East of Harlow Masterplanning Guidance SPD: Consultation Statement

1. Background

- 1.1. Harlow and Gilston was designated as a Garden Town by central Government in January 2017 and comprises new and existing communities in and around Harlow.
- 1.2. New neighbourhoods to the east, west and south and new villages to the north (collectively referred to as the new Garden Communities) will be established and integrated with the existing Harlow town. These will be supported by transformative investment in transport and community infrastructure.
- 1.3. The Harlow and Gilston Garden Town (HGGT) Partnership cross-boundary joint working arrangements between East Herts District Council (EHDC), Epping Forest District Council (EFDC) and Harlow District Council (HDC), working together with Essex County Council (ECC) and Hertfordshire County Council (HCC), ensure plans for the Garden Town deliver on their agreed HGGT Vision.
- 1.4. The purpose of the East of Harlow Masterplanning Guidance SPD is to set out the vision and key issues to be considered in the masterplanning and development of the site, while signposting to other policies and guidance.
- 1.5. When producing the masterplan, design codes and subsequent planning applications, compliance will be needed with the requirements of the policies in the Harlow and Epping Local Plans, as well as national policies and guidance. There should also be compliance with relevant local guidance and other key documents, such as the HGGT Infrastructure Delivery Plan, HGGT Sustainability Checklist and Guidance and HGGT Design Guide. These documents are referenced throughout this SPD and, therefore, are material considerations.
- 1.6. References to "Harlow and Epping Councils" specifically refer to Harlow District Council and Epping Forest District Council, working in partnership.

2. Town and Country Planning Regulations

- 2.1. The draft SPD was produced by Harlow and Epping Councils in accordance with the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended). The relevant regulations relating to the consultation process are set out below.
 - Regulation 12:
 - (a) Requires the Council to produce a consultation statement before adoption of the SPD, this must set out who was consulted, a summary of the issues raised, and how these issues were incorporated in to the SPD. (b) Requires the Council to publish the documents for a minimum 4 week consultation, specify the date when responses should be received and identify the address to which responses should be sent.
 - Regulation 35:
 Requires the Council to make documents available by taking the following steps;
 Make the document available at the principal office and other places within the area that the Council considers appropriate;

3. Consultation and Responses Received

- 3.1. The consultation period started on Monday 31 July 2023 and was due to close on Sunday 24 September 2023, but was extended by three weeks and closed on Monday 16 October 2023. The consultation was open, therefore, for a period of 11 weeks.
- 3.2. Harlow and Epping Councils complied with the legislative requirements for consulting on an SPD, as well as the requirements set out in the Councils' adopted Statement of Community Involvements.
- 3.3. This included:
 - notifications being sent to 412 contacts, including (see Appendix 1 for a full list):
 - statutory consultees (e.g. utility providers, Sport England, Network Rail, Environment Agency, Natural England, neighbouring Councils, Essex County Council, etc.)
 - o local organisations (e.g. parish councils, Harlow Civic Society, etc.)
 - o Councillors from Harlow and Epping Councils
 - o HGGT Board members
 - contacts on Harlow and Epping Councils' Local Plan databases who wished to be informed about SPDs or similar matters
 - o relevant developers and landowners
 - a notice being published in the local newspaper (see Appendix 2);
 - posts about the consultation being made on the relevant social media channels;
 - hard copies of the SPD being available at Harlow Civic Offices, Epping Forest Civic Offices, Old Harlow Library and Harlow Central Library;
 - an online version of the SPD being available on the Harlow and Epping Council websites and the HGGT consultation platform (see below); and
 - details of the consultation being available on the Harlow and Epping Council websites.
- 3.4. The HGGT consultation platform website hosted the SPD and allowed people to navigate the document by chapter and leave comments online. A PDF version was also able to be downloaded. If people preferred, they could also submit comments via email or post to the HGGT Freepost address. Paper surveys could also be returned to this address.
- 3.5. A full schedule of comments submitted via the platform, email and post split by SPD chapter can be viewed in Appendix 5. This schedule also includes Harlow and Epping Councils' joint responses to the comments.
- 3.6. The platform also hosted a survey about the SPD (see Appendix 3), hard copies of which were available. There were 14 questions, 12 of which were multiple choice or similar, with two open-ended questions to allow comments. The broad survey results can be seen at Chapter 5 of this report, while individual responses and Harlow and Epping Councils' joint responses to comments made in the open-ended questions can be viewed at Appendix 6.
- 3.7. On Tuesday 29 August 2023, a public drop-in event was held, in conjunction with Sheering Parish Council, at Sheering Village Hall. It ran from 10am to 12pm and included a one-hour question-and-answer session with officers from Harlow and Epping Councils and Essex County Council. The event was advertised by the Parish Council and was attended by approx. 60 people.

