Sustainability Appraisal (SA) for the Harlow Town Centre Area Action Plan

Interim SA Report

Harlow District Council

June 2018
Quality information

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# Sustainability Appraisal (SA) for the Harlow Town Centre Area Action Plan

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1. Introduction

Background

1.1 AECOM is commissioned to lead on Sustainability Appraisal (SA) in support of the emerging Harlow Town Centre Area Action Plan (TCAAP). SA is a mechanism for considering and communicating the likely effects of a Draft Plan, and alternatives, with a view to avoiding and mitigating adverse effects and maximising the positives. SA of Local Plans is a legal requirement and once adopted the TCAAP will for part of the Local Plan for Harlow.¹

SA explained

1.2 It is a requirement that SA is undertaken in line with the procedures prescribed by the Environmental Assessment of Plans and Programmes Regulations 2004, which transposed into national law EU Directive 2001/42/EC on Strategic Environmental Assessment (SEA).²

1.3 In accordance with the Regulations, a report (known as the SA Report) must be published for consultation alongside the Draft Plan that essentially ‘identifies, describes and evaluates’ the likely significant effects of implementing ‘the plan, and reasonable alternatives’.³ The report must then be taken into account, alongside consultation responses, when finalising the plan.

1.4 More specifically, the SA Report must answer the following three questions:

1. What has Plan-making / SA involved up to this point?
   • Including in relation to ‘reasonable alternatives’.

2. What are the SA findings at this stage?
   • i.e. in relation to the Draft Plan.

3. What happens next?
   • What steps will be taken to finalise (and monitor) the plan?

This Interim SA Report

1.5 This Interim SA Report is published alongside the Issues and Options Document, under Regulation 18 of the Local Planning Regulations. The legally required SA Report will be published subsequently, alongside the final draft (‘Publication’) version of the TCAAP, under Regulation 19 of the Local Planning Regulations.

1.6 Despite being an interim report, it is nonetheless helpful for this report to provide the information required of the SA Report. As such, questions 1 - 3 are answered in turn.

1.7 Before answering Question 1, two initial questions are answered in order to further ‘set the scene’: i) What is the plan trying to achieve?; and ii) What is the scope of the SA?

¹ Since provision was made through the Planning and Compulsory Purchase Act 2004 it has been understood that local planning authorities must carry out a process of Sustainability Appraisal alongside plan-making. The centrality of SA to Local Plan-making is emphasised in the National Planning Policy Framework (2012). The Town and Country Planning (Local Planning) (England) Regulations 2012 require that an SA Report is published for consultation alongside the ‘Proposed Submission’ plan document.

² The SA process incorporates the SEA process. Indeed, SA and SEA are one and the same process, differing only in terms of substantive focus. SA has an equal focus on all three ‘pillars’ of sustainable development (environment, social and economic).

³ Regulation 12(2) of the Environmental Assessment of Plans and Programmes Regulations 2004
Harlow Town Centre Area Action Plan

1.8 Harlow Council is producing an Area Action Plan (AAP) to cover the area of Harlow Town Centre. The AAP is a Development Plan Document and will sit alongside the emerging Local Plan. Although existing and emerging policies establish the primacy of the Town Centre and seek to protect and enhance its performance, the planning process has the potential to play a more proactive role in strengthening the vitality and viability of the Town Centre and enabling regeneration. The AAP in combination with the emerging Harlow Local Development Plan (along with other guidance) will enable Harlow Council, alongside wider stakeholder, landowner and developer partners, to plan positively for managed change and a sustainable, coordinated approach to growth.

1.9 The AAP will provide a spatial planning framework to guide development and secure the regeneration of Harlow Town Centre for the period up to 2033. This will take into account the key role the Town Centre performs across the wider Harlow area, reinforced by the need to accommodate additional retail provision, arising from increased housing growth being brought forward. The AAP once adopted will replace all policies relevant to the Town Centre as set out in the Adopted Replacement Harlow Local Plan July 2006 which have been saved.

1.10 The AAP has currently established Issues and Options, which represent the first stage of formal consultation in accordance with Regulation 18 of the Town and Country Planning Regulations (2012). The Issues and Options Report (June 2018), building on baseline evidence and analysis (including informal consultation), identifies the key issues, challenges and opportunities facing the Town Centre and sets out different options (reasonable alternatives) for the AAP to consider and explore.

1.11 The Vision Statement for the Town Centre is as follows:

"In the future, Harlow Town Centre will be a successful, sustainable place which serves as the commercial centre for the existing town of Harlow and the planned Garden Town of Harlow and Gilston. The town centre will play an important part in helping Harlow and Gilston to step up to a more active economic role within the London Stansted Cambridge Corridor.

In order to do this, the town centre will have a strong mix of shops and services; offices and employment space; civic and leisure uses; and a thriving evening economy and cultural offer. The town centre will also have a decent range of homes that can support a mixed and balanced community.

The town centre will be accessible to all, by public transport, cycle, on foot and by car and will help the District to minimise reliance on private cars in the future."

1.12 The following outcomes are defined to help assess whether the proposals and investments will help to deliver the vision

- A unified centre which re-balances the northern and southern areas;
- A Town Centre which supports wider economic growth in the District providing shops, services and homes, and a diverse mix of commercial activity in the Town Centre;
- A retail and leisure offer which appeals to Harlow’s catchment and limits expenditure leakage to competing centres;
- A high quality public realm and environment with active public spaces;
- An inclusive and accessible destination with excellent transport links capitalising on Harlow’s strategic location;
- A strong cultural offer which is supported by residents and visitors to the Town Centre;
- Community facilities which support the town’s population;
- A cohesive place, supported by uses and design proposals which complement one another and work towards the overarching vision; and
A commitment to retain the ethos and respond positively to the defining elements of the Gibberd masterplan including the plan aesthetic, public art and spaces, heritage assets and positive architectural characteristics.

1.13 Following consultation on the Issues and Options Report, the Council will prepare a Draft Area Action Plan. This Pre-submission draft will be further consulted upon before the final draft is prepared for submission to an Independent Inspector and Examination in Public. If the plan is found sound at Examination it can be formally adopted as a Development Plan Document guiding the future development of Harlow Town Centre.

What is the scope of the SA?

Scoping

1.14 The aim here is to introduce the reader to the scope of the SA, i.e. the sustainability objectives that should be a focus of (and provide a broad methodological framework for) SA. Further information on the scope of the SA - i.e. a more detailed review of sustainability issues/objectives as highlighted through a review of the sustainability 'context' and 'baseline' - is presented in Appendix I.

1.15 The Regulations require that “When deciding on the scope and level of detail of the information that must be included in the Environmental Report [i.e. the SA scope], the responsible authority shall consult the consultation bodies”. In England, the consultation bodies are the Environment Agency, Historic England and Natural England. A Scoping Report for the Local Plan was sent to the statutory consultees for comment in 2010. The responses received were taken into account and amendments made to the scope and SA objectives if necessary. 

1.16 The scoping information presented in Appendix I has been updated to take account of new or updated evidence as well as tailored to better reflect Harlow Town Centre. Statutory consultees are welcome to comment on the updated scope and any representations will be taken into account at the next stage of the SA process.

SA framework

1.17 Table 1 presents the refined sustainability objectives - grouped under eleven topic headings - established through SA scoping for the Local Plan, i.e. in light of context/baseline review and identified key issues. It is important to note that the SA objectives have been refined to better reflect the key issues for Harlow Town Centre. Any amendments to the framework are illustrated as red and underlined for additions and red and strikethrough for deletions.

1.18 Taken together, the sustainability topics and draft objectives presented in Table 1.1 provide a methodological ‘framework’ for appraisal.

Table 1.1: SA topics and objectives

<table>
<thead>
<tr>
<th>SA topics</th>
<th>SA objectives</th>
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<tbody>
<tr>
<td>Air quality</td>
<td>• To ensure that the Air Quality in Harlow Town Centre remains below objective limits and continues to improve.</td>
</tr>
<tr>
<td>Biodiversity and green infrastructure</td>
<td>• To conserve and enhance biodiversity in Harlow Town Centre.</td>
</tr>
<tr>
<td>Climate change (mitigation &amp; adaptation)</td>
<td>• To promote, and enhance and strategically expand the District's network of green infrastructure, alleviating fragmentation in and around the Town Centre.</td>
</tr>
<tr>
<td>Community and</td>
<td>• To reduce poverty and social exclusion.</td>
</tr>
<tr>
<td>SA topics</td>
<td>SA objectives</td>
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<td>---------------------</td>
<td>---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------</td>
</tr>
<tr>
<td><strong>wellbeing</strong></td>
<td>• To meet the health and social care needs of the District’s growing and ageing population and its disabled population.</td>
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<td></td>
<td>• To encourage healthy lifestyles and reduce inequalities in health, particularly through reducing obesity and diabetes.</td>
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<tr>
<td></td>
<td>• To reduce levels of crime, particularly Criminal Damage and Arson and Vehicle Offence crimes.</td>
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<tr>
<td></td>
<td>• To <strong>renew the District’s deprived neighbourhoods and address poor regenerate the Town Centre and address levels of deprivation through improving the public realm within and around residential areas to ensure that pedestrian routes are integrated with areas of activity and increasing areas of accessible green space.</strong></td>
</tr>
<tr>
<td></td>
<td>• To ensure that pedestrian and cycle routes are <strong>integrated with the Town Centre</strong>.</td>
</tr>
<tr>
<td><strong>Economy and employment</strong></td>
<td>• To reduce a mismatch between jobs and skills by improving levels of skills, training and qualifications within the District.</td>
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<tr>
<td></td>
<td>• To ensure that job creation is matched by the provision of appropriate facilities and infrastructure.</td>
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<tr>
<td></td>
<td>• To <strong>promote investment, develop an attractive employment base and create a diversified economy within the district through avoiding the dominance of a few large employers and encouraging the ‘clustering’ of businesses within existing locations</strong>.</td>
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<tr>
<td></td>
<td>• To <strong>regenerate the Town Centre through upgrading the level of retail provision, encouraging a broader mix of uses including residential, introducing a high quality public realm and restructuring centres to increase passing traffic and overcome accessibility issues</strong>.</td>
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<tr>
<td></td>
<td>• To <strong>promote long-term investment that will help create flexible retail floorspace (of all sizes) with a particular focus on medium-large shops capable of attracting modern, high-end retailers to develop an attractive employment base and create a diversified economy</strong>.</td>
</tr>
<tr>
<td><strong>Historic environment</strong></td>
<td>• To protect the <strong>District’s historic assets layout and architecture of the Town Centre from inappropriate development</strong>, as set out in Sir Fredrick Gibberd’s Masterplan.</td>
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<tr>
<td></td>
<td>• To ensure that development respects the <strong>character, appearance and features of historical designations</strong>, in addition to the setting and views into or out of these areas integrity of the Town Centre’s heritage assets, and does not impact upon the setting of these features.</td>
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<tr>
<td></td>
<td>• To ensure that the <strong>existing historic settlements and distinct settings of Churchgate Street and Old Harlow, and the new settlement of Newhall, retain their distinctive identity</strong>.</td>
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<tr>
<td></td>
<td>• To <strong>promote the creation of quality streets and spaces whilst protecting the town’s Town Centre’s distinctive character and heritage</strong>.</td>
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<tr>
<td><strong>Housing</strong></td>
<td>• To <strong>increase the provision of housing, particularly affordable housing of mixed tenures</strong>, to ensure that appropriate levels of new dwellings are provided in the Town Centre.</td>
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<tr>
<td></td>
<td>• To diversify the housing stock, increase density and address poor public realm within and around residential areas.</td>
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<td></td>
<td>• To ensure that that the housing needs of an ageing (and disabled) population are met.</td>
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<tr>
<td><strong>Land and waste</strong></td>
<td>• To <strong>support efficient use of land, including development of previously developed land in the district.</strong></td>
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<tr>
<td></td>
<td>• To <strong>support the remediation of contaminated land.</strong></td>
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<tr>
<td><strong>Landscape</strong></td>
<td>• To ensure that development takes into account the <strong>Green Belt and Green Wedges that characterise the District, separating the Town Centre from neighbouring centres.</strong></td>
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<tr>
<td></td>
<td>• To ensure that the <strong>district's landscape assets physical and visual links from the Town Centre to the surrounding countryside are protected and integrated to maximise their potential amenity value, particularly in greenfield areas.</strong></td>
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<tr>
<td><strong>Transport</strong></td>
<td>• To <strong>promote a more sustainable modal shift so that levels of private car use for commuting are reduced.</strong></td>
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<td></td>
<td>• To <strong>promote measures that integrate transport and land use planning in order to provide for the greatest possible increase in passenger transport uptake as well as implementing enhanced access to the M11 through a new junction.</strong></td>
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<tr>
<td></td>
<td>• To improve footpath and cycle tracks in the Town Centre to improve accessibility, particularly in relation to crossing the ring road and passing through the edge of the Town Centre.</td>
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<tr>
<td></td>
<td>• To improve accessibility to Harlow Town train station.</td>
</tr>
<tr>
<td><strong>Water</strong></td>
<td>• Given that Harlow is located in an area of serious water stress which will be exacerbated due to climate change and future growth and development, water efficiency measures</td>
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<table>
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<tr>
<th>SA topics</th>
<th>SA objectives</th>
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<tr>
<td>- Should be sought, including through the promotion of SuDS.</td>
<td></td>
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<tr>
<td>- To encourage reduced per capita consumption of water and maintain high levels of drinking water quality.</td>
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<tr>
<td>- To maintain and improve the water quality of Harlow’s water courses in line with the Water Framework Directive requirements.</td>
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<tr>
<td>- To ensure the distribution and location of new development takes the water supply and sewerage infrastructure into account.</td>
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Part 1: What has plan-making / SA involved up to this point?
2. Introduction (to Part 1)

2.1 The chapter sets out the work undertaken by the Council to date in the preparation of the AAP and Issues and Options Report. It also explains the reasons for selecting the alternatives to be dealt with through the SA at this stage.

Background

2.2 The Council began preparation of the AAP in 2014 which will set the spatial planning framework to guide development and secure the regeneration of Harlow Town Centre for the period up to 2033. The AAP once adopted will replace all policies relevant to the Town Centre as set out in the Adopted Replacement Harlow Local Plan July 2006 which have been saved.

2.3 The Council has been developing the evidence base and background research (which included informal consultation) to inform plan-making. In 2017 the evidence and consultation responses were synthesised to prepare the Issues and Options Report.

Developing alternatives

2.4 The Council has developed a number of options under eleven key themes. The themes have emerged from the review of the evidence base with a view to distilling the main issues and identifying potential responses (‘the options’). The options in most cases are not mutually exclusive, and the AAP may pursue multiple options to establish a joined-up, holistic strategy or policy position for any one theme.

2.5 The AAP is structured in two principal parts; Part A Policy Themes and Part B Opportunity Areas and Sites. The policy themes present topics which are thematic in nature, relating to the performance or character of the Town Centre as a whole. The Opportunity Areas identify incremental scenarios for potential development sites and interventions in the Town Centre.

2.6 The Policy Themes include the following:

- Strategic Growth;
- Movement;
- Public Realm;
- Urban Design;
- Heritage;
- Retail, leisure, and evening economy;
- Offices and workspace;
- Public and community infrastructure;
- Homes;
- Creative uses; and
- Delivery.

2.7 The Opportunity Areas set out three spatial scenarios which articulate the emerging direction of travel for area-specific guidance in the AAP. These are linked to the three options set out in Policy Theme 1 - Strategic Growth. The scenarios include a baseline scenario, medium intervention scenario and high intervention scenario. These should be interpreted as incremental phases rather than mutually exclusive, separate approaches.
Part 2: What are SA findings at this current stage?
3. Introduction (to Part 2)

3.1 The aim of this chapter is to present the summary findings of the appraisal of options presented in the Issues and Options document under the SA Topics.

Summary appraisal of the options

3.2 A summary of the appraisal of options are presented under each SA Topic below. For the method and detailed appraisal tables please see Appendix II.

Policy Theme 1: Strategic Growth (aligned with Opportunity Areas)

Option 1.1: Baseline scenario
Option 1.2: Medium intervention scenario
Option 1.3: High intervention scenario

3.3 The appraisal under the Strategic Growth theme identifies that these options do not restrict the ability of the plan to produce a range of policy guidance for development in the Town Centre. These options focus on the number of sites/areas to be spatially targeted within the AAP, and provide an incremental approach to growth in the Town Centre. The higher the level of intervention, then the higher level of development that is sought. Higher levels of development will increase levels of potential housing and employment growth as well as support increased public realm, green infrastructure and accessibility improvements with the potential for positive effects of greater significance. The appraisal did not identify any potential significant negative effects at this stage.

3.4 The appraisal of these options has identified two recommendations:

- The medium and high intervention scenarios could seek to deliver more biodiversity and green infrastructure connectivity enhancements within Opportunity Areas 4, 5 and 6 to maximise the potential for ecological corridors within the Town Centre and connectivity with the wider Green Wedge network; and

- The Plan should include aspirations to contribute to sustainable energy generation where possible in light of climate change impacts.

3.5 It should be noted that these growth options have implications for the other options explored through the AAP. A number of the options explored through other themes (e.g. Theme 3 on the Public Realm) look at whether to provide Town Centre wide policy guidance or site specific guidance. The level of intervention is intrinsically connected to these options. If a high level of intervention is pursued (and a higher number of sites/areas are targeted) then site specific policies may become increasingly more useful/effective. Alternatively, if the baseline scenario is pursued with a low level of intervention, then Town Centre wide policy guidance will become more important.
Policy Theme 2: Movement
Option 2.1: Framework of streets
Option 2.2: Potential pedestrian and cycle improvements
Option 2.3: Bus improvements
Option 2.4: Road network
Option 2.5: Rely on emerging planning guidance on parking in Local Plan policy
Option 2.6: Establish specific Town Centre car parking policy

3.6 With the exception of Option 2.5, all of the options seek to improve accessibility in some way with the potential for minor long term positive effects on transport, air quality, climate change, communities and wellbeing, the economy, the landscape and the historic environment.

3.7 It is considered that Option 2.5 fails to capitalise on potential opportunities to improve the efficiency of parking within the Town Centre, and as such is not considered likely to result in a positive effect of the same significance as Option 2.6.

3.8 With the exception of Option 2.5, each option in isolation is a positive step towards improving accessibility, but is highly focused on one aspect of, or location for, movement in the Plan area. As such, a hybrid approach which combines all of these potential measures is considered to cumulatively lead to effects of greater significance, particularly for the SA Topics of Transport, Air Quality and Climate Change. The appraisal has not identified any potential significant negative effects at this stage.

Policy Theme 3: Public Realm
Option 3.1: Town Centre public realm principles
Option 3.2: Site specific guidance

3.9 The policy options both seek to improve the public realm and overall experience of the Town Centre; and the appraisal has found the potential for significant long term positive effects for SA Topics relating to the Historic Environment and Landscape.

3.10 The difference between the options relates to the approach taken to deliver policy guidance. Town Centre wide guidance can underpin all development coming forward over the life of the plan, but in this respect guidance is more likely to be generalised. Site specific policy can be more detailed, prescriptive and localised to address identified opportunities or constraints. However, site specific guidance will not capture windfall sites. As both options present opportunities for positive effects, it is considered that a combination of the two approaches could have greater potential for significant positive effects. No potential significant negative effects were identified at this stage.

Policy Theme 4: Urban Design
Option 4.1: Guidance on character, height, scale and massing
Option 4.2: Site specific guidance

3.11 The policy options both seek to improve the overall experience of the Town Centre through targeted high quality urban design guidance. This is considered likely to lead to long term significant positive effects for the SA Topics of Landscape and the Historic Environment.

3.12 The difference between the options relates to the approach taken to deliver policy guidance; either at the Town Centre scale or at a site specific scale. As identified for the Public Realm theme above; Town Centre guidance can capture all development but with more generalised
principles, compared to site specific guidance which can be more detailed but will not capture windfall sites. Again the effectiveness of this site specific approach is also dependent on the level of intervention assessed in the Strategic Growth theme. Given the potential positive effects of both options, it is again considered that a combination of the two approaches could have a greater potential for significant positive effects.

3.13 No potential significant negative effects were identified at this stage.

Policy Theme 5: Heritage
Option 5.1: Rely on existing Local Plan policies
Option 5.2: Town Centre specific heritage policy

3.14 Both policy options will ensure that the historic environment is protected and enhanced; however, the appraisal has identified that Option 5.2 has greater potential for significant positive effects compared to Option 5.1. The creation of new policy (rather than relying on existing higher level policy), that is tailored to the Town Centre has the potential to ensure that the significance of designated and non-designated assets within the Town Centre are fully understood and appreciated, as well as providing the opportunity to address existing factors that currently negatively impact upon the historic character of the plan area. This is considered particularly beneficial for Harlow given the nature of the Town Centre; which contains few designated heritage assets and many non-designated heritage assets.

3.15 Given policy wording in emerging Local Plan Policy PL11 which identifies that “the greater the significance of the asset, the greater the weight that is given to the asset’s conservation”, it is considered that further policy development in the AAP can ensure that the significance of non-designated heritage assets in the Town Centre is fully appreciated.

3.16 No significant negative effects were identified at this stage.

Policy Theme 6: Retail, Leisure and Evening Economy
Option 6.1: Existing policies and frontage designation
Option 6.2: Character / activity-based policy position
Option 6.3: Site based proposals and illustrative material
Option 6.4: Emphasis on cultural opportunities and creative uses

3.17 The policy options relate to the provision of retail floorspace and supporting a competitive and viable town centre. The general difference between the policy options relates to the approach taken to deliver improvement measures, and in where the emphasis should lie when it comes to place-making.

