53 vehicle movements per hour assuming a 0.7 veh trip rate. This falls well within the suggested maximum of 2000 units per day.



3.1.5 Although a detailed analysis has not been carried out, 53 vehicle movements per hour also appears to be within the suggested parameters for continuous footway use within the Edinburgh Street Design Guide - less than 60v/h average or 120v/h peak – see below:



3.1.6 Additionally, the Surrey Healthy Streets Guide states that:

*‘Continuous crossings must be used whenever a lower order street, such as a local street connects to a higher order street, such as a primary street.’*

## 3.2 Radii

3.2.1 UK guidance from other Authorities states that ‘tight’ radii should be used. Where actual dimensions are provided, 6m is cited as a maximum, with 3m being the preferred maximum (sometimes reducing to 1m). Examples include ‘Active Travel Act Guidance (Welsh Government) and ‘Edinburgh Street Design Guidance’.

3.2.2 The London Cycling Design Standards provides guidance on corner radii (item 5.1.4), although does highlight that the use of continuous footways in the UK is relatively untested:

Designers should start from the assumption that corner radii should be minimised to benefit vulnerable road users, and then test whether this raises any issues. Junction design and the size of corner radii need to support calming and speed reduction measures, as described in section 3.3. Indicative ranges of corner radii to support speed limits on the street in question are:

- 0-3 metres for 20mph speed limit
- 2-6 metres for 30mph
- 3-10 metres for more than 30mph

### 3.3 Tactile Paving

- 3.3.1 Continuous footways, in Holland for example, do not typically incorporate tactile paving. UK research / guidance however suggests that this should be provided, unless vehicle flows are 'very' low.
- 3.3.2 Edinburgh Street Design Guidance – Fact Sheet G7 – page 8.

#### **Tactile Paving**

There is a presumption in favour of the use of tactile paving at continuous footway crossings. However, where the two way traffic flow is less than 20 veh./hr and the carriageway width over the ramp is less than 5m, tactile paving can be omitted.

## 4 Carriageway Narrowing's

- 4.1.1 Street narrowing / one way carriageway workings have been considered based on fire tender access and user comfort.
- 4.1.2 Lower order streets, such as the Neighbourhood Street proposes carriageway narrowing's of 3.1m for up to a maximum of approximately 30m to provide zones for landscaping, car parking, street furniture, and to provide inherent traffic calming.

## 4.2 Fire Tender Access:

- 4.2.1 Building Regulations (part B1 – Section B5 – Table 13.1) states a required minimum operating road width between kerbs of 3.7m.
- 4.2.2 Item 6.7.3 in Manual for Streets clarifies that this 3.7m width requirement is for the operating space at the scene of the fire and that the access route can be reduced to 2.75m over short distances providing the pump appliance can get to within 45m of the dwelling entrance.
- 4.2.3 It should be noted that the 45m requirement within the Building Regulations states that this should be to all points within a dwelling – not just to the front entrance.

## 4.3 User Comfort:

- 4.3.1 LTN 1/20 states that carriageway narrowing’s with widths between 3.2m and 3.9m should be avoided due to cyclist safety.

**7.2.9** Chicanes and pinch-points should be designed in such a way that cyclists are neither squeezed nor intimidated by motor vehicles trying to overtake. The preferred option is to provide a bypass or alternatively sufficient lane width (more than 3.9m) so that the cyclist can remain in the secondary position and be overtaken safely. Where the lane or cycle bypass is bounded by fixed objects such as full height kerbs, the additional widths given in Table 5-3 should be provided.

**7.2.10** When width is insufficient for a bypass, the carriageway width is restricted to prevent overtaking. This will not be desirable over long lengths unless motor traffic volumes are also very low, as cyclists will feel intimidated by vehicles waiting to overtake. Gaps between kerbs (or kerb and solid white centre line) should be a maximum of 3.2m. As noted above, widths between 3.2m and 3.9m may encourage close overtaking by motor traffic at pinch points and should not be used.

## 5. EDG Street Type Comparison

- 4.3.2 This section compares the draft Design Code Main Street types with the array of options presented in the EDG.

Street Type D Feeder (EDG P133) vs Latton Priory S1 Latton Avenue			
Design Feature	EDG Standard	Latton Priority Design Code	Notes
Dwellings Served	Up to 700 units	Latton Avenue serves approx. 1400 units via a through route	(to be checked / confirmed by EFDC)

Widths	c/w/ width 6.75m bus, footway 2m, Foot/cycle way 3.5m	c/w width 6.2m f/w x 2 @ 2m each Separated cycleway 3m	
Max Driver Speed	20mph	20mph	
Gradient	6% on bus route	TBC	
Centreline Radius	20m	TBC	
Kerb Radii	6m (10m on bus route)	2.5m (6m at STC)	
Use	Resi / non resi	Resi / non resi	* Type C Mixed Use Street features may be suitable for Latton Avenue at Local Centres
Verge Width	3m	2.5m	
Parking	Parking permitted where additional off c/w parking provided	Ok	
Accesses	No frontage access within 15m from side junctions	Ok	Design code states no frontage access along Latton Avenue
Reversing	Egress in forward gear only within 15 – 30m from a junction	Ok	
Alignment	Straight c/w 22m from all junctions	TBC	Confirm distance and add rule

4.3.3 \* Whilst Latton Avenue is considered a type D (Feeder) street based on the EDG – as this can serve both resi and non resi uses – design features of a type C (Mixed-use) street could be considered suitable for parts of Latton Avenue – at Local Centres for instance.

4.3.4 As per EDG type C Mixed Use Street – if 6.75m wide carriageway preferred, consider providing overrun-able central median and kerb line buffer strips to local centre.

Street Type E Access (P134) vs Latton Priory S2 Local Street			
Design Feature	EDG Standard	Latton Priority Design Code	Notes
Dwellings Served	Purpose – up to 400 units. 200 units on Cul-de-Sac	LP Local Street serves 100 - 300 units approx	(to be checked / confirmed by EFDC)
Widths	c/w 5.5m + 2 x 2m f/w	12.8m overall 4.8m c/w	



		2 x 2m f/w	
Max Driver Speed	20mph	OK	
Gradient	Max Gradient 8%	TBC	
Centreline Radius	13.6 – 30m	TBC	
Kerb Radii	6m	2.5m	
Accesses	No frontage access within 15m from side junctions	OK	Add rule
Alignment	Straight c/w 15m from all junctions	TBC	Confirm distance and add rule

4.3.5 Latton Priory incorporates S3 Neighbourhood Streets that do not align directly with the EDG type E or F streets. A hybrid has therefore been proposed using the EDG Minor Access type F street as a guide and to show similarities where relevant:

Latton Priory S3 Neighbourhood Streets (using EDG type F as guide)			
Ref	EDG Standard	Latton Priority Design Code	Notes
Dwellings Served	Up to 25 units in a cul-de-sac	Serves up to 100 dwellings	(to be checked / confirmed by EFDC)
Widths	Combined shared surface 6m	9.3m overall shared surface. 4.8m carriageway Min 0.5m buffer to private frontages. At least 1 x 2m min width footway.	
Length	Max length 125m	TBC	
Narrowing	Localised narrowing permitted	Narrowing up to max 30m for parking / soft landscaping. 2.75m wide carriageway min / 3.1m max	Potential for narrowing length will depend on overall street length, and fire tender dwelling access requirements
Max Driver Speed	20mph	20mph	Layout designed to encourage lower speeds
Gradient	Max Gradient 8%	TBC	
Centreline Radius	Radii 13.6 – 30m	TBC	

Kerb radii	-	4m min S3 to S3	
Accesses	Direct access to dwellings	Direct access to dwellings allowable	
Junction Treatment	Tabled entrance	OK	Add continuous crossing rule
Alignment	Straight c/w 15m from all junctions	TBC	Confirm distance and add rule

Street Type G Access vs Latton Priory S4 Spur Street			
Ref	Standard	Latton Priority Design Code	Notes
Dwellings Served	20 units		
Widths	Combined shared surface 6m	Combined shared surface 7.1m	
Length	50m approx	75m approx	(to be checked / confirmed by EFDC)
Narrowing	Localised narrowing permitted	Narrowing up to max 12m for parking / soft landscaping. 2.75m wide carriageway min / 3.1m max 4.1m min c/w where car can pass cycle or cars pass. 0.5m buffers to private frontage	
Gradient	Max Gradient 8%	TBC	
Centreline Radius	Radii 13.6 – 30m	TBC	
Kerb radii	-	1m max	
Junction Treatment	Special junction detail featuring entrance ramp/table.  Priority for pedestrians and cyclists across junctions.	OK	

	A constricted entrance enclosed by buildings or walls for the first 8m back from the approach street	OK	
Alignment	Straight c/w 10m from entrance junctions	TBC	

## 5 Relevant Adopted Street Examples

5.1.1 This section presents 10 good examples of typical adopted street designs, found in the UK to highlight some of the common arrangements and typical dimensions.

### 5.2 Whitmore Drive, Colchester



- Main street serving around 1500 homes and mixed-use facilities.
- Adopted Essex CC
- Carriageway width 6.5m, verge (with trees) 2.85m, footway 2.0m (source - Streets for Healthy Life)
- Designed as bus route
- Side Road radii est 6m

### 5.3 The Chase, Newhall Harlow



- Main street serving around 2500 homes and mixed-use facilities.
- Adopted Essex CC
- Carriageway width 7.6m (effective width due to parking 5.5m), verge (with trees) 3-4m, footway 2.0m (source - Streets for Healthy Life)
- Designed as bus route.
- Side Road radii est 6m

## 5.4 High Street Upton



- Main street serving around 2200 homes and mixed-use facilities.
- Adopted Northamptonshire CC
- Carriageway width 6.75m (estimated), 2m parking bays, footways 3.0- 5.0m
- Designed as bus route
- Side Road radii est 6m

## 5.5 Mulberry Way, Bath



- Main street serving around 700 homes.
- Adopted BANES
- Carriageway width 6.5m, 2m parking bays, footways 2.0m (estimated)
- Designed as bus route
- Side Road radii est 2m inset square format

## 5.6 Stret Euther Penndragon, Nansledan



- The Nansledan development near Newquay, Cornwall, is a large-scale project designed to create a sustainable community. It is planned to eventually comprise around 4,000 homes, integrating a diverse mix of residential properties, businesses, and community facilities
- Adopted Cornwall Council
- Carriageway width 6.5m, 2m parking bay inset, footways 2.0m – 5.0m (estimated)
- Designed as bus route
- Side Road radii est 2m inset square format

**5.7 Derwent Way, York**



- The Derwenthorpe development in York is planned to include a total of 481 homes
- Adopted - TBC
- Carriageway width 5.5m, 2m parking bay inset, footways 2.0m (estimated), some narrowing's to force shuttle working
- Designed as bus route
- Side Road radii est 5m



**5.8 Fedden Street, Brabazon, Bristol**



- Tertiary Street providing access to sub 25 units but forming part of wider loop.
- Adopted South Gloucestershire Council (except landscape)
- Carriageway Width – 4.5m, 2m landscape margins, 2.0m footways
- Flush – 25mm kerb
- Restricted zone, yet to be enforced

## 5.9 Navigation Street, Nottingham



- Tertiary Street providing access to sub 25 units, but forming part of wider loop.
- Adopted – Nottingham City Council
- Carriageway Width – 3.5m to 4.8m, 2m parking / landscape margins, 2.0m footways
- Flush kerbs
- Resident Parking Zone

## 5.10 Stret Lugan, Nanslegan



- Tertiary Street providing access to circa 100 units, but forming part of wider loop.
- Adopted – Cornwall Council
- Carriageway Width – 4.8m (inc parking on street), 2.0m footways
- 100mm kerbs
- Unrestricted Parking

## 6 Conclusions

- 6.1.1 Following stakeholder comments and further additional technical guidance, we recommend the following general changes are made to the draft Design Code.
- 6.1.2 **Latton Avenue** - increase carriageway width from 6.2m to 6.75m. Retain principles of Copenhagen crossings to side roads but consider increasing side road radii to 4.0 metres in conjunction with further discussion with ECC. This approach recognises at Copenhagen crossings will require special agreement with the highway authority.
- 6.1.3 **Local Streets** - increase carriageway width from 4.8 metres to 5.5 metres. All other design features remain unchanged.

- 6.1.4 Neighbourhood Streets - retain principle of 4.8 metre width and 3.1 metre narrowing's but add additional rules governing the use of narrowing's. To include, offset from junctions, length of narrowing, and widening on corners.

end



## **Harlow and Gilston Quality Review Panel**

### **Report of Workshop Review Meeting: Latton Priory Design Code**

Friday 19 May 2023

Room 1.2, Epping Forest District Council, Civic Offices, 323 High Street, CM16 4BZ

#### **Panel**

Peter Maxwell (chair)  
Richard Lewis  
Prachi Rampuria

#### **Attendees**

Ione Braddick	Epping Forest District Council lead for Harlow & Gilston Garden Town
Naisha Polaine	Harlow & Gilston Garden Town
Gavin Cooper	Essex District Council
Tai Tsui	Essex District Council
Paul Wilkinson	Essex District Council
Lucy Block	Frame Projects
Roxanne Salburg	Frame Projects

#### **Apologies / report copied to**

Rosalind Peebles	Epping Forest District Council
Deborah Denner	Frame Projects

#### **Confidentiality**

This is a pre-application review, and therefore confidential. As public organisations Harlow Council, East Hertfordshire District Council and Epping Forest District Council are subject to the Freedom of Information Act (FOI) and Environmental Information Regulations (EIR), and in the case of an FOI/EIR request may be obliged to release project information submitted for review.

## 1. Project name and site address

Latton Priory Strategic Design Code - Pathfinders

## 2. Presenting team

Krishma Shah	EFDC Senior Urban Design Officer
Peter Van der Zwan	EFDC Planning Officer
Jon Tricker	Phil Jones Associates (PJA)

## 3. Planning authority briefing

Epping Forest District Council (EFDC) received funding to produce a design code for the Latton Priory Strategic Masterplan Area as part of the DLUHC Pathfinders programme. The aim is to embed high-quality, sustainable, and equitable design into the development framework for Latton Priory, consistent with the principles in the National Design Guide and National Model Design Code.

As well as being a strategic masterplan site, Latton Priory is one of three new Harlow and Gilston Garden Town (HGGT) communities. The Latton Priory Strategic Masterplan (SMF) area is former green belt land at the north of the district on the border of Harlow. It is allocated to provide a minimum of 1,050 homes, a new local centre including retail and community uses, primary school, secondary school, a gypsy and traveller site, as well as strategic green infrastructure including SANG, sports pitches and an extension of the Harlow green wedge. The SMF scheme suggests that 1,500 homes can be accommodated subject to environmental impact testing.

Design code work is currently being progressed with a view to having a full draft ready by the end of July 2023. The team are seeking QRP input to ensure that the format, scope, coding plans and emerging design code are in line with the vision and high-quality sought by the District and HGGT.

The panel is invited to comment on the emerging design code and whether it fulfils the aim of being transferable and exemplary, to promote design quality on other sites within the Garden Town and beyond. Comments related to the scope and content are sought, as well as how best to coordinate with the developing Strategic Masterplan Framework, Sustainability Guidance and emerging Stewardship Charter. Officers would also welcome the panel's advice on whether it feels that the emerging code is sufficiently legible and enforceable, while providing flexible to allow for future innovation and creativity.



#### 4. Quality Review Panel's views

##### *Summary*

The panel is impressed with the amount of work undertaken since the previous review and it commends the detail and content developed. The focus on landscape design, public realm and developing a clear hierarchy of streets is positive. The panel feels that when combined, these considerations will enable good placemaking and support modal shift. Further reference to the identity and character of Harlow and Epping Forest would also be welcome, to make the design code more specific to the local context.

However, the panel cautions that there could be overlap between the different sections of the code, and it advises the team to sense check and simplify where possible to avoid duplication. The usability of the document should be considered for different user groups, including developers, design teams and planning officers. The sketches and axonometric diagrams are successful, and the panel suggests continuing to use graphic devices to further clarify the rules. Stress testing the document through consultation should also be considered, to ensure that the document achieves the project's ambitions.

The panel would like to see how the design code could relate more clearly to the delivery of the masterplan. Further information on phasing would be useful, as well as setting out clear steps for the user to apply as part of the design process. Mechanisms and controls for compliance should be developed alongside the design code. As the masterplan will be delivered over a significant period, it will be important to ensure that these mechanisms can be easily understood by a newcomer to the project, without deeper knowledge of the design code.

##### *Usability and content*

- The panel encourages further interrogation of the usability of the document for different users. To avoid the document being overly complex, the team should distil the priorities and purpose of the design code, to ensure the information is simple and easy to follow.
- A key element of the design code will be the executive summary, to clarify the purpose of the document for the reader. Getting someone outside the core team to write this could be helpful. This should also be tested through the wider consultation to assess how well the intent is understood.
- Adding a section at the beginning of the document to explain how to use and read the document could be beneficial. This should explain the content, as well as how to interpret the graphic layout and navigate the design code.
- The panel feels that there could be potential overlap between the *Nature*, *Public Space* and *Movement* sections of the document. This could be difficult to navigate and should be simplified wherever possible.





- The rules and explanation of applying these needs to be clear. The panel notes that there will need to be a careful balance to avoid the guidance being too prescriptive, allowing sufficient flexibility for design teams to translate the guidance into individual designs that add variety and character.
- The graphic design and illustrations developed are positive, particularly the street diagrams and axonometric views which help give a sense of place.
- The panel suggests the use of ‘must’ throughout the document needs to be carefully considered. It’s overuse will make it difficult for users to understand the true priorities. It will also increase the likelihood that there will be more conflicting codes and therefore difficult to create a compliant design.
- The panel suggests also using ‘tick’ and ‘cross’ examples, to help clarify the rules in a quick, visually accessible way. Captions will also be helpful to explain what the viewer is meant to specifically look at.

#### *Access and movement*

- The panel questions whether the streets will be adopted or privately managed.
- Privately managed roads could give more creative license, for instance in terms of materiality, road markings and carriage widths. However, there is also a need to take account of commercial viability and impact on service charge for the new residents and businesses. Stewardship options should be reviewed against the emerging Stewardship Charter.
- The range of street types is positive. However, the panel would like to see more detail about the defensible and threshold spaces, and when they are needed. For example, some of the tighter streets have the buildings directly abutting the pavement, recalling more historic parts of the district. This flexibility will be critical to developing characterful streets.
- The redesign of the main vehicular route is positive, and the panel feels that making this indirect is the right approach, to make driving less convenient, and encourage walking and cycling via more direct and usable routes.
- The panel is pleased to see the development of the active travel routes assessed against the natural topography of the site. These should also relate to key desire lines and destinations in Harlow to the north, including nearby local centres, schools and allotments.
- The proposed options for layering of pedestrian, cycle and vehicles works well. The panel feels that considering this alongside materiality, play features, planting and SUDS is successful and will result in high-quality placemaking.
- The panel would like to see further detail on the proposed connections to Harlow town centre, including detail of locations of bus stops along the Sustainable Transport Corridor. Although this may be outside the remit of the



design code, coordination with desire lines and routes within the SMF area will be essential.

- The design code could include guidance on the design of the Sustainable Transport Corridor and mobility hub, given that these sit outside the strategic masterplan framework.
- The panel is encouraged by the low parking ratio adopted. It agrees that on-street parking will be the most desirable option, but notes that alternatives may be needed to meet the required spaces.
- Parking enforcement options will need to be considered, to avoid illegal parking on verges and streets. This will be particularly important for vulnerable residents and those that live in accessible dwellings, who need designated parking close to their homes.
- The use of car barns could work well, and the panel welcomes the potential for conversion of these to other uses, should parking demand fall in the future. These structures could also be combined with photovoltaic panels, to generate energy for the development.

#### *Landscape design*

- The panel feels that the landscape design coding has been well developed since the previous review, responding more clearly to the site topography. Exploiting the green wedges is also successful and will capitalise on the existing ecology and natural features on the site.
- The panel feels that it would be helpful to list key landscape typologies, to clarify what areas of the design are non-negotiable for the success of the masterplan.

#### *Character and placemaking*

- Further detail of the coding for the architectural design would be welcome, but the panel appreciates that this may sit outside the remit of the strategic design code.
- The panel feels that the guide should be more reflective of the local identity of Harlow and Epping Forest. It suggests referencing local typologies and project examples.
- Building upon the 15-minute city concept is positive, but the panel feels that the scale of local centres proposed may not be able support this vision. Provision for additional convenience or corner store type uses would help support the walkable neighbourhoods proposed.
- Active frontages will be crucial to good placemaking. The panel suggests that clear rules for uses and building entrances should be included, alongside exemplar projects and case studies to reference.



- The character of the new neighbourhoods will centre around the narrative of people living there, and not just the buildings, spaces and streets created. 'Day in the life' scenarios for different users, age groups and abilities would help ensure that Latton Priory becomes a 'lifetime development' that can adapt and respond to people's needs over time.

#### *Phasing and delivery*

- Further consideration of phasing should be included in the design code. For instance, when looking at the guide from the developer perspective, it will be important to know what to prioritise and what should be done first.
- It will be important to ensure that the enabling infrastructure, including the sustainable transport links and hub, are delivered first to ensure that modal shift can be achieved when new residents and businesses move in.
- It would also be helpful to clarify expectations for design team knowledge and expertise, as well as which consultants should be commissioned at each stage of design. This will be particularly important when considering the individual plots to maintain high standards of design quality.
- Compliance tracking will be important to ensure that the ambitions of the design code are delivered. Given the duration of the project, this will likely be undertaken by others, not linked to the development of the design code. It will therefore be important to make this simple and easy to use.

#### *Consultation*

- The panel feels that the planned consultation period will be positive and will help the team distil the document further.
- Stress testing with different groups should be considered, to help inform the usability and accessibility of the information presented and ensure that the design code meets the ambitions of the project.

#### *Next steps*

- The panel notes that it will be critical to maintain momentum for the design code to be in place in time to meaningfully influence the strategic applications for Latton Priory. It would welcome the opportunity to review the Design Code again, if helpful.