- 3.8. On Tuesday 10 October 2023, a public event was held, in conjunction with the Churchgate Street Residents Association, at St Mary's Church in Churchgate Street. It ran from 6pm to 7pm and comprised a question-and-answer session with officers from Harlow and Epping Councils and Essex County Council. The event was advertised by the Residents Association and was attended by over 100 people.
- 3.9. Additionally, three online drop-in sessions were held online on Microsoft Teams, with officers from Harlow and Epping Councils and Essex County Council in attendance to answer questions. These sessions were held on Wednesday 30 August 2023 from 6pm to 7pm, Thursday 31 August 2023 from 2pm to 3pm and Thursday 7 September 2023 from 10am to 11am.
- 3.10. The majority of issues raised at the above sessions were similar to the main issues raised in written responses to the consultation (see Chapter 4 of this report).
- 3.11. As well as the above sessions, private meetings have also taken place between land owners, their agents and officers from Harlow and Epping Councils and Essex County Council. The purpose of these was to answer questions and queries they had prior to their formal written submissions to the consultation.
- 3.12. A total of 157 people, organisations or companies responded to the consultation, either by providing comments and/or completing a survey.

4. Issues Raised

- 4.1. Many respondents made similar points during the consultation and the main ones are summarised in the table below, along with joint responses from Harlow and Epping Councils.
- 4.2. Specific points made via submission of comments and completion of the open-ended questions in the survey, along with joint responses from Harlow and Epping Councils, can be viewed at Appendices 5 and 6 (separate documents).
- 4.3. The table below summarises the main issues raised during the consultation, many of which required amendments to the draft SPD.

Issue	Harlow and Epping Councils' Joint Response				
General traffic and travel – e.g. increased congestion, bus services, etc.	The HGGT Transport Strategy, STC and associated modal shift/change are key strands of the HGGT vision to address potential increased vehicular movements arising from new development. The STC will provide fast, direct, safe walking, cycling and bus routes for residents across the town. For the eastern part of the STC it will provide sustainable travel opportunities for residents at East of Harlow, Newhall and First Avenue in particular.				
	Buses on the STC would be funded by the development initially and it is expected they will become self-funding as the development grows. These buses would benefit the residents of Newhall (and other existing Harlow residents along the route) by providing a fast and reliable bus service to both the town centre and beyond and also the new health and wellbeing campus once relocated. Modal shift/change is about offering a choice for short car journeys to				
	be completed using sustainable transport instead, thereby reducing				

	the number of cars on the road overall. The intention is not to remove cars but provide worthwhile choice in how people travel so that sustainable and healthy choices can be made especially for those journeys where walking, cycling and using public transport is easier, cheaper and quicker than sitting in traffic in the car. The Garden Community is predicated on being a sustainable development and as such people will purchase properties in this knowledge and developers will be aware of this requirement. With multiple accesses onto Gilden Way, traffic will either be able to access towards the town centre and access the wider area or leave via J7a and then return. Since the development of Church Langley over 20 years ago, much has changed and this development as well as developments across the Garden Town will help deliver and fund a more cohesive sustainable transport system than what is currently
	available. The allocation of the site has been informed by transport assessment evidence as part of the Local Plan and further detailed transport assessments will be carried out by the developer.
	The HGGT IDP identifies what schemes and proposals are required from the development including those related to improving the highway network to accommodate growth.
M11 J7a	M11 J7a was designed to provide the second motorway access to Harlow and therefore helps to provide relief if either J7 gets blocked for any reason and vice versa.
	The road has been designed with enough capacity to deal with traffic associated with the new development and this is supported by modelling.
Traffic associated with hospital relocation	Although some traffic will be removed from the town as a result of the potential hospital relocation (closer to the new Junction 7a), further traffic modelling will be required to assess the full impacts of a relocated hospital. The scope of the SPD does not include traffic modelling and/or mitigation measures that may be required as the programming for its relocation is currently still being reviewed.
London Road closure	Comments and concerns regarding the closure of London Road have been noted by the Council. The issue and opposition around this proposal is being carefully considered outside of the SPD process in consultation with Essex County Council as local highway authority. The Council has provided some historical context in its response to these comments, but this particular issue does not affect the principles included in the SPD or delivery of the East of Harlow site.
Churchgate Street traffic	Development traffic would not be allowed to use routes through Churchgate Street and developers would be expected to prepare a construction plan to show how they would bring the site forward. Text in the SPD has been amended for clarification.
	Access to all the roads within Churchgate Street from routes travelling through the new development would only facilitate walking and cycling access, i.e. would be for walking and cycling only, enabling access to facilities, services and green spaces in the East of Harlow Garden