3.18 The appraisal has identified the potential for significant positive effects on the Economy as a result of implementing Option 6.2. It proposes an overarching new policy to manage and support the overall performance as well as area specific guidance, clearly articulating geographical priorities with specific statements of intent for each Opportunity Area. This is considered to be most ‘far-reaching’ in its potential for positive effects as it sets a spatial portrait but also supports this with qualitative detailing, and focuses on the Town Centre as a whole. This is compared to a piecemeal approach undertaken in Option 6.3 through site specific policies, and the less targeted approach taken in Option 6.4 relying on key identified principles. Option 6.1 does not propose new policy guidance, and as such this option is considered less likely to pursue localised opportunities or address localised issues in greater detail.

3.19 No significant negative effects were identified at this stage.
Policy Theme 7: Offices and Workspace

Option 7.1: Promote Harlow Town Centre as an office location

Option 7.2: Focus on enhancing the complementary role of the Town Centre in supporting employment growth throughout the District

Option 7.3: Promote Harlow Town Centre as a location for SMEs and smaller businesses

3.20 The appraisal has identified that all of the options are likely to lead to long term significant positive effects for the SA Topic of Economy and Employment, as they all seek to develop the economic role of the Town Centre.

3.21 Option 7.1 proposes the promotion of the Town Centre as an office location. Historically this has not proven to be of great success (considering existing high vacancy rates), and the option is complicated further by Permitted Development Rights in which office development can be converted to housing (already apparent in Harlow Town Centre). Therefore, despite planning policy efforts, there are external obstacles that conflict with the objectives of this option. As such, it is considered that this option may not maximise the potential for positive effects in so far as the other options could.

3.22 Option 7.2 has the potential for positive effects of greater significance in terms of the economy, given the opportunity for diversification. This option also has the potential for significant positive effects for the SA Topic of Transport as it seeks to improve overall connectivity between employment areas within and outside of the Town Centre. Option 7.3 could address local aspirations for employment space to meet the needs of smaller businesses and business start-ups. Therefore, it is considered that a combination of these two options (Options 7.2 and 7.3) is most likely to maximise the potential for positive effects.

3.23 No potential significant negative effects have been identified at this stage.

Policy Theme 8: Public and Community Infrastructure

Option 8.1: Links

Option 8.2: Co-location / efficient buildings

3.24 The appraisal has identified that both of the options have the potential for long term significant positive effects against the SA Topic of Community and Wellbeing, as both options seek to improve the quality of, and access to, community facilities. In particular Option 8.1 could not only improve connections to facilities and services within the Town Centre but also community infrastructure outside of the Town Centre, like the Harlow Leisurezone which is currently isolated by Velizy Avenue.

3.25 Option 8.2 is also considered to have the potential for long term significant positive effects for the economy by improving building efficiency, freeing up prime space and supporting higher densities and thus higher productivity in the Plan area. This option can support the spatial objective to rebalance the north and south areas of the Town Centre.

3.26 Whilst both options present opportunities for significant positive effects, it is considered that a combination of the approaches would be more likely deliver a positive effect of significance.

3.27 No significant negative effects were identified at this stage.
Policy Theme 9: Homes
Option 9.1: Rely on emerging planning guidance in Local Plan policy
Option 9.2: Town Centre specific residential policies
Option 9.3: Improved connections to surroundings
Option 9.4: Site specific guidance

3.28 With the exception of Option 9.1, all of the options capitalise on the opportunity that the AAP presents to identify the economic role housing can play in meeting wider aspirations for the Town Centre. As Option 9.1 fails to capture this opportunity it is considered to be less likely to capitalise on opportunities and result in a positive effect of significance compared to the other options.

3.29 The appraisal has identified the potential for significant positive effects in Option 9.2 for the SA Topics of Housing and Transport. Alongside delivering housing in an accessible location, the option is considered to provide significant scope to explore the role of housing in the central area, how it differs from the surrounding neighbourhoods, and how it can contribute to delivering benefits for the Town Centre and local communities. Similarly, Option 9.3 focuses on improving accessibility with the potential for significant positive effects against the SA Topic of Transport.

3.30 Option 9.4 can provide greater detail to address localised opportunities and constraints; however, it will not capture windfall sites, and in considering the strategic nature of connectivity, is less likely to lead to positive effects against other SA Topics such as Transport. As such, it is considered likely that a combination of Options 9.2, 9.3 and 9.4 is likely to maximise the potential for a positive effect of significance.

3.31 No significant negative effects have been identified at this stage.

Policy Theme 10: Creative Uses
Option 10.1: Review existing underutilised sites for possible arts spaces within the town
Option 10.2: Review funding opportunities for a replacement theatre

3.32 Both of the options seek to improve the provision of cultural facilities in the Town Centre, by either reviewing underutilised spaces to be repurposed for arts (Option 10.1), or by reviewing funding opportunities for a replacement theatre (Option 10.2), which has the potential for long term significant positive effects on the Communities and Wellbeing SA Topic. Whilst Option 10.2 will improve theatre facilities, Option 10.1 could diversify and expand the range of facilities which the Town Centre currently offers, and in this respect, is considered to provide a greater scope for potential positive effects.

3.33 No significant negative effects have been identified at this stage.
Policy Theme 11: Delivery

Option 11.1: Public Sector Led
Option 11.2: Land assembly
Option 11.3: Proactive approach to planning
Option 11.4: Improving transport and accessibility
Option 11.5: Enhancing the quality of the environment
Option 11.6: Town Centre promotion and management
Option 11.7: Town Centre specific S106 position

3.34 The options explore mechanisms for the delivery of implementation measures to address the key issues and priorities for the Town Centre identified within the Issues and Options Report. Whilst different options have the potential for significant positive effects on certain SA Topics, what is clear from the appraisal is that Option 11.3 provides an opportunity to encompass many aspects of the other options, and maximises the potential for significant positive effects. Whilst Option 11.7 could also play a significant role, it is a mechanism based on negotiation and as such it is considered less certain in its approach.

3.35 No significant negative effects have been identified at this stage.

Developing the Preferred Approach

3.36 At this stage there has been no decision made in terms of a preferred approach. The Council is currently seeking views from stakeholders and the public on the key issues and broad options set out in the Issues and Options Report. The majority of proposed options are not mutually exclusive and it is likely that a combination of them will be required to meet the needs of the Town Centre during the life of the Plan.
Part 3: What happens next?
4. Introduction (to Part 3)

4.1 The aim of this chapter is to explain next steps in the plan-making/SA process.

Next steps

4.2 This Interim SA Report will accompany the Issues and Options Document on public consultation in 2018. Any comments received will be reviewed and then taken into account as part of the iterative plan-making and SA process.

4.3 The representations received along with further evidence base work, including further SA work, will inform the development of a first full draft of the TCAAP, which is scheduled to be published for formal Regulation 19 consultation in 2018. An updated SA Report and a separate Non-Technical Summary will accompany the Draft AAP on consultation.
Appendices
Appendix I: Scoping Information

Introduction

As discussed in Chapter 1 (‘What’s the scope of the SA?’) the SA scope is primarily reflected in a list of objectives (‘the SA framework’), which was established subsequent to a review of the sustainability ‘context’ / ‘baseline’, analysis of key issues, and consultation. The detailed scoping information was presented in a draft scoping report sent to statutory consultees in 2010. The responses received were taken into account and amendments made to the scope and SA objectives if necessary.

The scoping information has been updated to take account of new or updated evidence as well as tailored to better reflect Harlow Town Centre. The aim of this appendix is to present a summary of the updated scoping information and ensure that the information required under Schedule 2 of the SEA Regulations is provided.

Relationship with other plans and programmes

The following plans and programmes provide the key policy context for the Harlow Local Plan:

**National Planning Policy Framework (NPPF):**\(^4\) sets out the Government’s planning policies for England and how these are expected to be applied. The framework acts as guidance for local planning authorities, covering a range of environmental, social and economic themes, including:

- The commitment to halt the overall decline in biodiversity by minimising impacts and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures;
- Adopting proactive strategies to adaptation and manage risks through adaptation measures including through the planning of green infrastructure;
- Sustain and contribute towards compliance with relevant limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas and Clean Air Zones, and the cumulative impacts from individual sites in local areas;
- Realising opportunities from existing or proposed transport infrastructure, and changing transport technology and usage;
- Encouraging land use and transport development which support reductions in greenhouse gas emissions and reduced congestion; and
- Supporting local and inward investment to meet anticipated needs over the plan period, including making provision for ‘clusters or networks of knowledge driven, creative or high technology industries’.

**National Planning Practice Guidance (NPPG):**\(^5\) provides relevant, technical planning practice guidance for local authorities, including:

- Local Plans should consider the opportunities that individual development proposals may provide to enhance biodiversity and contribute to wildlife and habitat connectivity in the wider area;
- Local Plans should support the delivery of appropriately sited green energy and the management of greenhouse gas emissions through energy efficiency measures;
- Local Planning Authorities should “adopt proactive strategies to mitigate and adapt to climate change”. Climate change can be mitigated through Local Plans by reducing the need to travel, providing opportunities for renewable and low carbon energy technologies,

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identifying opportunities for decentralised energy and heating and through the design of new
development to reduce energy demand;

- Where significant development of agricultural land is demonstrated to be necessary, local
  planning authorities should seek to use areas of poorer quality land in preference to those of
  a higher quality; and

- It is important for local planning authorities to undertake an assessment of the transport
  implications in developing or reviewing their Local Plan so that a robust transport evidence
  base may be developed to support the preparation and/or review of that Plan.

Biodiversity 2020 Strategy\(^6\): A strategy for England’s wildlife and ecosystem services, 2011:
bounds on the Natural Environment White Paper and set out the “strategic direction for biodiversity
policy for the next decade”. Aims to halt biodiversity loss and improve the ecological networks
and ecosystems for all peoples.

Climate Change Act 2008\(^7\): established a framework to develop an economically credible
emissions reduction path. The Act sets targets for greenhouse gas (GHG) emission reductions
through action in the UK of at least 80% by 2050, and reductions in CO2 emissions of at least
26% by 2020, against a 1990 baseline.

Flood and Water Management Act (2010)\(^8\): sets out measures to ensure that risk from all
sources of flooding, not just rivers and seas, is managed more effectively. This includes:
incorporating greater resilience measures into the design of new buildings; utilising the
environment in order to reduce flooding; identifying areas suitable for inundation and water
storage to reduce the risk of flooding elsewhere; rolling back development in coastal areas to
avoid damage from flooding or coastal erosion; and creating sustainable drainage systems
(SuDS).

Essex Biodiversity Action Plan (2011)\(^9\): sets targets for the protection of species and habitats
in Harlow. The Plan identifies 25 species and 10 habitat types as a focus for action. The
following are relevant to Harlow

- Species: Brown hare, dormouse, otter, pipistrelle bat, water vole, bittern, grey partridge,
  skylark, song thrush, great crested newt, stag beetle and black poplar.

- Habitats: Hedgerows, ancient woodland, old orchards, reed beds, urban habitats, natural
  grassland.

Essex Local Flood Risk Management Strategy (2013)\(^10\): sets out what needs to be done to
tackle flooding in Essex. The strategy focuses on ‘local flood risk’, assessing levels of risk from
different flooding sources.

and Suffolk Water will manage the balance between water supply and demand over a 25 year
period up to 2040. Non-household demand is forecast to be lower at the end of the period than it
is today and this follows the trend of the last 20 years although the rate of decline is forecast to
be much more modest. It concludes that in 2040, Essex will have a demand of around 11 Mega
litres per day less than today, despite a population increase of 100,000 people.

Essex & Southend Waste Local Plan (2017)\(^12\): Management of waste is guided by the Essex
& Southend Waste Local Plan (adopted, 2017). The Plan forms part of the statutory
development plan and provides the policies for planning decisions for all forms of waste
management development in the administrative areas of both authorities.

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\(^7\) Climate Change Act 2008 http://www.legislation.gov.uk/ukpga/2008/27/contents


https://www.eswater.co.uk/assets/documents/ESW_Final_Published_PR14_WRMP_Report_-_V3_-_08OCT14.pdf

The Greater Essex Integrated County Strategy (2010): provides a shared vision across all local authorities in Greater Essex, identifying the priorities needed to achieve increased economic growth. The broad strategic focus of the strategy is on the Thames Gateway, key towns and low carbon energy.

Essex Transport Strategy - the Local Transport Plan for Essex (2012): sets out the County Council’s aspirations for improving travel in the county. Priorities include providing for and promoting access by sustainable modes of transport to and from development areas; improving journey times on congested routes; improving the attractiveness of cycling; and improving access to green spaces. Consideration will also need to be given to other Non-Motorised Users (NMUs) such as equestrians, as well as ensuring the connectivity and accessibility between the sustainable transport modes.

Harlow Economic Development Strategy (2017): sets out Harlow’s Economic Development Strategy for the next five years, building on the success of the last five years in terms of business, investment, jobs, transport upgrade announcements and new housing developments. Focusing of the three themes of business and jobs, place, and people, the Strategy sets out a range of priorities and actions to deliver which will realise the Harlow Ambition and ensure prosperity is shared.

Harlow Council Corporate Plan 2017 – 2020 (2017): outlines the Council’s vision and priorities to drive improvement 2017 – 2020. To achieve this, the Plan identifies five priorities to be embedded within the emerging Harlow Local Plan and will inform the vision and strategic objectives relating to policies and proposals for growth and regeneration across the District.

Harlow Retail Frontages Study (2017): delivers an annual assessment of the retail frontages in Harlow, providing an analysis of changes that have occurred in Harlow's retail frontages.

Harlow Town Centre Market Analysis (2017): provides recommendations for the regeneration and targeted investment of Harlow Town Centre. The report recommends taking forward a number of initiatives which include: leading the public sector in the town; land assembly; taking a proactive approach to planning; improving transport and accessibility; enhancing the quality of the environment and town centre promotion and management.

Harlow Retail and Leisure Needs Study 2016 (2017): provides a robust evidence base to inform policy development and land use allocation within the new Local Plan. The Study seeks to provide the Council with a clear strategy for its network of centres to ensure that they remain attractive, vibrant retail centres over the course of the Plan period, fully able to meet local residents’ shopping, leisure, services and cultural needs.

Harlow Open Space and Green Infrastructure Study (2013): assesses the quantity, quality and value of the open space and green infrastructure in the District. The study forms a key part of the evidence base for the emerging Local Plan and other local policies, and includes locally-derived standards for the provision of open space and recreational facilities in the area. It recommends that the approach to open space planning in the future will be on improving the quality of existing sites as well as meeting the quantitative needs of the future population.

Harlow Regeneration and Social Inclusion Strategy (2010): provides a framework for the Council to prioritise its own actions and activities, and to engage with and influence other relevant organisations. The strategy aims to support Harlow as a place with an economically

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17 Harlow Council (2017) Harlow Retail Frontages Study http://www.harlow.gov.uk/search/site/Harlow%20Retail%20Frontages%20Study%202016
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thriving and inclusive community with the positive attributes and vibrancy of a city. The Strategy identifies the regeneration of Harlow’s Town Centre as the Council’s top corporate priority.

Harlow Contaminated Land Strategy (2008)\(^\text{22}\): sets out how land in the District which merits detailed individual inspection will be identified in an ordered, rational and efficient manner, and in what time scale.

Baseline information (environmental characteristics, problems and evolution without the plan)

Overview

Harlow District, which has a population of approximately 85,400 residents, is located in the west of Essex County, and is bordered by the Epping Forest District to the south, west and east; and East Hertfordshire District (in the county of Hertfordshire) to the north.\(^\text{23}\)

Harlow is 38km north of London and 50km south of Cambridge. It has good access to the M1 and the West Anglia Mainline railway and Stanstead Airport is located 24km to the north east. Harlow is the smallest local authority area in Essex, with a land area of 30.5sqkm.

Before the planned development of Harlow New Town, the area was largely fields with dispersed farmsteads and manors. The commercial centre grew around Old Harlow’s medieval market square and the more informal Churchgate Street to the south-east. The population grew from 1,514 people in 1801 to 3,471 in 1931, small in comparison to the 60,000 people for whom the new town was planned.

In 1949, Fredrick Gibberd’s masterplan for Harlow was established, to deliver the New Town. Gibberd’s vision reflected the New Town ethos of the 1940’s, drawing inspiration from the earlier Garden City movement and the drive to provide high quality and spacious homes with access to clean air and open space. The masterplan was influenced by the area’s distinctive landscape and environmental features, such as the River Stort in the north, the valley ridges and wooded areas in the south and other important ecological assets. The current tight administrative boundary of Harlow, and subsequent small size of the District, is a legacy of the Harlow New Town designation.

Since the conception of Harlow New Town, the Town Centre has undergone several stages of expansion. More recently there has been a large amount of development to the south of the Town Centre alongside residential development in the centre. The Town Centre has become polarised between the newer development to the south at the Water Gardens and the ageing northern end characterised by vacant or lower quality shops and a vastly diminished outdoor market, which has been compounded by previous piecemeal redevelopment within the Town Centre.

Harlow has large shopping population in its catchment but similar to many town and city centres across the UK, shifting economic trends have had, and continue to have a profound impact on the performance and prosperity of Harlow Town Centre. The Town Centre has experienced a decline in the retail ranking from 168 in 2012 to 185 in 2017, predominately as a result of outflow to competing centres.\(^\text{24}\)

Harlow’s surrounding neighbourhoods are separated from the Town Centre by Green Wedges and major connector roads. The Green Wedge network was an essential part of Gibberd’s vision for Harlow and provides natural green space accessible from the Town Centre. Almost half of the land in Harlow is a form of open space, much of which is multi-functional, with 28% being designated as Green Wedges or Green Fingers, and 10% of the land being designated as the Metropolitan Green Belt. The TCAAP area itself however is highlighted as lacking in planting and open spaces, and is not located within the Green Belt.

The Stort Valley runs to the north of the town with land rising gradually to the south, reaching a ridgeline of about 70 metres above the valley level to the south of existing settlement. Harlow was


\(^\text{23}\) ONS (2011)

\(^\text{24}\) Harlow Council (2017) Harlow Town Centre Market Analysis Report

Prepared for: Harlow Council

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planned to be contained within the cradle of Rye Hill, with this distinct topography offering expansive views of the surrounding countryside.

There are no internationally, nationally or locally designated biodiversity sites within the Town Centre area. In terms of heritage assets, there are five Grade II listed buildings within the TCAAP area which consist of one listed building and four sculptures which have listed building consent, and a Scheduled Monument located on the TCAAP area boundary. These heritage assets have distinctive historic character, with a number being from the original Gibberd masterplan. Others include features which are specific to New Town architecture and Harlow.

Harlow Town Centre is no longer considered to be an established office market “owing to its size, quality of existing stock and high vacancy rates”. Some limited provision is still located within the town centre but these units are not fully let and some have been converted to residential use. Public Health England have decided to locate a national science hub in Harlow, which is a major opportunity and is forecast, alongside the area’s Enterprise Zone, to have positive effects on the office market and values. However, links between the Town Centre and employment sites are poor, limiting the appeal of living in the Town Centre.

Harlow has a slightly higher percentage of working age people than the East of England with a high level of self-containment. However, residents of Harlow earn less than the County average and less than the average income of employees who work within Harlow, suggesting higher paid jobs are being filled by those living outside of Harlow.

Housing affordability in the District has been a significant problem in more recent times. People in Harlow are living longer and more live alone resulting in smaller households, increasing the need for homes irrespective of growing population. The percentage of overall housing need for 2011-33 is 67%, considerably higher than East Herts (31%), Epping Forest (34%), and Uttlesfield (27%).

Harlow Town Centre is positioned in close proximity to major transport corridors, including the A10, M25, A414 and the M11, which stretches from London to Cambridge and beyond towards Peterborough. Harlow is part of the ‘Core Area’ within the London Stansted Cambridge Corridor (LSCC). Stansted Airport is located to the north of Harlow.

Harlow Town and Harlow Mill train stations are located in the north of the District, with the train line running west-east. In terms of the TCAAP area, Harlow Town train station serves the area, being located 900m to the north east. Harlow Mill station is around 750m to the north of Old Harlow, approximately 2.8km east of the TCAAP area.

The bus network in Harlow is focused on Harlow Bus Station, located within the TCAAP area. Numerous bus routes connect Harlow Town Centre with the rest of the District, and also those neighbouring including Epping, Chelmsford and Hertford. There are numerous footways, bridleways and cycle tracks located throughout Harlow Town Centre, provided as an integral part of the design of the new town. However, primary issues for walking and cycling include crossing the ring road, and the passing through the edge of the Town Centre.

Air Quality

The Essex Air Quality Consortium identifies that traffic emissions are the most significant source of pollution in Harlow. The main roads in the District are the M11 which is to the east of the TCAAP area, and the A414 which runs to the north. In addition, there are a number of industrial processes which contribute significantly to pollution levels in Harlow; the majority of these are located in the two main industrial areas of the District, detached from the TCAAP area (Templefields to the north, and Pinnacles to the west).

Air pollution in Harlow is considered to be generally low, and monitoring of local Air Quality has measured no exceedances of air quality objective at relevant exposure. The Essex Air Quality Consortium state that the review and assessments to date have not identified any areas of concern or

26 Ibid.
27 Harlow District Council (2017) Air Quality Annual Status Report
an Air Quality Management Area (AQMA). The trend across all monitored sites indicates that air quality is improving throughout Harlow.

**Key issues:**
- Traffic emissions are the most significant source of pollution in Harlow District.
- Air pollution in Harlow is considered to be generally low, and monitoring of local Air Quality has measured no exceedances of air quality objective at relevant exposure.\(^{28}\)

### Biodiversity

Harlow District is a predominately urban environment, however contains a number of national and local designated biodiversity sites. There are no European sites located within the District boundary, and there are no national or local sites located within the TCAAP area.