# Agenda Item 13

## ***Report to the Cabinet***

***Report reference:*** C-050-2023/24

***Date of meeting:*** 18<sup>th</sup> March 2024



**Epping Forest  
District Council**

**Portfolio:** Place – Cllr. Nigel Bedford

**Subject:** East of Harlow Masterplanning Guidance Supplementary Planning Document

**Responsible Officer:** Nigel Richardson (01992 564 110)

**Democratic Services Officer:** V. Messenger ([democraticservices@eppingforestdc.gov.uk](mailto:democraticservices@eppingforestdc.gov.uk))

---

### **Recommendations/Decisions Required:**

- (1) To note the process undertaken and the outputs from the joint public consultation by Epping Forest District Council and Harlow Council on the Draft East of Harlow Masterplanning Guidance (EHMG) Supplementary Planning Document (SPD) between July and October 2023.
- (2) To agree that the EHMG SPD be formally adopted to inform the development of a masterplan for the site by a developer consortium.
- (3) To agree that the Planning Services Director, in consultation with the Planning Portfolio holder, be authorised to make minor amendments to the EHMG SPD, including any mapping and links, prior to adoption.

### **Executive Summary:**

- The Harlow and Gilston Garden Town (HGGT) Partnership agreed to produce a document for the East of Harlow site to provide masterplanning principles.
- The aim is to provide guidance for a developer producing a masterplan for the site, to ensure the masterplan reflects the vision for the site which is shared by the HGGT partners and meets the Garden Town Vision.
- Work on the document progressed during 2022, including regular workshops to consolidate existing information and produce principles within it, and the work was reviewed by the Quality Review Panel in November 2022.
- In March 2023, it was agreed in principle that the document should be adopted as a Supplementary Planning Document (SPD) by both Harlow Council (HC) and Epping Forest District Council (EFDC), following the relevant governance and consultation processes. An SPD has more material planning weight than a guidance document and is subject to a more formal consultation. The HGGT partners have worked collaboratively to prepare the draft consultation version and to incorporate the feedback from consultation.
- Public consultation took place between July and October 2023 and a finalised SPD (Appendix B) has now been produced, for endorsement by the HGGT Board in March 2024 and subsequent adoption by both HC and EFDC later the same month.

### **Reasons for Proposed Decision:**

The masterplan guidance SPD has been developed collaboratively by Epping Forest District Council, Harlow Council, Harlow and Gilston Garden Town and Essex County Council in accordance with the Town and Country Planning Regulations 2012. It has undergone extensive scrutiny with the public, landowners, Princess Alexandra Hospital and statutory consultees. Where

necessary and appropriate changes have been made to respond to representations from consultation. These changes will be collated and published to demonstrate how representations have been incorporated. The document will guide a developer masterplan for the site, to ensure that it reflects the shared HGGT partner's vision. The consultation has been carried out in accordance with the requirements for the adoption of a SPD.

### **Other Options for Action:**

To not endorse the EHMG as a SPD prior to the formulation of a developer masterplan. This may result in developers leading on the establishment of principles for the site which may not align with the agreed vision and principles of the HGGT partnership authorities. This may protract the development of an agreed masterplan for the site, delay determination of planning applications and thus housing delivery while also delaying provision of key infrastructure such as the Sustainable Transport Corridor, community and education buildings and lower the quality of design for this large mixed use garden town settlement.

### **Report:**

#### **1. Introduction and background**

1.1 East of Harlow is one of Harlow and Gilston Garden Town's strategic sites. It sits across the Harlow Council and Epping Forest District Council border, with 2,600 homes allocated in the Harlow Local Development Plan and 750 homes allocated in the Epping Forest District Council Local Plan, totalling 3,350 homes. It also includes the proposed site for the new Princess Alexandra Hospital, and is covered by Essex County Council (ECC) as the Highways Authority.

1.2 The developer led masterplanning of the site has lacked sufficient progress, which could result in a potential impact on delivery timescales for homes and infrastructure on the site and therefore, the risk increases of ad-hoc development coming forward within the masterplan area. This may jeopardise the vision for the strategic site.

1.3 The decision was taken by HGGT partners to produce an 'East of Harlow Masterplanning Principles' document (which has now been renamed as a guidance SPD). The aim is to provide guidance for a developer producing a masterplan for the site, to ensure the masterplan reflects the vision for the site which is shared by the HGGT partners and best meets the Garden Town's Vision. The HGGT vision covers principles of; Placemaking and Homes; Landscape and Green Infrastructure; Sustainable Movement and Economy and regeneration.

1.4 Work on the document progressed during 2022, including regular workshops to consolidate existing information, develop a project proposal and produce a vision for the site.

1.5 The draft document was reviewed by the HGGT Quality Review Panel in November 2022 and this informed subsequent versions of the EHMG.

1.6 EFDC, HC and ECC have previously worked to develop guidance for the East of Harlow masterplan area, and this work has guided development of the document.

1.7 The EHMG SPD builds on the existing policies/guidance for the site, including:

- Epping Forest Local Plan (EFLP), Green Infrastructure (GI) Strategy, Sustainability Guide
- Harlow Local Development Plan (HLDP)
- HGGT Vision, Design Guide, Transport Strategy, Sustainability Guidance and Checklist, GI Strategy Framework
- Essex County Council (ECC) Highways Sustainable Transport Corridor (STC) Guidance, Access Guidance and Traffic Modelling, ECC Garden Communities, ECC Planning School Places, and ECC GI Strategy

## **2. Development of the SPD**

2.1 In March 2023, it was agreed that the document would be redrafted as guidance and adopted as a Supplementary Planning Document (SPD) by both EFDC and HC. This will ensure the guidance has as much planning weight as possible, as a material consideration, and will be robust to ensure the developer prepares a masterplan which reflects the visions for the site and the overall Garden Town.

2.2 National Planning Practice Guidance provides that SPDs should build upon and provide more detailed advice or guidance on existing policies in an adopted local plan. SPDs cannot introduce new policies into the local plan as they are supplementary in nature and should not add unnecessarily to the financial burdens on development. Both HC and EFDC Officers are satisfied that these requirements are met.

2.3 Where an SPD is likely to have significant environmental effects that have not already been assessed during the preparation of the relevant strategic policies, a Strategic Environmental Assessment (SEA) may be required. However, relevant significant environmental effects were previously assessed during the preparation of the policies in the Epping Forest Local Plan and Harlow Local District Plan, taking into account the criteria in the Environmental Assessment of Plans and Programmes Regulations 2004 (as amended) and consultation responses received at the time.

## **3. Content of the SPD**

3.1 As noted in other sections of this report, the SPD will assist the site developer to produce a masterplan by detailing the 'high-level' matters that need to be considered as agreed by HGGT partners. These include the broad locations of green space and sustainable drainage (Green and Blue infrastructure) and locations of facilities such as schools, sustainable transport corridors and site entrances. These are issues that are already referred to in the district-wide Local Plans of Harlow and Epping Forest District Councils.

3.2 The SPD provides an introduction and an explanation of the document context and covers the following nine topics:

- Stewardship
- General Design and Character
- Landscape and Green and Blue Infrastructure
- Sustainability and Build Quality
- Sustainable Movement
- Sustainable Transport Corridors
- All-Vehicle Access
- Education Provision
- Other Infrastructure and Local Centres

Each of the topics has a section detailing policy and guidance to enable the developer to understand key relevant documents. The topic sections detail what the key relevant issues are and highlights aspects that will require further consideration by developers when a masterplan is produced.

The topics typically include both written and map information which is summarised at the end of the document in a 'Combined Principles' map.

## **4. Consultation on the draft East of Harlow Masterplan Guidance SPD**

4.1 The draft EHMG was produced by Harlow and Epping Forest District Councils in accordance with the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) and the Councils' adopted Statement of Community Involvement.

4.2 This was a joint consultation by EFDC and HC with oversight from HGGT and input from ECC on infrastructure matters. Given the larger portion of the site is within Harlow, HC officers collated consultation comments and led on the production of the consultation report. Amendments to the document were agreed between all parties: HGGT, EFDC, HC and ECC. EFDC cabinet approved the draft document prior to public consultation on July 10<sup>th</sup> 2023.

4.3 The consultation period started on Monday 31 July 2023 and was due to close on Sunday 24 September 2023, but was extended by three weeks and closed on Monday 16 October 2023. The consultation was open, therefore, for a period of 11 weeks.

4.4 The HGGT consultation platform website hosted the SPD and allowed people to navigate the document by chapter and leave comments online. If people preferred, they could also submit comments via email or post. A link to the platform website was also hosted on EFDC's website.

4.5 A full schedule of comments submitted via the platform, email and post – split by SPD chapter can be viewed in the Consultation Statement at Appendix C This also includes Harlow and Epping Forst District Councils' joint responses to the comments.

4.6 The platform also hosted a survey about the SPD. There were 14 questions, 12 of which were multiple choice or similar, with two open-ended questions to allow comments. The survey results can be seen in the Consultation Statement.

4.7 On Tuesday 29 August 2023, a public drop-in event was held, in conjunction with Sheering Parish Council, at Sheering Village Hall. It ran from 10am to 12pm and included a one-hour question and answer session with officers from Epping Forest District Council and Essex County Council. The event was advertised by the Parish Council and was attended by approximately. 60 people.

4.8 On Tuesday 10 October 2023, a public event was held, in conjunction with the Churchgate Street Residents Association, at St Mary's Church in Churchgate Street. It ran from 6pm to 7pm and comprised a question and answer session with officers from Harlow and Epping Forest District Councils and Essex County Council. The event was advertised by the Residents Association and was attended by over 100 people.

4.9 Additionally, three online drop-in sessions were held online on Microsoft Teams, with officers from HC, EFDC and ECC in attendance to answer questions. These sessions were held on Wednesday 30 August 2023 from 6pm to 7pm, Thursday 31 August 2023 from 2pm to 3pm and Thursday 7 September 2023 from 10am to 11am.

4.10 The majority of issues raised at the above sessions were similar to the main issues raised in written responses to the consultation (see below).

4.11 As well as the above sessions, private meetings have also taken place between land owners, their agents and officers from Harlow and Epping Forest District Councils and Essex County Council. The purpose of these was to answer questions and queries they had prior to their formal written submissions to the consultation.

4.12 A total of 157 people, organisations or companies responded to the consultation, either by providing comments and/or completing a survey.

## **5. Issued raised during the consultation**

5.1 Of the total 157 members of the public, organisations or companies who responded to the consultation, many made similar points and these main comments are summarised in the table below, along with joint responses from Harlow and Epping Forest District Councils along with Essex County Council.

5.2 Specific points made via submission of comments and completion of the open-ended questions in the survey, along with joint responses from Harlow and Epping Forest District Councils, can be viewed in the Consultation Statement (Appendix C)

5.3 The table below summarises the main issues raised during the consultation, many of which required amendments to the draft SPD:

#	Issue	Harlow Council, Epping Forest District Council and Essex County Council joint response:
1.	General traffic and travel – e.g. increased congestion, bus services etc.	<p>The HGGT Transport Strategy, STC (which will connect to the new hospital) and associated modal shift/change are key strands of the HGGT vision to address potential increased vehicular movements arising from new development.</p> <p>Buses on the STC would be funded by the development initially and it is expected they will become self-funding as the development grows. These buses would also benefit the residents of Newhall (and other existing Harlow residents along the route) by providing a fast and reliable bus service to both Harlow town centre and beyond and also the new hospital site.</p> <p>Modal shift/change is about allowing short journeys to be completed using sustainable transport instead of cars, thereby reducing the number of cars on the road overall. The intention is not to remove cars but provide worthwhile choice in how people travel so that sustainable choices can be made especially for those journeys where walking, cycling and using public transport is easier, cheaper and quicker than sitting in traffic in the car.</p> <p>The Garden Community is predicted on being a sustainable development and as such people will purchase properties in this knowledge and developers will be aware of this requirement. With multiple accesses onto Gilden Way, traffic will either be able to access towards the town centre and access the wider area or leave via J7a and then return.</p> <p>The allocation of the site has been informed by transport assessment evidence and further detailed transport assessments will be carried out by the developer.</p> <p>The HGGT IDP identifies what schemes and proposals are required including those related to the highway network to accommodate growth.</p>
2.	M11 Junction 7a	<p>The M11 Junction 7a was designed to provide the second access to Harlow and therefore helps to provide relief if either Junction 7 gets blocked for any reason and vice versa.</p> <p>The road has been designed with enough capacity to deal with traffic associated with the new development and this is supported by modelling.</p>
3.	Traffic associated with hospital relocation	<p>The relocation of the hospital has a lesser impact on traffic generation than a totally new development at the current site would. Proximity to the M11 means that traffic which previously came from the M11 to the hospital can in future do so without traversing the town.</p>



4.	Closure of London Road, Harlow	<p>It was a requirement of the Newhall Section 106 agreement that there must be suitable secondary access to Newhall and contributions towards improvements across the Harlow road network.</p> <p>An application was approved by HC in 2017 for the secondary Newhall access arrangement and Bus Gate proposals. The reference number for this application is HW/FUL/17/00130. The officers report and planning statement produced by the developer provides information on why the bus gate is to be implemented.</p>
5.	Traffic matters at Churchgate Street, Harlow	<p>Development traffic would not be allowed to use routes through Churchgate Street and developers would be expected to provide a construction plan to show how they would bring the site forward.</p> <p>Access to all the roads within Churchgate Street from routes travelling through the new development would only facilitate walking and cycling access.</p>
6.	Possibility of increased flood risk	<p>SuDS, including new ponds and swales, are likely to help with future flooding. For example, improvements to the Gilden Park area have led to less flooding at the underpass.</p> <p>The Churchgate Street area flooding this year was as a result of a very intense and short period of rain that impacted on the local brook within a known flood zone area (as per Environment Agency maps). This is with EA to decide whether further work/what work is required.</p> <p>The assessments for flooding considered future events. As part of the masterplan and eventual planning application, further flood risks will be required to be considered.</p>
7.	Provision of suitable infrastructure	<p>The site will be supported by the right infrastructure in the right location including health, education, sustainable transport, access and highway improvements and all utility provision. This is set out in the HGGT Infrastructure Delivery Plan.</p> <p>Infrastructure will have to be provided in a phased approach based on the occupation of dwellings once they are completed. However, it is not appropriate for the SPD to provide detail on phasing of housing and phasing of infrastructure provision - this will come at the masterplan stage in detailed discussion with infrastructure providers.</p> <p>The SPD will be amended to ensure there is specific reference to the need for Local Centres to include community infrastructure such as preschool provision, doctors, dentist, play areas, and community rooms for use for faith activities, toddler groups, support groups, etc.</p> <p>The HGGT partners and developers will work with utility providers on water provision and are aware of the development sites in this area through the Local Plan process.</p>
8.	Location of new schools	<p>The exact locations of the schools have yet to be established and are indicative in the SPD. Essex County Council will be providing further evidence and justification for the best location. The SPD has therefore been amended to remove the school options and state that locations are to be decided.</p>
9.	Ensuring developers adhere	<p>The adherence to S106 agreements is not something for this SPD to address, but HC's legal action against the developers at Gilden Park</p>

	to Section 106 agreements for infrastructure provision	is likely to set an important precedent which will help to ensure developers adhere to planned delivery of infrastructure in the future.
10.	Need for housing at this location	<p>The East of Harlow site was allocated for housing and associated ancillary uses in the Harlow and Epping Local Plans, which went through rigorous rounds of consultation, public examination and inspection by government.</p> <p>The south-east of the UK has some of the highest house prices in the country due in part to high demand and lack of supply. Issues such as people living longer than previous generations, higher rates of divorce in older people (resulting in a divorced couple requiring two homes instead of one), and birth rates historically being higher than death rates, has increased demand.</p> <p>The need for housing - including affordable housing - is detailed further in the evidence base supporting the Harlow and Epping Local Plans.</p>
11.	Landscape, biodiversity and farmland concerns	<p>The SPD requires the masterplan to be landscape-led, ensuring that open spaces and Green Infrastructure are provided, while respecting and preserving the original landscape as much as possible. This also includes a mandatory net increase in biodiversity.</p> <p>Most of the farmland in question is Grade 3, meaning it is Good to Moderate and therefore not the best (which would be Grades 1 and 2). Around 70% of UK land is farmland. It was accepted at the examinations for the Harlow and Epping Local Plans, which allocated this site, that the loss of farmland is, on balance, acceptable in order for the districts to meet their identified housing targets.</p>
12.	Impact on existing communities, particularly Sheering	<p>The SPD requires the masterplan to sensitively consider existing communities. The SPD indicates that the masterplan will require a buffer between the northern part of the site and Sheering to ensure coalescence is prevented and that Sheering retains its identity.</p> <p>It is possible that improvements to existing Sheering infrastructure will be part of the East of Harlow development, but this will be determined at the masterplanning and planning application stages.</p>
13.	Clarity of maps	The maps have been altered prior to the final version of the SPD being produced, including adding OS base maps, updated aerial photo imagery and names of existing settlements and road names.
14.	Online platform	The Councils were aware of some technical issues with the online platform and liaised directly with those affected to resolve the matters. Feedback has been passed to the platform supplier to avoid future issues.

5.3 Additionally, a number of comments were received from statutory consultees and landowners (via their agents). Their details can be found in the Consultation Statement. The table below details how the SPD has been amended as a result of comments from these consultees:

#	Topic	Amendment
1.	Green and blue infrastructure	Improved/additional references to role of green infrastructure in relation to climate change, blue infrastructure and the possibility for new water bodies, greening of local centres, SANG guidance, linkages with the surrounding landscape to improve and encourage

		access, consideration of “green” routes, guidance on provision of sports facilities, HGGT GI Framework action plans, wider uses of green infrastructure, tree and hedgerow retention, SFRAs and flooding strategies, and waterway restoration and enhancement. Maps amended so that the area in the north of the site is referred to as a green buffer rather than for a specific SANG/BNG use.
2.	Infrastructure	Improved/additional references to utilities infrastructure, need for developers to engage with water/wastewater bodies to ensure requirements are met, effects of development on emergency services, and the need for local centres to include a wide range of facilities such as GP healthcare, dentist, play areas and community rooms for faith activities, fitness activities, toddler groups, support groups, etc.  Clarification that road capacity on the local and strategic networks is not intended to be prioritised by health facilities over residential uses.
3.	Sustainable movement	Improved/additional references to possibility of a cycling route through the green buffer towards Sheering, interim measures for sustainable modes and in particular for Princess Alexandria Hospital (PAH), connection of PAH with sustainable transport network, establishing green infrastructure in sustainable transport and PRoW networks, effects on waterways/flooding arising from new roads or crossings.  Removal of reference to Champions roundabout regarding dwelling occupation.
4.	Education	Improved/additional references to role of schools in meeting the community sports facility needs, primary school playing field being multi-purpose and opportunities for natural play.  Removal of school options as these will need further consideration at masterplanning stage.
5.	General	Amendments to ensure the SPD is not overly prescriptive. Improved/additional references to Section 106 requirements, Essex Design Guide, climate change and stewardship.  Amendments to maps to improve clarity and address points raised by consultees.

5.4 The full schedule of comments and Council’s responses is included in the Consultation Statement (Appendix C).

## 6. Conclusion

The development of the East of Harlow Masterplan Guidance SPD has been progressed in consultation with officers from Harlow and Gilston Garden Town, Harlow Council, Essex County Council, the public, landowners and statutory consultees.

EFDC officers are confident that the guidance document provides a sound basis for developers to commence the development of a Strategic Masterplan Framework document with the representations of the above groups understood. EFDC officers are also confident that the document is not at odds with the EFDC Local Plan and will not prevent the forthcoming developer masterplan from fulfilling the requirements of EFDC’s endorsed Strategic Masterplanning Briefing Note (2018).

- End of report -

## **Resource Implications:**

The adoption of this document as an SPD does not directly give rise to additional resource implications for EFDC.

However following the adoption of this document, it is anticipated a developer consortium will come forward to develop a Strategic Masterplan Framework for East of Harlow. Input from EFDC's Implementation Team, alongside Harlow Council will be required to manage the development of the Strategic Masterplan Framework with developers through a Planning Performance Agreement process. This is to ensure the framework will meet EFDC's Local Plan, Masterplanning Briefing Note and all other EFDC strategies and guidance documents and is being undertaken on other EFDC Local Plan strategic allocation sites.

Following the endorsement of the Strategic Masterplan Framework, EFDC resource will be required to assess the forthcoming planning applications. Planning applications cannot be approved until the Strategic Masterplan Framework is endorsed by EFDC Cabinet.

## **Legal and Governance Implications:**

National Planning Practice Guidance provides that SPDs should build upon and provide more detailed advice or guidance on existing policies in an adopted local plan. SPDs cannot introduce new policies into the local plan as they are supplementary in nature and should not add unnecessarily to the financial burdens on development. Both HC and EFDC Officers are satisfied that these requirements are met.

Where an SPD is likely to have significant environmental effects that have not already been assessed during the preparation of the relevant strategic policies, a Strategic Environmental Assessment (SEA) may be required. However, relevant significant environmental effects were previously assessed during the preparation of the policies in the Epping Forest Local Plan and Harlow Local District Plan, taking into account the criteria in the Environmental Assessment of Plans and Programmes Regulations 2004 (as amended) and consultation responses received at the time.

## **Safer, Cleaner and Greener Implications:**

The Local Plan contains a policy designed to promote the notion of making good places to live, work and visit. This will include safer by design principles, sustainable development, the provision of alternatives to the car, energy efficiency and environmental considerations as well as sustainable drainage systems and quality green infrastructure.

These aspects are amplified through this guidance document, the Strategic Masterplan Framework that follows this SPD will be the mechanism for these place-making measures to be delivered in more detail.

## **Consultation**

Extensive information is included in item 3 of this report. A Consultation Statement is included in Appendix C.

## **Background Papers**

EFDC Cabinet Report – Approval of Draft East of Harlow Masterplanning Guidance for Consultation

Appendix A: HGGT Board East of Harlow Masterplanning Guidance Adoption SPD report

Appendix B: Draft East of Harlow Masterplanning Guidance SPD

Appendix C: East of Harlow Consultation Report

## **Risk Management**

This document involves the agreement of guidance for this site that spans two district authority areas and where coordination with Harlow and Gilston Garden Town on vision principles and Essex County Council on the provision of infrastructure is required. Were the council not to take a pro-active and collaborative approach to working with these stakeholders, there is a real risk of development occurring of a type that does not extract maximum value for the provision of physical and social infrastructure with resulting poor quality development.

### **Appendix A:**

Appendix A: HGGT Board East of Harlow Masterplanning Guidance Adoption SPD report

### **Appendix B:**

Draft East of Harlow Masterplanning Guidance SPD

### **Appendix C:**

East of Harlow Consultation Report

## Agenda Item **XX**

### **HARLOW AND GILSTON GARDEN TOWN**

<b>Report to:</b>	<b>HARLOW AND GILSTON GARDEN TOWN BOARD</b>
<b>Title:</b>	<b>East of Harlow Masterplanning Guidance (EHMG) SPD</b>
<b>Date:</b>	<b>12 March 2024</b>
<b>Report Authors:</b>	<b>David Watts, Senior Forward Planning Officer, HDC Vicky Forgione, Principal Forward Planning Officer, HDC Paul MacBride, Forward Planning Manager, HDC</b>
<b>Enclosures:</b>	<b>Appendix 1 – East of Harlow Masterplanning Guidance SPD (EHMG) Appendix 2 – EHMG Consultation Statement</b>

#### **1. EXECUTIVE SUMMARY**

- 1.1 The HGGT Partnership agreed to produce a document for the East of Harlow site to provide masterplanning principles.
- 1.2 The aim is to provide guidance for a developer producing a masterplan for the site, to ensure the masterplan reflects the vision for the site which is shared by the HGGT partners and meets the Garden Town Vision.
- 1.3 Work on the document progressed during 2022, including regular workshops to consolidate existing information and produce principles within it, and the work was reviewed by the Quality Review Panel in November 2022.
- 1.4 In March 2023, it was agreed in principle that the document should be adopted as a Supplementary Planning Document (SPD) by both Harlow Council (HDC) and Epping Forest District Council (EFDC), following the relevant governance and consultation processes. An SPD has more material planning weight than a guidance document and is subject to a more formal consultation. The HGGT partners have worked collaboratively to prepare the draft consultation version.
- 1.5 Public consultation took place between June and September 2023, and a finalised SPD has now been produced, ready for endorsement by the HGGT Board in March 2024 and subsequent adoption by both HDC and EFDC later the same month.

#### **2. RECOMMENDATIONS**

- 2.1 That the Board notes the adoption version of the East of Harlow Masterplanning**

## **Guidance SPD (EHMG).**

- 2.2 That the Board notes the EHMG Consultation Statement.**
- 2.3 That the Board recommends that Harlow District Council and Epping Forest District Council should adopt the finalised EHMG.**
- 2.4 That the Board agrees that the HGGT Director, in consultation with the HGGT Board Chair, be authorised to make minor amendments to EHMG prior to adoption.**

## **3. BACKGROUND**

- 3.1 East of Harlow is one of Harlow and Gilston Garden Town's strategic sites. It sits across the Harlow District (HDC) and Epping Forest District Council (EFDC) border, with 2,600 homes proposed within Harlow and 750 homes within Epping Forest. It also includes the proposed site for the new Princess Alexandra Hospital, and is covered by Essex County Council (ECC) as the Highways Authority.
- 3.2 The masterplanning of the site has lacked sufficient progress, which could result in a potential impact on delivery timescales for homes and infrastructure on the site and, therefore, the risk increases of ad-hoc development coming forward within the masterplan area. This could, in turn, jeopardise the vision for the strategic site.
- 3.3 The decision was taken by HGGT partners to produce an 'East of Harlow Masterplanning Principles' document (which has now been renamed to become a guidance SPD). The aim is to provide guidance for a developer producing a masterplan for the site, to ensure the masterplan reflects the vision for the site which is shared by the HGGT partners and best meets the Garden Town's Vision.
- 3.4 Work on the document progressed during 2022, including regular workshops to consolidate existing information, develop a project proposal and produce a vision for the site.
- 3.5 The draft document was reviewed by the HGGT Quality Review Panel in November 2022 and this informed subsequent versions of the EHMG.
- 3.6 Both EFDC and HDC and ECC have previously worked to develop guidance for the East of Harlow masterplan area, and this work has guided development of the document.
- 3.7 The EHMG SPD builds on the existing policies/guidance for the site, including:
  - Epping Forest Local Plan (EFLP), Green Infrastructure (GI) Strategy, Sustainability Guide
  - Harlow Local Development Plan (HLDP)
  - HGGT Vision, Design Guide, Transport Strategy, Sustainability Guidance and Checklist, GI Strategy Framework

- Essex County Council (ECC) Highways Sustainable Transport Corridor (STC) Guidance, Access Guidance and Traffic Modelling, ECC Garden Communities, ECC Planning School Places, and ECC GI Strategy

## 4. DEVELOPMENT OF THE SPD

- 4.1 In March 2023, it was agreed that the document would be redrafted as guidance and adopted as a Supplementary Planning Document (SPD) by both HDC and EFDC. This will ensure the guidance has as much planning weight as possible, as a material consideration, and will be robust to ensure the developer prepares a masterplan which reflects the visions for the site and the overall Garden Town.
- 4.2 As noted in national Planning Practice Guidance, SPDs should build upon and provide more detailed advice or guidance on existing policies in an adopted local plan. SPDs cannot introduce new policies into the local plan as they are supplementary in nature and should not add unnecessarily to the financial burdens on development. Both HDC and EFDC Officers are satisfied that these requirements are met.
- 4.3 Where an SPD is likely to have significant environmental effects that have not already have been assessed during the preparation of the relevant strategic policies, a Strategic Environmental Assessment (SEA) may be required. However, relevant significant environmental effects were previously assessed during the preparation of the policies in the HLDP and EFLP, taking into account the criteria in the Environmental Assessment of Plans and Programmes Regulations 2004 (as amended) and consultation responses received at the time.

## 5. CONSULTATION ON THE DRAFT EHMG

- 5.1 The draft EHMG was produced by Harlow and Epping Councils in accordance with the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) and the Councils' adopted Statement of Community Involvements.
- 5.2 The consultation period started on Monday 31 July 2023 and was due to close on Sunday 24 September 2023, but was extended by three weeks and closed on Monday 16 October 2023. The consultation was open, therefore, for a period of 11 weeks.
- 5.3 The HGGT consultation platform website hosted the SPD and allowed people to navigate the document by chapter and leave comments online. If people preferred, they could also submit comments via email or post.
- 5.4 A full schedule of comments submitted via the platform, email and post – split by SPD chapter – can be viewed in the Consultation Statement at Appendix I. This also includes Harlow and Epping Councils' joint responses to the comments.
- 5.5 The platform also hosted a survey about the SPD. There were 14 questions, 12 of which were multiple choice or similar, with two open-ended questions to allow comments. The survey results can be seen in the Consultation Statement.



# HGGT

## HARLOW & GILSTON GARDEN TOWN

- 5.6 On Tuesday 29 August 2023, a public drop-in event was held, in conjunction with Sheering Parish Council, at Sheering Village Hall. It ran from 10am to 12pm and included a one-hour question-and-answer session with officers from Harlow and Epping Councils and Essex County Council. The event was advertised by the Parish Council and was attended by approx. 60 people.
- 5.7 On Tuesday 10 October 2023, a public event was held, in conjunction with the Churchgate Street Residents Association, at St Mary's Church in Churchgate Street. It ran from 6pm to 7pm and comprised a question-and-answer session with officers from Harlow and Epping Councils and Essex County Council. The event was advertised by the Residents Association and was attended by over 100 people.
- 5.8 Additionally, three online drop-in sessions were held online on Microsoft Teams, with officers from Harlow and Epping Councils and Essex County Council in attendance to answer questions. These sessions were held on Wednesday 30 August 2023 from 6pm to 7pm, Thursday 31 August 2023 from 2pm to 3pm and Thursday 7 September 2023 from 10am to 11am.
- 5.9 The majority of issues raised at the above sessions were similar to the main issues raised in written responses to the consultation (see below).
- 5.10 As well as the above sessions, private meetings have also taken place between land owners, their agents and officers from Harlow and Epping Councils and Essex County Council. The purpose of these was to answer questions and queries they had prior to their formal written submissions to the consultation.
- 5.11 A total of 157 people, organisations or companies responded to the consultation, either by providing comments and/or completing a survey.

## 6. ISSUES RAISED

- 6.1 A total of 157 people, organisations or companies responded to the consultation. Many respondents made similar points and the main ones are summarised in the table below, along with joint responses from Harlow and Epping Councils.
- 6.2 Specific points made via submission of comments and completion of the open-ended questions in the survey, along with joint responses from Harlow and Epping Councils, can be viewed in the Consultation Statement.
- 6.3 The table below summarises the main issues raised during the consultation, many of which required amendments to the draft SPD.

Issue	Harlow and Epping Councils' Joint Response
<b>General traffic and travel – e.g. increased congestion, bus services, etc.</b>	The HGGT Transport Strategy, STC (which will connect to the new hospital) and associated modal shift/change are key strands of the HGGT vision to address potential increased vehicular movements arising from new development.

# HGGT

## HARLOW & GILSTON GARDEN TOWN

	<p>Buses on the STC would be funded by the development initially and it is expected they will become self-funding as the development grows. These buses would also benefit the residents of Newhall (and other existing Harlow residents along the route) by providing a fast and reliable bus service to both the town centre and beyond and also the new hospital site.</p> <p>Modal shift/change is about offering a choice for short car journeys to be completed using sustainable transport instead, thereby reducing the number of cars on the road overall. The intention is not to remove cars but provide worthwhile choice in how people travel so that sustainable choices can be made especially for those journeys where walking, cycling and using public transport is easier, cheaper and quicker than sitting in traffic in the car.</p> <p>The Garden Community is predicted on being a sustainable development and as such people will purchase properties in this knowledge and developers will be aware of this requirement. With multiple accesses onto Gilden Way, traffic will either be able to access towards the town centre and access the wider area or leave via J7a and then return. Since the development of Church Langley over 20 years ago, much has changed and sustainable transport has become much more a choice for many than in the early 90s.</p> <p>The allocation of the site has been informed by transport assessment evidence and further detailed transport assessments will be carried out by the developer.</p> <p>The HGGT IDP identifies what schemes and proposals are required including those related to the highway network to accommodate growth.</p>
<b>M11 J7a</b>	<p>M11 J7a was designed to provide the second access to Harlow and therefore helps to provide relief if either J7 gets blocked for any reason and vice versa.</p> <p>The road has been designed with enough capacity to deal with traffic associated with the new development and this is supported by modelling.</p>
<b>Traffic associated with hospital relocation</b>	<p>The impact of the hospital is not as significant as a totally new development as it is a relocation. Being close to the M11 means that traffic which previously came from the M11 to access the hospital can in future do so without traversing the town to get there.</p>
<b>London Road closure</b>	<p>It was a requirement of the Newhall Section 106 agreement that there must be suitable secondary access to Newhall and contributions towards improvements across the Harlow road network.</p> <p>An application was approved in 2017 for the secondary Newhall access arrangement and Bus Gate proposals. The reference number for this application is HW/FUL/17/00130. The officers report and planning statement produced by the developer provides information on why the bus gate is to be implemented.</p>
<b>Churchgate Street traffic</b>	<p>Development traffic would not be allowed to use routes through Churchgate Street and developers would be expected to a construction plan to show how they would bring the site forward. Text in SPD amended for clarification.</p> <p>Access to all the roads within Churchgate Street from routes travelling through the new development would only facilitate walking and cycling access, i.e. would be for walking and cycling only. Text in SPD amended for clarification.</p>

# HGGT

## HARLOW & GILSTON GARDEN TOWN

<p><b>Possibility of increased flood risk</b></p>	<p>SuDS, including new ponds and swales, are likely to help with any future flooding. The improvements to Gilden Park area helped with flooding because the underpass, for example, now floods less.</p> <p>Churchgate Street area flooding this year was as a result of a very intense and short period of rain that impacted on the local brook within a known flood zone area (as per EA maps). This is with EA to decide whether further work/what work is required. The assessments for flooding considered future events. As part of the masterplan and eventual planning application, further flood risks will be required to be considered.</p> <p>The assessments for flooding considered future events. As part of the masterplan and eventual planning application, further flood risks will be required to be considered.</p>
<p><b>Provision of suitable infrastructure</b></p>	<p>The site will be supported by the right infrastructure in the right location including health, education, sustainable transport, access and highway improvements and all utility provision. This is set out in the HGGT Infrastructure Delivery Plan.</p> <p>Infrastructure will have to be provided in a phased approach based on the occupation of dwellings once they are completed. However, it is not appropriate for the SPD to provide detail on phasing of housing and phasing of infrastructure provision - this will come at the masterplan stage in detailed discussion with infrastructure providers.</p> <p>The SPD will be amended to ensure there is specific reference to the need for Local Centres to include community infrastructure such as preschool provision, doctors, dentist, play areas, and community rooms for use for faith activities, toddler groups, support groups, etc.</p> <p>The HGGT partners and developers will work with utility providers on water provision and are aware of the development sites in this area through the Local Plan process.</p>
<p><b>Locations of new schools</b></p>	<p>The exact locations of the schools have yet to be established and are indicative in the SPD. Essex County Council will be providing further evidence and justification for the best location. The SPD will therefore be amended to remove the school options and state that locations are to be decided.</p>
<p><b>Ensuring developers adhere to Section 106 agreements for infrastructure provision</b></p>	<p>The adherence to S106 agreements is not something for this SPD to address, but the Council's legal action against the developers at Gilden Park is likely to set an important precedent which will help to ensure developers adhere to planned delivery of infrastructure in the future.</p>
<p><b>Need for housing at this location</b></p>	<p>The East of Harlow site was allocated for housing and associated ancillary uses in the Harlow and Epping Local Plans, which went through rigorous rounds of consultation, public examination and inspection by government.</p> <p>The south-east of the UK has some of the highest house prices in the country due to high demand and lack of supply. Issues such as people living longer than previous generations, higher rates of divorce in older people (resulting in a divorced couple requiring two homes instead of one), and birth rates historically being higher than death rates, has increased demand.</p> <p>The need for housing - including affordable housing - is detailed further in the evidence base supporting the Harlow and Epping Local Plans.</p>
<p><b>Landscape, biodiversity and farmland concerns</b></p>	<p>The SPD requires the masterplan to be landscape-led, ensuring that open spaces and Green infrastructure are provided, while respecting and preserving the original</p>

# HGGT

## HARLOW & GILSTON GARDEN TOWN

	<p>landscape as much as possible. This also includes a mandatory net increase in biodiversity.</p> <p>Most of the farmland in question is Grade 3, meaning it is Good to Moderate and therefore not the best (which would be Grades 1 and 2). Around 70% of UK land is farmland. It was accepted at the examinations for the Harlow and Epping Local Plans, which allocated this site, that the loss of farmland is, on balance, acceptable in order for the districts to meet their identified housing targets.</p>
<b>Impact on existing communities, particularly Sheering</b>	<p>The SPD requires the masterplan to sensitively consider existing communities.</p> <p>The SPD indicates that the masterplan will require a substantial buffer between the northern part of the site and Sheering to ensure coalescence is prevented and that Sheering retains its identity.</p> <p>It is possible that improvements to existing Sheering infrastructure will be part of the East of Harlow development, but this will be determined at the masterplanning and planning application stages.</p>
<b>Clarity of maps</b>	<p>The maps will be significantly altered prior to the final version of the SPD being produced, including adding OS base maps and names of existing settlements and road names.</p>
<b>Online platform</b>	<p>The Councils were aware of some technical issues with the online platform and liaised directly with those affected to resolve the matters. Feedback has been passed to the platform supplier to avoid future issues.</p>

6.4. Additionally, a number of comments were received from statutory consultees and land owners (via their agents). Their details can be found in the Consultation Statement.

6.5. The table below details how the SPD has been amended as a result of comments from these consultees:

<b>Topic</b>	<b>Amendment</b>
<b>Green &amp; Blue Infrastructure</b>	<p>Improved/additional references to role of GI in relation to climate change, blue infrastructure and the possibility for new water bodies, greening of local centres, SANG guidance, linkages with the surrounding landscape to improve and encourage access, consideration of “green” routes, guidance on provision of sports facilities, HGGT GI Framework action plans, wider uses of GI, tree and hedgerow retention, SFRA and flooding strategies, and waterway restoration and enhancement.</p> <p>Maps amended so that the area in the north of the site is referred to as a green buffer rather than for a specific SANG/BNG use.</p>
<b>Infrastructure</b>	<p>Improved/additional references to utilities infrastructure, need for developers to engage with water/wastewater bodies to ensure requirements are met, effects of development on emergency services, and the need for local centres to include a wide range of facilities such as GP healthcare, dentist, play areas and community rooms for faith activities, fitness activities, toddler groups, support groups, etc.</p> <p>Clarification that road capacity on the local and strategic networks is not intended to be prioritised by health facilities uses over residential uses.</p>
<b>Sustainable Movement</b>	<p>Improved/additional references to possibility of a cycling route through the green buffer towards Sheering, interim measures for sustainable modes and in particular for PAH, connection of PAH with sustainable transport network,</p>

	<p>establishing GI in sustainable transport and PRow networks, effects on waterways/flooding arising from new roads or crossings Removal of reference to Campions roundabout regarding dwelling occupation.</p>
<b>Education</b>	<p>Improved/additional references to role of schools in meeting the community sports facility needs, primary school playing field being multi-purpose and opportunities for natural play. Removal of school options as these will need further consideration at the masterplanning stage.</p>
<b>General</b>	<p>Amendments to ensure the SPD is not overly prescriptive. Improved/additional references to Section 106 requirements, Essex Design Guide, climate change and stewardship. Amendments to maps to improve clarity and address points raised by consultees.</p>

6.7. There are greater details of amendments in the full schedules of comments and the Councils' responses at Appendices 5 and 6 (separate documents).

---

## HGGT Vision Assurance

1. What principles of the HGGT Vision does this seek to achieve?

The EHMG seeks to support the achievement of the following HGGT Vision Principles:

### Placemaking and Homes

- o Responsive and distinctive
- o Balanced, diverse and functional communities
- o Healthy, safe and connected neighbourhoods and villages
- o Maximising visibility and appreciation of our heritage

### Landscape and Green Infrastructure

- o Enhancing the Green Belt and expanding the Green Wedge network
- o Landscape-led masterplanning
- o Designing in biodiversity, climate resilience and food security
- o Making best use of technology in energy generation and conservation

### Sustainable Movement

- o Revitalising the cycle and walking network
- o Changing the character of roads to streets
- o Integrated transport: a viable and preferred alternative to cars to achieve a modal shift
- o Anticipating change and future proofing infrastructure

### Economy and regeneration

- o The right work spaces, homes and community facilities
- o A diverse employment base and skilled labour supply
- o A vibrant and resilient Town Centre for all the Garden Town

---

2. What steps have been taken to ensure the HGGT Vision is embedded into the project?

# HGGT

HARLOW & GILSTON  
GARDEN TOWN

The EHMG has undergone numerous reviews by HGGT Partner Officers, as well as the Quality Review Panel, to ensure the Vision is embedded. The Vision was one of the core documents that formed the production of the EHMG.

---



Epping Forest  
District Council

## **Report to the Cabinet**

**Report reference:** C-051-2023/24

**Date of meeting:** 18 March 2024

**Portfolio:** Planning & Sustainability – Cllr. Bedford

**Subject:** North Weald Bassett Masterplan Strategic Masterplan (*Residential*)

**Responsible Officer:** Nigel Richardson/Richard Schunemann (01992 564 110).

**Democratic Services Officer:** V Messenger  
([democraticservices@eppingforestdc.gov.uk](mailto:democraticservices@eppingforestdc.gov.uk))

---

### **Recommendations/Decisions Required:**

- (1) To note the process undertaken and the outputs from the public consultation on the Draft North Weald Bassett Strategic Masterplan Framework undertaken between November 2023 and January 2024.
- (2) To agree that the North Weald Bassett Strategic Masterplan Framework be formally endorsed in order for it to be taken into account as an important material consideration in the determination of future planning applications, and to inform pre-application advice, assessing planning and any other development management and implementation related purposes relating to the site.
- (3) To agree that the Planning Services Director, in consultation with the Planning Portfolio Holder, be authorised to make minor amendments to the North Weald Bassett Strategic Masterplan Framework, including any document accessibility requirements, prior to publication.

### **Executive Summary:**

The development of the North Weald Bassett (NWB) Strategic Masterplan Framework (SMF) responds to the adopted Epping Forest District Local Plan 2011-2033 and Policy P6 'North Weald Bassett'. The NWB Masterplan Area forms one of the allocated Strategic Masterplan sites where the need for an SMF is identified. Following the requirements in policies SP2 and P6, a strategic masterplan has been developed for the allocated strategic area.

Since 2018 the land promoter Vistry Group (previously known as Countryside PLC) have been engaging with a number of local communities in North Weald, such as the Parish Council, the North Weald Neighbourhood Plan Steering Group, the Memorial Playing Fields Trust, St Andrews Primary School and the local community in general.

Land ownership is split between five sub allocations, but the site promoter representing an interest in largest allocation (NWB.R3 Land South of Vicarage Lane) is Vistry Group, who have progressed the development of the masterplan. Vistry Group and its predecessor company Countryside have been engaging with EFDC and ECC officers since 2018 in the development of the NWB SMF in accordance with the Strategic Masterplanning Briefing

Note, which was agreed by the Council's Cabinet in October 2018. The Briefing Note sets out the detailed approach to SMF development to support the requirement of Policy P6 which states:

*Planning applications for sites NWB.R1, NWB.R2, NWB.R3, NWB.R4, NWB.R5 and NWB.T1 should be accompanied by a Strategic Masterplan for the North Weald Bassett Masterplan Area which demonstrates that the development requirements set out in this Policy have been accommodated and which has been endorsed by the Council. The endorsed Strategic Masterplan will be taken into account as an important material consideration in the determination of any planning applications.*

The Strategic Masterplan Framework has been subject to extensive review and scrutiny by the professional applicant team engaged in drafting the SMF, the Council, as Local Planning Authority, as well as Essex County Council and the masterplan proposals have been reviewed by the Quality Review Panel on three occasions (June 2019, August 2021 and September 2023).

The formal public consultation on the Draft North Weald Bassett SMF finished on the 16th January 2024. Since then the SMF has been reviewed and amended to incorporate and respond to, where necessary and appropriate, the consultation responses. Key points raised during the consultation, and response to these, are outlined in the report below, and set out in more detail in the Consultation Report (Appendix B).