Harlow Woods Site of Scientific Interest (SSSI) is located 2.6km to the south of the TCAAP area and is made up of two units of broadleaved, mixed, and yew woodland – lowland habitat comprising three adjacent ancient semi-natural woods: Parndon Wood, Hospital Wood and Risden’s Wood. The status of this site is unfavourable recovering (53.95%) and favourable (46.05%).

Hunsdon Mead SSSI is located 2.2km to the northwest of Harlow TCAAP area, on the District's boarder. This site is a registered Common, comprising of unimproved grassland managed on the traditional ancient Lammas system of hay making followed by winter grazing. The status of this site is unfavourable recovering.

SSSI Impact Risk Zones (IRZs) are a GIS tool/dataset which maps zones around each SSSI according to the particular sensitivities of the features for which it is notified. They specify the types of development that have the potential to have adverse impacts at a given location. Natural England is a statutory consultee on development proposals that might impact on SSSIs. Although the TCAAP area is within the SSSI IRZ for these sites, the IRZs do not relate to the type of development to be proposed through the TCAAP.

In terms of BAP priority habitats, Rectory Wood is located adjacent to the northern boundary of the TCAAP area. Woodland abutting the TCAAP area includes National Forest Inventory Conifer, and Priority Habitat Inventory Deciduous Woodland. Outside of the TCAAP area, a key habitat within Harlow area is the River Stort located along the northern border of the District.

The District contains a network of green space of particular importance to the character of the area and community wellbeing. The Green Wedges and Green Fingers provide a series of connectable open spaces throughout the District, holding significant biodiversity value for the area. The Town Centre is separated from Harlow's surrounding neighbourhoods by Green Wedges; however there is limited green space within the TCAAP area itself.

**Key issues:**
- The District and the TCAAP area in particular are predominately urban.
- There are no European sites located within the District boundary, and there are no national or local sites located within the TCAAP area.
- Rectory Wood is located adjacent to the northern boundary of the TCAAP area. Woodland abutting the TCAAP area includes National Forest Inventory Conifer, and Priority Habitat Inventory Deciduous Woodland.
- The District contains a network of green space of particular importance to the character of the District and community-wellbeing. The Green Wedges and Green Fingers separate the Town Centre from neighbouring centres.
- The TCAAP area is limited in green space.

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Climate Change
The Government has set a target under the Climate Change Act 2008 to reduce CO₂ emissions by 80% by 2050, with an interim target of 34% by 2020, both against a 1990 baseline. The Government requires local planning authorities to adopt proactive strategies to mitigate and adapt to climate change and reduce the consumption of natural resources. For example, the impact of new development on climate change can be reduced by locating it where possible in places where it is not entirely necessary to rely on having access to a car; and by the design of carbon neutral homes which seek to achieve energy and water efficiency through sustainable construction and by increased use of renewable energy.

With regards to ‘sustainable design and construction’, the AAP’s role is more limited, following Government’s withdrawal of the Code for Sustainable Homes in March 2015. There is, however, the potential to minimise carbon emissions from the built environment by supporting decentralised, low carbon heat and electricity generation/transmission.

The Council’s Carbon Management Plan (2016) shows that the 25% target reduction in its 2011 Plan has been achieved, and sets a target of reducing its operational carbon emissions by a further 25% by 2020/21 (from a baseline of 2014/15). The baseline represents 2700 tonnes CO₂ produced from Council operations including energy, waste and water usage. A target of 25% by 2020/21 will see these emissions reduced by 5% or 135 tonnes CO₂ each year.

Harlow is located within the River Stort Catchment. Tributaries of the River Stort that flow through Harlow include Harlowbury Brook, Parndon Brook, Cannons Brook, Princey Brook, and Todd Brook which runs just south of the TCAAP area. The Strategic Flood Risk Assessment Level 1 (2016) identifies that primary flood risk in Harlow is associated with the River Stort to the north of the town around Harlow Town station, Temple Fields north of the railway line, and south of the railway line at the A414 roundabout. These areas are located in Flood Zone 2. Some properties along Guilfords, in the east of Harlow, are also shown to be at risk from the Harlowbury Brook and are located in Flood Zone 2. The whole of the TCAAP area is located within Flood Zone 1, which is of low risk of flooding.

Areas identified to be at risk of surface water flooding are in the south of Harlow towards Todd Brook, and Temple Fields. The entirety of the TCAAP area is not at risk of surface water flooding.

Key issues:
- Harlow Council’s Carbon Management Plan (2016) shows that the 25% target reduction in its 2011 Plan has been achieved, and sets a target of reducing its operational carbon emissions by a further 25% by 2020/21 (from a baseline of 2014/15).
- Harlow is located within the River Stort Catchment.
- The TCAAP area is not at risk of surface water flooding. In terms of fluvial flooding, the TCAAP area is located within Flood Zone 1 which is of low risk of flooding.

Community and Wellbeing
Harlow was designed with a hierarchy of retail centres; which may now be described as: a Town Centre; five Neighbourhood Centres: Old Harlow, The Stow, Church Langley, Bush Fair, and Staple Tye; and 18 Hatches. The Gibberd Masterplan sets out self-providing neighbourhoods with strong local centres, which are separated by Green Wedges. The Green Wedge network was an essential part of Gibberd’s vision for Harlow and often accommodates cycling and walking routes. Natural landscape and green space can be easily reached by foot from the Town Centre, although the Town Centre itself lacks planting and open spaces.

In 2015, Harlow’s population was recorded as being approximately 85,400 residents, of which, 42,000 are male and 44,000 are female. In 2011, compared to Essex and the rest of England, the District had a high proportion of children aged 0 to 15 years (20.6%) which is higher than both Essex (18.65%) and England (18.91%). Similarly, Harlow’s proportion of residents aged between 25 and 59 is higher than the County and England figure. Harlow’s proportion of elderly residents aged 90 and

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29 ONS (2011)
above is in line with the County and England figures at 0.64%. Population growth for the District is projected at 89,000 for 2020\(^{30}\), an increase of 4.5%.

Less than half of all residents in Harlow are married (44.82%) which is lower than both the Essex (50.62%) and England (46.59%) figures. Harlow’s proportion of residents registered in a civil partnership was recorded at 0.15% in 2011, which is comparable with the proportion of resident’s in the County (0.16%), however is lower than the national figure (0.23%). Harlow has a high proportion of divorcees with 10.76% being divorced in 2011. This is higher than the County figure (9.38%) and the England figure (8.97%).

The 2011 census found that the majority of the population described their ethnic group as white British (83.86%), which is slightly lower than the average for Essex (90.76%) but higher than the average for England (69.75%). A further 4.16% described their ethnic group as ‘Other’, while 2.75% described their ethnic group as ‘African’; which is considerably greater than that of Essex (0.87%) and England (1.84%).

The Indices of Multiple Deprivation (IMD) 2013 measures deprivation for seven sub-domains and also calculates an overall index score. In 2015, Harlow District was ranked 71/326 nationally, where the lowest number is the most deprived. This is significantly lower than neighbouring authorities Epping Forest (199/326), and East Hertfordshire (315/326).

At a local scale, the IMD (2015) measures how deprived a ‘Lower Super Output Area (LSOA)’ area (this is usually equal to or smaller than an electoral Ward) is compared with all of the other areas in the country, using a range of indicators. It then ranks them in order of deprivation with 1 being the most deprived area in the country, and 32,844 being the least deprived. There are a total of 54 Lower Super Output Areas within the District.

The LSOAs which cover the TCAAP area are: Harlow 007B, Harlow 007E, Harlow 003A, and Harlow 004E. Collectively, these LSOAs fall within the 40% most deprived neighbourhoods in the country (4\(^{th}\) decile). LSOA Harlow 007E covers the majority of the TCAAP area and falls within the 20% most deprived (2\(^{nd}\) decile). It is also of note that Harlow 007E falls within the 20% most deprived (2\(^{nd}\) decile) in relation to income deprivation, employment deprivation, crime, and barriers to housing and services.

In general there is a strong association between deprivation and health inequality, and this is reflected in differences in life expectancy of up to 5 years in different parts of the town, with an association between poor life expectancy and the more deprived parts of Harlow (namely the Town Centre).\(^{31}\) Nonetheless, overall measures for health in the District are good. In 2011 97.22% of Harlow’s working age population had no limitations on their ability to carry out day-to-day activities. This is slightly lower than the Essex figure of 88.40%, but in line with the England figure of 87.25%. 7.54% of resident’s aged between 16 and 64 recorded that their day-to-day activities were limited a little which is higher than the figure recorded for Essex (6.83%) and England (7.14%).

In terms of general health, 70.08% of Harlow’s population were in ‘very good health’ at the time of the 2011 census. This was slightly higher in Essex (74.78%) and in England (72.84%). The figures for the population in ‘good health’ in Harlow (55.69%) are more comparable with Essex (55.44%) and England (52.85%). Similarly, those who were recorded as being in ‘very bad health’ (1.88%) were comparable regionally (1.73%) and nationally (1.92%).

90.16% of Harlow’s population receive no unpaid care compared with 89.51% in Essex and 89.76% in England. The highest amount of unpaid care in Harlow is between 1 and 19 hours per week (6.13%) compared with 6.94% in Essex and 6.51% in England.

**Key issues:**
- The Gibberd Masterplan sets out self-providing neighbourhoods with strong local centres, which are separated by Green Wedges. Natural landscape and green space can be easily reached by foot from the Town Centre, although the Town Centre itself lacks planting and open spaces.

\(^{30}\) Public Health England (2017) Harlow District Health Profile

\(^{31}\) Harlow Regeneration and Social Inclusion Strategy
The LSOAs which cover the TCAAP area are: Harlow 007B, Harlow 007E, Harlow 003A, and Harlow 004E. Collectively, these LSOAs fall within the 40% most deprived neighbourhoods in the country (4th decile).

LSOA Harlow 007E covers the majority of the TCAAP area and falls within the 20% most deprived (2nd decile). Harlow 007E also falls within the 20% most deprived (2nd decile) in relation to income deprivation, employment deprivation, crime, and barriers to housing and services.

There is a strong association between deprivation and health inequality, and this is reflected in differences in life expectancy of up to 5 years in different parts of the town, with an association between poor life expectancy and the more deprived parts of Harlow (namely the Town Centre).

In terms of overall health and general health for the District, measures are good with Harlow performing comparatively to that of Essex and England.

**Economy and Employment**

Harlow’s economy has changed dramatically from its New Town origins. Large companies are no longer the hallmark of the economy, with 99.5% of Harlow’s businesses now classified as small & medium-sized enterprises, employing less than 250 people. The vast majority of Harlow’s businesses (86.9%) employ less than 10 people. Manufacturing has declined but still remains a very important element of the economy supporting 3,500 jobs.\(^{35}\)

Harlow has a 51 hectare Enterprise Zone (EZ), which is one of the 48 designated sites across the UK selected by Government to provide a platform for economic growth and deliver benefits for business.\(^{33}\) At the heart of the London Stansted Cambridge corridor, Harlow, as a business location, is growing in significance as a location for world class knowledge-based businesses and organisations including Life Sciences (Public Health England), ICT & Digital (Arrow Electronics) and Advanced Manufacturing (Raytheon). Harlow has also experienced very strong growth in its business population and this is reflective of economic growth sectors in the wider London Stansted Cambridge Corridor (LSCC).\(^{34}\)

Harlow Town Centre is the only defined ‘Town Centre’ within the District. It is the focus for the District’s comparison goods shopping, although the retail parks of Edinburgh Way also have a large comparison goods offer, which compete for spending with the Town Centre. Additionally, Harlow Town Centre has a range of employment facilities (including the Civic Centre), leisure facilities (including cinema, bowling, gym’s and bingo) and three supermarkets (Tesco Metro and a large Asda store within the main centre and a large Sainsbury’s to the north of the Town Centre). The centre is pedestrianised throughout and much of the ‘prime pitch’ retail offer is occupied by national multiple retailers, particularly in the covered Harvey Centre and the Water Gardens, a southern extension to the Town Centre which opened in 2003/4.\(^{35}\)

The Town Centre has been the main shopping channel for centuries, but in the face of new forms of e-tailing (i.e. online shopping) and m-tailing (shopping through mobile phones, tablets, etc.) competition, centres will need to continue to adapt in order to remain viable shopping destinations. The health check assessment for Harlow Town Centre confirms that there remains under-provision of leisure and social activities as well as traditional retailing with increased bars, restaurants, food outlets and community spaces.\(^{36}\) There is also a lack of higher-end retailers in the centre; with evidence showing A1 Town Centre primary frontages have reduced from 78% in 2003 to 60% in 2017 mainly due to large store closures. Additionally, 10.5% of primary frontages and 20.5% of secondary frontages were vacant in June 2017. This may partly be a reflection of the current demographic profile of the area.\(^{37}\)

Harlow has a slightly higher percentage of working age people (16-64) than the East of England. Of these, 67.7% are economically active, which is higher than that of the East of England, but lower than...
that of England as a whole. Currently, however, Harlow residents do not take advantage of the higher-skilled, higher-paid jobs in the Town. Residents of Harlow earn less than the county average and less than the average income of employees who work in Harlow, suggesting that higher paid jobs are being filled by those living outside of the District.

In 2011, the proportion of the District’s residents with no qualifications was higher than the average for the East of England and for England as a whole. However, more of the District’s residents had Level 1 and Level 2 qualifications, than the average for the East of England or the average for England as a whole. Nevertheless, there are less of the District’s residents with Level 3, and Level 4 and above qualifications than the average for the East of England and for England as a whole.

Key issues:
- Large companies are no longer the hallmark of the economy, with 99.5% of Harlow’s businesses now classified as small & medium-sized enterprises, employing less than 250 people.
- Harlow, as an EZ, is growing in significance as a location for world class knowledge-based businesses and organisations including Life Sciences (Public Health England), ICT & Digital (Arrow Electronics) and Aerospace (Raytheon).
- Harlow is the only defined ‘Town Centre’ within the District. It is the focus for the District’s comparison goods shopping, and has a range of employment facilities (including the Civic Centre), leisure facilities (including bowling, a new gym and bingo) and two supermarkets (Tesco Metro and a large Asda store).
- Retail parks and e-tailing are competing for spending with the Town Centre. A1 Town Centre primary frontages have reduced from 78% in 2003 to 60% in 2017. Additionally, 10.5% of primary frontages and 20.5% of secondary frontages were vacant in June 2017.
- While Harlow has a slightly higher percentage of working aged people (16-64), residents of Harlow earn less than the county average and less than the average income of employees who work in Harlow, suggesting that higher paid jobs are being filled by those living outside of the District.

Historic Environment

Harlow is largely urban and its historical value is largely reflected in its designation as a New Town in 1947. The layout and architecture of the Town is strongly linked to the concepts set out in Sir Fredrick Gibberd’s Master Plan.

There are five Grade II listed buildings within the TCAAP area, including the Water Gardens from the original Gibberd masterplan, which contributes considerably to the Town Centre’s heritage. The Meat Porters Sculpture and Wild Boars Sculpture are also Grade II listed, and are specific to New Town architecture and Harlow, having a special historic character and identity which are an important part of the Town’s fabric.

There is a Scheduled Monument, Bowl barrel 110m north-east of Harlow Hospital, located adjacent to the north western boundary of the TCAAP area.

Key issues:
- Harlow is largely urban and its historical value is largely reflected in its designation as a New Town in 1947.
- The layout and architecture of the Town is strongly linked to the concepts set out in Sir Fredrick Gibberd’s Master Plan.
- There are five Grade II listed buildings within the TCAAP area.
- There is a Scheduled Monument, Bowl barrel 110m north-east of Harlow Hospital, located adjacent to the north western boundary of the TCAAP area.

38 ONS (2011)
39 Harlow Council (2017) Harlow Economic Development Strategy
40 Ibid.
Housing

The 2011 Census recorded over 35,800 dwellings in the District and 34,700 households. In accordance with the emerging Local Plan, this is expected to rise to approximately 40,745 dwellings and 39,455 households by 2033.

The census also provides detailed information about occupancy, which provides a measure of whether a household’s accommodation is overcrowded or under occupied. When considered by tenure, Harlow has seen a more modest increase (+21%) including a reduction in owned (-4%), but with a larger increase in private rent (+38%) and social rented (+21%).

Harlow’s property prices are lower than other parts of Essex. However, the affordable housing percentage requirement in Harlow is 61%, compared to 35% in Epping Forest, 32% in East Hertfordshire and 26% in Uttlesford. The number of households on the housing register in Harlow rose from 1,900 to 3,300 over the period 2001-2014.

Key issues:
- Significant growth is set for Harlow up to 2033.
- Harlow’s property prices are lower than other parts of Essex.
- The affordable housing percentage requirement in Harlow is 61%, compared to 35% in Epping Forest, 32% in East Hertfordshire and 26% in Uttlesford.

Land and Waste

Although the District is largely urban, 10% of the land is currently designated as being in the Metropolitan Green Belt. It is noted that the TCAAP area does not lie within the Green Belt.

There are large areas of Green Wedges and Green Fingers in Harlow, which, alongside the Green Belt, prevent neighbourhood coalescence. The Gibberd plan shaped the development of Harlow and allowed for the designation of large landscaped areas of Green Wedges to separate out neighbourhoods and compensate for small garden spaces. These remain a fundamental element of the network of green spaces within Harlow. Harlow’s surrounding neighbourhoods are separated from the Town Centre by Green Wedges and major connector roads. The Town Centre itself, however, is highlighted as lacking in planting and open spaces.

The Agricultural Land Classification (ALC) for Harlow District is that of an urban area, however; the periphery of the District and the neighbouring areas contain land of high agricultural quality (Grade 2 and Grade 3) and are of a traditional farmland character. The TCAAP area is wholly located within the ‘urban’ land classification.

In terms of the District’s Waste Performance for 2015/16, the total recycled or composted (45.3%) is lower than the authority average 41.

Key issues:
- The Gibberd plan shaped the development of Harlow and allowed for the designation of large landscaped areas of Green Wedges to separate out neighbourhoods and compensate for small garden spaces. Harlow’s surrounding neighbourhoods are separated from the Town Centre by these Green Wedges.
- The TCAAP area is wholly located within the ‘urban’ land classification.

Landscape

National policy and legislation supports the protection and improvement of the natural environment through measures such as the development of green infrastructure networks and through habitat and species protection together with the achievement of net gains in biodiversity.

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The original Harlow Master Plan utilised a ‘landscape-led’ approach for Harlow, which shaped the Town’s urban environment and linked strongly to the surrounding countryside. In addition to Green Wedges (linear open spaces) forming the urban structure of the Town’s neighbourhoods, and the Green Belt on the periphery of the District, the District contains large amounts of designated open space. However, it is noted that this is limited within the TCAAP area.

Harlow has numerous physical and visual links from the Town Centre to the surrounding countryside through the Green Wedges, which “encapsulate natural features such as valleys, woods and brooks”. The Stort Valley runs to the north of the town with land rising gradually to the south, reaching a ridgeline of about 70 metres above the valley level to the south of existing settlement. Harlow was planned to be contained within the cradle of Rye Hill, with this distinct topography offering expansive views of the surrounding countryside.

In terms of significant landscape constraints, there are three areas designated as Special Landscape Areas within the District, which are areas that have a “special visual quality that distinguishes them from other tracts of countryside”. These however are distant from the TCAAP area, located in the north-western corner, south-western corner and north-eastern corner of the District, falling within designated Green Belt land.

Harlow District is located within the National Character Area (NCA) 86: South Suffolk and North Essex Clayland. It lies in the south of this area, close to the border with the Northern Thames Basin NCA 111. NCA 86 is “Broadly flat, chalky, boulder clay plateau dissected by undulating river valley topography, particularly marked in upper valley reaches, which are much smaller in scale.”

Key issues:
- The original Harlow Master Plan utilised a ‘landscape-led’ approach for Harlow, which shaped the Town’s urban environment and linked strongly to the surrounding countryside.
- The TCAAP area is urban in character; however there are numerous physical and visual links from the Town Centre to the surrounding countryside through the Green Wedges.
- The Stort Valley runs to the north of the town. Harlow was planned to be contained within the cradle of Rye Hill, with this distinct topography offering expansive views of the surrounding countryside.

Transport
Harlow is a regional transport node and is part of the Harlow and Stanstead/ M111 Corridor strategy area for Essex.

Harlow is located in the south of the East of England close to London, and has excellent access to the major international airport of Stansted (20 minutes away), Cambridge, London, and links to the M25 and the Channel Tunnel. Key transport routes are provided by the M11 and A414.

The M11 and the A414 carry large volumes of traffic and have a direct influence upon the daily traffic patterns and conditions in Harlow and on the immediately adjacent highway network. The most notable area of congestion is on the routes and links to Junction 7 of the M11 (Harlow’s principal access to the strategic motorway network), but primarily on the A414 (a busy, major intra-regional highway route, serving both local traffic and longer distance through traffic connecting to the motorway network).

The main highway links and junctions throughout Harlow regularly experience congestion and delay, and this is likely to get worse as car ownership continues to rise. Furthermore, the reliance on only one junction is unusual for a town of the size and character of Harlow. In this context, it is recognised that the Government have announced support for a new motorway junction to the north of Harlow (known as 7a) and that Harlow Council are continuing to press the case for construction at the earliest practicable opportunity.

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43 Harlow Council (2017) Harlow Economic Development Strategy
Other major roads of note include: the A1184 – provides access to Harlow and Junction 7 of the M11 (via A414) and Sawbridgeworth to the north; the A1169 – links to the A414; the B181 – runs north-south from Roydon to Epping and provides access to the A414; the B1393 – runs north-south, and; the B180.

Harlow Town and Harlow Mill train stations are located in the north of the District, with the train line running west-east. In terms of the TCAAP area, Harlow Town train station is located 900m to the north east, whilst Harlow Mill station is around 750m to the north of Old Harlow, approximately 2.8km east of the TCAAP area. There is also another station located at Roydon to the west of the District.

Harlow Town has regular direct services to: London Liverpool Street, Bishops Stortford, Stansted Airport, Cambridge North and Stratford. Harlow Town is within walking distance of the Town Centre; however, the route is severed by a number of main roads. A number of bus services provide access to the station during peak periods, and bus route 10 offers access outside of peak times. In addition, 52 bicycle parking spaces are available at the station.

The bus network in Harlow is focused on Harlow Bus Station, located within the TCAAP area. Numerous bus routes serve the bus station, including the 1, 4, 5, 9, 10, 14, 86, 87, 418 and 424. These services connect Harlow Town Centre with the rest of the District, and also those neighbouring including Epping, Chelmsford and Hertford. The urban bus routes (1, 2, 3, 4, 5, 6, 8, 9/91, and 14) all have a frequency no lower than every 30 minutes. However, number 14 only operates at peak hours. A selection of routes serving the bus station only operate on certain days of the week, these are less frequent.

There are many footways, bridleways and cycle tracks located throughout Harlow Town Centre, provided as an integral part of the design of the new town. However, there are two primary issues for walking and cycling. One is crossing the ring road, and the second is passing through the edge of the Town Centre which is typified by large blocks of multi-storey car parks and the service yards for large retail premises. The combination of the busy road crossing and a lack of attractive routes through the edge of town acts as a both a physical and mental barrier to walking and cycling between the Town Centre and neighbouring residential areas. The pedestrian network within the centre is a reasonably coherent series of public squares linked by pedestrianised streets. Cycling is prohibited in the pedestrianised Town Centre although cycle parking is provided.

Cycle access across the ring road is provided by one subway on each side of the town; however there is no way to cycle from west to east across the Town Centre. Additionally, the cycle infrastructure ends at the edge of the Town Centre. Consequently, there are no ‘through routes’ that serve useful destinations within the Town, they all go around the edge of the Town Centre and at the back of commercial buildings away from entrances, discouraging cycling in the area.

Key issues:
- Harlow is located in the south of the East of England close to London, and has excellent access to the major international airport of Stansted (20 minutes away), Cambridge, London, and links to the M25 and the Channel Tunnel.
- Harlow Town train station is located 900m to the north east, whilst Harlow Mill station is around 750m to the north of Old Harlow, approximately 2.8km east of the TCAAP area.
- Harlow Bus Station is located within the TCAAP area. Numerous routes serve the bus station connecting Harlow Town Centre with the rest of the District, and also those neighbouring including Epping, Chelmsford and Hertford. The majority of services run frequently.
- There are numerous footways, bridleways and cycle tracks located throughout Harlow Town Centre, however there are two primary issues for walking and cycling; crossing the ring road, and passing through the edge of the Town Centre (which is typified by large blocks of multi-storey car parks and the service yards for large retail premises).

Water

Harlow is located within an area of serious water stress, which will be exacerbated due to climate change and future growth and development.
Harlow falls into the Upper Lee catchment area and portable drinking water in the District is provided by Affinity Water. Across Affinity Water’s Central Region area, which Harlow is located in, the Water Resources Management Plan (2014) sets out water related infrastructure projects which will ensure there is not a water deficit.

Thames Water is responsible for waste water in Harlow and the surrounding area, ensuring infrastructure is in place to accommodate anticipated growth. In this context, the Rye Meads Sewage Treatment Works (STW) is currently being upgraded to increase capacity. The upgrade will provide Rye Meads STW with a treatment capacity of 447,134 Population Equivalent.

Thames Water position statement (2017) indicates that capacity in the Treatment Works is expected up to 2036; however upgrades may be required in sludge and storm streams. Further network modelling and growth review is being undertaken by Thames Water to understand sewer capacity in the area before outlining further intervention solutions. This modelling work will inform a Watercycle Study being prepared by the Council.

**Key issues:**
- Harlow is located within an area of serious water stress, which will be exacerbated due to climate change and future growth and development.
- The Rye Meads Sewage Treatment Works (STW) is currently being upgraded to increase capacity in Harlow.

**What is the situation without the Plan**

There can be many factors that may influence the future of Harlow Town Centre’s baseline. In terms of biodiversity, without careful strategic planning proposed through the AAP, habitats and species located in and around the Town Centre have the potential to come under increased pressure from the provision of new housing, employment and infrastructure. This could include from increased disturbance (recreational, noise and light induced) and atmospheric pollution as well as the loss of habitats and fragmentation of biodiversity networks. As well as being ecologically less resilient, the loss and/or disconnect of fragments of the Green Wedge network would reduce the aesthetic appeal of the Town Centre, minimise opportunities for recreation, and limit the enjoyment of historical and other features linked to a sense of local identity. Benefits for biodiversity have the potential to arise from the increasing integration of biodiversity considerations within forward planning. This includes efforts to maintain and enhance the Green Wedge network throughout the Town Centre and the wider District, and promoting net gain.

In terms of climate change mitigation, per capita emissions are likely to continue to decrease as energy efficiency measures, renewable energy production and new technologies become more widely adopted. This includes relating to transport, as increased take up of more energy efficient vehicles and electric vehicles takes place, as promoted through the Emerging Local Plan. However, an increase in the built footprint of the Town Centre may lead to an increase in overall emissions if efficiency measures do not keep pace.

Rising CO₂ emissions can be attributed to future transport problems, such as those relating to the existing transport linkages along the Harlow and Stanstead/ M11 corridor, and at a local scale, those related to pedestrian and cyclist accessibility in Harlow Town Centre. Housing, employment and retail provision has the potential to increase vehicular use and levels of congestions without appropriate locational policies and interventions, which is likely to be a considerable issue for the TCAAP area considering the high percentage of travellers to work outside of the Town Centre.

Future housing, employment and infrastructure growth in the Town Centre is likely to result in loss of/damage to the limited existing open space, and may also impact on the fabric and setting of cultural heritage assets. This includes losing the positive townscape characteristics of the original Gibberd masterplan and other assets such as the Water Garden, through inappropriate design and layout. It should be noted, however, that existing historic environment designations will offer a degree of protection to cultural heritage assets and their settings.

In terms of communities, without the AAP, mixed and balanced communities within the TCAAP area would likely not be realised. The Town Centre would likely continue to deteriorate, with increased deprivation seen in the TCAAP area. This may include though reduced accessibility to essential...
facilities and services within walking distance for local residents, increasing levels of health inequality across the District.

Without the AAP the retail ranking of the Town Centre is likely to increase, resulting in higher levels of vacant primary frontages and secondary frontages, and a likely economic shift to online shopping, and larger competitive retailers. Additionally, issues of connectivity between the Town Centre and the surrounding neighbourhood areas may be perpetuated, which may further contribute towards a lack of investment in employment/retail provision. This would likely have an adverse effect on the economic prosperity of the TCAAP area, and the functionality of the Town Centre as the heart of the District.
Appendix II: SA of Options

Introduction

As explained within ‘Part 1’ above, the Council have developed a number of options under eleven key themes. The themes have emerged from the review of the evidence base with a view to distilling the main issues and identifying potential responses ('the options'). The options in most cases are not mutually exclusive, and the AAP may pursue multiple options to establish a joined-up, holistic strategy or policy position for any one theme.

Appraisal methodology

A comparative appraisal of the options under each key theme is carried out. The appraisal examines likely significant effects on the baseline, drawing on the refined sustainability objectives identified through scoping (see Table 1.1) as a methodological framework. The significance key below is provided below.

**Significance Key:**

<table>
<thead>
<tr>
<th></th>
<th>Likely significant positive effect</th>
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</thead>
<tbody>
<tr>
<td>Y</td>
<td>Likely significant negative effect</td>
</tr>
<tr>
<td>N</td>
<td>No likely significant effect</td>
</tr>
<tr>
<td>?</td>
<td>Uncertain</td>
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</table>

Where it is not possible to predict likely significant effects on the basis of reasonable assumptions, efforts are made to comment on the relative merits of the alternatives in more general terms and to indicate if there are any key differences. This is helpful, as it enables a distinction to be made between the alternatives even where it is not possible to distinguish between them in terms of 'significant effects'.
SA of options

Policy Theme 1: Strategic Growth (aligned with Opportunity Areas)
Option 1.1: Baseline scenario
Option 1.2: Medium intervention scenario
Option 1.3: High intervention scenario

Discussion of potential effects and relative merits of options

<table>
<thead>
<tr>
<th>Significant effect?</th>
<th>Opt 1.1</th>
<th>Opt 1.2</th>
<th>Opt 1.3</th>
</tr>
</thead>
<tbody>
<tr>
<td>Air quality</td>
<td>N</td>
<td>N</td>
<td>N</td>
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</table>

The policy options relate to the number of sites to be spatially targeted within the Area Action Plan (AAP) over its lifetime. All of the options can deliver Town Centre wide policy guidance to support the forecasted growth (in relation to increasing accessibility, and promoting a modal shift) with the potential for indirect minor positive effects against this SA Topic. The difference between the options lies in the potential detail of the spatial portrait. The more sites that are targeted, the more detail is prescribed, as well as potential investment avenues for development gains identified. A lower level of proposed growth has the potential to minimise traffic generation, but it is also less likely to address issues in relation to accessibility and/or promote potential opportunities for investment.

The medium and higher levels of intervention have greater potential to support public realm and accessibility improvements that reconnect the Town Centre internally, as well as improve pedestrian and cycle links with the surrounding communities. Both of these scenarios also provide housing growth in an accessible location, with the potential for long term indirect minor positive effects on air quality. The higher level of intervention (Option 1.3) unlocks the potential for an improved northern gateway. This could enhance pedestrian and cycle access to and from Harlow Town Railway Station, supporting a modal shift, with the potential for further indirect positive effects on air quality.

Overall, the effects are indirect and unlikely to be of significance, particularly considering that there are no existing significant air quality issues to address (there are no designated Air Quality Management Areas (AQMAs) within or immediately surrounding the Town Centre).

<table>
<thead>
<tr>
<th>Biodiversity and green infrastructure</th>
<th>N</th>
<th>Y</th>
<th>Y</th>
</tr>
</thead>
</table>

The policy options relate to the number of sites to be spatially targeted within the AAP over its lifetime. All of the options can deliver Town Centre wide policy guidance to support the forecasted growth (in relation to enhancing biodiversity and green infrastructure networks) with the potential for minor long term positive effects against this SA Topic. The difference between the options lies in the potential detail of the spatial portrait. The more sites that are targeted, the more detail is prescribed, as well as potential investment avenues for development gains identified. A lower level of proposed growth has the potential to minimise disruption, but is also less likely to promote potential opportunities for investment and/or address the identified issues in relation to connectivity with the wider Green Wedge Network.

The medium and higher levels of intervention have greater potential to address localised issues, as well as realise wider spatial aspirations - as depicted in the corresponding scenario maps. Therefore, these scenarios have the potential for long term significant positive effects on biodiversity and green infrastructure, particularly through increased connectivity (alleviating fragmentation) and potential net gain in green space. It is recommended that the medium and high intervention levels seek to deliver more biodiversity and green infrastructure connectivity enhancements within Opportunity Areas 4, 5 and 6 to maximise the potential for ecological corridors.
### Discussion of potential effects and relative merits of options

<table>
<thead>
<tr>
<th>Climate change</th>
<th>Opt 1.1</th>
<th>Opt 1.2</th>
<th>Opt 1.3</th>
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</thead>
<tbody>
<tr>
<td>The policy options relate to the number of sites to be spatially targeted within the AAP over its lifetime. All of the options can deliver Town Centre wide policy guidance to support the forecasted growth (in relation to climate change mitigation and adaptation) with the potential for minor long term positive effects on this SA Topic. The Town Centre is not located in an area of flood risk and any level of intervention is unlikely to affect flooding now or in the foreseeable future. As identified above, although no options are likely to lead to significant effects on air quality, the medium and high levels of intervention have greater potential for minor long term positive effects. These options have the potential to unlock avenues for investment in terms of development gain, and ensure that regeneration supports a modal shift. From unlocking the potential for an improved northern gateway and access from the railway station, to public realm and accessibility improvements that support increased pedestrian access from the surrounding communities. The medium and higher intervention levels are also recognised above as having significant potential to increase green infrastructure connectivity. This can support healthy functioning ecosystems. Overall, it is considered that the medium and higher levels of intervention have the potential for positive effects of greater significance. The current Issues and Options Report does not explore the potential for low carbon/renewable energy generation within the Town Centre. It is recommended that the Plan seeks to include aspirations to contribute to sustainable energy generation where possible in light of climate change impacts. This could be incorporated at any level of intervention to identify the potential opportunities and constraints.</td>
<td>N</td>
<td>Y</td>
<td>Y</td>
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</tbody>
</table>

<table>
<thead>
<tr>
<th>Community and wellbeing</th>
<th>Opt 1.1</th>
<th>Opt 1.2</th>
<th>Opt 1.3</th>
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</thead>
<tbody>
<tr>
<td>The policy options relate to the number of sites to be spatially targeted within the AAP over its lifetime. All of the options can deliver Town Centre wide policy guidance to support the forecasted growth (in relation to promoting social inclusion, and supporting community health and wellbeing) with the potential for minor long term positive effects. The difference between the options lies in the potential detail of the spatial portrait. The more sites that are targeted, the more detail is prescribed, as well as potential investment avenues for development gains identified. The medium and higher levels of intervention seek to deliver wider regeneration aspirations that support local communities. This includes; improving access to the central area from the surrounding neighbourhoods, improving the experience of Town Centre spaces and routes, improving the night-time and leisure economies, promoting greater diversity in Town Centre uses, and improving green space provisions. Therefore, it is considered that the medium and higher intervention options have a greater potential for significant positive effects.</td>
<td>N</td>
<td>Y</td>
<td>Y</td>
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<table>
<thead>
<tr>
<th>Economy and employment</th>
<th>Opt 1.1</th>
<th>Opt 1.2</th>
<th>Opt 1.3</th>
</tr>
</thead>
<tbody>
<tr>
<td>The policy options relate to the number of sites to be spatially targeted within the AAP over its lifetime. All of the options can deliver Town Centre wide policy guidance to support the forecasted growth (in relation to supporting a thriving economy and particularly in responding to aspirations to diversify the range of uses within the Town Centre, create active frontages, and increase building efficiency) with the potential for long term minor positive effects. Over and above this, the spatial portrait also has the potential to identify sites for employment development. All scenarios propose a level of new employment development (albeit limited to retail refurbishments in the baseline scenario) with the potential for minor long term positive effects. The medium and higher levels of intervention offer higher levels of employment growth, particularly through mixed use schemes. The higher levels are spread across more development areas, and identify investment channels for development gains - public realm and accessibility improvements which can support investment potential and overall performance. Therefore, it is considered that the medium and higher levels of intervention have the potential for significant positive effects for this SA Topic. It should be noted that all of the options also seek office to residential conversions, with higher levels of this occurring through the higher levels of intervention. Although this will result in the loss of office employment space to residential purposes, with the potential for negative effects, it has to be viewed in the context of the area which currently experiences high vacancy rates, and which is seeking to improve the night-time economy (which the presence of people in the evenings will contribute to). Thus these potential negative effects are not considered likely to be significant in this particular context.</td>
<td>N</td>
<td>Y</td>
<td>Y</td>
</tr>
</tbody>
</table>
**Discussion of potential effects and relative merits of options**

<table>
<thead>
<tr>
<th>Historic environment</th>
<th>Opt. 1.1</th>
<th>Opt. 1.2</th>
<th>Opt. 1.3</th>
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<tbody>
<tr>
<td>The policy options relate to the number of sites to be spatially targeted within the AAP over its lifetime. All of the options can deliver Town Centre wide policy guidance to support the forecasted growth (in relation to protecting and enhancing the historic environment) with the potential for minor long term positive effects. The difference between the options lies in the potential detail of the spatial portrait. The more sites that are targeted, the more detail is prescribed, as well as potential investment avenues for development gains identified. The medium and higher levels of intervention have the potential for positive effects of greater significance through the ability to outline significant contributors to character of place at the street level, as well as regenerating areas that currently detract from character of place, or act as barriers to realising greater opportunities for character enhancements. These levels of intervention are also considered to have greater potential in realising the spatial objectives identified for the plan area, such as retaining the plan aesthetic, rebalancing the focus of gravity northwards and celebrating and reflecting design heritage. Therefore, it is considered that the medium and higher levels of intervention have the potential for significant positive effects for this SA Topic.</td>
<td>Y</td>
<td>N</td>
<td>Y</td>
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<table>
<thead>
<tr>
<th>Housing</th>
<th>Opt. 1.1</th>
<th>Opt. 1.2</th>
<th>Opt. 1.3</th>
</tr>
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<tbody>
<tr>
<td>The policy options relate to the number of sites to be spatially targeted within the AAP over its lifetime. All of the options can deliver Town Centre wide policy guidance to support the forecasted growth (in relation to housing mix, type and tenures) with the potential for minor long term positive effects. Over and above this, the spatial portrait also has the potential to identify sites for housing development. All scenarios propose a level of new housing development with the potential for long term positive effects, but the medium and higher levels of intervention offer higher levels of housing growth across more development areas, and thus have the potential for positive effects of greater significance for this SA Topic.</td>
<td>N</td>
<td>Y</td>
<td>Y</td>
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<thead>
<tr>
<th>Land and waste</th>
<th>Opt. 1.1</th>
<th>Opt. 1.2</th>
<th>Opt. 1.3</th>
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<tbody>
<tr>
<td>The policy options relate to the number of sites to be spatially targeted within the AAP over its lifetime. All of the options can deliver Town Centre wide policy guidance to support the forecasted growth (in relation to the efficient use of land and buildings) with the potential for minor long term positive effects. The difference between the options lies in the potential detail of the spatial portrait. Each scenario focuses development around the regeneration of existing sites and as such, each scenario is considered to have the potential for long term positive effects on this SA Topic. The higher the level of intervention, the more land is regenerated. The more housing that is directed to brownfield sites in central accessible locations (supported by existing facilities and services) then the greater potential for positive effects of significance, as this avoids greenfield development in less accessible places outside of the Town Centre. The medium and higher levels of intervention (Options 1.2 and 1.3) also seek to improve building efficiency - particularly through mixed use schemes - which has the potential for positive effects of greater significance than the baseline scenario (Option 1.1).</td>
<td>N</td>
<td>Y</td>
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<table>
<thead>
<tr>
<th>Landscape</th>
<th>Opt. 1.1</th>
<th>Opt. 1.2</th>
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</thead>
<tbody>
<tr>
<td>The policy options relate to the number of sites to be spatially targeted within the AAP over its lifetime. All of the options can deliver Town Centre wide policy guidance to support the forecasted growth (in relation to enhancing the townscape) with the potential for minor long term positive effects. The difference between the options lies in the potential detail of the spatial portrait. The more sites that are targeted, the more detail is prescribed, as well as potential investment avenues for development gains identified. It is considered that the medium and higher levels of intervention have the potential for positive effects of greater significance, through the ability to outline significant contributors to townscape, as well as opportunities to regenerate areas that currently detract from the townscape, or act as barriers to realising greater opportunities for character enhancements. These levels of intervention are also considered to have greater potential in realising the spatial objectives identified for the plan area, such as retaining the plan aesthetic, rebalancing the focus of gravity northwards and celebrating and reflecting design heritage. Therefore, it is considered that the medium and higher levels of intervention have the potential for significant positive effects for this SA Topic.</td>
<td>N</td>
<td>Y</td>
<td>Y</td>
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</tbody>
</table>
### Discussion of potential effects and relative merits of options

#### Transport

The policy options relate to the number of sites to be spatially targeted within the AAP over its lifetime. All of the options can deliver Town Centre wide policy guidance to support the forecasted growth (in relation to increasing accessibility, and promoting a modal shift) with the potential for minor positive effects against this SA Topic. The difference between the options lies in the potential detail of the spatial portrait. The more sites that are targeted, the more detail is prescribed, as well as potential investment avenues for development gains identified. A lower level of intervention identify potential measures to address these issues. The medium and higher levels of intervention have greater potential to support public realm and accessibility improvements that reconnect the Town Centre internally, as well as improve pedestrian and cycle links with the surrounding communities. Both of these scenarios also provide housing growth in an accessible location, with the potential for long term indirect minor positive effects on transport. The higher level of intervention (Option 1.3) also unlocks the potential for an improved northern gateway that enhances pedestrian and cycle access to and from Harlow Town Railway Station, supporting a modal shift with the potential for further positive effects. Therefore, it is considered that both the medium and higher levels of intervention have the potential for positive effects of greater significance.

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<tr>
<th>Opt 1.1</th>
<th>Opt 1.2</th>
<th>Opt 1.3</th>
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<tr>
<td>N</td>
<td>Y</td>
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#### Water

The policy options relate to the number of sites to be spatially targeted within the AAP over its lifetime. All of the options can deliver Town Centre wide policy guidance to support the forecasted growth (in relation to water efficiency and water quality) with the potential for minor long term positive effects. The difference between the options lies in the potential detail of the spatial portrait. Although high levels of planned growth could exacerbate water stress, the planned incremental approach to realising each level of intervention should ensure that the necessary infrastructure improvements can be delivered in a timely manner alongside new development. As such it is considered unlikely that any of the options will lead to any significant effects for this SA Topic.

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<th>Opt 1.1</th>
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<td>N</td>
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### Summary:

The appraisal under the Strategic Growth theme identifies that these options do not restrict the ability of the plan to produce a range of policy guidance for development in the Town Centre. These options focus on the number of sites/areas to be spatially targeted within the AAP, and provide an incremental approach to achieve the expanding visions for the Town Centre. The higher the level of intervention, then the higher level of development is sought. Higher levels of development will increase levels of potential housing and employment growth as well as support increased public realm, green infrastructure and accessibility improvements with the potential for positive effects of greater significance. The appraisal did not identify any potential significant negative effects at this stage.