Following this review and amendments to the SMF, officers are of the view that meaningful public consultation has been undertaken, and the Strategic Masterplan Framework can now be formally endorsed to support high quality development proposals to come forward.

### **Reasons for Proposed Decision:**

The Masterplan has undergone extensive scrutiny and where necessary and appropriate changes have been undertaken in accordance with the masterplanning process set out in the Council's Strategic Masterplanning Briefing Note which was endorsed by the Council's Cabinet in October 2018. This has included review of the emerging Strategic Masterplan by EFDC's Quality Review Panel (QRP) and following receipt of responses to the first and second stages of public consultation. The Strategic Masterplan is considered to be capable of endorsement as an important material consideration in the determination of any planning applications and will be taken into account as such. It will also be used to inform the provision of pre-application advice and other development related purposes.

To ensure that members are kept fully up to date on the progress of Masterplans and Concept Frameworks and other major proposals being promoted within the District.

To comply with the Council's general obligations as a local planning authority and the requirements set out in national planning guidance.

### **Other Options for Action:**

To not endorse the North Weald Bassett Strategic Masterplan Framework as an important material consideration in the determination of planning applications. This could result in a delay in delivering a high-quality neighbourhood and homes in the District.



## Report:

### Introduction

1. The NWB Masterplan Area is located North of the existing North Weald Bassett village, east of the North Weald Bassett Airfield and South of Vicarage Lane and West of the A414. The site is located within the North Weald Bassett Parish and it is within the administrative area of EFDC.
2. The site is allocated as part of the adopted Epping Forest District Local Plan 2011-2033 and Policy P6 'North Weald Bassett'.
3. The masterplan area is made up of five separate site allocations which reflect separate site ownerships as follows:
  - NWB.R1/T1 Land West of Tylers Green,
  - NWB.R2 Land at Tylers Farm,
  - NWB.R3 Land South of Vicarage Lane,
  - NWB.R4 Land at Chase Farm and
  - NWB.R5 Land at The Acorns, Chase Farm
4. The largest of these sites is NWB.R3 (promoted by Vistry). NWB.T1 identifies the dual allocation of site NWB.R1 as the location identified for the traveller pitches.
5. The SMF addresses surface water flooding, the preservation or enhancement of the special architectural or historic interest of the Grade II Listed Buildings at Bluemans Farm/Tyler's Farmhouse and their settings, the need to upgrade/widen the existing Vicarage Lane West access in order to ensure a safe access point which has sufficient capacity for the development it serves;
6. To ensure a comprehensive and cohesive approach is taken to the planning and delivery of development and infrastructure on site, the Local Plan requires a strategic masterplan to be produced for the NWB site (and for other strategic allocations). The Strategic Masterplanning Briefing Note 2018 was agreed by the Council's Cabinet in October 2018. This document sets out the requirement for the endorsement of Strategic Masterplans and Concept Frameworks as allocated in the Adopted Local Plan. This requirement is set out in Policy SP2 Place Shaping and in the place specific policy relating to NWB (Policy P6). The strategic masterplan for North Weald Bassett needs to adhere to the place-shaping and development principles set out under Policy SP2 (place-shaping) and the site-specific considerations identified.

### Strategic Masterplanning and Engagement process

7. In accordance with best practice the Local Plan contains a requirement that a Strategic Masterplan for North Weald Bassett Masterplan Area is produced. This is in order to ensure that proposed development on the site is brought forward in a comprehensive and co-ordinated manner in order to achieve high quality and sustainable development which incorporates the place making principles of the Local Plan. This includes meeting the Council's expectations in terms of the quality, scale and nature of development to be delivered, providing sustainable transport opportunities and other

supporting infrastructure and services, responding to the environmental context, and responding appropriately to the outputs from community engagement.

8. The preparation of the Strategic Masterplan was supported by a wide range of technical work including, environmental issues, biodiversity, transport, heritage, sustainability considerations and place-making.
9. The site promoters for North Weald Bassett, Vistry Group, have been engaging with EFDC officers since 2018 in the development of the North Weald Bassett SMF following the Strategic Masterplanning Briefing Note, which was agreed by the Council's Cabinet in October 2018. This document sets out the requirement for the endorsement of Strategic Masterplans and Concept Frameworks as allocated in the EFDC Adopted Local Plan
10. The Strategic Masterplan Framework has been subject to extensive review and scrutiny by the professional applicant team engaged in drafting the SMF, the Council, as Local Planning Authority, Essex County Council and other statutory consultees including the HGGT.
11. The North Weald Bassett site promoter team have been engaging with the local communities of Epping Forest District and since 2018. A consultation report which notes this background, as well as reporting on the recent formal public consultation, can be found at Appendix B.
12. During 2018-2023 several meetings and workshops (as described in the endorsed Masterplanning Briefing Note 2018) have been held between key stakeholders including EFDC, the main site promoters (Vistry) and ECC (Highway and Infrastructure).
13. The Site promoter has undertaken intensive engagement throughout the project:
  - In September 2018 the Site promoter engaged with the North Weald Neighbourhood Plan Steering Group (NPSG) to introduce the project and run a workshop to test preliminary ideas.
  - In February 2019 the Site Promoter engaged with the Parish Council and the NPSG to present in a workshop the progress in relation to spatial ideas, public transport and public space.
  - In November 2019 the Site Promoter engaged the NPSG and the governors of St Andrews Primary School to discuss matters of landscape design and the provision of educational facilities.
  - In January 2020 the Site promoter engaged with the NPSG to cover issues of traffic and highways and commuter services to Epping Tube Station.
  - In 2021 the Site promoter held a meeting with the Trustees of the Queen's Hall Charity to ensure the any proposed facilities did not compete with the memorial Playing Fields and Queen's Hall but instead to compliment them.
  - In the summer 2023 the land promoters carried out informal public consultation for which around 3600 leaflets were distributed to local homes. 176 official responses were received where most of the concerns where about connectivity, education, healthcare, and flooding.
  - Between 2022 and 2023 the site promoters and officers from EFDC and ECC took part in the following Topic Based Meetings:
    - Urban Design Principles
    - Education facilities and needs

- Public Transportation, movement and highways
- Natural Environment, Green & Blue Infrastructure
- Social Infrastructure
- Sustainability
- Heritage
- Local Centre
- Planning & Engagement Strategy
- Housing Needs
- Infrastructure Delivery

14. The site has previously undertaken three reviews by the QRP, the first in June 2019, with a second review in August 2021 and a third one in September 2023.
15. The Masterplan has been developed in a comprehensive manner and it includes the whole allocation area spanning across different land ownerships. The site promoters and design team have provided the council with satisfactory options to ensure that the masterplan can be delivered around this landholding.

### **Quality Review Panel (2019, 2021, 2023)**

16. The masterplan has been to three Quality Review Panel's (QRPs), a key aspect of quality assurance and independent critical friend advice, from an expert panel of built environment practitioners.

#### Summary of comments from first QRP (June 2019):

- Calls for a comprehensive approach that transcends ownership boundaries and integrates the development with the existing settlement.
- Stresses the need for seamless pedestrian and cycle connections between the new and old areas.
- Highlights the crucial role of the Airfield Masterplan in providing employment opportunities and contributing to a holistic vision.
- Emphasizes the need for critical mass in housing to support amenities and sustainable travel.
- Encourages exploration of diverse housing typologies and uses to create a vibrant community.
- Recommends measures to ensure the new settlement feels self-sufficient and attractive to residents beyond the Airfield employees.
- Suggests identifying key nodes like the school and church to serve as focal points for the combined settlement.
- Recommends a detailed open space strategy that considers function, character, and biodiversity enhancement.
- Commends the existing principles but recommends further development, particularly on design quality, community clusters, and open space strategy.

- Encourages the use of sustainability and energy modelling to inform layout and building design.

#### Summary of comments from second QRP (August 2021):

- While the report presents a promising vision, it is not fully addressing concerns raised in 2019.
- The masterplan needs to set higher standards for greenfield development, focusing on environmental sustainability through net-zero carbon homes, water management, and exceeding biodiversity targets.
- The plan needs to better connect the new development with the existing village and North Weald Airfield Masterplan, considering future connections and a range of housing options to cater to different needs.
- The report lacks specifics on key aspects like density, landscape design, and community facilities. Further detailed analysis and review are necessary before approving the masterplan.

#### Summary of comments from third QRP (September 2023):

- The masterplan has developed significantly since the previous review.
- Integration: The masterplan should prioritize connectivity and a cohesive character area.
- Sustainability: The sustainability strategy needs further development but has moved forwards since the previous review. Now it needs to aim for Passivhaus or Zero Carbon standards. Best practices and the Council's sustainability checklist should be applied.
- Layout: The current layout could benefit from increased density in specific areas to ensure true sustainability and optimal land use.
- Public Realm: More details are needed for public spaces like play areas, ensuring proper integration with housing and avoiding isolated locations. Play for all ages, green corridors, and accessibility for walking and cycling should be prioritized.
- Transportation and Access: The panel understand work is in progress with regards to public transport links.

### **Engagement Findings and Summary**

17. The North Weald Basset SMF team has been committed to effective engagement to ensure that local views and priorities are reflected in the draft strategic masterplan and the hybrid planning application.
18. Wide ranging and in-depth local engagement has therefore been undertaken between 2018 and 2023 to inform and shape the masterplan and hybrid planning application to reflect local priorities. Engagement with key local stakeholders since 2018 to understand detailed local issues has helped to evolve the masterplan to a stage where it could be consulted upon with the wider community earlier this year. Engagement across this

period has included meetings, presentations, workshops, exhibitions, mailings and online consultation with a range of stakeholders including:

- North Weald Bassett Parish Council
- Local EFDC councillors
- North Weald Bassett Neighbourhood Plan Steering Group
- St Andrew's Primary School
- Queen's Hall Charity
- Other local groups and organisations
- Site neighbours
- Wider community across the Parish

#### 19. Neighbourhood Planning Group

A series of meetings, site walks and workshops were held between 2018 and 2020 with the Neighbourhood Plan Steering Group. These sessions coupled with feedback from the Group's own widespread community consultation, which included questionnaires issued to all households in the Parish in 2018, provided in depth local knowledge of the issues relevant to the village:

- The findings from the Group's own community questionnaire consultation helped provide a foundation for discussions, highlighting issues such as traffic, anti-social behaviour, healthcare facilities, the feel of the village and access to open countryside.
- From the meetings, strengths identified included the existing walking routes to countryside to the north through the site, the strong village feel and sense of community. Weaknesses included traffic congestion and use of rat runs and the lack of social destinations for walking routes in the village.
- The emerging framework masterplan was illustrated spatially with the group, culminating in a draft annotated sketch plan being produced. This highlighted potential masterplan drivers related to pedestrian and vehicular movement, key views and the sensitive treatment of specific edges within the masterplan area.
- Opportunities included potential new community and retail facilities, a 'country park' and ways that traffic could be directed away from the village centre. Site threats identified included additional traffic in the village and new shops competing with existing shops.
- Transportation matters covered included traffic flows, a new roundabout on the A414, pedestrian safety, the future of Church Lane and public transport options, including examining the potential for a commuter service to Epping Station.

#### 20. NWB Parish Council

Meetings and presentations have been held with Parish Councillors between 2019 and 2024 to explore issues and provide updates on the progress of the masterplan.

Members and Officers of the Parish Council provided input into the material prepared for widespread public consultation in June 2023:

- Meetings since 2019 included in-person and online presentations during the evolution of the draft masterplan. Key issues raised included support for the retention of hedgerows, sensitive treatment of the masterplan boundary, maximising the potential for sports and recreation, adequate healthcare provision and parking in the village. Traffic concerns were also mentioned and underlined.
- A meeting was also held with the Parish Council Footpaths Officer to identify key routes and develop a broad footpath connectivity strategy including potential diversions.

## **21. St Andrew's Primary School**

There have been five meetings with Governors and the headteacher at St Andrew's Primary School since 2019. During discussions, a clear preference emerged to expand the existing primary school rather than provide a new school, The county Council has however clarified that their preferred position is to build a new school. Other findings from the engagement with St Andrew's Primary School were as follows:

- Detailed discussions covered issues such as pupil yield and explored feasibility options for the potential expansion of the school. A preferred option emerged which would retain and enclose the swimming pool and provide a new pedestrian access to the north of the school which would help address some existing issues.
- A letter dated 23 June 2023 was received from the Chair of Governors and Headteacher underlining the expansion of the existing primary school as their preferred option and opposing the provision of a second school as it had the potential to be socially divisive.

## **22. Queen's Hall Charity**

Meetings online and on-site have been held with the Trustees of the Queen's Hall Charity since 2020:

- One of the key issues emerging from discussions was to ensure that any new community facilities did not compete with and undermine existing sporting and social activities at Queen's Hall.
- Feasibility options were then progressed to explore the potential upgrade of Queen's Hall and improving sporting and play provision.
- Discussions are continuing with the Trustees and representatives of the Parish Council on the delivery of additional community uses in the masterplan area.

## **23. Communitywide informal consultation June 2023**

The consultation was launched at the beginning of June 2023 using a variety of methods so that information was accessible to as many residents and businesses as possible such as mailshots, posters and newsletter emails. The commonly raised issues were as follows:

- A prevalent issue in the feedback appears to be a lack of knowledge of the Local Plan and housing allocation for North Weald Bassett.
- Education and healthcare provision were some of the most commonly raised issues as was the inclusion of traveller pitches.
- Many of the visitors to the exhibitions lived adjacent to the site. Many of the issues raised therefore related to boundary related issues on Queen's Road, Oak Piece and Blackhorse Lane.
- There was a wide range of feedback on what community, recreational and retail facilities should be provided. There was a good level of support for the memorial playing fields becoming the focus for formalised sport in the masterplan area.
- Addressing anti-social behaviour was a commonly raised issue when discussing recreational facilities.
- Lack of public transport provision and traffic on the A414 were commonly raised existing concerns.
- Drainage was raised fairly often given historical flooding in the village.

#### 24. **Formal Public Consultation November 2023 – January 2024**

An 8-page consultation brochure and (pre-paid) postal feedback form was issued to over 3,000 addresses in North Weald Parish. A dedicated phone number and email address was also provided. The entire Parish which also includes Thornwood Common and Hastingwood was included in the consultation at the suggestion of the Parish Council. An additional insert was provided to residential addresses bounding the masterplan area, which provided further detail on the boundary treatment and invited residents to a specific exhibition session. As part of the Formal Consultation process Epping Forest in collaboration with the developer organised and took part in the following activities:

- Pre-consultation member briefing.
- Meeting with North Weald Bassett Parish Council & Neighbourhood Plan team
- Online consultation portal, providing independent website and feedback gathering tool.
- Council's website signposting to the consultation portal
- Mailshot to 3,600 local households and community and statutory stakeholders, informing them of the consultation (and providing advice on how to take part if not digitally able) – this includes homes within both Epping Forest and North Weald Parish.
- Press release
- Pop up exhibition panel hosted in Council building(s) with printed copy of SMF and paper copy questionnaires for completion/ collection.
- Questionnaire – available on the online portal and paper copies available.
- 2No. in person events taking place AT St. Andrews School with 30 attendees over the 2 days.

#### 25. **Statutory Consultees**

From the Statutory Consultees and other organisations consulted, we have received feedback from the following:

- EFDC Air Quality
- Essex County Council
- Environment Agency
- Epping Forest Heritage Trust
- Historic England
- National Highways
- Natural England
- North Weald Bassett Parish Council
- Thames Water
- Hertfordshire & West Essex Integrated Care Board
- Harlow & Gilston Garden Town
- City of London (Conservators of Epping Forest)
- Landowner of sites NWB.R1 and NWB.T1

26. For details of the feedback from these stakeholders and our response to each point raised please refer to Appendic C.

27. The main concerns and issued raised during the public consultation were as follows (for full Consultation Report please refer to Appendix B):

#### **Transport and access**

- Support new roundabout access on A414.
- General queries re traffic modelling and infrastructure upgrades.
- Junction 7 motorway junction capacity and need for upgrading.
- Traffic volumes heading east to

- Queries regarding need for additional bus services.

### **Drainage and sewerage**

- Sewage capacity – concerns with current capacity.
- Potable water pressure and connection point – report that Blackhorse Lane residents experience low water pressure.
- Surface water drainage at times of high rainfall water flows south into village (rather than north).

### **Other**

- Contamination – comments about land historically being used as a landfill for the deposit of contaminated material
- Report of buried WWII bomber straddling the site boundary.
- Fire safety – concern that there are not sufficient strategic gaps to prevent the rapid spread of fire
- In principle objection to the loss of agricultural land
- General questions about development parameters / green corridors along the boundary; and rear access to gardens

## **Strategic Masterplan Framework**

### 28. **Specific Site requirements**

The Policy specifically identifies the following requirements for the masterplan:

- a local centre including retail, community, and appropriate provision of health facilities.
- addressing surface water flooding.
- education provision including early years and primary school places.
- adequate levels of public open space to be provided on the site.
- a Suitable Alternative Natural Greenspace, the location of which will be determined through the Strategic Masterplanning process.
- a minimum of 1,050 homes and five traveller pitches.
- preserving or enhancing the special architectural or historic interest of the Grade II Listed Buildings at Bluemans Farm/Tyler's Farmhouse and their settings.
- new and improved Public Rights of Way and cycle linkages with the surrounding area including East to West connectivity between the two Masterplan Areas.
- careful design and layout to ensure that where sensitive land uses are proposed near the intermediate High-Pressure Gas Pipeline they accord with the requirements set out in the HSE's Land Use Planning Methodology;
- the need to upgrade/widen the existing Vicarage Lane West access in order to ensure a safe access point which has sufficient capacity for the development it serves.
- the continued protection of those trees benefitting from a Tree Preservation Order, and other identified Veteran Trees; and
- strengthening of the existing field boundary along the Western edge of the Strategic Masterplan Area to form the defensible boundary to the Green Belt.

29. The SMF proposed to be endorsed is enclosed at Appendix A and is commented upon as follows:



## **Placemaking**

30. The masterplan has been developed observing EFDC's Adopted Local Plan Policy SP2 Place Shaping, where emphasis has been given to ensure generous, well connected and biodiverse rich green space provision with a sense of place/ identity. The masterplan will be well connected through a hierarchy of streets, walking paths and cycle lanes along rich green and blue infrastructure features to the local centre that will host community facilities, retail and service opportunities as well as schools and a sustainable movement hub.

## **Transport**

31. EFDC is currently working together with Essex County Council and the Land promoters of North Weald Bassett Masterplan to explore a new bus routes that will connect North Weald Bassett with the school provision at Latton Priory, further connections to Harlow Town and Epping town centre and Tube station.

## **Green Infrastructure**

32. The NWB Masterplan is a landscape-led development that will provide large areas of SANG together with Blue and Green Infrastructure features that will enhance biodiversity and the natural environment following EFDC's Adopted Local Plan Policies SP2, SP5 and SP6 as well as the EFDC Green Infrastructure Strategy which sets out SANG requirements for North Weald Bassett. The masterplan will also provide residents with a wide range of amenities ranging from a vibrant local centre provision with access to community facilities and service/retail opportunities as well as dedicated areas for play, food growing and community gardening and sports.

## **Local centre and social facilities**

33. The NWB Masterplan provides a Local Centre following EFDC's Adopted Local Plan Policy P5. The local centre and adjoining areas will provide:
- Community Centre including health care provision
  - A new primary school with early years facilities
  - Community facilities including potential for a library, café, activity studios, flexible working space
  - Mobility Hub with access to EV charging points, cycle hire, cycle repair shop, car club.
  - A new retail area off the access roundabout for a small neighbourhood Supermarket and other retail facilities.
  - Playing fields as a focal point.

## **Sustainability**

34. The NWB Masterplan will be a sustainably connected new neighbourhood with safe, direct and attractive cycle routes integrated within the network of roads, PROWS and open space which link key facilities within the site and further afield, including Epping Town and Epping Tube Station. The development of the masterplan has observed the following documents: EFDC Sustainability Guide and Checklist, EFDC Green Infrastructure Strategy. This has indicated that further work on energy, utilities and digital infrastructure needs to be provided to ensure that this is secured at masterplanning stage. Orientation and form also need to be considered at the

masterplanning level in relation to solar gain, walkability, and densities, which all attribute to holistic sustainable development. Further work on the approach to Stewardship, to ensure that it is community-led.

### **Housing Numbers and Tenure**

35. The masterplan has a capacity for a minimum of 1,050 dwellings in line with the EFDC Adopted Local Plan. While the masterplan allows the potential for increases in this number to be explored, any increase in the site capacity at the NWB site will need to be fully assessed in terms of traffic impacts and by reference to the Habitat Assessment Regulations with regards to the potential impact on air quality Epping Forest SAC.
36. Housing tenure is stated as being targeted to be in accordance with the EFDC Adopted Local Plan with a position of 40% affordable housing sought with the right type of housing to assist the delivery of the Council Social Housing List.

### **Conclusion**

37. The development of the NWB Masterplan has been progressed in consultation with officers from EFDC and ECC. Officers are confident that at this stage of the Masterplanning process the Strategic Masterplan Framework fulfils the intentions of the EFDC Adopted Local Plan and Strategic Masterplanning Briefing Note (2018) in enabling meaningful public consultation, and would lead to high quality development, supporting the following EFDC Adopted Local Plan strategic policies:
  - Policy SP1 – Spatial Development Strategy 2011-2033
  - Policy SP2 – Place Shaping
  - Policy SP6 – The Natural Environment, Landscape Character and Green and Blue Infrastructure
  - Policy H1 – Housing Mix and Accommodation Types
  - Policy H2 – Affordable Homes
  - Policy H4 – Traveller Site Development
  - Policy P6 – North Weald Bassett
38. Further guidance documents observed:
  - EFDC Green Infrastructure Strategy
  - EFDC Statement of Community Involvement
  - EFDC Endorsed Strategic Masterplanning Briefing Note
  - EFDC Infrastructure Delivery Plan

### **Resource Implications:**

The successful delivery of the strategic sites within Epping Forest District will require considerable commitment of officer time from EFDC. The noting of the contents of this report do not give rise to additional resource implications.