The appraisal of these options has identified two recommendations:

- The medium and high intervention scenarios could seek to deliver more biodiversity and green infrastructure connectivity enhancements within Opportunity Areas 4, 5 and 6 to maximise the potential for ecological corridors within the Town Centre and connectivity with the wider Green Wedge network; and
- The Plan should include aspirations to contribute to sustainable energy generation where possible in light of climate change impacts.

It should be noted that these growth options have implications for the rest of the options explored through the AAP. A number of the options explored through other themes (e.g. Theme 3 on the Public Realm) look at whether to provide Town Centre wide policy guidance or site specific guidance. The level of intervention is intrinsically connected to these options, in such that if a high level of intervention is pursued (and a higher number of sites/areas are targeted) then site specific policies may become increasingly more useful/effective. Alternatively, if the baseline scenario is pursued with a low level of intervention, then Town Centre wide policy guidance will become more important.
Policy Theme 2: Movement
Option 2.1: Framework of streets
Option 2.2: Potential pedestrian and cycle improvements
Option 2.3: Bus improvements
Option 2.4: Road network
Option 2.5: Rely on emerging planning guidance on parking in Local Plan policy
Option 2.6: Establish specific Town Centre car parking policy

Discussion of potential effects and relative merits of options

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<td>Opt 2.1</td>
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Air quality

The options relate to different modes of transport and how they, and different routes into the Town Centre, can be promoted or improved through the AAP. Each option (except Option 2.5) seeks to improve accessibility through measures to reconnect the north and south of the plan area and improve movement flows in Option 2.1; improved pedestrian and cycle routes in Option 2.2; improved bus services with increased access to the central area in Option 2.3; improvements to the road network in Option 2.4; and new policy guidance for Town Centre parking in Option 2.6; with the potential for minor indirect long term positive effects on this SA Topic.

Option 2.5 on the other hand provides the option of using existing and emerging district wide policy in regards to parking and is unlikely to lead to any significant effects on air quality.

The difference between the options relates generally to the mode of transport in focus, but also looks at options for reconnecting areas. Each option in isolation is a positive step towards indirectly improving air quality, but is highly focused on one aspect of movement in the Plan area. As such, a hybrid approach which combines all of these potential measures is considered to cumulatively lead to effects of greater significance.

Biodiversity and green infrastructure

The options relate to different modes of transport and how they, and different routes into the Town Centre, can be promoted or improved through the AAP. None of the options are considered likely to lead to any significant effects on this SA Topic.

Climate change

The options relate to different modes of transport and how they, and different routes into the Town Centre, can be promoted or improved through the AAP.

As previously stated under Air Quality, each option (except Option 2.5) seeks to improve accessibility through different measures, with the potential for indirect minor positive effects on air quality.

The difference between the options relates generally to the mode of transport in focus, but also looks at options for reconnecting areas. Each option in isolation is a positive step towards indirectly improving air quality, but is highly focused on one aspect of movement in the Plan area. As such, a hybrid approach which combines all of these potential measures is considered to cumulatively lead to effects of greater significance.

The Town Centre is not located in an area of flood risk, and the options are not considered likely to affect flood risk now or in the foreseeable future. The options are also not considered likely to lead to any significant effects on renewable energy generation.
### Discussion of potential effects and relative merits of options

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#### Community and wellbeing

The options relate to different modes of transport and how they, and different routes into the Town Centre, can be promoted or improved through the AAP. As previously stated under Air Quality, each option (except Option 2.5) seeks to improve accessibility through different measures, with the potential for indirect minor positive effects on health and wellbeing.

The difference between the options relates generally to the mode of transport in focus, but also looks at options for reconnecting areas. Each option in isolation is a positive step towards improving accessibility (which can support social inclusiveness and healthier lifestyles) but is highly focused on one aspect of movement in the Plan area. As such, a hybrid approach which combines all of these potential measures is considered to cumulatively lead to effects of greater significance, although these effects are still considered likely to be minor for this SA Topic.

#### Economy and employment

The options relate to different modes of transport and how they, and different routes into the Town Centre, can be promoted or improved through the AAP. As previously stated under Air Quality, each option (except Option 2.5) seeks to improve accessibility through different measures. Improving accessibility has the potential to support inward investment with indirect minor positive effects on the economy.

The difference between the options relates generally to the mode of transport in focus, but also looks at options for reconnecting areas. Each option in isolation is a positive step towards improving accessibility, but is highly focused on one aspect of movement in the Plan area. As such, a hybrid approach which combines all of these potential measures is considered to cumulatively lead to effects of greater significance, although these effects are still considered likely to be minor for this SA Topic.

#### Historic environment

The options relate to different modes of transport and how they, and different routes into the Town Centre, can be promoted or improved through the AAP. As previously stated under Air Quality, each option (except Option 2.5) seeks to improve accessibility through different measures. Improving accessibility can support increased awareness and enjoyment of the historic environment with the potential for indirect minor positive effects.

The difference between the options relates generally to the mode of transport in focus, but also looks at options for reconnecting areas. Each option in isolation is a positive step towards improving accessibility, but is highly focused on one aspect of movement in the Plan area. As such, a hybrid approach which combines all of these potential measures is considered to cumulatively lead to effects of greater significance, although these effects are still considered likely to be minor for this SA Topic.

Option 2.5 provides the option of using existing and emerging district wide policy in regards to parking. The APP identifies that this could lead to the provision of underutilised spaces in the Town Centre, with the potential for minor negative effects on landscape and the historic environment. Existing and emerging policy guidance should ensure that these effects will not be of significance; however Option 2.5 is discouraged on this basis.

#### Housing

The options relate to different modes of transport and how they, and different routes, into the Town Centre can be promoted or improved through the AAP. As such all options are considered likely to lead to neutral effects against this SA Topic.

#### Land and waste

The options relate to different modes of transport and how they, and different routes, into the Town Centre can be promoted or improved through the AAP. As such all options are considered likely to lead to neutral effects against this SA Topic.
## Discussion of potential effects and relative merits of options

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<td>Opt 2.4</td>
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<td>Opt 2.5</td>
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<tr>
<td>Opt 2.6</td>
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</table>

### Landscape

The options relate to different modes of transport and how they, and different routes into the Town Centre, can be promoted or improved through the AAP.

As previously stated under Air Quality, each option (except Option 2.5) seeks to improve accessibility through different measures. Improving accessibility can support an improved public realm and townscape, with the potential for indirect minor positive effects.

The difference between the options relates generally to the mode of transport in focus, but also looks at options for reconnecting areas. Each option in isolation is a positive step towards improving accessibility, but is highly focused on one aspect of movement in the Plan area. As such, a hybrid approach which combines all of these potential measures is considered to cumulatively lead to effects of greater significance, although these effects are still considered likely to be minor for this SA Topic.

Option 2.5 provides the option of using existing and emerging district wide policy in regards to parking. The APP identifies that this could lead to the provision of underutilised spaces in the Town Centre, with the potential for minor negative effects on landscape and the historic environment. Existing and emerging policy guidance should ensure that these effects will not be of significance; however Option 2.5 is discouraged on this basis.

### Transport

The options relate to different modes of transport and how they, and different routes into the Town Centre, can be promoted or improved through the AAP.

Each option (except Option 2.5) seeks to improve accessibility, through improved traffic flow (including allowing buses more central access) in Option 2.1; improved pedestrian and cycle routes in Option 2.2, improved bus services with increased access to the central area in Option 2.3, improvements to the road network in Option 2.4, and new policy guidance for Town Centre parking in Option 2.6; with the potential for minor long term positive effects on this SA Topic.

Option 2.5 on the other hand provides the option of using existing and emerging district wide policy in regards to parking. This option is considered unlikely to capitalise on potential opportunities to improve the efficiency of parking within the Town Centre, and is less favourable than Option 2.6 in this respect.

The difference between the options relates generally to the mode of transport in focus, but also looks at options for reconnecting areas. Each option in isolation is a positive step towards indirectly improving air quality, but is highly focused on one aspect of movement in the Plan area. As such, a hybrid approach which combines all of these potential measures is considered to cumulatively lead to effects of greater significance.

### Water

The options relate to different modes of transport and how they, and different routes, into the Town Centre can be promoted or improved through the AAP. As such all options are considered likely to lead to neutral effects against this SA Topic.

### Summary:

With the exception of Option 2.5, all of the options seek to improve accessibility in some way with the potential for minor long term positive effects on transport, air quality, climate change, communities and wellbeing, the economy, the landscape and the historic environment.

It is considered that Option 2.5 fails to capitalise on potential opportunities to improve the efficiency of parking within the Town Centre, and as such is not considered likely to result in a positive effect of the same significance as Option 2.6.

With the exception of Option 2.5, each option in isolation is a positive step towards improving accessibility, but is highly focused on one aspect of, or location for, movement in the Plan area. As such, a hybrid approach which combines all of these potential measures is considered to cumulatively lead to effects of greater significance, particularly for the SA Topics of Transport, Air Quality and Climate Change. The appraisal has not identified any potential significant negative effects at this stage.
### Policy Theme 3: Public Realm

**Option 3.1: Town Centre public realm principles**

**Option 3.2: Site specific guidance**

#### Discussion of potential effects and relative merits of options

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<tr>
<th></th>
<th>Opt 3.1</th>
<th>Opt 3.2</th>
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<tbody>
<tr>
<td><strong>Air quality</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>The policy options both seek to improve the public realm and overall experience of the Town Centre, and the options seek to integrate with movement proposals to increase accessibility and support a modal shift with the potential for minor long term indirect positive effects. The effects are unlikely however to be of significance. The difference between the two options relates to the approach taken to deliver this guidance. Option 3.1 could provide strategic direction for development across the whole of the Town Centre, thus capturing areas that are not identified at this stage for future development but which may come forward during the life of the plan. Option 3.2 however will target specific sites with more detailed and localised guidance. This can address localised issues and opportunities; however, the effectiveness of this option is also dependent on the level of intervention that is pursued (see Strategic Growth assessment). Given that there are no identified Air Quality Management Areas in the Town Centre or immediately surrounding it, it is unlikely that site specific intervention will lead to greater effects over and above Option 3.1 for this SA Topic.</td>
<td>N</td>
<td>N</td>
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</table>

| **Biodiversity and green infrastructure** |         |         |
| The policy options both seek to improve the public realm and overall experience of the Town Centre, which include measures to increase green infrastructure with the potential for minor long term positive effects. The difference between the two options relates to the approach taken to deliver this guidance, and neither option is considered likely to result in significant effects against this SA Topic. | N | N |

| **Climate change** |         |         |
| The policy options both seek to improve the public realm and overall experience of the Town Centre, which is identified above includes measures to increase green infrastructure and accessibility within the central area with the potential for minor long term positive effects on both climate change mitigation and adaptation. The options are unlikely to affect flood risk (as there are no flood risk areas within the Town Centre) or renewable energy generation. The difference between the two options relates to the approach taken to deliver this guidance, and neither option is considered likely to result in significant effects against this SA Topic. | N | N |

| **Community and wellbeing** |         |         |
| The policy options both seek to improve the public realm and overall experience of the Town Centre, which include measures to increase green infrastructure and accessibility within the central area with the potential for minor long term positive effects on communities, health and wellbeing. The difference between the two options relates to the approach taken to deliver this guidance, and neither option is considered likely to result in significant effects against this SA Topic. | N | N |

| **Economy and employment** |         |         |
| The policy options both seek to improve the public realm and overall experience of the Town Centre, which could support inward investment with the potential for minor long term positive effects on this SA Topic. The difference between the two options relates to the approach taken to deliver this guidance and neither option is considered likely to result in significant effects against this SA Topic. | N | N |

| **Historic environment** |         |         |
| The policy options both seek to improve the public realm and overall experience of the Town Centre, and the options seek to integrate with movement proposals to increase accessibility and support a modal shift with the potential for minor long term indirect positive effects. The effects are unlikely however to be of significance. The difference between the two options relates to the approach taken to deliver this guidance. Option 3.1 could provide strategic direction for development across the whole of the Town Centre, thus capturing areas that are not identified at this stage for future development but which may come forward during the life of the plan. Option 3.2 however will target specific sites with more detailed and localised guidance. This can address localised issues and opportunities; however, the effectiveness of this option is also dependent on the level of intervention that is pursued (see Strategic Growth assessment). Given that there are no identified Air Quality Management Areas in the Town Centre or immediately surrounding it, it is unlikely that site specific intervention will lead to greater effects over and above Option 3.1 for this SA Topic. | Y | Y |
### Discussion of potential effects and relative merits of options

Centre, which could support historic environment enhancements with the potential for significant long term positive effects on this SA Topic. The difference between the two options relates to the approach taken to deliver this guidance. Option 3.1 could provide strategic principles to underpin all new development within the Town Centre whereas Option 3.2 could target specific sites with more detailed and localised guidance. This can address localised issues and opportunities; however, the effectiveness of this approach is also dependent on the level of intervention that is pursued (see Strategic Growth assessment). It is considered that a combination of the two approaches is most likely to maximise the potential for positive effects.

#### Housing

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<th>Opt 3.2</th>
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<tbody>
<tr>
<td>Centre, which could support historic environment enhancements with the potential for significant long term positive effects</td>
<td>Neutral effects</td>
<td>Neutral effects</td>
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</table>

#### Land and waste

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#### Landscape

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<tbody>
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<td>Centre, which could support historic environment enhancements with the potential for significant long term positive effects</td>
<td>Significant effects?</td>
<td>Significant effects?</td>
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#### Transport

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#### Water

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<td>Centre, which could support historic environment enhancements with the potential for significant long term positive effects</td>
<td>Neutral effects</td>
<td>Neutral effects</td>
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### Summary:

The policy options both seek to improve the public realm and overall experience of the Town Centre; and the appraisal has found the potential for significant long term positive effects for SA Topics relating to the Historic Environment and Landscape.

The difference between the options relates to the approach taken to deliver policy guidance. Town Centre wide guidance can underpin all development coming forward over the life of the plan, but in this respect guidance is more likely to be generalised. Site specific policy can be more detailed, prescriptive and localised to address identified opportunities or constraints. However, site specific guidance will not capture windfall sites. As both options present opportunities for positive effects, it is considered that a combination of the two approaches could have greater potential for significant positive effects. No potential significant negative effects were identified at this stage.
Policy Theme 4: Urban Design

Option 4.1: Guidance on character, height, scale and massing
Option 4.2: Site specific guidance

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<th>Opt.4.2</th>
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### Discussion of potential effects and relative merits of options

#### Air quality

The policy options refer to urban design guidance for new development within the Town Centre, and both options seek to improve the overall experience of the plan area. Improving the experience of the Town Centre can encourage pedestrian activity, which may indirectly positively affect a modal shift and thus improved air quality. The effects however, are unlikely to be of any significance.

The difference between the two options relates to the approach taken to deliver this guidance. Option 4.1 could provide strategic direction for development across the whole of the Town Centre, thus capturing areas that are not identified at this stage for future development but which may come forward during the life of the plan. Option 4.2 however will target specific sites with more detailed and localised guidance. This can address localised issues and opportunities; however, the effectiveness of this approach is also dependent on the level of intervention that is pursued (see Strategic Growth assessment). Given that there are no identified Air Quality Management Areas in the Town Centre or immediately surrounding it, it is unlikely that site specific intervention will lead to greater effects over and above Option 4.1 for this SA Topic.

#### Biodiversity and green infrastructure

The policy options seek to improve the overall experience of the Town Centre through high quality design principles, including guidance in relation to urban character. These principles are likely to include measures to increase green infrastructure within the Town Centre and thus lead to minor positive effects against this SA Topic.

The difference between the two options relates to the approach taken in delivering this design guidance.

Option 4.1 can provide broader guidance to strategically address biodiversity and green infrastructure connectivity across the whole of the Town Centre, seeking to address issues and deliver benefits at the townscape scale. Option 4.1 can specifically support identified issues in relation to connectivity between the Town Centre and Green Wedge network.

Option 4.2 on the other hand can provide more detailed guidance at a more localised scale. More detailed guidance provided under Option 4.2 can ensure that sites coming forward for future development deliver prescribed benefits or address localised issues where necessary. It should be noted that the potential positive effects arising from Option 4.2 are also dependent on the intervention level that is pursued (see Strategic Growth above).

It is considered likely that a combination of these policy options will maximise the potential for positive effects against this SA Topic; however, it still considered unlikely to result in significant effects overall.

#### Climate change

As previously identified, the policy options, which seek to improve the overall experience of the Town Centre, may indirectly positively affect climate change and air quality by supporting a modal shift; however these effects are considered unlikely to be of significance. Option 4.1 has the potential to deliver further positive effects by providing guidance in relation to urban character and form which can support tree planting and shading and other measures to address climate change adaptation across the Town Centre. Option 4.2 also has the potential to deliver these positive effects, however with Option 4.2 these are likely to be more localised, potentially more prescribed, and the effectiveness of this approach is again dependent on the level of intervention pursued (see Strategic Growth assessment). It is considered that a combination of these policy options is likely to maximise the potential positive effects against this SA Topic; however, overall the effects are still considered unlikely to be of significance.

The options are unlikely to affect flood risk (as there are no flood risk areas within the Town Centre).
## Discussion of potential effects and relative merits of options

### Community and wellbeing
The policy options seek to improve the overall experience of the Town Centre and are likely to include measures which seek to improve urban character and layout. The policy options can support spatial objectives relating to the connectivity of the Town Centre with the surrounding neighbourhoods, and in rebalancing the focus of gravity northwards, which has the potential for minor long term positive effects on community identities, inclusiveness, health and wellbeing. Both policy options are also likely to support improved green infrastructure (GI) and GI connectivity within the Town Centre, which is also likely to lead to long term minor positive effects on community health and wellbeing. Overall however, these potential effects are considered unlikely to be of any significance.

The difference between the options again relates the how these positive effects can be delivered. Option 4.1 is more strategic in nature than Option 4.2, and as such can support measures at the townscape scale, giving guidance for example as to how development across the whole of the Town Centre can support the targeted spatial objectives. Option 4.2 could seek to deliver localised opportunities at specific sites, and perhaps target problem areas with more detailed guidance. The effectiveness of this approach is also dependent on the intervention level (see Strategic Growth assessment) which will ultimately decide how many specific sites are targeted within the plan. It is considered that a combination of these policy options is likely to maximise the potential for positive effects against this SA Topic; however, overall the effects are still considered unlikely to be of significance.

### Economy and employment
The policy options refer to urban design guidance for new development, which seek to improve the overall experience of the Town Centre through targeted advice on character, height, scale and massing. The guidance can support improvements to public spaces to introduce a sense of night-time or leisure uses as the plan identifies (thus supporting the night-time and leisure economies), with the potential for minor long term positive effects against this SA Topic; however, these are unlikely to be of significance. The difference between the options relates to delivering this guidance at the Town Centre scale or at a site specific scale, both of which could deliver these benefits. It is considered that a combined approach is likely to maximise the potential opportunities for positive effects against this SA Topic.

### Historic environment
As identified in the plan, design quality is a key concern for Harlow Town Centre. The policy options seek to promote high-quality urban design that improves the overall experience and responds positively to the existing character and context of the plan area. Urban design guidance has the potential to support improved access and signage in relation to designated and non-designated heritage assets. Both policy options are therefore considered to have the potential for significant long term positive effects. The difference between the options is again in the delivery of the guidance. Option 4.1, being more strategic in nature than Option 4.2, can provide Town Centre wide guidance, including the identification and reinforcement of key design principles apparent across the whole of the plan area, and can seek to ensure that development is consistent in its design-led approach. Option 4.2 can provide more localised and detailed guidance, targeting site specific issues and opportunities; however the extent of the positive effects are again dependent on the level of intervention pursued (see Strategic Growth assessment). It is considered that a combined approach is most likely to maximise the potential for positive effects against this SA Topic.

### Housing
The policy options refer to urban design guidance for new development, which seek to improve the overall experience of the Town Centre through targeted advice on character, height, scale and massing. As such the policy options are considered to have the potential for a neutral effect against this SA Topic.
Discussion of potential effects and relative merits of options

**Land and waste**

The policy options refer to urban design guidance for new development, which seek to improve the overall experience of the Town Centre through targeted advice on character, height, scale and massing. As such the policy options are considered to have the potential for a **neutral effect** against this SA Topic.

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**Landscape**

The policy options seek to improve the townscape through targeted design guidance aiming to ensure that new development responds positively to the existing character and context of the plan area, with the potential for **significant long term positive effects** against this SA Topic.

Option 4.1 seeks to provide strategic guidance for urban design across the Town Centre, and this provides greater certainty that all future development will accord to agreed principles in regards to character, height, scale and massing. However, given the strategic nature of Option 4.1 the policy is likely to be broader in terms of what is encouraged; compared to Option 4.2 which seeks to provide more detailed guidance at a localised scale, the effectiveness of which is dependent on the level of intervention pursued (see Strategic Growth assessment). It is therefore considered that a combined approach is likely to maximise these potential positive effects by both encompassing all development potential in the Town Centre as well as providing more detailed guidance to target site specific opportunities and issues.

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<th>Opt 4.1</th>
<th>Opt 4.2</th>
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<td>Y</td>
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**Transport**

The policy options refer to urban design guidance for new development within the Town Centre, which seek to improve the overall experience. Improving the experience of the Town Centre could encourage pedestrian activity, which may indirectly positively affect a modal shift; the effects however, are unlikely to be of any significance.

The policy options are likely to include measures which seek to improve urban layout, supporting spatial objectives relating to the connectivity of the Town Centre with the surrounding neighbourhoods, which also has the potential for minor long term positive effects; however, again these are unlikely to be of significance.

The difference between the options relates to providing this guidance at the Town Centre scale or at a localised site specific scale. It is considered that a combined approach is likely to maximise these potential benefits by addressing connectivity and accessibility strategically and by targeting localised issues or opportunities in future development sites.

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<th>Opt 4.1</th>
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**Water**

The policy options refer to urban design guidance for new development, which seek to improve the overall experience of the Town Centre through targeted advice on character, height, scale and massing. As such the policy options are considered to have the potential for a **neutral effect** against this SA Topic.

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<th>Opt 4.1</th>
<th>Opt 4.2</th>
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**Summary:**

The policy options both seek to improve the overall experience of the Town Centre through targeted high quality urban design guidance. This is considered likely to lead to long term significant positive effects for the SA Topics of Landscape and the Historic Environment.

The difference between the options relates to the approach taken to deliver policy guidance; either at the Town Centre scale or at a site specific scale. As identified for the Public Realm theme above, Town Centre guidance can capture all development but with more generalised principles, compared to site specific guidance which can be more detailed but will not capture windfall sites. Again the effectiveness of this site specific approach is also dependent on the level of intervention assessed in the Strategic Growth theme. Given the potential positive effects of both options, it is again considered that a combination of the two approaches could have a greater potential for significant positive effects.

No potential significant negative effects were identified at this stage.
**Policy Theme 5: Heritage**

**Option 5.1: Rely on existing Local Plan policies**

**Option 5.2: Town Centre specific heritage policy**

<table>
<thead>
<tr>
<th>Discussion of potential effects and relative merits of options</th>
<th>Opt 5.1</th>
<th>Opt 5.2</th>
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<tbody>
<tr>
<td><strong>Air quality</strong></td>
<td>N</td>
<td>N</td>
</tr>
<tr>
<td>The policy options refer to protection and enhancement of the historic environment, identifying both positive and negative contributors within the Town Centre. As such the policy options are considered to have the potential for a <em>neutral effect</em> against this SA Topic.</td>
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<tr>
<td><strong>Biodiversity and green infrastructure</strong></td>
<td>N</td>
<td>N</td>
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<tr>
<td>The policy options refer to protection and enhancement of the historic environment, identifying both positive and negative contributors within the Town Centre. As such the policy options are considered to have the potential for a <em>neutral effect</em> against this SA Topic.</td>
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<tr>
<td><strong>Climate change</strong></td>
<td>N</td>
<td>N</td>
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<tr>
<td>The policy options refer to protection and enhancement of the historic environment, identifying both positive and negative contributors within the Town Centre. As such the policy options are considered to have the potential for a <em>neutral effect</em> against this SA Topic.</td>
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<tr>
<td><strong>Community and wellbeing</strong></td>
<td>N</td>
<td>N</td>
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<tr>
<td>The policy options refer to protection and enhancement of the historic environment, identifying both positive and negative contributors within the Town Centre. The plan identifies that consultation has revealed a genuine community interest in the Town Centre’s unique design heritage with a desire to see it better promoted. Both of the policy options could support public realm improvements, with the potential for minor long term positive effects for community identity and social inclusion. Option 5.1 relies on existing Local Plan policies to provide the general guidance with supporting text to ensure that the historic environment character is considered as part of urban design guidance. Option 5.2 however seeks to provide more detailed guidance that is tailored to the Town Centre plan area. Option 5.2 therefore is more likely to address localised issues and opportunities, and the creation of additional policy allows for further community engagement and involvement in shaping the future direction for development in Harlow Town Centre. It is therefore considered that Option 5.2 offers greater opportunities for positive effects of greater significance than Option 5.1 at this stage of the assessment for this SA Topic; however, these effects are not considered to be significant overall.</td>
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<tr>
<td><strong>Economy and employment</strong></td>
<td>N</td>
<td>N</td>
</tr>
<tr>
<td>The policy options refer to protection and enhancement of the historic environment, identifying both positive and negative contributors within the Town Centre. As such the policy options are considered to have the potential for a <em>neutral effect</em> against this SA Topic.</td>
<td></td>
<td></td>
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<tr>
<td><strong>Historic environment</strong></td>
<td>N</td>
<td>Y</td>
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<tr>
<td>The policy options refer to protection and enhancement of the historic environment, and both options seek to protect designated and non-designated heritage assets and their settings. Option 5.1 would rely on emerging policy in the Local Plan to provide general guidance, whereas Option 5.2 would seek to create new policy guidance tailored to the needs of Harlow Town Centre. Although both options will ensure that the necessary protection and guidance is in place for development in and around the Town Centre, it is clear that Option 5.2 offers greater opportunities for positive effects on the historic environment, just by providing more detail relating specifically to the Town Centre. This could be particularly beneficial for Harlow given the nature of their Town Centre; which contains few designated heritage assets and many non-designated heritage assets. Given policy wording in emerging Local Plan Policy PL11 which identifies that; “the greater the significance of the asset, the greater the weight that is given to the asset’s conservation”, it is considered that further policy development in the Town Centre AAP can ensure that the significance of non-designated heritage assets within the Town Centre are fully understood and appreciated. Option 5.2 is therefore considered to have the potential for <em>significant long term positive effects</em>, compared to Option 5.1 which is considered positive but unlikely to lead to any significant effects.</td>
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Discussion of potential effects and relative merits of options

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<tr>
<th>Significant effect?</th>
<th>Opt 5.1</th>
<th>Opt 5.2</th>
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**Housing**
The policy options refer to protection and enhancement of the historic environment, identifying both positive and negative contributors within the Town Centre. As such the policy options are considered to have the potential for a neutral effect against this SA Topic.

**Land and waste**
The policy options refer to protection and enhancement of the historic environment, identifying both positive and negative contributors within the Town Centre. As such the policy options are considered to have the potential for a neutral effect against this SA Topic.

**Landscape**
The townscape of Harlow is largely influenced by its historic environment, in both positive and negative ways. Both of the policy options seek to protect and enhance the historic environment, which could indirectly positively affect townscape given the interrelationship between the two topics. Option 5.1 would rely on emerging policy in the Local Plan to provide general guidance, whereas Option 5.2 would seek to create new policy guidance tailored to the needs of Harlow Town Centre. Although both options will ensure that the necessary protection and guidance is in place for development in and around the Town Centre, it is clear that Option 5.2 offers greater opportunities for positive effects on the historic environment and townscape, just by providing more detail relating specifically to the Town Centre. This is particularly beneficial for Harlow as it provides the opportunity to also identify those areas that are negatively impacting upon the historic townscape character and recommend redevelopment where appropriate, whereas Option 5.1 would give more focus to conserving the positive aspects. Option 5.2 is therefore considered to have the potential for significant long term positive effects, compared to Option 5.1 which is considered positive but unlikely to lead to any significant effects.

**Transport**
The policy options refer to protection and enhancement of the historic environment, identifying both positive and negative contributors within the Town Centre. As such the policy options are considered to have the potential for a neutral effect against this SA Topic.

**Water**
The policy options refer to protection and enhancement of the historic environment, identifying both positive and negative contributors within the Town Centre. As such the policy options are considered to have the potential for a neutral effect against this SA Topic.

**Summary:**
Both policy options will ensure that the historic environment is protected and enhanced; however, the appraisal has identified that Option 5.2 has greater potential for significant positive effects compared to Option 5.1. The creation of new policy (rather than relying on existing higher level policy), that is tailored to the Town Centre has the potential to ensure that the significance of designated and non-designated assets within the Town Centre are fully understood and appreciated, as well as providing the opportunity to address existing factors that currently negatively impact upon the historic character of the plan area. This is considered particularly beneficial for Harlow given the nature of the Town Centre; which contains few designated heritage assets and many non-designated heritage assets.

Given policy wording in emerging Local Plan Policy PL11 which identifies that “the greater the significance of the asset, the greater the weight that is given to the asset’s conservation”, it is considered that further policy development in the AAP can ensure that the significance of non-designated heritage assets in the Town Centre is fully appreciated.

No potential significant negative effects were identified at this stage.
### Policy Theme 6: Retail, Leisure and Evening Economy

#### Option 6.1: Existing policies and frontage designation

#### Option 6.2: Character / activity-based policy position

#### Option 6.3: Site based proposals and illustrative material

#### Option 6.4: Emphasis on cultural opportunities and creative uses

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<tr>
<td><strong>Air quality</strong></td>
<td>N</td>
<td>N</td>
<td>N</td>
<td>N</td>
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<tr>
<td>The policy options seek to address the identified need for retail floorspace, as well as ensure the competitiveness and viability of the Town Centre. Increasing the provisions within and enhancing the performance of the Town Centre has the potential to increase vehicular presence and indirectly negatively affect air quality. However, given that there are no AQMAs within or immediately adjacent to the Town Centre, and considering mitigation provided through other existing and emerging district wide policies (as well as potential movement policies arising in the AAP) which seek to achieve a modal shift and protect air quality, these effects are not considered likely to be of significance. All the policy options support increased provision in the Town Centre in line with the higher level policy framework, and the difference between the policy options relate to the approach taken to deliver improvement measures, and in where the emphasis should lie when it comes to place-making. However, the differing policy approaches do not affect the topic of Air Quality, as it is indirectly affected by their shared aim (increased provisions and enhanced performance); therefore none of the options are considered to have the potential for greater or lesser effects comparatively at this stage of the assessment.</td>
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| **Biodiversity and green infrastructure** | N | N | N | N |
| The policy options seek to address the identified need for retail floorspace, as well as ensure the competitiveness and viability of the Town Centre. Though the Options are considered unlikely to lead to any significant effects on this SA Topic, improving the public realm is one focus within Options 6.2 and 6.3. This could include enhanced green infrastructure provisions with the potential for minor positive effects. |

| **Climate change** | N | N | N | N |
| The policy options, which seek to deliver increased retail provisions within the Town Centre, could increase vehicular activity with the potential for minor indirect negative effects on air quality. Given existing and emerging policy mitigation, it is unlikely that these effects will be of significance. The policy options also seek to improve the public realm which can support a modal shift, and is likely to include increased green infrastructure provisions, with the potential for indirect positive effects on both air quality and climate change adaptation (through tree planting and shading for example). However, again these effects are unlikely to be of any significance. The difference between the policy options relates to the approach taken to deliver improvement measures, and in where the emphasis should lie when it comes to place-making. Options 6.2 and 6.3 are area or site specific and as such both have the potential to be detailed and prescriptive in terms of requirements for new development providing a greater sphere of influence than Option 6.1 which relies on existing and emerging district wide policy, and Option 6.4 which takes a less targeted approach, outlining general principles for development. The Town Centre is not located in an area of flood risk, as such none of the Options are considered likely to lead to any significant effects on flood risk now or in the foreseeable future. |
Discussion of potential effects and relative merits of options

**Community and wellbeing**

The policy options seek to address the identified need for retail floorspace, as well as ensure the competitiveness and viability of the Town Centre. The planned growth of the retail, leisure and evening economy has the potential to affect the health and wellbeing of communities. Increased growth can support communities through increased employment, leisure and recreational opportunities with the potential for minor long-term positive effects. The policy options recognise the role of the public realm in attracting future investment, and public realm improvements can support a modal shift and increased footfall, with potential indirect minor positive effects for health and wellbeing. None of these effects are considered likely to be significant at this stage of the assessment.

The difference between the policy options relates to the approach taken to deliver new development or improvement measures, and in where the emphasis should lie when it comes to place-making. Option 6.1 relies on existing and emerging district wide policy and is not proposing any new policy guidance. Whilst district wide policy will still ensure that new retail and leisure development is realised within the Town Centre, it fails to maximise on the potential for positive effects. New policy guidance could support communities to ensure that some of the benefits of development are directed to them, for example; policy guidance that supports the shared vision of diversification for the Town Centre; or site specific guidance that seeks to improve pedestrian or cycle access in a currently poorly accessible area. New policy guidance also supports inclusiveness by providing communities with further opportunities to shape the future development of the Town Centre. Options 6.2 to 6.4 are therefore considered to have greater potential for positive effects than Option 6.1.

Option 6.2 offers an overarching new policy to manage and support the overall performance through area specific guidance, clearly articulating geographical priorities with specific statements of intent for each opportunity area. This option is considered to be most ‘far-reaching’ in its potential for positive effects as it sets a spatial portrait but also supports this with qualitative detailing, and focuses on the Town Centre as a whole, compared to a piecemeal approach undertaken in Option 6.3 through site specific policies, and the less targeted approach taken in Option 6.4 relying on key identified principles. As such Option 6.2 is considered to have greater sphere of influence and thus greater potential for positive effects than the other options.

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**Economy and employment**

The policy options seek to address the identified need for retail floorspace, as well as ensure the competitiveness and viability of the Town Centre.

With the exception of Option 6.1, all of the options are considered to have the potential for minor long term positive effects by implementing measures to improve the Town Centre as a destination for retail, leisure and evening economies, and above the protections and directions provided by existing and emerging district wide policies.

Option 6.1 relies on existing or emerging policy to address the identified issues. Whilst this is not considered likely to lead to any significant negative effects, it also fails to maximise the potential opportunities for further positive effects in comparison to the other options. For example, new guidance in the AAP has the potential to identify key regeneration areas or future capacities, and create a locally shared vision for how these areas should develop and diversify. New policy guidance is also considered likely to be more consistent with, or supportive of, the higher level local plan, given the emphasis placed on the local level Action Plan for delivering retail priorities and place-making improvements in emerging Policy RS2 of the Local Plan.

The difference between Options 6.2 to 6.4 relates to the approach taken to deliver improvement measures, and in where the emphasis should lie when it comes to place-making, i.e. structuring place with spatially defined areas (character/activity based approach identified in Option 6.2 or site specific approach identified in Option 6.3) or qualitative features/measures that underpin the culture (as identified in Option 6.4).

Option 6.3 has the opportunity to support key sites for redevelopment with significant detail to ensure that spatial priorities or opportunities are realised, and any localised issues are addressed. It should be noted however, that the effectiveness of this approach is also dependent on the level of intervention to be pursued (see Strategic Growth assessment) and as such an element of uncertainty exists at this stage of the assessment.
Discussion of potential effects and relative merits of options

In comparison Option 6.4 is less likely to support key areas with prescribed detailing, but instead seeks to underpin any development with key principles that connect back with the original principles of the place.

Option 6.2 offers an overarching new policy to manage and support the overall performance and area specific guidance, clearly articulating geographical priorities with specific statements of intent for each opportunity area. This option is considered to be most ‘far-reaching’ in its potential for positive effects as it sets a spatial portrait but also supports this with qualitative detailing, and focuses on the Town Centre as a whole, compared to a piecemeal approach undertaken in Option 6.3 through site specific policies, and the less targeted approach taken in Option 6.4 relying on key identified principles. As such Option 6.2 is considered to have greater potential for significant positive effects than the other options.

Overall however, it is considered that a combination of these policy options is likely to maximise the potential for significant positive effects against this SA Topic.

Historic environment

The policy options seek to address the identified need for retail floorspace, as well as ensure the competitiveness and viability of the Town Centre. Improving the public realm is one focus within the policy options to improve the appeal of the town to residents, visitors and investors. Measures to improve the public realm have the potential to indirectly positively affect this SA Topic; however, at this stage of the assessment it is considered unlikely to lead to any significant effects.

The difference between the policy options relates to the approach taken to deliver improvement measures, and in where the emphasis should lie when it comes to place-making. Option 6.1 does not propose new policy guidance, with a reliance on existing and emerging higher level policy directions. As such, this option is less likely to pursue new opportunities or address localised issues with greater detailing. The rest of the policy options are likely to pursue public realm improvements (over and above existing and emerging policy directions) and as such are more likely than Option 6.1 to lead to further long term indirect positive effects on this SA Topic.

Options 6.2 is considered to be most ‘far-reaching’ in its potential for positive effects as it sets a spatial portrait but also supports this with qualitative detailing, and focuses on the Town Centre as a whole, compared to a piecemeal approach undertaken in Option 6.3 through site specific policies, and the less targeted approach taken in Option 6.4 relying on key identified principles.

As such Option 6.2 is considered at this stage to have greater potential for positive effects than the other options; however, these effects are still not likely to be significant.

Housing

The policy options relate to the provision of retail floorspace and supporting a competitive and viable Town Centre. As such the policy options are considered to have the potential for a neutral effect against this SA Topic.

Land and waste

The policy options seek to address the identified need for retail floorspace, as well as ensure the competitiveness and viability of the Town Centre. The potential development of brownfield sites or reinstatement of contaminated sites to accommodate this planned growth has the potential to positively affect this SA Topic. The extent of these effects is largely dependent on the level of intervention to be pursued (see Strategic Growth assessment) and thus the number of sites targeted by the plan; however, overall they are considered unlikely to be significant.

Landscape

The policy options seek to address the identified need for retail floorspace, as well as ensure the competitiveness and viability of the Town Centre. Improving the public realm is one focus within the policy options to improve the appeal of the town to residents, visitors and investors. Measures to improve the public realm, alongside the potential development of brownfield sites that are not positively contributing to the townscape, have the potential to positively affect this SA Topic; however, at this stage of the assessment it is considered unlikely to lead to any significant effects.

The development of the Town Centre (in terms of retail, leisure and evening economy) also has the potential to negatively affect the townscape, for example, through interrupting key
Discussion of potential effects and relative merits of options

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sightlines, or the development of previously undeveloped land. The extent of these effects is largely dependent on the potential sites for inclusion within the plan, as well as the level of intervention to be pursued (see Strategic Growth assessment). However, given existing or emerging policy mitigation (emerging Local Plan Policies including PL1 and PL7, Harlow Design Guide SPD) it is considered unlikely that these effects will be of significance.

The difference between the policy options relates to the approach taken to deliver improvement measures, and in where the emphasis should lie when it comes to place-making. Option 6.1 does not propose new policy guidance, with a reliance on existing and emerging higher level policy directions. This option avoids the potential for negative effects; however, it also fails to maximise the potential for positive effects.

The rest of the policy options are likely to seek enhanced townscape/public realm improvements (over and above existing and emerging policy directions) and as such are more likely than Option 6.1 to lead to long term indirect positive effects on this SA Topic.

Options 6.2 is considered to be most ‘far-reaching’ in its potential for positive effects as it sets a spatial portrait but also supports this with qualitative detailing, and focuses on the Town Centre as a whole, compared to a piecemeal approach undertaken in Option 6.3 through site specific policies, and the less targeted approach taken in Option 6.4 relying on key identified principles. As such Option 6.2 is considered at this stage to have greater potential for positive effects than the other options; however, these effects are still not likely to be significant.

Transport

As previously identified, the policy options, which seek to deliver increased retail provisions within the Town Centre, could increase vehicular activity with the potential for minor long-term negative effects, however, given mitigation provided through other existing and emerging district wide policies (as well as potential movement policies arising in the AAP) which seek to achieve a modal shift, these effects are not considered likely to be of significance.

The policy options also seek to improve the public realm which can support a modal shift, with the potential for indirect long-term positive effects. However, again these effects are unlikely to be of any significance.

The difference between the policy options relates to the approach taken to deliver improvement measures, and in where the emphasis should lie when it comes to place-making. Options 6.2 and 6.3 are area or site specific and as such, both have the potential to be detailed and prescriptive in terms of requirements for new development (for example public realm improvements that prioritise the pedestrian) providing a greater sphere of influence than Option 6.1 which relies on existing and emerging district wide policy, and Option 6.4 which takes a less targeted approach, outlining general principles for development.

Water

The policy options relate to the provision of retail floorspace and supporting a competitive and viable Town Centre, however at this stage of the assessment no development is proposed. As such the policy options are considered to have the potential for a neutral effect against this SA Topic.

Summary:

The policy options relate to the provision of retail floorspace and supporting a competitive and viable town centre. The general difference between the policy options relates to the approach taken to deliver improvement measures, and in where the emphasis should lie when it comes to place-making.

The appraisal has identified the potential for significant positive effects on the Economy as a result of implementing Option 6.2. It proposes an overarching new policy to manage and support the overall performance as well as area specific guidance, clearly articulating geographical priorities with specific statements of intent for each Opportunity Area. This is considered to be most ‘far-reaching’ in its potential for positive effects as it sets a spatial portrait but also supports this with qualitative detailing, and focuses on the Town Centre as a whole. This is compared to a piecemeal approach undertaken in Option 6.3 through site specific policies, and the less targeted approach taken in Option 6.4 relying on key identified principles. Option 6.1 does not propose new policy guidance, and as such this option is considered less likely to pursue localised opportunities or address localised issues in greater detail.

No significant negative effects were identified at this stage.
Policy Theme 7: Offices and Workspace

Option 7.1: Promote Harlow Town Centre as an office location
Option 7.2: Focus on enhancing the complementary role of the Town Centre in supporting employment growth throughout the District
Option 7.3: Promote Harlow Town Centre as a location for SMEs and smaller businesses

Discussion of potential effects and relative merits of options

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### Air quality
The policy options seek to develop the role of employment workspace in the Town Centre, and explore the types of business that the Town Centre should attract in the future to secure its vitality and viability.

All of the options seek to deliver new jobs within the Town Centre, and as such they seek to increase footfall within this area. This has the potential to indirectly negatively affect air quality through increased vehicular use. There are no AQMAs within or immediately surrounding the Plan area, and given the emphasis on improving public transport connections and accessibility within the plan itself, alongside existing and emerging policy guidance (emerging Local Plan Policy IN1, Harlow Design Guide SPD), it is considered unlikely that the effects will be of significance.

The difference between the options relates to the type of employment development (size, use and connections to existing employment areas). As such the options do not differ significantly from each other in their potential for effects against this SA Topic.

### Biodiversity and green infrastructure
The policy options seek to develop the role of employment workspace in the Town Centre, and explore the types of business that the Town Centre should attract in the future to secure its vitality and viability. As such the policy options are considered to have the potential for a neutral effect against this SA Topic.