### **Legal and Governance Implications:**

The work on Strategic Masterplans has been developed in accordance with Government policy (NPPF and NPPG) and Planning Law

### **Safer, Cleaner and Greener Implications:**

The Local Plan contains a policy designed to promote the notion of making good places to live, work and visit. This will include safer by design principles, sustainable development, the provision of alternatives to the car, energy efficiency and environmental considerations as well as sustainable drainage systems and quality green infrastructure. Strategic Masterplans and Concept Framework Plans will be the mechanism for these place-making measures to be delivered in identified Masterplan Areas.

### **Consultation / Scrutiny Undertaken:**

The Site promoter has undertaken intensive engagement throughout the project:

- In September 2018 the Site promoter engaged with the North Weald Neighbourhood Plan Steering Group (NPSG) to introduce the project and run a workshop to test preliminary ideas.
- In February 2020 the Site Promoter engaged with the Parish Council and the NPSG to present in a workshop the progress in relation to spatial ideas, public transport and public space.
- In November 2019 the Site Promoter engaged the NPSG and the governors of St Andrews Primary School to discuss matters of landscape design and the provision of educational facilities.
- In January 2020 the Site promoter engaged with the NPSG to cover issues of traffic and highways and commuter services to Epping Tube Station.
- In 2021 the Site promoter held a meeting with the Trustees of the Queen's Hall Charity to ensure the any proposed facilities did not compete with the memorial Playing Fields and Queen's Hall but instead to compliment them.
- In the summer 2023 the land promoters carried out informal public consultation for which around 3600 leaflets were distributed to local homes. 176 official responses were received where most of the concerns were about connectivity, education, healthcare, and flooding.
- Between 2022 and 2023 the site promoters and officers from EFDC and ECC took part in the following Topic Based Meetings:
  - Urban Design Principles
  - Education facilities and needs
  - Public Transportation, movement and highways
  - Natural Environment, Green & Blue Infrastructure
  - Social Infrastructure
  - Sustainability
  - Heritage
  - Local Centre
  - Planning & Engagement Strategy
  - Housing Needs
  - Infrastructure Delivery

The site has previously undertaken three reviews by the QRP, the first in June 2019, with a second review in August 2021 and a third one in September 2023.

### **Background Papers:**

Cabinet Report – 13<sup>th</sup> November 2023

Appendix A: Final Draft North Weald Bassett Strategic Masterplan Framework

Appendix B: Consultation Report

Appendix C: Statutory and Other Written Consultee Responses

### **Risk Management:**

If the Council was not to take a pro-active stance on the delivery of Masterplans and major applications arising from the Local Plan, there is a real risk of development occurring of a type that does not extract maximum value for the provision of social infrastructure and poor quality development may occur.

### **Equality:**

#### **Equality Impact Assessment**

1. Under s.149 of the Equality Act 2010, when making decisions, Epping District Council must have regard to the Public Sector Equality Duty, ie have due regard to:
  - eliminating unlawful discrimination, harassment and victimisation, and other conduct prohibited by the Act,
  - advancing equality of opportunity between people who share a protected characteristic and those who do not,
  - fostering good relations between people who share a protected characteristic and those who do not, including tackling prejudice and promoting understanding.
2. The characteristics protected by the Equality Act are:
  - age
  - disability
  - gender
  - gender reassignment
  - marriage/civil partnership
  - pregnancy/maternity
  - race
  - religion/belief
  - sexual orientation.
3. In addition to the above protected characteristics you should consider the cross-cutting elements of the proposed policy, namely the social, economic and environmental impact (including rurality) as part of this assessment. These cross-cutting elements are not a characteristic protected by law but are regarded as good practice to include.
4. The Equality Impact Assessment (EqIA) document should be used as a tool to test and analyse the nature and impact of either what we do or are planning to do in the future. It can be used flexibly for reviewing existing arrangements but in particular should enable identification where further consultation, engagement and data is required.
5. Use the questions in this document to record your findings. This should include the nature and extent of the impact on those likely to be affected by the proposed policy or change.
6. Where this EqIA relates to a continuing project, it must be reviewed and updated at each stage of the decision.

7. All **Cabinet, Council, and Portfolio Holder reports must be accompanied by an EqlA**. An EqlA should also be completed/reviewed at key stages of projects.
8. To assist you in completing this report, please ensure you read the guidance notes in the Equality Analysis Toolkit and refer to the following Factsheets:
  - Factsheet 1: Equality Profile of the Epping Forest District
  - Factsheet 2: Sources of information about equality protected characteristics
  - Factsheet 3: Glossary of equality related terms
  - Factsheet 4: Common misunderstandings about the Equality Duty
  - Factsheet 5: Frequently asked questions
  - Factsheet 6: Reporting equality analysis to a committee or other decision making body

<b>Section 1: Identifying details</b>
Your function, service area and team: Planning Service
If you are submitting this EqlA on behalf of another function, service area or team, specify the originating function, service area or team: N/A
Title of policy or decision: Progress of Strategic Masterplans & Planning Performance Agreements
Officer completing the EqlA: Rick Schunemann Email: rschunemann@eppingforestdc.gov.uk
Date of completing the assessment: 26/09/2023

<b>Section 2: Policy to be analysed</b>	
2.1	Is this a new policy (or decision) or a change to an existing policy, practice or project? No
2.2	Describe the main aims, objectives and purpose of the policy (or decision): The report is to seek approval from cabinet members to take the North Weald Bassett Strategic Masterplan Framework for official 8 week public consultation.  What outcome(s) are you hoping to achieve (ie decommissioning or commissioning a service)? To brief members of the masterplanning process for the North Weald Bassett strategic allocation and to gain approval to go to official 8-week public consultation.

2.3	<p>Does or will the policy or decision affect:</p> <ul style="list-style-type: none"> <li>• service users</li> <li>• employees</li> <li>• the wider community or groups of people, particularly where there are areas of known inequalities?</li> </ul> <p>Not directly but supports the development identified within the Adopted Local Plan</p> <p>Will the policy or decision influence how organisations operate? No</p>
2.4	<p>Will the policy or decision involve substantial changes in resources? No, the report is for information only</p>
2.5	<p>Is this policy or decision associated with any of the Council's other policies and how, if applicable, does the proposed policy support corporate outcomes? It is associated to Adopted Local Plan policies SP2 and P6. Approval for consultation should not have any adverse effect on other Policies</p>

### Section 3: Evidence/data about the user population and consultation<sup>1</sup>

As a minimum you must consider what is known about the population likely to be affected which will support your understanding of the impact of the policy, eg service uptake/usage, customer satisfaction surveys, staffing data, performance data, research information (national, regional and local data sources).

3.1	What does the information tell you about those groups identified? N/A
3.2	<p>Have you consulted or involved those groups that are likely to be affected by the policy or decision you want to implement? If so, what were their views and how have their views influenced your decision?</p> <p>The groups mentioned in 2.3 have been consulted previously and we will seek updated views and if necessary the view will inform changes to the North Weald Bassett SMF.</p>
3.3	<p>If you have not consulted or engaged with communities that are likely to be affected by the policy or decision, give details about when you intend to carry out consultation or provide reasons for why you feel this is not necessary:</p> <p>Informal public consultation on North Weald Bassett has taken place in 2019, 2020, 2021 and 2023. This will be the first time the project team is seeking approval from Cabinet to go to formal 8-week public consultation. Should approval be gained at this Cabinet meeting, public consultation would take place from the second week of November 2023 and run for six weeks.</p>

**Section 4: Impact of policy or decision**

Use this section to assess any potential impact on equality groups based on what you now know.

<b>Description of impact</b>	<b>Nature of impact</b> Positive, neutral, adverse (explain why)	<b>Extent of impact</b> Low, medium, high (use L, M or H)
Age	None	N/A
Disability	None	N/A
Gender	None	N/A
Gender reassignment	None	N/A
Marriage/civil partnership	None	N/A
Pregnancy/maternity	None	N/A
Race	None	N/A
Religion/belief	None	N/A
Sexual orientation	None	N/A



**Section 5: Conclusion**

		<b>Tick Yes/No as appropriate</b>	
5.1	Does the EqIA in Section 4 indicate that the policy or decision would have a medium or high adverse impact on one or more equality groups?	No <input checked="" type="checkbox"/>	
		Yes <input type="checkbox"/>	If ' <b>YES</b> ', use the action plan at <b>Section 6</b> to describe the adverse impacts and what mitigating actions you could put in place.

**Section 6: Action plan to address and monitor adverse impacts**

<b>What are the potential adverse impacts?</b>	<b>What are the mitigating actions?</b>	<b>Date they will be achieved.</b>

**Section 7: Sign off****I confirm that this initial analysis has been completed appropriately.****(A typed signature is sufficient.)**

Signature of Head of Service: Nigel Richardson

Date: 31/01/24

Signature of person completing the EqlA: Rick Schunemann

Date: 31/01/24

**Advice**

Keep your director informed of all equality & diversity issues. We recommend that you forward a copy of every EqlA you undertake to the director responsible for the service area. Retain a copy of this EqlA for your records. If this EqlA relates to a continuing project, ensure this document is kept under review and updated, eg after a consultation has been undertaken.

Appendix A: Final Draft North Weald Bassett Strategic Masterplan Framework  
Appendix B: Formal Consultation Report  
Appendix C: Statutory and Other Written Consultee Responses  
Appendix D: Quality Review Panel September 2023

- This Consultation Report has been prepared by Development Communications Limited (DevComms) on behalf of Epping Forest District Council (EFDC) in respect of formal consultation undertaken on a Draft Strategic Masterplan Framework Document for North Weald Bassett.
- Policy P6 of the adopted EFDC Local Plan requires a Strategic Masterplan to be prepared and accompany any planning applications for allocated sites within the North Weald Bassett Masterplan Area. The endorsed Strategic Masterplan will be taken into account as an important material consideration in the determination of any planning applications.
- The formal consultation on the Draft Strategic Masterplan Framework Document was led by EFDC and undertaken between 21 November 2023 and 16 January 2024. A programme of public consultation was developed with regard to policy requirements set out in the EFDC Statement of Community Involvement and Masterplanning Briefing Note.
- The consultation arrangements included a consultation page on EFDC website with access to online and pdf feedback form, copies of the Strategic Masterplan Document (and feedback forms) on deposit at three locations including the Civic Offices in Epping; and two public exhibitions held in North Weald.
- 18 feedback forms were received together with a further 18 emails and letters from the local community and statutory consultees. The feedback included a wide range of issues, some which are relevant to the masterplan and others that will be considered in relation to planning applications that come forward.
- The issues relating to the Strategic Masterplan will now be considered before it is finalised and subsequently endorsed.



## 1. Introduction

This Statement of Community Involvement has been prepared by Development Communications Limited (DevComms) on behalf of Epping Forest District Council (EFDC) in respect of formal consultation undertaken on a Draft Strategic Masterplan Framework Document for North Weald Bassett.

Policy P6 of the adopted EFDC Local Plan requires a Strategic Masterplan to be prepared and accompany any planning applications for allocated sites within the North Weald Bassett Masterplan Area. The endorsed Strategic Masterplan will be taken into account as an important material consideration in the determination of any planning applications.

The Strategic Masterplan is being prepared in accordance with a Strategic Masterplanning Briefing Note published by Epping Forest District Council in October 2018. This sets out the Council's intention that Strategic Masterplans will be formally endorsed to become a material planning consideration. The Council also requires the Strategic Masterplan to be prepared in a form and manner that will allow future adoption as an SPD.

Vistry Group is leading a team that has been developing the Strategic Masterplan for North Weald Bassett. Vistry has been engaging with the local community on the Masterplan since 2018 and undertook a widespread community consultation exercise in June 2023.

A Draft Strategic Masterplan Framework Document was subsequently prepared and approved for formal consultation at a meeting of EFDC's Cabinet on 13 November 2023. Formal consultation on Masterplan was led by EFDC and undertaken between 21 November 2023 and 16 January 2024. DevComms has been appointed to collate and report on the consultation responses, solely on behalf of the Council. Appropriate GDPR provisions have accordingly been in place.

This report provides details of the consultation undertaken and the feedback received.



## **2. Policy Content and Background**

### **2.1 EFDC Statement of Community Involvement**

Epping Forest District Council's Statement of Community Involvement (SCI) was adopted in November 2019.

The section titled "Principles of Community and Stakeholder Engagement on Strategic Sites for Developers" relates to community engagement in respect of Strategic Masterplans. It expects that "appropriate effective engagement and consultation will take place with stakeholders and the local community, including Town and Parish Councils, in order to build a sense of community ownership and inform the progress of Strategic Master Plan or Concept Framework".

Also that: "Any communication or engagement activity will be easily accessible to the community, both through how it's shared and in the way it is written. At each stage it will be made clear whether there is an opportunity to provide comments/ feedback and how these comments will be used or responded to".

It sets out the requirement for a six-week period of consultation on the Draft Masterplan or Concept Framework that will involve at least a public exhibition and formal methods of collecting views on the Master Plan or Concept Framework through the Councils website.

### **2.2 EFDC Strategic Masterplanning Briefing Note**

The Briefing Note includes the following requirements in relation to public consultation on the Draft Strategic Masterplan:

- It is anticipated that public consultation should last for a minimum of six weeks and incorporate a variety of methods to maximise participation and feedback. As a minimum, copies of documentation should be made available at the reception of respective Council(s), on Council(s) website(s), in local libraries, and at local Parish / Town Council offices. The use of a static and / or staffed exhibition will be encouraged.
- The site promoter(s) will be responsible for designing and printing materials required for the public consultation, such as leaflets, banners or boards. The use of feedback forms should be encouraged where appropriate. The Council(s) will be responsible for collating and analysing any feedback received through consultation.
- Care must be taken to ensure that the scope and purpose of public engagement is clearly articulated in order to avoid confusion or 'consultation fatigue' within the local community.
- It is the intention of the Councils that the Strategic Masterplans will be formally endorsed to become a material planning consideration in the consideration of pre-application proposals and the determination of subsequent Planning Applications. The Council(s) may also choose to adopt the Masterplans as a Supplementary Planning Document ('SPD') at a future point in time. To that effect,



the Council require the Strategic Masterplan to be prepared in a form and manner that will allow future adoption as a SPD.

### **2.3 SPD regulations**

Regulations 11 to 16 of the Town and Country Planning (Local Planning) (England) Regulations 2012 set out the requirements for producing Supplementary Planning Documents. This would require a Consultation Statement to be prepared prior to any adoption, should the Strategic Masterplan become a Supplementary Planning Document.





### **3. Scope of Community Engagement**

#### **3.1 Summary of Engagement Approach**

Epping Forest District Council is dedicated to fostering a strong and inclusive community through active engagement and collaboration.

A programme of public consultation was developed with regard to policy requirements set out in the EFDC Statement of Community Involvement and Masterplanning Briefing Note. In summary, the consultation comprised:

- Consultation page on EFDC website with access to online and pdf feedback form
- Copies of the Strategic Masterplan Document (and feedback forms) at the Civic Offices in Epping, Parish Hall in Thornwood Common and Library in North Weald Bassett Library
- Two public exhibitions held at St Andrew's School in North Weald

The Consultation was advertised by:

- A press release issued by EFDC
- A link on the EFDC website home page
- Banners at locations where hard copies of the Document were on deposit
- A brochure issued by Vistry to over 3,000 addresses in North Weald Bassett Parish

A dedicated phone line and email address was provided and advertised on consultation material.

Statutory consultees were also written to by EFDC and invited to comment on the Strategic Masterplan Document.

A presentation was given to North Weald Bassett Parish Council on Monday 20 November which summarised the latest draft masterplan document and provided details of the formal consultation.

#### **3.2 Online engagement**

A specific page relating to the North Weald Bassett Strategic Masterplan consultation was created on the EFDC website and could be accessed through a link from the homepage. The webpage provided a summary of the Masterplan, a copy of the full masterplan document, a pdf download of the feedback form and a link to an online version of the feedback form. It also provided details of the public exhibitions and locations where hard copies of the Masterplan Document could be viewed. A screenshot of the webpage can be found at Appendix A.

#### **3.3 Deposit copies of Masterplan**

Full printed copies of the Draft Strategic Masterplan Framework Document were available for inspection throughout the consultation period at key locations. These comprised the District Council offices in Epping, the Parish Hall at Thornwood Common and North Weald Bassett Library. Hard copies of the feedback form were also



provided and a banner advertising the consultation and providing contact details. A copy of the banner can be found at Appendix B.

### **3.4 Public Consultation Events**

Two public consultation events were held at St Andrews Primary School in North Weald Bassett. The school was chosen as the venue as it is located within the masterplan area and has been used for previous exhibitions regarding the Strategic Masterplan. The events were held on:

- Saturday 9<sup>th</sup> December from 10:00 till 14:00
- Tuesday 12<sup>th</sup> December from 16:00 till 19:00

10 exhibition boards were included in the exhibition which covered a wide range of topics related to the Masterplan. A copy of the exhibition boards can be found at Appendix C.

Hard copies of feedback forms were also provided at the exhibition. EFDC officers and members of the masterplan development team were on hand to discuss issues with visitors to the exhibitions.

### **3.5 Community brochure**

Vistry Group, which is leading the masterplan team issued a 6-page brochure to the local community at the start of the consultation period providing details of the formal EFDC consultation, including the public exhibitions and ways of providing feedback. This was issued via Royal Mail to circa 3,000 addresses. The brochure was hand delivered to 100 addresses directly neighbouring the masterplan area to ensure those closest received a copy in a timely manner. A copy of the brochure can be found at Appendix D

### **3.7 Press release**

A copy of the press release published by EFDC can be found at Appendix E.

### **3.8 Feedback form**

The feedback form sought to provide a balance of open and closed questions in order to seek a wide range of views whilst obtaining quantifiable feedback. It sought feedback on the level of agreement with the masterplan vision; general layout; and a range of principles relating to the masterplan. It also provided the opportunity to provide open feedback on any aspect of the masterplan. A copy of the feedback form can be found at Appendix F.



### 3.9 Data Protection

A statement was included on the online feedback forms which detailed how collected data would be used. This detailed that in undertaking public engagement with the local community, Development Communications Limited (DevComms) is a Data Controller under the General Data Protection Regulations (GDPR).

At all times, processing of personal data is carried out in accordance with GDPR regulations, with the feedback form providing an 'opt-in' option and information on respondents' rights under GDPR.

Only data required for the purposes of the consultation was requested on the feedback form.

The feedback collated during the engagement exercise is held by DevComms and will only be used for the purposes of consultation and research on the Strategic Masterplan.

Consultation respondents will only be contacted again in the future in relation to the Masterplan proposals if they have explicitly stated that they would like to be kept updated.



## 4. Feedback

### 4.1 Overview of Feedback

In summary, the following engagement and feedback was received from the formal consultation on the Strategic Masterplan:

- 30 people attended exhibitions
- 18 feedback forms were received
- Four emails from local residents
- Also, three emails and letters from those representing landowners or sites within the masterplan area, including St Andrew's Primary School.
- Eleven further responses from statutory consultees.

Further detail on the feedback is set out in this section.

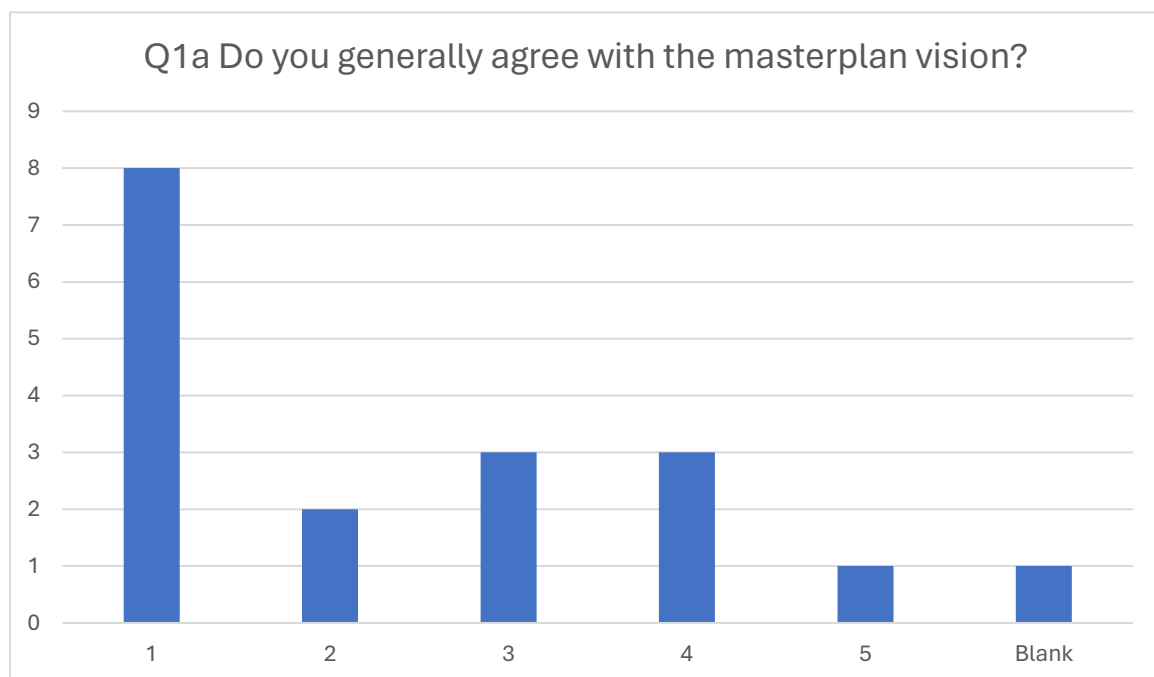
### 4.2 Feedback from completed forms

Feedback from completed forms mainly comprised responses from local residents but also included responses from or on behalf of three of the landowners within the Masterplan Area and the Conservators of Epping Forest.

The following is a breakdown of the feedback provided by those who chose to complete a form either in hard copy format or online:

#### **Question 1: Masterplan vision**

Respondents were asked to rate whether they agreed or disagreed with the statement in Q1a (1 disagree – 5 agree).



**Question 1b: Why have you given this score?**

The responses to the question from members of the local community comprised:

- Object to more building / keep as a village
- Increased traffic
- Too dense / out of character
- Insufficient facilities / utilities
- Broadly in agreement / vision is sensitive
- Surface water drainage
- Destroy nature and outlook
- Need better transport facilities

Feedback from landowners was supportive of the content of the Strategic Masterplan.