### Climate change
The policy options seek to develop the role of employment workspace in the Town Centre, and explore the types of business that the Town Centre should attract in the future to secure its vitality and viability.

As identified in the topic of Air Quality above, all of the options seek to deliver new jobs within the Town Centre, and as such they seek to increase footfall within this area. This has the potential to indirectly negatively affect air quality through increased vehicular use. However, given the emphasis on improving public transport connections and accessibility within the plan itself, alongside existing and emerging policy guidance (emerging Local Plan Policy IN1, Harlow Design Guide SPD), it is considered unlikely that the effects will be of significance.

The difference between the options relates to the type of employment development (size, use and connections to existing employment areas). As such the options do not differ significantly from each other in their potential for effects against this SA Topic.

The Town Centre is not in a flood risk area, as such none of the options are considered likely to lead to any significant effects on flooding now or in the foreseeable future.

### Community and wellbeing
The policy options seek to develop the role of employment workspace in the Town Centre, and explore the types of business that the Town Centre should attract in the future to secure its vitality and viability.

All of the options seek to deliver new jobs within the Town Centre which could lead to minor positive effects on this SA Topic, by potentially reducing inequalities. The difference between the options relates to the type of employment development (size, use and connections to existing employment areas). Options 7.2 and 7.3 are considered most likely to maximise the potential positive effects for communities, health and wellbeing, in Option 7.3 by responding to community aspirations for smaller business and business start-up space, and in Option 7.2 by seeking to increase connectivity between employment areas, therefore increasing accessibility. The potential effects however are considered unlikely to be of significance at this stage of the assessment.
Discussion of potential effects and relative merits of options

**Economy and employment**

All of the options seek to improve the role and function of employment workspace within the Town Centre, with the potential for **significant long term positive effects** on this SA Topic.

Option 7.1 proposes to promote the Town Centre as an office location. Historically this has not proven to be of great success (considering existing high vacancy rates), and the option is complicated further by Permitted Development Rights in which office development can be converted to housing (already apparent in Harlow Town Centre). Despite planning efforts therefore, there are external obstacles in achieving this aspiration. As such it is considered that this option may not maximise the potential for positive effects in so far as the other options could.

Option 7.3 also proposes to promote the Town Centre as an office location, but seeks to accommodate SMEs (small-medium sized enterprises) and smaller businesses. Although subject to the same constraints as identified in Option 7.1, consultation to date has highlighted a local aspiration for the Town Centre to support the needs of smaller businesses and business start-ups, which this Option has the potential to address.

Option 7.2 on the other hand seeks to establish the role of the Town Centre within the wider economic vitality of the District, and how it can connect with and support employment areas outside of the centre. This option allows for more discussion around the role the Town Centre can play in supporting more sustainable uses, including delivering central housing to increase accessibility to existing and future employment areas. Given the precedent set by existing office workspace (of underachieving against economic aspirations for the Town Centre) this option allows for new avenues to be explored which could be more successful in delivering local benefits and ensuring the long term vitality of the area. Furthermore the option can address local aspirations to diversify, and increased housing in the central area can indirectly support aspirations to improve the nightlife atmosphere of the central area.

It is therefore considered that Option 7.2 has the potential for more ‘far-reaching’ positive effects than the other options; however, it is likely that a combination of both Option 7.2 and 7.3 would lead to positive effects of greater significance.

**Historic environment**

The policy options seek to develop the role of employment workspace in the Town Centre, and explore the types of business that the Town Centre should attract in the future to secure its vitality and viability. All of the options seek to deliver new jobs within the Town Centre, which has the potential for both positive and negative effects against this SA Topic. New employment development could detract from the historic character with the potential for long term negative effects; however, given existing and emerging policy mitigation (emerging Local Plan Policies WE4 and PL11 and Harlow Design Guide SPD) it is considered highly unlikely that negative effects will arise. New employment development also has the potential to positively affect the historic environment through public realm enhancements, and improvements to accessibility and signage. It is considered however that these effects are unlikely to be of significance.

The difference between the options relates to the type of employment development (size, use and connections to existing employment areas). As such the options do not differ significantly from each other in their potential for effects against this SA Topic.

**Housing**

The policy options seek to develop the role of employment workspace in the Town Centre, and explore the types of business that the Town Centre should attract in the future to secure its vitality and viability. As such all of the policy options, except for Option 7.2 are considered to have the potential for a **neutral effect** against this SA Topic. Option 7.2 on the other hand, considers the potential to deliver new housing within the central area, supporting local communities’ needs in an accessible location, with the potential for minor long term positive effects.
## Discussion of potential effects and relative merits of options

### Land and waste

The policy options seek to develop the role of employment workspace in the Town Centre, and explore the types of business that the Town Centre should attract in the future to secure its vitality and viability. All of the options seek to deliver new jobs within the Town Centre, which has the potential for positive effects through the regeneration of existing brownfield land. The difference between the options relates to the type of employment development (size, use and connections to existing employment areas). As such the options do not differ significantly from each other in their potential for effects against this SA Topic.

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<th>Option</th>
<th>Significant effect?</th>
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<tr>
<td>Opt 7.1</td>
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<tr>
<td>Opt 7.2</td>
<td>N</td>
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<tr>
<td>Opt 7.3</td>
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### Landscape

The policy options seek to develop the role of employment workspace in the Town Centre, and explore the types of business that the Town Centre should attract in the future to secure its vitality and viability. All of the options seek to deliver new jobs within the Town Centre, which has the potential for minor long term positive effects through the regeneration of land, potential public realm enhancements, and improvements to accessibility. It is considered however that these effects are unlikely to be of significance.

The difference between the options relates to the type of employment development (size, use and connections to existing employment areas). As such the options do not differ significantly from each other in their potential for effects against this SA Topic.

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<td>Opt 7.1</td>
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<tr>
<td>Opt 7.2</td>
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<tr>
<td>Opt 7.3</td>
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### Transport

The policy options seek to develop the role of employment workspace in the Town Centre, and explore the types of business that the Town Centre should attract in the future to secure its vitality and viability. All of the options seek to deliver new jobs within the Town Centre which could increase vehicular presence, with the potential for minor long term negative effects. However, given the emphasis on improving public transport connections and accessibility within the plan itself, alongside existing and emerging policy guidance (emerging Local Plan Policy IN1, Harlow Design Guide SPD), it is considered unlikely that the effects will be of significance. New development within the Town Centre also has the potential to address localised accessibility issues, and support enhancements that promote a modal shift, with the potential for minor long term positive effects.

Options 7.1 and 7.3 seek to promote Harlow as an office location (albeit for smaller businesses in Option 7.3), and given the precedent set by existing office workspace (of underachieving against economic aspirations for the Town Centre) these options may not capitalise on opportunities to encourage the inward investment required to deliver townscape, accessibility and public realm improvements.

Option 7.2 seeks to explore the connections between the Town Centre and existing employment sites and how the role of the Town Centre can support these wider areas. This option therefore has greater scope for transport and accessibility enhancements, through the aspiration for connected development within and beyond the central area. The option seeks to explore different central uses, such as housing, which can also improve the accessibility of employment areas for residents. This option is therefore considered to have the potential for significant long-term positive effects against this SA Topic.

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<tr>
<td>Opt 7.1</td>
<td>N</td>
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<tr>
<td>Opt 7.2</td>
<td>Y</td>
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<tr>
<td>Opt 7.3</td>
<td>N</td>
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</table>

### Water

The policy options seek to develop the role of employment workspace in the Town Centre, and explore the types of business that the Town Centre should attract in the future to secure its vitality and viability. As such the policy options are considered to have the potential for a neutral effect against this SA Topic.

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<td>Opt 7.1</td>
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<tr>
<td>Opt 7.2</td>
<td>N</td>
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<tr>
<td>Opt 7.3</td>
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### Summary:

The appraisal has identified that all of the options are likely to lead to long term significant positive effects for the SA Topic of Economy and Employment, as they all seek to develop the economic role of the Town Centre.

Option 7.1 proposes the promotion of the Town Centre as an office location. Historically this has not proven to be of great success (considering existing high vacancy rates), and the option is complicated further by Permitted Development Rights in which office development can be converted to housing (already apparent in Harlow Town Centre). Therefore, despite planning policy efforts, there are external obstacles that conflict with the objectives of this option. As such, it is considered that this option may not maximise the potential for positive effects in so far...
Discussion of potential effects and relative merits of options

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<th>Significant effect?</th>
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<th>Opt 7.2</th>
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as the other options could.

Option 7.2 has the potential for positive effects of greater significance in terms of the economy, given the opportunity for diversification. This option also has the potential for significant positive effects for the SA Topic of Transport as it seeks to improve overall connectivity between employment areas within and outside of the Town Centre. Option 7.3 could address local aspirations for employment space to meet the needs of smaller businesses and business start-ups. Therefore, it is considered that a combination of these two options (Options 7.2 and 7.3) is most likely to maximise the potential for positive effects. No potential significant negative effects have been identified at this stage.
### Policy Theme 8: Public and Community Infrastructure

**Option 8.1: Links**

**Option 8.2: Co-location / efficient buildings**

#### Discussion of potential effects and relative merits of options

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<th>Significant effect?</th>
<th>Opt 8.1</th>
<th>Opt 8.2</th>
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<tr>
<td><strong>Air quality</strong></td>
<td>N</td>
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</table>

The policy options seek to improve access to and provision of public and community infrastructure. Although the options explore potential relocations, they do not propose new infrastructure and as such are considered to have the potential for a neutral effect against this SA Topic.

| **Biodiversity and green infrastructure** | N | N |

The policy options seek to improve access to and provision of public and community infrastructure. The options do not propose new infrastructure and as such are considered to have the potential for a neutral effect against this SA Topic.

| **Climate change** | N | N |

The policy options seek to improve access to and provision of public and community infrastructure. Although the options explore potential relocations, they do not propose new infrastructure and as such are considered to have the potential for a neutral effect against this SA Topic.

| **Community and wellbeing** | Y | Y |

All of the policy options seek to improve the quality of, and access to, community facilities with the potential for significant long term positive effects against this SA Topic.

Option 8.1 explores the potential to improve pedestrian links to the Town Centre. This could not only improve access to all facilities and services within the Town Centre, but also create connections to existing community infrastructure outside of the Town Centre like Harlow College and Harlow Leisurezone which is currently isolated by Velizy Avenue.

Option 8.2 looks at an approach of relocating certain facilities to the north of the Town Centre supporting co-location, and building efficiency. This option responds to the spatial objective to rebalance the focus of gravity northwards.

Both options present opportunities for long term positive effects individually; however, it is considered that a combination of the approaches is realistic and likely to maximise the potential for positive effects against this SA Topic.

| **Economy and employment** | N | Y |

The policy options seek to improve access to and provision of public and community infrastructure. Option 8.1 seeks to improve pedestrian access to the Town Centre, which could lead to indirect minor positive effects on the economy through an improved public realm attracting inward investment.

Option 8.2 looks at an approach of relocating certain facilities to the north of the Town Centre supporting co-location, and building efficiency. Co-location and building efficiency can support higher densities and more productivity overall and relocation could free up prime space in the south for economic development that meets local needs (e.g. to meet aspirations for diversification). It is therefore considered that this option has the potential for significant long-term positive effects against this SA Topic.

| **Historic environment** | N | N |

The policy options seek to improve access to and provision of public and community infrastructure. Although the options do not propose new infrastructure development, Option 8.2 does explore the possibility for relocation of some existing community/ civic uses (e.g. library, police station and council offices), which has the potential to both negatively and positively affect the historic character of the Town Centre. Given existing and emerging policy mitigation (emerging Local Plan Policies WE4 and PL11, and Harlow Design Guide SPD) it is considered unlikely that any relocation will lead to significant negative effects. The potential relocations identified in Option 8.2 could however lead to minor long term positive effects through likely associated public realm/ signage improvements.
Discussion of potential effects and relative merits of options

### Housing
The policy options seek to improve access to and provision of public and community infrastructure. The options do not propose housing development and as such are considered to have the potential for a neutral effect against this SA Topic.

### Land and waste
The policy options seek to improve access to and provision of public and community infrastructure. Although the options do not propose new infrastructure development, Option 8.2 does explore the possibility for relocation of some existing community/civic uses (e.g. library, police station and council offices) to include co-location. This has the potential to accommodate more uses within a smaller area, and provide brownfield land/regeneration opportunities in the south of Town Centre, with the potential for minor long term positive effects against this SA Topic.

### Landscape
The policy options seek to improve access to and provision of public and community infrastructure. Although the options do not propose new infrastructure development, Option 8.2 does explore the possibility for relocation of some existing community/civic uses (e.g. library, police station and council offices), which has the potential to both negatively and positively affect townscape character. Given existing and emerging policy mitigation (emerging Local Plan Policy PL1, Harlow Design Guide SPD) it is considered unlikely that any relocation will lead to significant negative effects. The potential relocations could however lead to minor long term positive effects through likely associated townscape improvement measures.

### Transport
The policy options seek to improve access to and provision of public and community infrastructure. Option 8.1 seeks to improve the pedestrian links connecting the Town Centre with the surrounding communities; this could support a modal shift with the potential for minor long term positive effects against this SA Topic.

Option 8.2 explores the possibility for relocating some of the existing community/civic uses to the north of the Town Centre, contributing to the spatial objective of rebalancing the focus of gravity northwards. Whilst both options are likely to positively effect this SA Topic, the effects are considered unlikely to be of significance.

### Water
The policy options seek to improve access to and provision of public and community infrastructure. Although the options explore potential relocations, they do not propose new infrastructure and as such are considered to have the potential for a residual neutral effect against this SA Topic.

### Summary:
The appraisal has identified that both of the options have the potential for long term significant positive effects against the SA Topic of Community and Wellbeing, as both options seek to improve the quality of, and access to, community facilities. In particular Option 8.1 could not only improve connections to facilities and services within the Town Centre but also community infrastructure outside of the Town Centre, like the Harlow Leisurezone which is currently isolated by Velizy Avenue.

Option 8.2 is also considered to have the potential for long term significant positive effects for the economy by improving building efficiency, freeing up prime space and supporting higher densities and thus higher productivity in the Plan area. This option can support the spatial objective to rebalance the north and south areas of the Town Centre.

Whilst both options present opportunities for significant positive effects, it is considered that a combination of the approaches would be more likely deliver a positive effect of significance. No significant negative effects were identified at this stage.
## Discussion of potential effects and relative merits of options

### Air quality

The level of housing growth has already been identified through the higher level Local Plan. The options explore how housing can support the vitality and viability of the Town Centre, and whether it is appropriate or necessary to introduce new residential policy guidance applying to either the whole Town Centre or specific sites. The effects on air quality are largely dependent on the level and distribution of growth, and as such it is considered that Options 9.1, 9.2 and 9.4 have the potential for a **neutral effect** against this SA Topic. Option 9.3 on the other hand seeks to improve accessibility which can support a modal shift and lead to indirect minor positive effects for air quality. It is also appreciated however that this option could also be easily incorporated within Options 9.2 and 9.4 to generate the same potential.

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### Biodiversity and green infrastructure

The level of housing growth has already been identified through the higher level Local Plan. The options explore how housing can support the vitality and viability of the Town Centre, and whether it is appropriate or necessary to introduce new residential policy guidance applying to either the whole Town Centre or specific sites. The effects on biodiversity and green infrastructure are largely dependent on the level and location of development, and as such it is considered that at this stage of assessment, the options have the potential for a **neutral effect** against this SA Topic.

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### Climate change

The level of housing growth has already been identified through the higher level Local Plan. The options explore how housing can support the vitality and viability of the Town Centre, and whether it is appropriate or necessary to introduce new residential policy guidance applying to either the whole Town Centre or specific sites. As identified above, the effects on air quality are largely dependent on the level and distribution of growth, and whilst increasing accessibility as outlined in Option 9.3 can support a modal shift and contribute to climate change mitigation, the effects are considered unlikely to be of significance.

The Town Centre is not located in an area of flood risk, and the options are unlikely to lead to any significant effects on flood risk now, or in the foreseeable future.

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### Community and wellbeing

The options explore how housing can support the vitality and viability of the Town Centre, and whether it is appropriate or necessary to introduce new residential policy guidance applying to either the whole Town Centre or specific sites. Therefore, the AAP has the ability to explore the types of housing suitable for this central location, and contribute to achieving mixed and balanced communities. A key issue for housing in this central location is the constraints to delivery of affordable housing, and only Option 9.2 seeks to explore this aspect of social inclusion, with the potential therefore for positive effects of greater significance than the other options. The option identifies the challenges to viability by meeting the aspirational targets for the delivery of affordable housing, and seeks to support a reduced target. Although this would naturally seem to the reader as a negative effect on social inclusion, in reality it is likely to increase delivery given that schemes are made more viable. The higher target of 30% within the Town Centre may deter the necessary investment when viability becomes a constraint, and thus ultimately lead to lower levels of development. Option 9.3 seeks to focus on accessibility improvements which can support a modal shift and healthier lifestyles with the potential for minor long term positive effects. It should be noted however, that increased accessibility can easily be incorporated within Options 9.2 and 9.4. In reality a combination of the options is likely to maximise the potential for positive effects (a Town Centre policy that includes an emphasis on increased accessibility and is supported by site specific policies).

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<td>9.4</td>
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Discussion of potential effects and relative merits of options

### Economy and employment

The options explore how housing can support the vitality and viability of the Town Centre, and whether it is appropriate or necessary to introduce new residential policy guidance applying to either the whole Town Centre or specific sites. The AAP therefore has the ability to explore the economic role of housing within the Town Centre, and how housing can contribute to its overall performance.

Option 9.1 fails to capitalise on this opportunity, and by relying on existing and emerging policy guidance it is considered less likely to maximise the potential for positive effects.

The rest of the options seek to develop this economic role, either through a Town Centre wide policy direction (Option 9.2), site specific guidance (Option 9.4), or through a focus on increased accessibility and stronger connections to areas surrounding the Plan area (Option 9.3).

Option 9.3 focuses on improving accessibility and maximising the potential for indirect positive effects (for example, public realm improvements which encourage inward investment), which has the potential for minor long term positive effects on this SA Topic. Option 9.4 can provide greater detailing and prescriptive measures to ensure that sites deliver economic benefits; however, it is a piecemeal approach which is less likely to communicate the aspirations for the role of housing within the Town Centre overall.

Option 9.2 is considered to have the greatest scope for positive effects, as it seeks to identify and assert how the role of housing in the Town Centre differs from that found in surrounding neighbourhoods, and shows appreciation for the different constraints found in the Plan area (particularly in delivering affordable housing). It also has the potential to encompass an emphasis on increased accessibility (Option 9.3). It is therefore considered that this option has the greatest potential for long term positive effects.

Although Option 9.2 is considered more favourably here, in reality a combination of these approaches (Town Centre wide housing policy exploring the role of housing, encompassing an emphasis on improved accessibility, and supported by site specific detailed guidance) is most likely to maximise the potential for significant long term positive effects.

### Historic environment

The options explore how housing can support the vitality and viability of the Town Centre, and whether it is appropriate or necessary to introduce new residential policy guidance applying to either the whole Town Centre or specific sites. The delivery of new housing has the potential to both negatively and positively affect the historic townscape; however, given existing and emerging policy guidance (emerging Local Plan Policies WE4 and PL11, and Harlow Design Guide SPD) it is considered unlikely that new housing will lead to any significant negative effects.

The identified potential for regeneration within the Town Centre could lead to long term minor positive effects by improving areas that currently detract from the historic townscape and by improving accessibility and signage. Therefore, the AAP has the opportunity to place emphasis on the regeneration of key areas, which support character enhancements. Option 9.1 fails to capitalise on this opportunity and as such is considered less likely to lead to significant positive effects. A Town Centre housing policy (Option 9.2) or site specific housing policies (Option 9.4) on the other hand have the opportunity to identify and aspire to historic townscape improvements, and have greater potential for long term positive effects against this SA Topic than the other options.

### Housing

The options tease out the need to explore how housing can support the vitality and viability of the Town Centre. Housing needs and opportunities within the Town Centre differ from those of the surrounding neighbourhoods, in such that central housing can also play an economic role; attracting significant investment, and in realising wider priorities such as accessibility and public realm improvements.

Option 9.1 relies on emerging guidance in Local Plan policy. This option is unlikely to lead to any negative effects; however, it is considered that it fails to capitalise on potential opportunities for greater positive effects, for example through providing guidance which identifies how housing can support the wider aspirations for the Town Centre.
Discussion of potential effects and relative merits of options

Option 9.2 on the other hand provides significant scope to explore the role of housing in the central area, how it differs from the surrounding neighbourhoods, and how it can contribute to delivering positive benefits for the Town Centre as well as local communities. This option also seeks to address the identified constraints in delivering affordable housing in this area. Without this (i.e. Options 9.1 and 9.3), the district wide housing policy constraints could mean that aspirations for housing development in the central area may not be fully realised. It also explores appropriate housing types which can support mixed and balanced communities. It is considered that Option 9.2 therefore has the potential to lead to significant long term positive effects for this SA Topic.

Option 9.3 promotes a focus on improving connections, so that new housing supports increased accessibility and linkages between neighbourhoods and the Town Centre. Although this is likely to lead to positive effects, it is considered that this option is likely to be addressed through movement themed policies, and as such fails to maximise the potential for tailoring policy to address housing related issues and opportunities, such as, housing types suitable for the Town Centre, or ensuring viability whilst delivering affordable housing.

Option 9.4 would provide guidance at a site specific scale. Site specific policy is likely to be highly detailed and prescriptive and thus can ensure that site aspirations are realised. However, it is also considered to be a piecemeal approach; with no overarching policy relating to Town Centre housing, the district wide policies (and thus constraints identified above) would apply to any sites outside of those identified in the AAP that may come forward over the life of the plan.

It is considered overall that Option 9.2 provides a greater scope for potential positive effects; however, in reality a combination of these approaches is likely to maximise the potential for positive effects. For example; a Town Centre specific housing policy, which encompasses an emphasis on increased accessibility, and is supported by site specific guidance; has the potential to deliver all of the positive effects identified above.

### Land and waste

The options explore how housing can support the vitality and viability of the Town Centre, and whether it is appropriate or necessary to introduce new residential policy guidance applying to either the whole Town Centre or specific sites. As such the options at this stage of assessment do not vary significantly in their potential for effects against this SA Topic, which is largely dependent on the location of development, and the level of intervention to be pursued (see Strategic Growth assessment). Further assessment would be required once this is established.

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<tr>
<th>Option</th>
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### Landscape

The options explore how housing can support the vitality and viability of the Town Centre, and whether it is appropriate or necessary to introduce new residential policy guidance applying to either the whole Town Centre or specific sites. The delivery of new housing has the potential to both negatively and positively affect the townscape; however, given existing and emerging policy guidance (emerging Local Plan Policy PL1, Harlow Design Guide SPD) it is considered unlikely that new housing will lead to any significant negative effects.

The identified potential for regeneration within the Town Centre could lead to long term minor positive effects by improving areas that currently detract from the townscape. Therefore the AAP has the opportunity to place emphasis on the regeneration of key areas, which support townscape enhancements. Option 9.1 fails to capitalise on this opportunity and as such is considered less likely to lead to significant positive effects. A Town Centre housing policy (Option 9.2) or site specific housing policies (Option 9.4) on the other hand have the opportunity to identify and aspire to townscape improvements, and have greater potential for long term positive effects against this SA Topic than the other options.

### Transport

The policy options seek to contribute to the delivery of the identified housing need, and explore the ways in which housing can support the vitality and viability of the Town Centre. New housing in the Town Centre has implications for traffic and transport. It is likely to increase vehicular presence, including levels of parking, with the potential for minor long term negative effects. Given existing and emerging policy mitigation, it is considered unlikely that these effects will be of significance.

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<th>Option</th>
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Discussion of potential effects and relative merits of options

New housing in the Town Centre however would be centrally located with good access to public transport (central bus station and rail station north of the Town Centre), and located in close proximity to a number of employment opportunities. This can support a modal shift with the potential for minor long term positive effects.

The different options explore how this new housing could support the vitality and viability of the Town Centre, and whether it is appropriate or necessary to introduce new policy guidance applying to either the whole Town Centre or specific sites. In terms of increasing accessibility, the AAP presents opportunities to specify actions that can be taken to deliver improvements or address identified issues or constraints. In this respect, Option 9.1 is considered less likely to maximise the potential for positive effects, given its approach of relying on existing and emerging district wide policy guidance. Option 9.2 however seeks to explore the role of housing within the Town Centre, and how new housing delivery could contribute to wider aspirations for the Town Centre, including for example public realm and accessibility improvements with the potential for positive effects of greater significance. Option 9.3 provides a focus on increased accessibility and improved connections between neighbourhoods and the Town Centre, which obviously has the potential for direct significant positive effects on this SA Topic. Option 9.4 proposes to provide policy guidance at a site specific scale. This provides opportunities for greater detail and prescriptive guidance that could address site level issues and opportunities.

Although site specific guidance could be beneficial in addressing known localised accessibility issues and in identifying potential opportunities at the site level - it is considered that given the strategic nature of connectivity, a Town Centre scale approach could be more appropriate in identifying and addressing opportunities and constraints. In reality it is considered that a combination of these approaches would maximise the potential for positive effects for this SA Topic.

Water

All of the options seek to contribute to the delivery of the identified housing needs, which has the potential for negative effects on both water supply and quality. The level of housing growth has already been established through the higher level Local Plan, which also provides policy mitigation (emerging Policy PL10) to minimise/ avoid the potential negative effects, thus ensuring these effects are not of significance. The AAP options explore how housing can support the vitality and viability of the Town Centre, and whether it is appropriate or necessary to introduce new policy guidance applying to either the whole Town Centre or specific sites. As such the options at this stage of assessment do not vary significantly in their potential for effects against this SA Topic, which is largely affected by the overall level of growth. Further assessment would be required once potential locations for development have been identified (dependent of the level of intervention to be pursued - see Strategic Growth assessment).

Summary:

With the exception of Option 9.1, all of the options capitalise on the opportunity that the AAP presents to identify the economic role housing can play in meeting wider aspirations for the Town Centre. As Option 9.1 fails to capture this opportunity it is considered to be less likely to capitalise on opportunities and result in a positive effect of significance compared to the other options.

The appraisal has identified the potential for significant positive effects in Option 9.2 for the SA Topics of Housing and Transport. Alongside delivering housing in an accessible location, the option is considered to provide significant scope to explore the role of housing in the central area, how it differs from the surrounding neighbourhoods, and how it can contribute to delivering benefits for the Town Centre and local communities. Similarly, Option 9.3 focuses on improving accessibility with the potential for significant positive effects against the SA Topic of Transport.

Option 9.4 can provide greater detail to address localised opportunities and constraints; however, it will not capture windfall sites, and in considering the strategic nature of connectivity, is less likely to lead to positive effects against other SA Topics such as Transport. As such, it is considered likely that a combination of Options 9.2, 9.3 and 9.4 is likely to maximise the potential for a positive effect of significance. No significant negative effects have been identified at this stage.
Policy Theme 10: Creative Uses
Option 10.1: Review existing underutilised sites for possible arts spaces within the town
Option 10.2: Review funding opportunities for a replacement theatre

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<tr>
<td><strong>Option 10.1</strong></td>
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<tr>
<td><strong>Option 10.2</strong></td>
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### Discussion of potential effects and relative merits of options

#### Air quality

The policy options seek to increase the cultural offer of the Town Centre, by either reviewing underutilised spaces to be repurposed for arts, or by reviewing funding opportunities for a replacement theatre. Option 10.1 proposes an approach of a presumption in favour of creative development, particularly seeking the development of a gallery, spaces for young people and/or a music venue. Option 10.2 proposes to explore the potential for new theatre facilities. Both options therefore seek to improve the provision of cultural facilities, which is likely to increase the number of people accessing the central area. This could increase vehicular presence in the Town Centre with the potential for minor long term indirect negative effects on air quality. Given that there are no identified AQMAs in the Town Centre or immediately surrounding it; existing and emerging Policy mitigation which supports a modal shift (emerging Policy IN1 and Harlow Design Guide SPD); and the emphasis within the AAP itself on improving accessibility; it is considered unlikely that these effects will be of significance.

#### Biodiversity and green infrastructure

The policy options seek to increase the cultural offer of the Town Centre, by either reviewing underutilised spaces to be repurposed for arts (Option 10.1), or by reviewing funding opportunities for a replacement theatre (Option 10.2). Neither option is considered likely to affect the SA Topic of biodiversity and green infrastructure at this stage of the assessment, with the potential for neutral effects. This will need to be re-assessed once potential locations for development have been identified.

It should also be noted that there is the potential to encompass green infrastructure enhancement aspirations in the pursuit of Option 10.1, in such that identified spaces for art could also deliver new or improved green infrastructure provisions.

#### Climate change

Both of the options seek to improve the provision of cultural facilities in the Town Centre which is likely to increase the number of people accessing the central area. As identified above this could increase vehicular presence with the potential for minor long term negative effects on climate change mitigation. However, given existing and emerging policy mitigation, as well as an emphasis within the AAP itself on improving accessibility, it is considered unlikely that these effects will be of significance.

As the Town Centre is not in a flood risk area, the options are unlikely to lead to any significant effects on flood risk now or in the foreseeable future.

#### Community and wellbeing

Both of the options seek to improve the provision of cultural facilities in the Town Centre, which has the potential for long term significant positive effects on communities, health and wellbeing. Both options are likely to bolster social inclusiveness, but Option 10.1 specifically addresses identified community aspirations to deliver new and improved spaces for young people as well as a replacement music venue. Option 10.2 will improve theatre facilities, however given the existence of Harlow Playhouse, this option does not diversify or expand the range of facilities which the Town Centre currently offers. In this respect, Option 10.1 is considered to provide a greater scope for potential positive effects.

#### Economy and employment

Both of the policy options seek to improve the provision of cultural facilities in the Town Centre, which has the potential for minor long term positive effects on the economy; particularly in terms of developing the night-time economy, which consultation to date has identified as a community aspiration for the Town Centre. Option 10.1 specifically addresses identified community aspirations to deliver new and improved spaces for young people as well as a replacement music venue. Option 10.2 will improve theatre facilities, however given the existence of Harlow Playhouse, this option does not diversify or expand the range of facilities which the Town Centre currently offers. In
Discussion of potential effects and relative merits of options

this respect, Option 10.1 is considered to provide a greater scope for potential positive effects.

### Historic environment

The policy options seek to increase the cultural offer of the Town Centre, by either reviewing underutilised spaces to be repurposed for arts (Option 10.1), or by reviewing funding opportunities for a replacement theatre (Option 10.2).

A replacement theatre has the potential for both minor negative and positive effects on the historic environment. Given existing and emerging policy mitigation (emerging Local Plan Policies WE4 and PL11, and Harlow Design Guide SPD) it is considered unlikely that negative effects will arise. A new theatre has the potential for public realm enhancements that may lead to minor positive effects on the historic character, particularly if enhancements improve access or signage.

Option 10.1 could see underutilised spaces regenerated, thus delivering public realm enhancements that are more likely to improve accessibility and signage with greater potential for minor long term positive effects. Overall it is considered unlikely that the options will lead to any significant effects; however, this would need to be re-assessed once potential locations for development have been identified.

### Housing

The policy options seek to increase the cultural offer of the Town Centre, by either reviewing underutilised spaces to be repurposed for arts, or by reviewing funding opportunities for a replacement theatre. Neither option is considered likely to affect the SA Topic of housing, with the potential for neutral effects.

### Land and waste

The policy options seek to increase the cultural offer of the Town Centre, by either reviewing underutilised spaces to be repurposed for arts, or by reviewing funding opportunities for a replacement theatre. Neither option is considered likely to affect the SA Topic of land and waste, with the potential for neutral effects.

### Landscape

The policy options seek to increase the cultural offer of the Town Centre, by either reviewing underutilised spaces to be repurposed for arts (Option 10.1), or by reviewing funding opportunities for a replacement theatre (Option 10.2).

A replacement theatre has the potential for both minor negative and positive effects on townscape. Given existing and emerging policy mitigation (emerging Local Plan Policy PL1, Harlow Design Guide SPD) it is considered unlikely that negative effects will arise. A new theatre has the potential for public realm enhancements that may lead to minor positive effects on townscape character.

Option 10.1 could see underutilised spaces regenerated, thus delivering public realm enhancements that improve the townscape with the potential for minor long term positive effects. Overall it is considered unlikely that the options will lead to any significant effects; however, this would need to be re-assessed once potential locations for development have been identified.

### Transport

The policy options seek to increase the cultural offer of the Town Centre, by either reviewing underutilised spaces to be repurposed for arts, or by reviewing funding opportunities for a replacement theatre.

Option 10.1 proposes an approach of a presumption in favour of creative development, particularly seeking the development of a gallery, spaces for young people and/or a music venue. Option 10.2 proposes to explore the potential for new theatre facilities. Both options therefore seek to improve the provision of cultural facilities, which is likely to increase the number of people accessing the central area. This could increase vehicular presence in the Town Centre with the potential for minor long term negative effects on transport. However, given existing and emerging Policy mitigation which supports a modal shift (emerging Policy IN1 and Harlow Design Guide SPD), and the emphasis within the AAP itself on improving accessibility; it is considered unlikely that these effects will be of significance. The potential for new cultural facilities development to support public realm and accessibility enhancements which support a modal shift, could lead to minor long term indirect positive effects on transport. At this stage of assessment it is considered unlikely that any
Discussion of potential effects and relative merits of options

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<td>Opt 10.1</td>
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<td>Opt 10.2</td>
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**Water**

The policy options seek to increase the cultural offer of the Town Centre, by either reviewing underutilised spaces to be repurposed for arts, or by reviewing funding opportunities for a replacement theatre. Neither option is considered likely to affect the SA Topic of water, with the potential for neutral effects.

**Summary:**
Both of the options seek to improve the provision of cultural facilities in the Town Centre, by either reviewing underutilised spaces to be repurposed for arts (Option 10.1), or by reviewing funding opportunities for a replacement theatre (Option 10.2), which has the potential for long term significant positive effects on the Communities and Wellbeing SA Topic. Whilst Option 10.2 will improve theatre facilities, Option 10.1 could diversify and expand the range of facilities which the Town Centre currently offers, and in this respect, is considered to provide a greater scope for potential positive effects.

No significant negative effects have been identified at this stage.
### Policy Theme 11: Delivery

Option 11.1: Public sector led  
Option 11.2: Land assembly  
Option 11.3: Proactive approach to planning  
Option 11.4: Improving transport and accessibility  
Option 11.5: Enhancing the quality of the environment  
Option 11.6: Town Centre promotion and management  
Option 11.7: Town Centre specific S106 position

#### Discussion of potential effects and relative merits of options

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<td>Y</td>
<td>N</td>
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<tr>
<td>Biodiversity and green infrastructure</td>
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<td>N</td>
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<td>Climate change</td>
<td>N</td>
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#### Air quality

Theme 11 options explore mechanisms for the delivery of implementation measures to address the key issues and priorities for the Town Centre identified within the Issues and Options Report.

In terms of delivering measures to improve air quality, Option 11.4 provides a focus on improving transport and accessibility and Option 11.3 would provide an Area Action Plan (AAP) which could also encompass these measures. These two options are therefore considered to have the potential for significant positive effects in terms of delivery. Options 11.5 and 11.7 could also provide support through public realm improvements or specific directions which promote increased pedestrian/cycle accessibility; however, Option 11.5 is considered a less direct approach and Option 11.7 is based on negotiation. As such, Options 11.3 and 11.4 are considered more secure in their potential for positive effects. Options 11.1 and 11.2 relate to assembling sites and Option 11.6 looks at Town Centre promotion, as such these options are not considered likely to deliver aspirational measures to improve air quality.

#### Biodiversity and green infrastructure

The options explore mechanisms for the delivery of implementation measures to address the key issues and priorities for the Town Centre identified within the Issues and Options Report.

In terms of delivering measures to enhance biodiversity and green infrastructure, Option 11.5 provides a focus on enhancing the quality of the environment and Option 11.3 would provide an AAP which could also encompass these measures. These two options therefore are considered to have the potential for significant positive effects in terms of delivery. Whilst Option 11.7 could encompass these measures, the mechanism is based on negotiation and as such is less secure in its approach. Options 11.1 and 11.2 relate to assembling sites, Option 11.4 focuses on improving transport and accessibility and Option 11.6 relates to Town Centre promotion, as such these options are not considered likely to deliver aspirational measures to enhance biodiversity and green infrastructure.

#### Climate change

Theme 11 options explore mechanisms for the delivery of implementation measures to address the key issues and priorities for the Town Centre identified within the Issues and Options Report.

In terms of delivering measures to address climate change (mitigation and adaptation), Options 11.3 and 11.7 are the only options broad enough to encompass the range of implementation measures that could affect this topic. Option 11.7 is based on negotiation as such is considered to be less secure in its approach. Whilst Options 11.4 and 11.5 could address aspects of climate change mitigation and adaptation, they do not individually deliver the full range of measures which could affect this topic.

Options 11.1 and 11.2 relate to assembling sites and Option 11.6 looks at Town Centre promotion, as such these options are not considered likely to deliver aspirational measures to address climate change.
**Sustainability Appraisal (SA) for the Harlow Town Centre Area Action Plan**

**DRAFT**

**Interim SA Report**

### Discussion of potential effects and relative merits of options

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#### Community and wellbeing

The options explore mechanisms for the delivery of implementation measures to address the key issues and priorities for the Town Centre identified within the Issues and Options Report.

In terms of delivering measures to support communities, health and wellbeing, Options 11.3 and 11.7 are the only options broad enough to encompass the range of implementation measures that could affect this topic. Option 11.7 is based on negotiation as such is considered to be less secure in its approach. Whilst the rest of the options are likely to include measures to address this topic to some extent, they do not in isolation deliver the full range of measures which could affect this topic.

#### Economy and employment

The options explore mechanisms for the delivery of implementation measures to address the key issues and priorities for the Town Centre identified within the Issues and Options Report.

In terms of delivering measures to support the economy and employment, all of the options individually provide opportunities; through the assembly of sites in Options 11.1 and 11.2, through a strategy and AAP in Option 11.3, through improving transport and accessibility in Option 11.4, through enhancing the quality of the environment in Option 11.5, through Town Centre promotion in Option 11.6 and through development gains in Option 11.7. However, it is considered that overall Option 11.3 provides the opportunity to encompass the potential benefits of all of these options and maximises the potential for significant long term positive effects.

#### Historic environment

The options explore mechanisms for the delivery of implementation measures to address the key issues and priorities for the Town Centre identified within the Issues and Options Report.

In terms of delivering measures to support historic environment enhancements, Option 11.5 provides a focus on enhancing the public realm and Option 11.4 focuses on improving accessibility, both of which have the potential for minor positive effects on the historic environment. However, in isolation these approaches do not directly address the range of potential effects for the historic environment.

Option 11.3 would provide an AAP which could identify a range of measures to support historic character enhancements, with the potential for significant positive effects in terms of delivery. Whilst Option 11.7 could encompass these measures, the mechanism is based on negotiation and as such is less secure in its approach.

Options 11.1 and 11.2 relate to assembling sites, and Option 11.6 relates to Town Centre promotion, as such these options are not considered likely to deliver aspirational measures to enhance the historic environment.

#### Housing

The options explore mechanisms for the delivery of implementation measures to address the key issues and priorities for the Town Centre identified within the Issues and Options Report.

In terms of delivering measures to support housing, Options 11.1 and 11.2 pursue a proactive approach to releasing sites for development, and as such have the potential to significantly positively affect this topic. Option 11.3 proposes an AAP which could not only propose development sites but also include policy guidance and a vision for new housing development with the potential for positive effects of greater significance.

The rest of the options are specific to certain subjects (e.g. transport and accessibility improvements or Town Centre promotion) and as such are not considered likely to deliver aspirational measures to support housing delivery, or expand on the interrelationships between housing and other topics (such as economy and employment).
## Discussion of potential effects and relative merits of options

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### Land and waste

The options explore mechanisms for the delivery of implementation measures to address the key issues and priorities for the Town Centre identified within the Issues and Options Report.

In terms of delivering measures to support efficient land use, Option 11.1 seeks to improve building efficiency and release land for regeneration opportunities which has the potential for significant positive effects on this SA Topic. Option 11.3 has the potential to encompass Option 11.1 as well as provide policy guidance which places an emphasis on efficient land use, and as such it is considered to have the potential for positive effects of greater significance.

The rest of the options are specific to certain subjects (e.g., transport and accessibility improvements or Town Centre promotion) and as such are not considered likely to deliver aspirational measures to support efficient land use.

### Landscape

The options explore mechanisms for the delivery of implementation measures to address the key issues and priorities for the Town Centre identified within the Issues and Options Report.

In terms of delivering measures to support townscape enhancements, Option 11.5 provides a focus on enhancing the public realm which has the potential for significant positive effects on townscape. Option 11.3 would provide an AAP which could also identify a range of measures to support townscape enhancements, as well as identify and communicate key existing aspects which significantly contribute to townscape and create an overall vision, with the potential for positive effects of greater significance.

Whilst Option 11.7 could encompass measures to improve the townscape, it is unlikely to successfully communicate an overall vision, and the mechanism is based on negotiation. As such it is considered to be less secure in its approach.

Options 11.1 and 11.2 relate to assembling sites, Option 11.4 relates to transport and accessibility improvements, and Option 11.6 relates to Town Centre promotion, as such these options are not considered likely to deliver aspirational measures to enhance the townscape.

### Transport

The options explore mechanisms for the delivery of implementation measures to address the key issues and priorities for the Town Centre identified within the Issues and Options Report.

In terms of delivering measures to improve traffic and transport, Option 11.4 provides a focus on improving transport and accessibility and Option 11.3 would provide an AAP which could also encompass these measures. These two options are therefore considered to have the potential for significant positive effects in terms of delivery. Options 11.5 and 11.7 could also provide support through public realm improvements or specific directions which promote increased pedestrian/cycle accessibility; however, Option 11.5 is considered a less direct approach and Option 11.7 is based on negotiation. As such, Options 11.3 and 11.4 are considered more secure in their potential for positive effects. Options 11.1 and 11.2 relate to assembling sites and Option 11.6 looks at Town Centre promotion, as such these options are not considered likely to deliver aspirational measures to improve traffic and transport.
Discussion of potential effects and relative merits of options

**Water**

The options explore mechanisms for the delivery of implementation measures to address the key issues and priorities for the Town Centre identified within the Issues and Options Report.

In terms of delivering measures to support water supply and water quality, Options 11.3 and 11.7 are the only options broad enough to encompass implementation measures that could affect this topic. Option 11.7 is based on negotiation, and as such is considered to be less secure in its approach. The rest of the options are specific to certain subjects (e.g., site identification or transport and accessibility improvements) and as such are not considered likely to deliver aspirational measures to enhance water efficiency and water quality, or sufficient to address any localised issues.

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**Summary:**

The options explore mechanisms for the delivery of implementation measures to address the key issues and priorities for the Town Centre identified within the Issues and Options Report. Whilst different options have the potential for significant positive effects on certain SA Topics, what is clear from the appraisal is that Option 11.3 provides an opportunity to encompass many aspects of the other options, and maximises the potential for significant positive effects. Whilst Option 11.7 could also play a significant role, it is a mechanism based on negotiation and as such is considered less certain in its approach.

No significant negative effects have been identified at this stage.