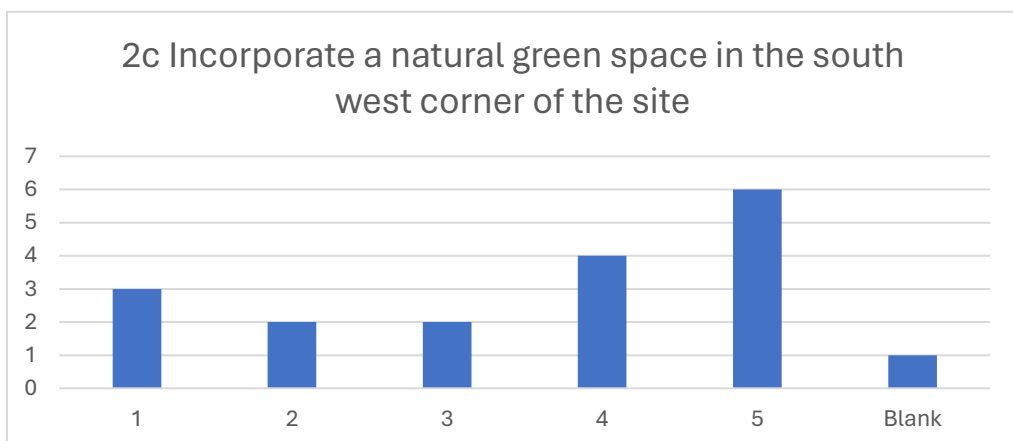
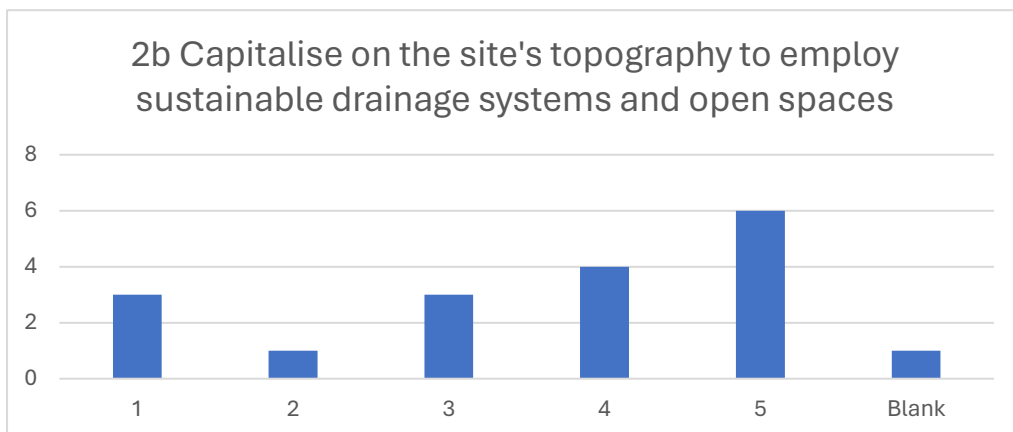
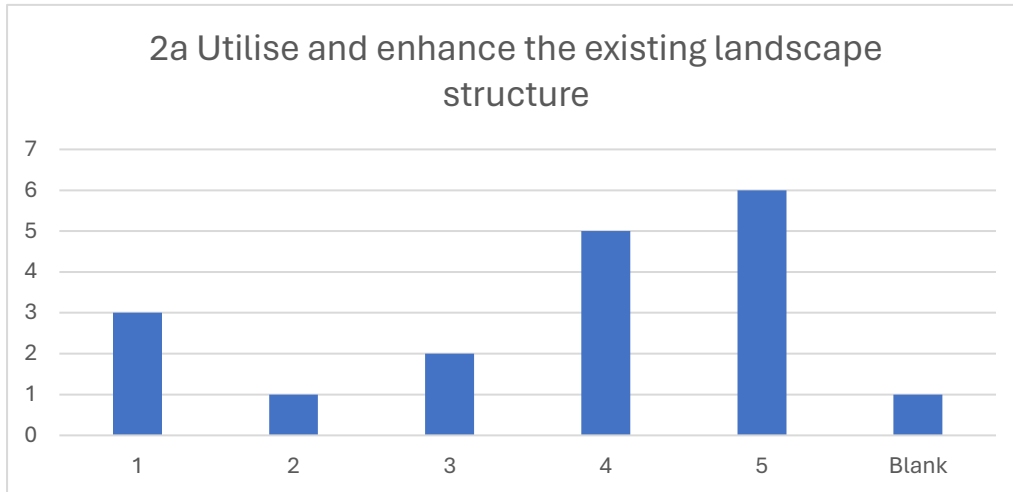
The response from the Conservators of Epping Forest is reported with other statutory consultee responses.



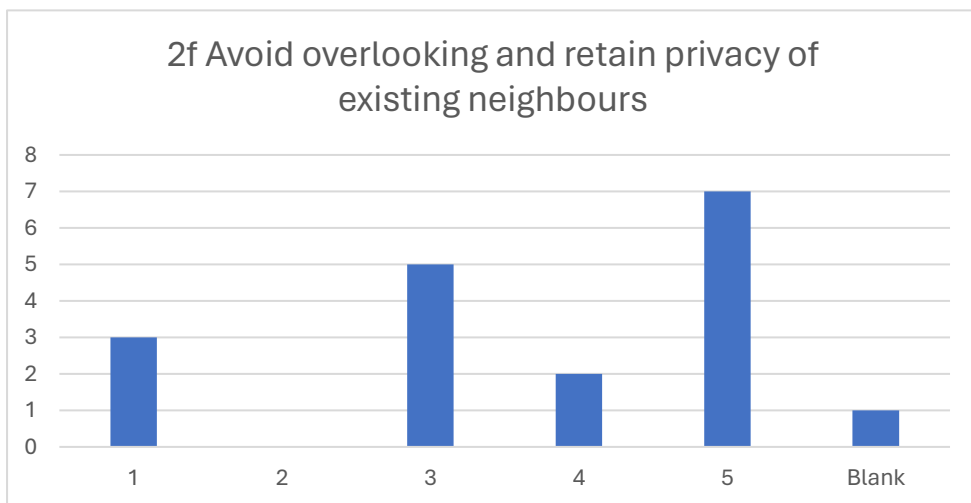
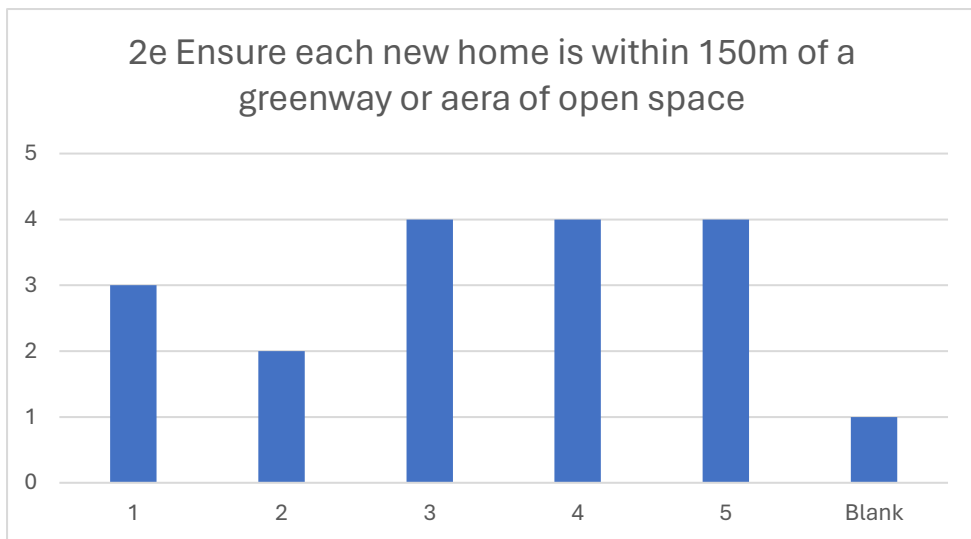
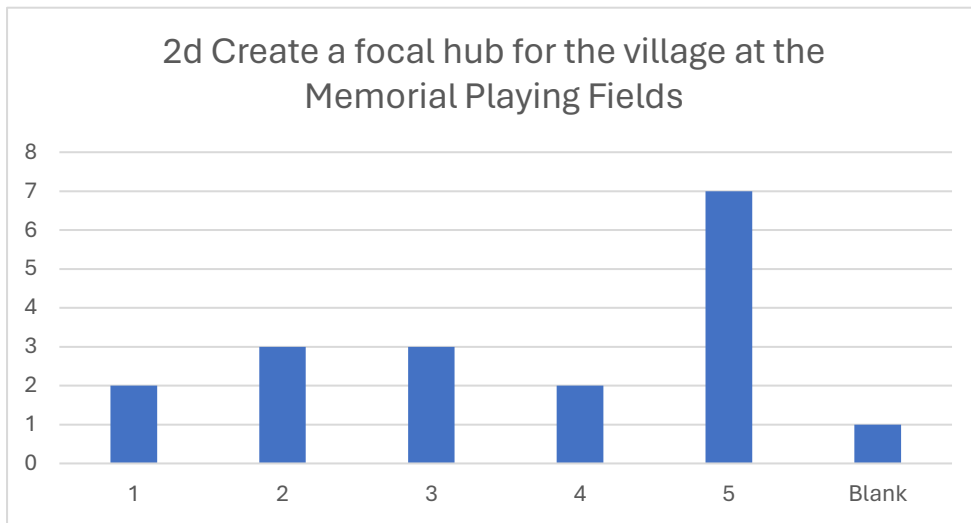
## Question 2: Themes

Respondents were asked to rank the extent to which they agreed with the themes and principles that underpin the masterplan vision. These comprised 18 principles under the headings of six themes. Responses were ranked from 1 (disagree) to 5 (agree) and are set out below.

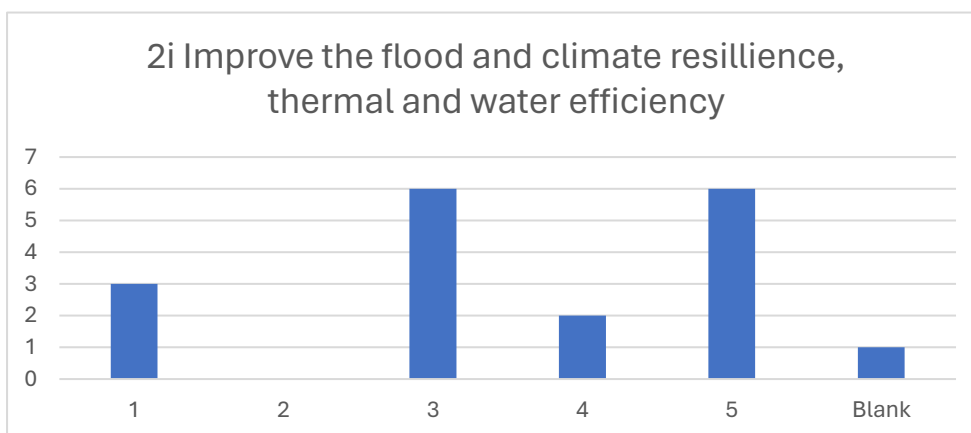
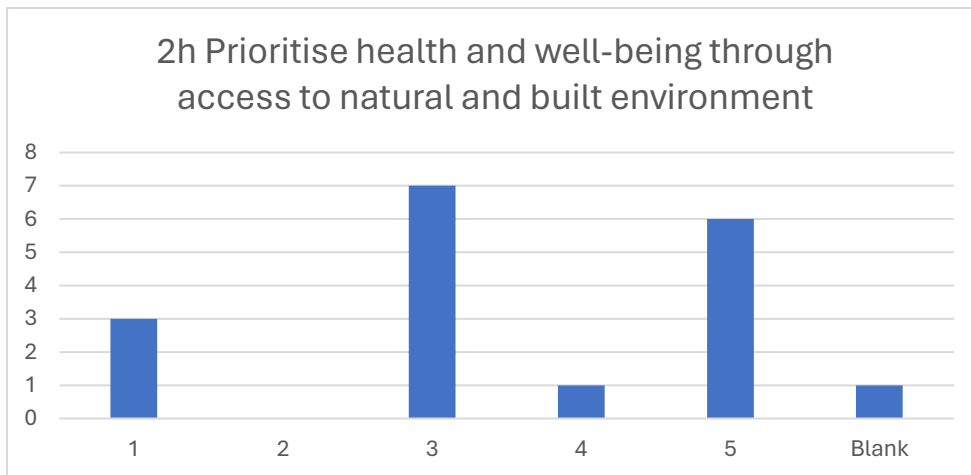
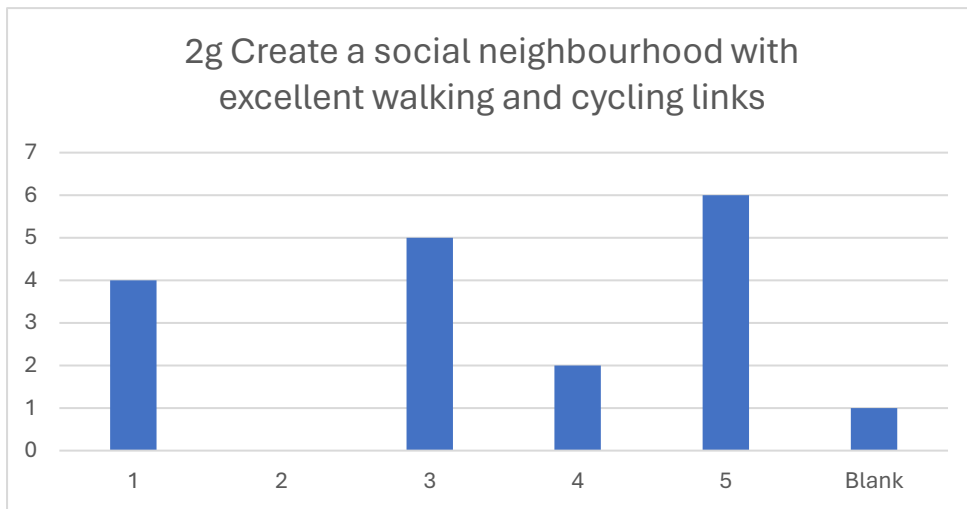
### Landscape & Topography



**Open Spaces and Focal Points:**

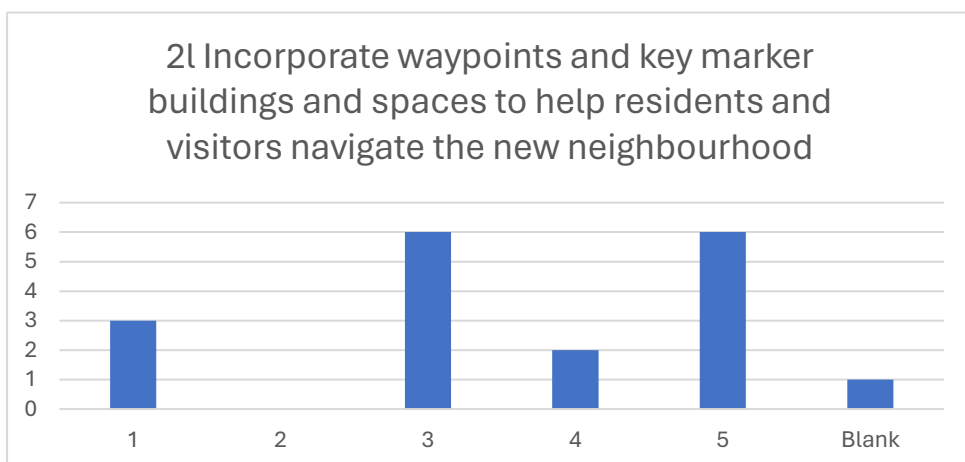
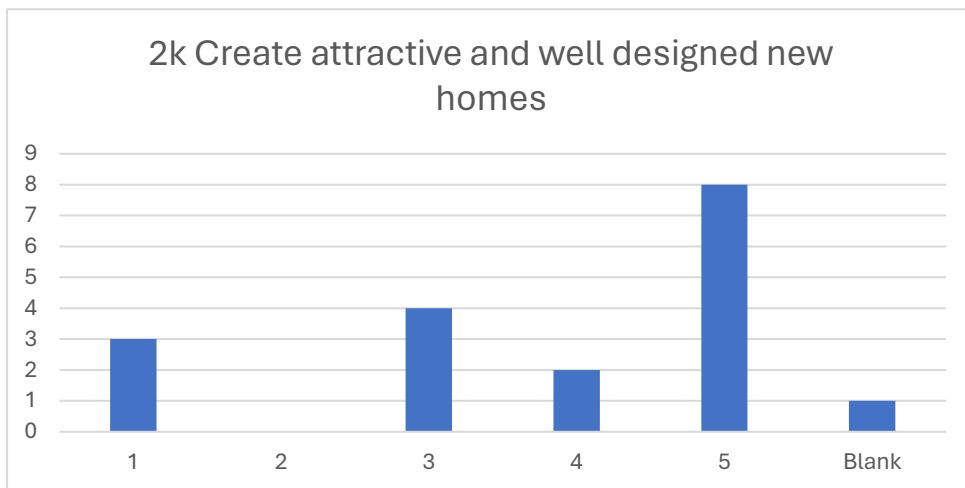
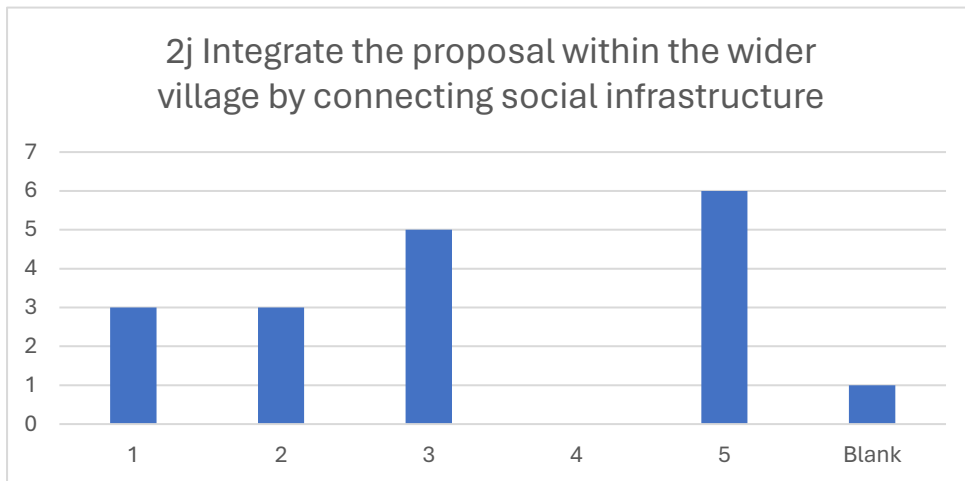


**Creating a Highly Sustainable Place:**

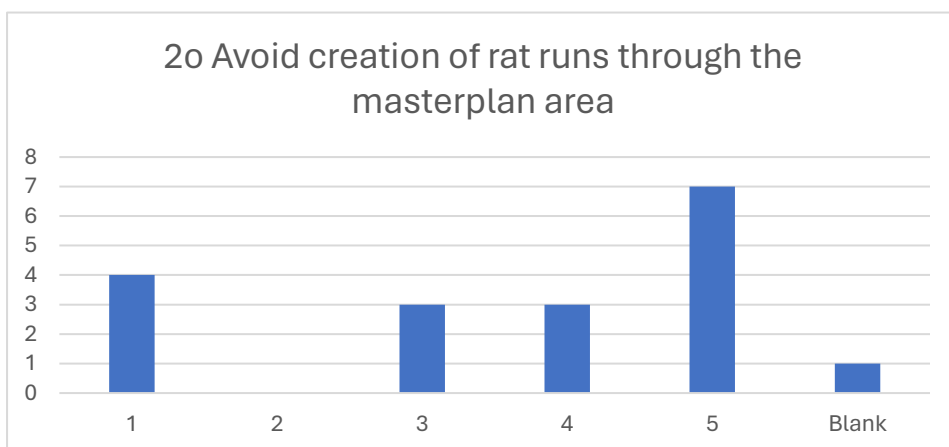
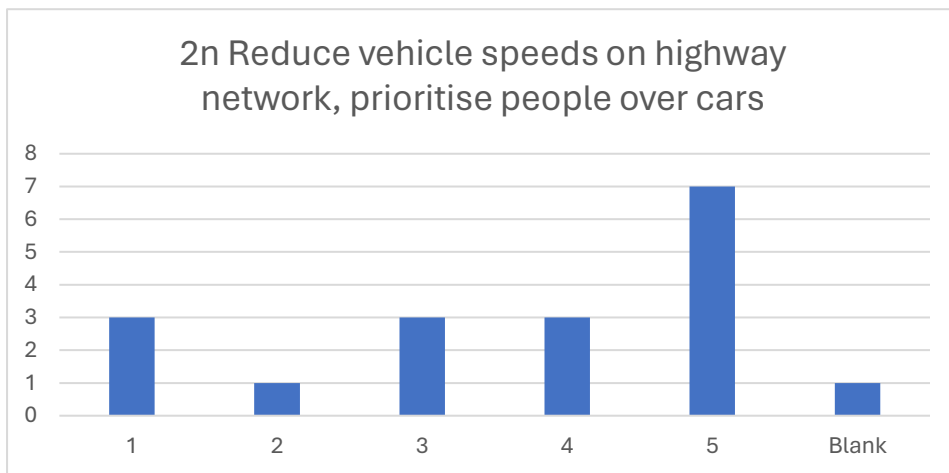
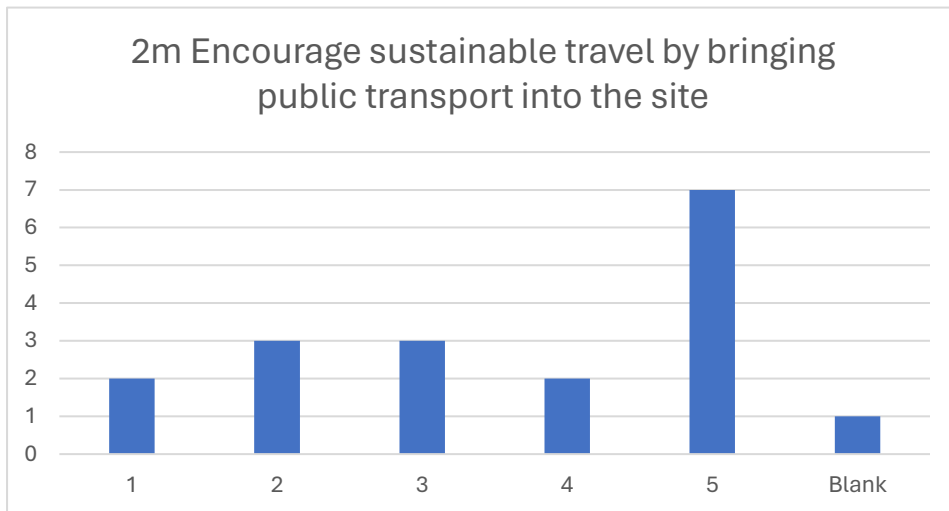




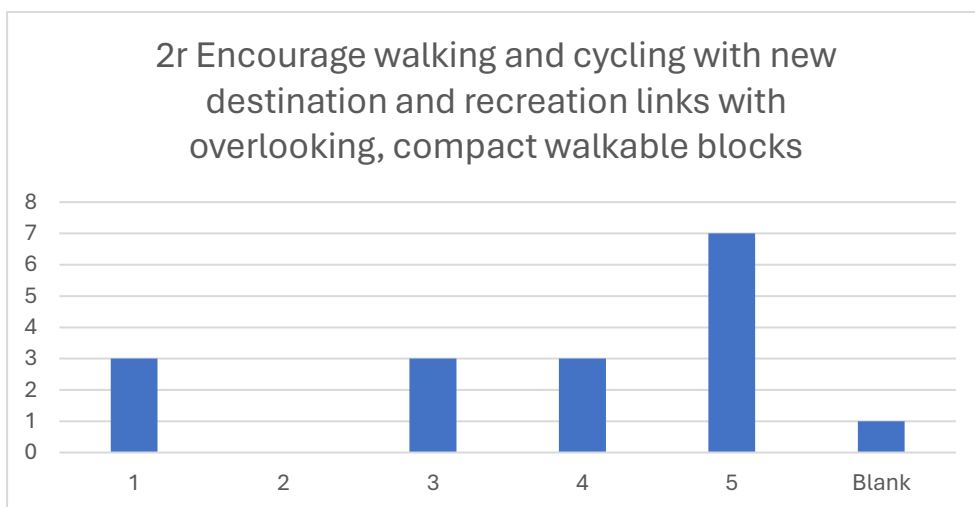
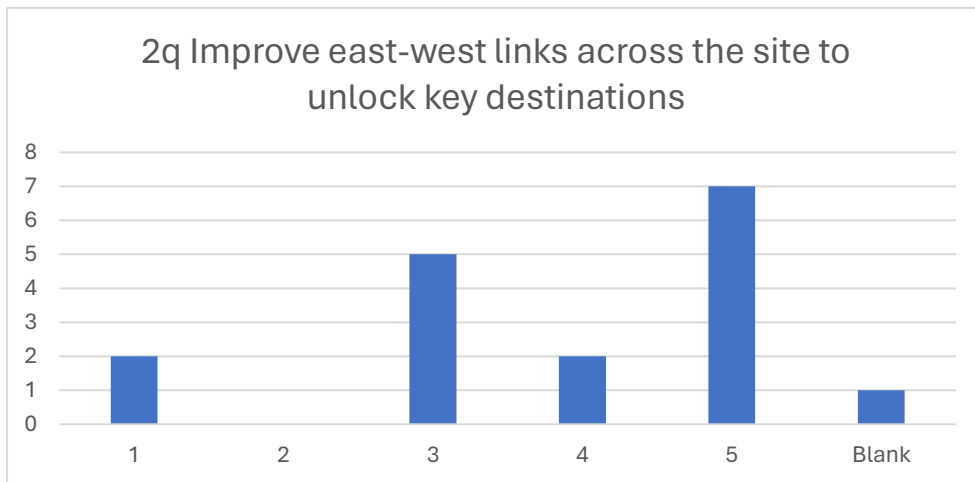
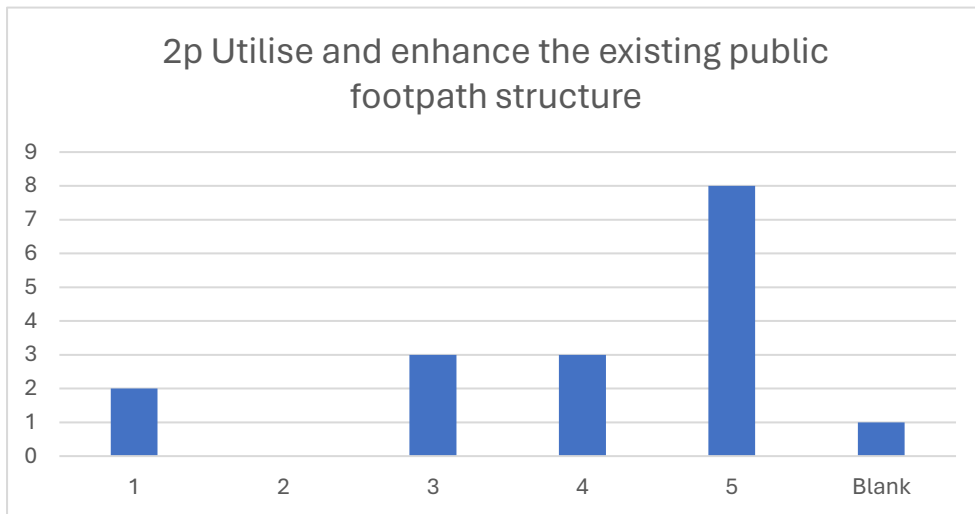
**Integration & Legible Urban Form:**



**Public Transport & Vehicular Access:**

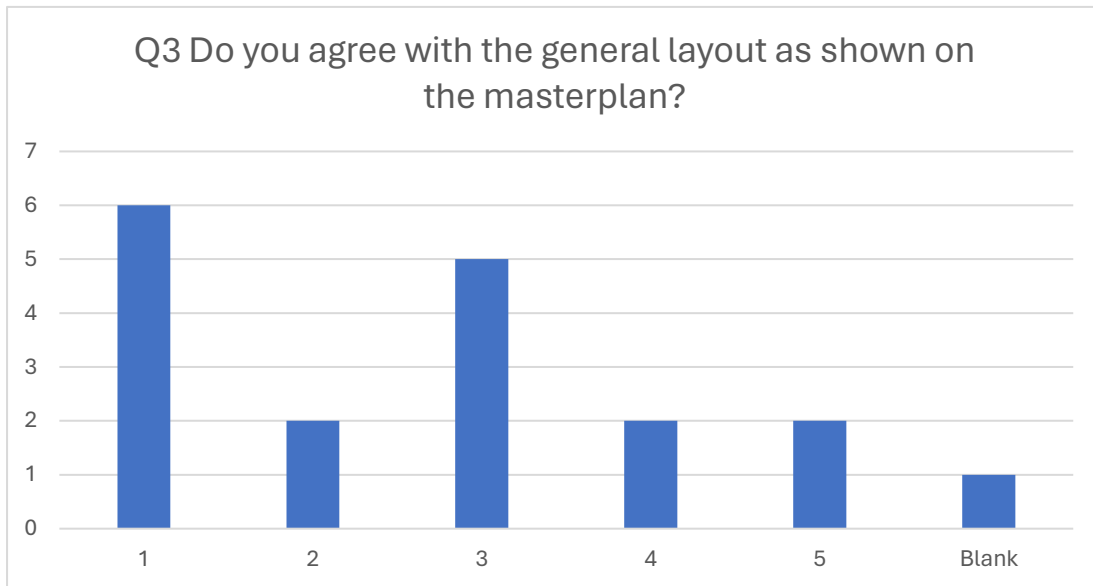


**Enhancing Public Right of Way:**



**Question 3: Do you agree with the general layout as shown on the masterplan?**

Respondents were asked to rate whether they agreed or disagreed with the statement in Q3 (1 disagree – 5 agree).



#### **Question 4: Comments on the Masterplan**

The responses to the question from members of the local community comprised:

- Need better water supply / pressure
- Need better sewerage and waste
- Cripsey Brook long term maintenance should be in place to cope with overflow / Surface water drainage
- How will future management of water bodies be funded and overseen? / maintenance of open areas
- Loss of open green spaces
- More trees required
- Footpaths should remain
- Need layby north of A414 by Rayley Lane roundabout for disabled people to access public transport
- Need footpath along A414 to Talbot Roundabout
- More school buses for north of village
- No access to village via Church Lane
- Need parking strategy / minimum 3 spaces per home
- Zero ready homes needed
- Maintain privacy of existing home owners
- Need publicly available Construction Management Plan
- Object / disagree with masterplan
- Object to scale / change in character
- Farmland should be retained
- Traveller site not needed

Feedback from landowners comprised:

- Chase Farm is an industrial estate but is shown as housing
- Incorrect rights of way shown across Chase Farm
- Housing design should be traditional

The response from the Conservators of Epping Forest is reported with other statutory consultee responses.



### 4.3 Feedback from Letters and Emails

Four emails were received from the local community which raised the following issues:

- Need to improve local bus services in terms of frequency, later into the evening and to Chelmsford
- Keen for discussions relating to land for primary school and early years
- How will development affect Vicarage Lane?
- The Masterplan only relates to North Weald, not North Weald Bassett
- Urban references made in Masterplan but the village is rural
- Outcomes (such as modal change) are either subjective or based upon little research
- A minimum of 1,050 indicates cramming in as many homes as possible
- The impact on the A414 has been neglected and an additional roundabout will add to the dangers of using that strategic highway
- Can't see how bus routes down High Road and A414 will be practical
- Concern with density in a village setting
- What are the other developers and what plans do they have?
- Does the traveller site include space for a paddock?
- Significant issues in running an orchard and play areas
- Impact on Green Belt in North Weald Bassett Parish

An email was received from St Andrews Primary School which raised the following issues:

- Supportive of the Masterplan
- Strongly against additional primary school
- Support the expansion of the existing school
- Include new vehicular access to the north of the School and use existing entrance for pedestrian access
- Open to the idea of opening existing and any proposed sporting and leisure resources out to the community
- Consider lighting footpath that runs alongside the school

Two further emails and letters were received on behalf of other landowners and the issues are summarised below:

- Supportive of the production of the document but has raised some fundamental concerns
- Site NWB.R1 has been designed to include two LAP play areas, which is more appropriate than one LEAP
- Not clear on how NWB.R1 would be served by buses
- One single SUDs basin will be adequate for site NWB.R1
- It is logical for a potential new bus route to use the proposed access into site NWB.R1 from the A414
- Measures to make the stretch of the A414 between the existing and proposed roundabouts a safer environment for cyclists and pedestrians is essential



- NWB.R1 should be served by a direct access from the A414 for all vehicles and all movements, provided that its use ceases once the link between R1 and R3 is delivered
- Object to the reliance on proposed roundabout as the only permanent means to access NWB.R1/NWB.T1
- Question whether second pedestrian path leading to R2 is necessary
- A bus route, bus stop and school drop off point within NWB.R1 are supported in principle but the direct access from the A414 should be retained permanently for buses (and potentially for all users)
- Consider combined bus stop / school drop off
- Strongly urge that additional pedestrian crossing across the A 414 is provided within close proximity to the access to NWB.R1
- Pedestrian and cycle access should be provided at the southern edge of R1 to Blackhorse Lane
- Indicative location of traveller site cannot be provided as shown and alternative locations are suggested
- Clarity on minimum site area for traveller pitches required
- Range of densities for site R1 somewhat welcomed
- References to building heights are supported
- Object to suggested mechanism relating to traveller site in infrastructure delivery table
- Chase Farm should be shown as industrial site
- Incorrect reference to rights of way across lane

#### **4.4 Feedback from Public Consultation Events**

During the public consultation events held on the Saturday 9<sup>th</sup> December and Tuesday 12<sup>th</sup> December 2023, issues were raised in discussion with EFDC officers and members of the Masterplan team. These can be summarised as follows:

##### **Transport and access**

- Support new roundabout access on A414
- General queries regarding traffic modelling and infrastructure upgrades
- Junction 7 motorway junction capacity and need for upgrading
- Traffic volumes heading east to Ongar
- Queries relating to the need for additional bus services

##### **Drainage and sewerage**

- Sewage capacity – concerns with current capacity
- Potable water pressure and connection point – report that Blackhorse Lane residents experience low water pressure.
- Surface water drainage at times of high rainfall water flows south into village (rather than north)

##### **Other**

- Contamination – comments about land historically being used as a landfill for the deposit of contaminated material



- Report of buried WWII bomber straddling the site boundary.
- Fire safety – concern that there are not sufficient strategic gaps to prevent the rapid spread of fire
- In principle objection to the loss of agricultural land
- General questions about development parameters / green corridors along the boundary; and rear access to gardens

A composite list of all non-statutory feedback can be found at Appendix G.

#### **4.5 Feedback from statutory consultees**

Responses were received from the following statutory consultees:

- North Weald Bassett Parish Council
- Epping Forest Heritage Trust
- Historic England
- Natural England
- Environment Agency
- Essex County Council
- National Highways
- EFDC Air Quality
- Thames Water
- Harlow and Gilston Garden Town
- Hertfordshire and West Essex Integrated Care Board
- Conservators of Epping Forest

A composite list of all non-statutory feedback can be found at Appendix G.





## 5. Summary and conclusions

- The formal consultation included a comprehensive range of ways in which stakeholders could access information on the Strategic Masterplan and provide their feedback. This met and exceeded the policy and regulatory requirements.
- There was a relatively low level of response from the wider community as part of the formal consultation, although a wide range of quantitative feedback was received. This had been preceded earlier in 2023 by a widespread community consultation by Vistry Group which elicited a higher level of response, which resulted in changes being made to the Draft Masterplan.
- There were a range of responses to Q1 “Do you agree with the Masterplan Vision” although the overall responses were more weighted to disagree. There was a similar response to Q3 “Do you agree with the general layout as shown on the Masterplan”.
- There was also a spread of responses to Q2 themes and principles. However, responses were more weighted to agreeing with the themes and principles that underpin the Masterplan vision.
- A good level of response was received from statutory consultees and landowners which raised a wide range of issues. These will be reviewed and appropriate changes made to the masterplan before it is finalised.





## **Epping Forest District Quality Review Panel**

### **Report of Formal Review Meeting: North Weald Bassett Strategic Masterplan Framework**

Friday 1 September 2023

Epping Forest District Council, 323 High St, Epping CM16 4BZ

#### **Panel**

Phil Askew (chair)

Laura Baron

Garry Colligan

Vivienne Ramsey

Richard Wilson

#### **Attendees**

Nigel Richardson Epping Forest District Council

Richard Schunemann Epping Forest District Council

Krishma Shah Epping Forest District Council

Lucy Block Frame Projects

Aretha Ahunanya Frame Projects

Tasnima Ahmed Frame Projects

#### **Apologies / report copied to**

Nick Finney Epping Forest District Council

Deborah Denner Frame Projects

#### **Confidentiality**

This is a pre-application review, and therefore confidential. As a public organisation Epping Forest District Council is subject to the Freedom of Information Act (FOI) and Environmental Information Regulations (EIR), and in the case of an FOI / EIR request may be obliged to release project information submitted for review.

---

## 1. Project name and site address

Land south of Vicarage Lane, North Weald Bassett

## 2. Presenting team

Paul Gibbs	David Jarvis Associates
Clive Burbridge	Iceni Projects
David Fletcher	Strutt & Parker
Mawgan Pengelly	tor&co
William Wood	Vistry Group

## 3. Planning authority briefing

The site is in the village of North Weald Bassett, approximately three miles to the north of Epping Town, and four and a half miles to the south of Harlow within the Epping Forest District. Approximately 300 metres to the west of the site is the North Weald Airfield, which proposes 10 hectares of new employment land along with the retention and enhancement of existing airfield operations. The airfield masterplan is being brought forward by the Council, who are the landowners. This plan has been developed and endorsed by the Council on 13 March 2023.

The vision for the North Weald Bassett Strategic Masterplan Framework area is a landscape-led masterplan that respects the character of the village, uses existing landscape features, and places an emphasis on social focal points, connectivity, and integration with the fabric of the village. The masterplan proposes 1,050 new homes, as well as education, community, and sporting facilities. A dedicated east to west pedestrian and cycle link will run through the centre of the masterplan, connecting the eastern side of the village through to North Weald Airfield and the local nature reserve to the west. The masterplan aims to revitalise the existing recreation ground and memorial playing fields into a social hub for sports, health, community, and mobility facilities.

The Council would welcome the panel's views on the development of the strategic masterplan framework, and particularly how successful the proposals address the relationship with the existing village, the North Weald Airfield masterplan and the wider area. The panel is invited to comment on the development of placemaking and character, as well as the arrangement of social, community and retail uses in relation to public realm and open space. Comments are also sought on the energy strategy, sustainability approach and environmental design.



#### 4. Quality Review Panel's views

##### *Summary*

The masterplan has developed significantly since the previous review, and the panel thanks the applicant for providing the comprehensive document in advance. As the strategic masterplan is the first step in the planning process for the site, the framework should provide clarity about when the detail will be developed through design codes and reserved matter applications. The additional baseline evidence and studies are welcome, and this analysis has helped to inform decisions around layout, access, and public realm. However, the masterplan still lacks detail of how the new development will be integrated with the existing village, as well as the neighbouring North Weald Airfield masterplan site and the wider area. As such, the current proposal reads as three distinct places, with the masterplan area turning its back to the village, looking outward to the north and the A414. Opportunities should be explored to enhance connectivity beyond the site boundary, and to develop character areas and placemaking in response to the site's context.

The landscape focus is positive, and the site provides excellent existing natural assets which should be preserved and enhanced. Further detail should be provided on how the public spaces will be maintained, as well as how the landscape enhancements address climate change and resilience. There is still too little information on the approach to sustainability, which the panel feels should underpin the whole of the masterplan, informing broader decision making. If this approach is not explicitly set out within the strategic masterplan framework, there is a risk that it will not be delivered further down the line. The applicant should therefore apply the Council's sustainability checklist to develop a cohesive approach to energy, embodied and operational carbon, as well as broader environmental strategies that address sustainable drainage, ecology and habitat.

##### *Strategic approach*

- The strategic masterplan framework has developed well. Its principles and aims are commendable, and the panel feels that the vision themes developed are successful.
- Further work is required on the masterplan area's integration with the existing village, the neighbouring airfield masterplan, and the wider area. The site allocation notes that this development should be an expansion of North Weald Bassett, rather than a distinct new settlement. Therefore, connectivity and cohesion will be fundamental to the success of the masterplan.
- The current layout feels too outward looking, turning its back on the existing village. This is manifested in the greater density and retail uses to the north, which feels counterintuitive.
- The disconnection of key community and retail uses from the 'heart' of the masterplan should be reviewed, to ensure that the 15-minute neighbourhood concept is delivered.



- As the airfield masterplan area is allocated for employment, the panel would like clarity on the types of uses on site, as well as likely employee numbers and analysis of how people will get to work. This information should be used to inform the site layout and access, as well as the placement of communal and social areas.
- Timescales for phasing and implementation across the two sites should also be coordinated.
- The panel appreciate the politics around the parcels of land and ownership. While designing the masterplan to discount these boundaries is positive, the panel would like to see an overlay of the ownership to ensure that the layout, open spaces and access routes are deliverable.

#### *Placemaking, character and identity*

- Further development of the masterplan principles should focus on creating a high-quality place with a strong identity. The panel suggests referring to the original concept illustration to challenge whether the intended vision is being achieved through the strategic masterplan framework.
- While the character analysis of North Weald is useful, the panel notes that the existing village is not of a particularly high quality. It suggests looking further across Epping District, to better examples of the rich architectural character of the area, as well as other contemporary examples.
- The panel feels that the individual character areas are not yet sufficiently differentiated. It cautions against relying on design code and reserved matter stages further along the process to deliver these.
- The village green at the heart of the site is successful. Providing a distinctive and complementary sports and leisure offer for the area will be positive and create opportunities to bring the new and existing communities together.
- The panel suggests exploring complementary uses alongside the sports and play facilities, to provide passive surveillance over these spaces. For instance, a pub or café use, similar to a traditional sports pavilion, could be considered.
- An employment hub may also be appropriate, given the increase in the number of people working from home. This should be reviewed against the employment offer on the neighbouring airfield site.

#### *Energy, sustainability and environmental strategies*

- The masterplan provides an opportunity for an exemplar environmental design that addresses the climate emergency, as well as enhancing green and blue infrastructure, ecology, habitat, and biodiversity. The panel strongly recommends adopting best practice targets, which could include an expectation of Passivhaus certification for all dwellings.



- The panel is disappointed that the energy and sustainability section of the report is yet to be developed to the same level as the rest of the masterplan framework. This should have been addressed earlier to inform key decision making around layout, access, and open space.
- The applicant should refer to the Council's sustainability checklist, working through each vision theme of the masterplan to directly apply the recommendations.
- Given the scale of development there could be significant carbon generated by the scheme. An assessment of embodied and operational carbon should be carried out as part of the masterplan.
- The proposed on-plot energy strategy is an appropriate approach. However, it will be important to develop clear expectations for how each building is designed to address orientation for optimised photovoltaic panels, minimising overheating, and achieving an efficient form factor.
- Further clarity on the sustainable drainage approach for the site should be provided. Less engineered solutions, such as swales and raingardens, should be considered, alongside the attenuation ponds proposed.
- Opportunities for integrating habitat and ecology within the buildings should be included, based on the outcomes of the baseline studies undertaken. For example, bat and swift bricks could be considered where appropriate.
- Opportunities for rainwater harvesting and green roofs should also be considered.
- As the masterplan develops a significant extent of green field land, the panel notes the social responsibility to make best use of the land. It questions the efficiency of the layout and suggests that additional density could be appropriate to make the development truly sustainable.

#### *Landscape and public realm*

- The panel welcomes the focus on landscape. The site presents an excellent opportunity, given the existing mature trees and hedgerows. Retaining and strengthening these features, to build upon the existing character of the site, will be vital to the success of the masterplan.
- Planting new trees and enhancing hedgerows is positive, but the species chosen should address both climate and disease resilience.
- Improvements to the safety and navigability of the existing byways and pathways is supported. However, the existing scrub and undergrowth is valuable habitat, and the extent of its removal will need to be carefully balanced.



- The location of the play space for teenagers feels isolated, which could result in antisocial behaviour issues. Relocating this in an area that is overlooked and integrated with housing should be considered.
- Early years play should be located close to active, social functions, such as health centres, cafes and shops. The panel feels that this would be attractive for parents and carers.
- Creating opportunities for 'play on the way' should be considered further. The panel would like to see further detail of how this could be integrated with the design of streets, as well as the green corridors.
- Opportunities for play for all ages should also be provided. Circular walking and running routes, as well as outdoor gyms, would help build upon themes around health and wellbeing.
- An approach to lighting should be included within the masterplan framework. This will be important, both for personal safety and for protecting the natural environment and wildlife.
- The panel would like to see further detail of the proposed boundary treatments, to ensure that the existing village and new development feel integrated. Privacy of back gardens should be considered.

#### *Access and transport*

- The panel feels that the connections beyond the redline will be critical to ensuring that the site is accessible, as well as positive and attractive to visit and live in.
- The proposed bus route will be fundamental to improving access to the site and promoting sustainable modes of transport. Further clarity on how the new route connects to the wider area, including Harlow and Epping town centre, should be provided.
- Broader improvements should be made to cycling and walking networks beyond the redline to support active travel.
- The panel questions the legibility of the primary road through the site. The masterplan should ensure that wayfinding is clear, with clarity of hierarchy and integration with the wider footpath and cycle network.
- As the primary road is likely to dominate the public realm, the panel encourages considering opportunities for sustainable drainage and public realm opportunities, while keeping people and cyclists safely separate from vehicles.



- 
- Further opportunities for improved site access from School Green Lane should be considered, particularly as this acts as a key desire line to the proposed location of the social heart of the scheme.
  - The link to Queen's Road is positive and is likely to be well used. However, the panel questions the legibility and safety of this route as presented, given that it passes between existing homes.
  - The panel supports the decision to reduce parking, despite Essex County Council standards.

### *Process*

- The panel appreciates that the strategic masterplan is the first step in the planning process for the site. The framework should provide clarity about when the detail will be developed, for instance through design codes and reserved matter applications, to establish clear expectations and deliverables.
- The community consultation undertaken to date is positive. Getting buy-in from existing residents and neighbours will be important to the successful cohesion on the village expansion. There will inevitably be tensions with immediate neighbours, and the panel urges the applicant to be clear and honest around expectations.
- Further detail of phasing should be provided. This will be particularly relevant to the delivery of the landscape design, given the extent of new planting proposed, which will need time to mature.
- Given the proposed footpath closures, and diversions to existing public rights of way, clear signposting will be needed, with changes clearly communicated to the community.

### *Next steps*

- The panel would welcome the opportunity to review the strategic masterplan framework again, particularly to address the development of the sustainability strategy.





## **Report to the Cabinet**

**Report reference:** C-052-2023/24

**Date of meeting:** 18/03/2024



**Epping Forest  
District Council**

**Portfolio:** Cllr C Whitbread, Leader of Council

**Subject:** Fit for the Future Transformation Portfolio, Governance

**Responsible Officer:** Georgina Blakemore, Chief Executive

**Democratic Services Officer:** V Messenger ([democraticservices@eppingforestdc.gov.uk](mailto:democraticservices@eppingforestdc.gov.uk))

---

### **1. Recommendations/Decisions Required:**

**To agree the proposed governance structure for the Fit for the Future Transformation Portfolio, laid out within this report and Appendix F.**

### **2. Executive Summary:**

Fit for the Future is a portfolio of transformation activity over the next 4 years (2024-2027), ensuring that the Council can continue to operate within its financial means and deliver services that residents and businesses need.

This report provides an outline of the Council's proposed Fit for the Future Transformation Portfolio Governance.

The report sets out a structure for transformation that is intended to ensure good governance, with decisions at the lowest level possible and with oversight from Members and Officers at the highest level.

#### **2.1 Reasons for Proposed Decision:**

The proposed structure incorporates existing groups and processes to ensure most effective use of resources and to capitalise on successful approaches to advice and decision-making already in place.

The existing officer groups and processes outlined in Appendix F, have proven to encourage better service delivery and improved accountability, whilst supporting any needed interventions to achieve the intended outcomes. They also provide structure to manage risk and performance through robust internal control including standard tools and processes to enable change to be delivered against agreed quality, time, and cost objectives.

The proposed structure utilises existing member governance through Cabinet for due decision making and Scrutiny for appropriate challenge.

## **2.2 Other Options for Action:**

An alternative option would be to design a new governance structure, with the creation of additional boards, groups and committees, with this portfolio sitting outside of the existing governance model. This option is not recommended as it would be duplication in terms of time and resource, when the existing structures are sufficient and appropriate.

## **3. Report:**

3.1 The Fit for the Future Transformation Portfolio Cabinet report (Appendix G) and its recommendations were approved at a Cabinet meeting on 5<sup>th</sup> February 2024.

3.2 Fit for the Future is a portfolio of transformation activity over the next 4 years (2024-2027), ensuring that the Council can continue to operate within its financial means and deliver services that residents and businesses need.

3.3 The approved Budget agreed by Council on 5 February 2024 included provision for the creation of a Reserve of up to £3 million to offset the one-off costs associated with the implementation of the programme.

3.4 This report provides an outline of the Council's proposed Fit for the Future Transformation Portfolio Governance and how approvals for spending will be sought.

3.5 The report sets out a structure for transformation that is intended to ensure good governance, with decisions at the lowest level possible and with oversight from Members and Officers at the highest level.

3.6 The proposed structure incorporates existing groups and processes to ensure most effective use of resources and to capitalise on successful approaches to advice and decision-making already in place.

3.7 The Council's Governance arrangements represent good practice, are robust and regularly tested and reviewed. Commitment of expenditure is controlled by Financial Regulations and a scheme of delegations. Spending above designated thresholds needs to be authorised by increasingly senior individuals or democratic bodies and spend committed as part of this programme will need to comply with this, and the Council's proper procurement rules.

3.8 The Council monitors all spending through Quarterly Reporting to Overview and Scrutiny and to Cabinet. Performance monitoring is also undertaken by Overview and Scrutiny. Overview and Scrutiny, together with the Place and Community Scrutiny Committees set their own work programmes and have the ability to add individual aspects of the transformation programme, or the entire programme, to their forward plans for scrutiny.

3.9 Please refer to Appendix F to review the proposed governance structure.

#### **4. Scrutiny Comments**

This governance structure proposal report has not been presented to a scrutiny panel.

#### **5. Resource Implications:**

The recommended approach will have a minimal impact on resources, as the groups and processes already exist within the organisation.

#### **6. Legal and Governance Implications:**

None at present, as the report is based on governance.

#### **7. Safer, Cleaner and Greener Implications:**

None at present.

#### **8. Consultation / Scrutiny Undertaken:**

None for this report.

#### **9. Background Papers:**

##### **Appendices**

Appendix F – Fit for the Future Transformation Portfolio Governance slide deck  
[Appendix G – Fit for the Future Transformation Portfolio Cabinet report 5 Feb '24 and its Appendices, A-E.](#)

#### **10. Risk Management:**

No risks identified regarding this report.

#### **11. Equality:**

At this stage there are no direct implications. A full Equality Impact Assessment will be conducted at a programme level and included within the appropriate Cabinet report.

# Director, North Essex Councils

**A new and exciting post is waiting to be filled by an ambitious individual keen to take on the challenge of driving forward a pioneering local authority partnership.**

The North Essex Councils (NEC) partnership of eight districts and Essex CC is seeking a director to provide strong executive leadership and turn its programme plans into reality for the benefit of communities across North Essex.

The local authority partners that make up NEC are the districts Braintree, Colchester, Chelmsford, Epping Forest, Harlow, Maldon, Tendring and Uttlesford and Essex. The partnership, born out of the North Essex Economic Board, was created in 2022.

Cllr Chris Whitbread, NEC chairman, cabinet member for finance at Essex CC and leader of Epping Forest DC, said: "This is a really exciting opportunity for someone to be involved in planning the future of North Essex and shaping our delivery programme. Already progress has been made so there is a lot for the new director to build on but there is also so much more than can be done."

NEC vice-chairman David King, Colchester City Council's leader, said: "The director will build a lasting

partnership for the benefit of the million residents in North Essex."

North Essex is a particularly attractive place in which to live and work. It includes both urban and rural areas, major roads and railways, a port and an airport, Stansted, in Uttlesford DC.

The area has had major population, housing and employment growth in recent years which is set to continue with its proximity to London. The Great Eastern Main Line provides rail services between London Liverpool Street and the East of England while Harwich in Tendring DC is one of the major UK ports for ferry and cruise departures and includes Freeport designation. The growing passenger traffic from Stansted will continue to



create additional extra pressures on road and rail infrastructure.

The area has a mixed economy focused on the service sector, including wholesale and retail, business services, tourism, health and education, alongside manufacturing, logistics and construction. Agriculture and its related industries play an important part in the overall economy. There are significant future economic opportunities including in Construction and Retrofit, Clean Energy, Advanced Manufacturing and Engineering, Digital Tech and Life Sciences.

The director will be expected to deliver the work programme as agreed and defined by the NEC partnership, to provide expert policy and strategic advice that translates into real benefits across North Essex and to develop excellent, trustworthy, relationships with all partners. The director will need to work closely with the nine authorities on NEC and develop close relationships with their leaders, chief executives and directors as well as external partners.

The successful candidate will need vision, tenacity, exceptional relationship-building skills, and a good understanding of both current

and emerging strands in service delivery to bring partners together, add value to what they do and identify opportunities to reduce costs.

Cllr Whitbread said: "We need someone with energy, strong communication skills and readiness to engage at director level as well as with chiefs and leaders. Delivery is really important. There is enormous potential for our North Essex partnership and we want to be able to speak as one voice on behalf of our people." ■



## STRONGER TOGETHER.



Director, North Essex Councils up to £118k • 2-year FTC

The complex challenges of the future can only be met by a shared approach to reimagining public service provision and driving economic growth. Building on a strong legacy of collaboration stretching back many years, we believe we're at a genuine tipping point for the communities of North Essex.

In this role, you'll co-design the overall operational and governance architecture of our future model, then bring together the people, resources and partnerships that will turn it into a reality.

You'll need vision, tenacity, exceptional relationship-building skills, and a sophisticated grasp of both current and emerging strands in service delivery. With the strong support of elected members and executive peers alike, it's a real chance to shape something extraordinary.

Visit [www.nec-potential.co.uk](http://www.nec-potential.co.uk) to find out more, or contact Steve Guest at Solace in Business on 0207 976 3311 to arrange an informal conversation.

Closing date: 12 February 2024.



# Challenges, objectives and outcomes



**Organisational resilience** – We all carry numerous vacant posts and find it difficult to recruit the right staff for the future. Working in partnership we can be more resilient by sharing services, sharing key posts, attracting the right people.



**Improving capacity and agility** – Specialists posts can be shared rather than a reliance upon agency staff and Suppliers. Peaks and troughs in workload can be dealt with through improved capacity and sharing of common processes and policies.



**Staff retention and development** – There is the opportunity to develop some bigger/challenging roles across the partnership that will underpin our ability to retain key staff. Investing in staff development will be a key part of service design.



**Aligning and developing best practice** – The co-design of services will enable us to build upon strengths, significantly improve common pain points and lead to a one-off change in delivery through the alignment towards shared service best practice.



**Service efficiency** – We will co-design more efficient services by designing out pain points whilst at the same time dealing with frustrations of staff with existing service delivery models .



**Shaping our own future in Essex** – Three strategically aligned partners can move quickly enough to co-design shared services now. This way we are in control of service delivery models rather than waiting to ‘be done to’.



**Improve the customer journey** – This programme presents us with a step-change (one-off) opportunity to co-design services around Customer needs.

# Shared Service Programme Structure

< ---- **Shared Service Executive Board** ---- >

CEO, Colchester CC

CEO, Braintree DC

CEO, Epping Forest DC

IT Workstream Sponsor (& **Acting Programme Director**)

HR Workstream Sponsor

R&B Workstream Sponsor

Finance Workstream Sponsor

Page 270

Programme Manager  
ICT Enabling  
(Contractor) (working  
with Interim HoS and  
Directors on ICT Shared  
Service)

Programme Manager  
PMO / Transformation  
& Programme Mgr  
(Contractor)

Delivery Lead  
HR

Delivery Lead  
Revs & Bens

Delivery Lead  
Finance

EFDC Partnership Lead &  
Workstream Analyst

CCC Partnership Lead &  
Workstream Analyst

BDC Partnership Lead &  
Workstream Analyst

Corporate Director, BDC

**Workstream Steering Groups / Project  
Boards**

Partnership Lead & Workstream Analyst Roles support the Delivery leads and Programme Managers and represent each Council at a delivery level. \*Programme will also require additional specialist delivery support e.g. Business Analysts

for all workstreams – will include service  
reps/enablers/etc as needed

Cross Cutting Roles :

**Comms Lead and PA Support**

*ICT Enabling (dual role with ICT Shared Service programme manager), PMO likewise  
Other enabling support from Legal, Finance, HR, MOs*

Representing Key :

Neutral

Epping/Colchester

Braintree

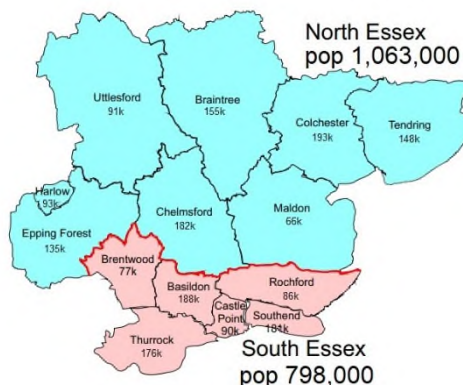
Colchester

Epping

## Association of North Essex Local Authorities Memorandum of Understanding

**Between:**

Braintree District Council  
Chelmsford City Council  
Colchester City Council  
Epping Forest District Council  
Essex County Council  
Harlow Council  
Maldon District Council  
Tendring District Council  
Uttlesford District Council



### 1. Background

- 1.1 Together, we are responsible for delivering services to over a million residents, equivalent to the City of Birmingham. The area delivers significant gross value added at over £17bn and supports almost 41,000 businesses.
- 1.2 This new partnership of North Essex Authorities is well placed to deliver local ambitions, to respond to emerging opportunities and Government policies, as well as being able to promote North Essex as desirable place for living, leisure and to do business in.
- 1.3 The Authorities have established a good track record of partnership working in various previous collaborations.
- 1.4 The nine Authorities wish to record their intention to establish the basis of our collaboration through a Memorandum of Understanding (MoU) and to form this new partnership, building on previous joint working successes.

### 2. Core Purpose and aims

- 2.1 The core purpose of NEA is to provide for a platform for enhanced cooperation across North Essex, to achieve better outcomes for our residents and businesses, by working together rather than separately. Through our collaborative approach we are best placed to develop and deliver a vision for North Essex, promoting sustainable growth for our economies and communities up to 2050.
- 2.2 NEA will focus on the strategic opportunities, regardless of individual local authority boundaries, for North Essex to influence and secure the collaboration and investment that will help our individual areas to flourish and realise their full economic, social and environmental potential.

2.3 The aims of NEA will be to:

- a. Agree a 2050 vision for North Essex.
- b. Provide strong and collective place leadership and a voice into Government.
- c. Increase the ability of all authorities to cope with public spending restrictions and increased demands on services.
- d. Influence Government powers and attract Government funding to North Essex.
- e. Raise the profile and reputation of North Essex as a desirable place for living, leisure and to do business in.
- f. Improve transport and digital connectivity, securing funding for strategic infrastructure.
- g. Provide sufficient new homes to meet the needs of a growing and ageing population.
- h. Attract investment and stimulate economic growth, focusing on key sectors and the low carbon economy.
- i. Increase productivity by improving educational attainment and access to skills relevant to our future labour market.
- j. Enable North Essex to respond and adapt to Climate Change
- k. Support wellbeing and healthy life expectancy by tackling the wider determinants of health with our health partners and the voluntary and community sector.
- l. Develop innovative approaches to funding to deliver shared objectives, including developing joint bids where appropriate.
- m. Work together to help harness the energy, know-how and assets of local communities.

**3. Principles of collaboration**

- 3.1. Working together on strategic priorities irrespective of local authority boundaries.
- 3.2. Creating collective scale, resilience, and impact for the benefit of our residents and businesses.
- 3.3. Tackling problems and issues that we cannot solve individually.
- 3.4. Collaborating to gain something, without losing something (including local identities).
- 3.5. Governance arrangements proportionate to our shared ambition.
- 3.6. Opportunities to discharge certain functions jointly, and pooling of resources, should be considered where this can have collective and measurable impact.



#### **4. Term and Termination**

- 4.1. This MoU shall commence on the date of the signature by each Authority and shall expire if NEA dissolves, with its area of influence reducing should any individual signatory authority withdraw

#### **5. Variation**

- 5.1. The MoU can only be varied by written agreement of all the Authorities, save for any individual authority withdrawing

#### **6. Charges and liabilities**

- 6.1. Except as otherwise provided, the Parties shall bear their own costs and expenses incurred in complying with their obligations under this MoU.

#### **7. Status**

- 7.1. This MoU cannot override the statutory duties and powers of the parties and is not enforceable by law. However, the parties agree to the principles set out in this MoU.

# Fit for the Future Portfolio Outline

**Stronger Council**

**Stronger Communities**

**Stronger Place**

Shared Services and  
Partnership Working

Digital Customer

Council Asset Plan

Future Workforce

Waste & Recycling Service  
Development

Economic Growth  
(including local plan  
employment sites)



# Fit for the Future Transformation Portfolio

Governance

Page 275

# Transformation Portfolio Governance

- Fit for the Future is a portfolio of transformation activity over the next 4 years (2024-2027), ensuring that the Council can continue to operate within its financial means and deliver services that residents and businesses need.
- The following slides set out a structure for transformation that is intended to ensure good governance, with decisions at the lowest level possible and with oversight from Members and Officers at the highest level.
- The proposed structure incorporates existing groups and processes to ensure most effective use of resources and to capitalise on successful approaches to advice and decision-making already in place.

# Transformation Portfolio Governance Structure



Page 277

# Transformation Governance Bodies

Governance Body	Purpose	Frequency
Scrutiny Committees	To review and challenge the decisions taken by the Council and its partners associated with the projects and programmes within the transformation portfolio, making evidence-based recommendations to improve services provided by the Council and partner organisations.	As needed
Senior Leadership Team	To be accountable for the delivery of the transformation portfolio and the achievement of its deliverables. Approve the initial portfolio and any substantial additions (or deletions) from it.	Monthly
Portfolio Steering Group	To oversee the successful delivery of programmes and projects within the portfolio, as informed and advised by Project Managers, Project Sponsors and the Project Management Office. To oversee the programme's change activity, providing corporate oversight, including effective and appropriate challenge and support and ensuring adequate and appropriate controls. Review the progress of initiatives and where possible resolve escalated issues and risks, promote a focus on delivery, and collaborative working.	Monthly
Programme Boards	To monitor progress and timelines at the individual programme and project level. Ensure the quality of programme and project delivery. Identify programme level risks and issues, mitigating where possible and escalating where required. Approve changes in the scope and budget of programmes and projects. Agree and action any decisions raised.	As needed
Project Boards	Agree the project deliverables and objectives and monitor the work of the project team. Own the benefits of the project and ensure that the project is on track to achieve them. Provide direction and management for the project and is responsible for the success of the project.	Monthly

# Fit for the Future Portfolio

**Stronger Council**

**Stronger Communities**

**Stronger Place**

Shared Services and  
Partnership Working

Digital Customer

Council Asset Plan

Future Workforce

Waste & Recycling Service  
Development

Economic Growth  
(including local plan  
employment sites)

Page 279

\*Throughout March there will be Officer workshops to build on the emerging portfolio.

# Fit for the Future Portfolio – Stronger Council Workstream

## Shared Services and Partnership Working

Across North Essex with our partner Councils, we are collaborating to provide a platform for enhanced cooperation across North Essex, to achieve better outcomes for our residents and businesses, by working together rather than separately.

Page 280  
Within Shared Services, we will shape one service delivering to multiple councils with the objective of improving performance to customers, retaining specialisms in second tier Councils and attracting quality people with attractive challenging roles working across Councils efficiently.

Other examples of integrated and partnership working will also be reflected here, including our relationships with Health and the Integrated Care System, North Essex Economic Board and Essex county council.

## Future Workforce

EFDC organisational design work will focus on the form of and skills within the organisation as the functions EFDC deliver begin to transform into new models of delivery such as shared services, partnership working, contractual relationships and other mixed economy of delivery types.



# Fit for the Future Portfolio – Stronger Communities Workstream

## **Digital Customer**

The alignment of customer strategy and digital investment to maximise the customer experience. This will include all contact methods ensuring that complex and urgent customer need is met as a priority and customer satisfaction is on an upwards trajectory.

## **Waste and Recycling Service Development**

Provision of waste and recycling services following the end of the Biffa contract. Focus on the value add of insourcing a service that touches every household across the district. Work with Essex County Council as the strategic waste disposal authority and government as policy and legislative change approaches.

# Fit for the Future Portfolio – Stronger Place Workstream

## **Economic Growth (including Local Plan employment sites)**

Focus on the creation of skilled jobs for local people on sites that the Council has ownership or partnership influence. Inclusive of the Harlow and Gilston Garden Town, North Weald and other significant sites designated in the adopted Local Plan.

## **North Essex Economic Board**

Maximising the opportunity to build on the employment, skills, and training agendas, in order to benefit residents, and the provision of business support, along with higher-level strategic infrastructure opportunities.

Aligning UK Shared Prosperity Funding to achieve greater benefits for the district.

## **Council Asset Programme**

Leverage opportunities for EFDC assets to contribute to the financial stability, growth, and inward investment of our District.

# Portfolio Management

Alignment of entire project portfolio, ensuring alignment with strategic objectives through selection, prioritisation and ongoing control

## Programme Management

Combination of projects that have shared goals, aimed at optimising use of shared resource

## Project Management

Tactical delivery of quality outcomes to a clear scope, cost, and timescale

# Agenda Item 18

By virtue of paragraph(s) 3 of Part 1 of Schedule 12A  
of the Local Government Act 1972.

Document is Restricted