	Community to the benefit of existing residents in this area. Text in SPD amended for clarification.					
Concerns of increased flood risk	SuDS, including new ponds and swales, are likely to help with any future flooding. Churchgate Street area flooding in 2023 was due to a very intense and short period of rain that impacted on the local brook within a					
	known flood zone area (as per EA maps). This is with EA to decide whether further work/what work is required As part of the masterplan and eventual planning application, further flood risks will be required to be considered.					
Provision of suitable infrastructure	The site will be supported by the right infrastructure in the right location including health, education, sustainable transport, access and highway improvements and all utility provision having considered any pressures in the local area. This is set out in the HGGT Infrastructure Delivery Plan.					
	Infrastructure will have to be provided in a phased approach based on the construction/occupation of dwellings. However, it is not appropriate for the SPD to provide detail on phasing of housing and phasing of infrastructure provision - this will come at the masterplan stage in detailed discussion with infrastructure providers.					
	The SPD will be amended to ensure there is specific reference to the need for Local Centres to include community infrastructure such as preschool provision, doctors, dentist, play areas, and community rooms for use for faith activities, toddler groups, support groups, etc. This will not only benefit new residents on the site but also provide facilities to support the potential needs of villages and residents around the site.					
	The HGGT partners and developers will work with utility providers on water provision and are aware of the development sites in this area through the Local Plan process.					
Locations of new schools	The exact locations of the schools have yet to be established and are indicative in the SPD. Essex County Council will be providing further evidence and justification for the best location. The SPD will therefore be amended to remove the school options and state that locations are to be decided.					
Ensuring developers adhere to Section 106 agreements for infrastructure provision	The adherence to S106 agreements is not something for this SPD to address, but the Council's legal action against the developers at Gilden Park is likely to set an important precedent which will help to ensure developers adhere to planned delivery of infrastructure in the future.					
Need for housing at this location	The East of Harlow site was allocated for housing and associated ancillary uses in the Harlow and Epping Local Plans, which went through rigorous rounds of consultation, public examination and inspection by government.					
	The south-east of the UK has some of the highest house prices in the country due to high demand and lack of supply. Issues such as people living longer than previous generations, higher rates of divorce in older					

	people (resulting in a divorced couple requiring two homes instead of one), and birth rates historically being higher than death rates, has increased demand.
	The need for housing - including much needed affordable housing - is detailed further in the evidence base supporting the Harlow and Epping Local Plans. The Harlow portion of the East of Harlow Garden Community will help deliver affordable homes for Harlow residents as well as a range of other benefits and opportunities
Landscape, biodiversity and farmland concerns	The SPD requires the masterplan to be landscape-led, ensuring that open spaces and Green infrastructure are provided, while respecting and preserving the original landscape as much as possible. This also includes a mandatory net increase in biodiversity and the delivery of a new Green Wedge through the development for new and existing residents to enjoy.
	Most of the farmland in question is Grade 3, meaning it is Good to Moderate and therefore not the best (which would be Grades 1 and 2). Around 70% of UK land is farmland. It was accepted at the examinations for the Harlow and Epping Local Plans, which allocated this site, that the loss of farmland is, on balance, acceptable in order for the districts to meet their identified housing targets.
Impact on existing communities, particularly Sheering	The SPD requires the masterplan to sensitively consider existing communities. In particular it states that the effects on existing settlements, such as the historic settlement of Churchgate Street, must be considered and any adverse impacts mitigated against, particularly regarding density and building heights.
	The SPD indicates that the masterplan will require a substantial buffer between the northern part of the site and Sheering to ensure coalescence is prevented and that Sheering retains its identity.
	It is possible that improvements to existing Sheering infrastructure will be part of the East of Harlow development, but this will be determined at the masterplanning and planning application stages.
	The addition of references to the need for design codes throughout the document means that specific design details can be carefully considered and agreed by the Councils, in consultation with stakeholders and the community, ensuring that the impact on areas such as Churchgate Street are minimised.
Clarity of maps	The maps have been significantly altered, including adding OS base maps and names of existing settlements and road names.
Online platform	The Councils were aware of some technical issues with the online platform and liaised directly with those affected to resolve the matters. Feedback has been passed to the platform supplier to avoid future issues.

4.4. Additionally, a number of comments were received from the following statutory consultees and land owners (via their agents):

- AM Planning o.b.o. Tinneys
- Canal & River Trust
- CBRE and Strutt & Parker o.b.o. Swires & Collins
- East of England Ambulance Service NHS Trust
- Environment Agency
- Essex County Council
- Essex County Fire and Rescue
- Hertfordshire and West Essex ICB
- Highways England
- Historic England
- Iceni o.b.o. Woolbro Morris Ltd
- Lawson o.b.o. PAH NHS Trust
- Natural England
- Newhall Projects
- NHS Property Services
- Old Harlow Health Centre
- Savills, o.b.o. Mr Robert Jones
- Sawbridgeworth Town Council
- Sheering Parish Council
- Sport England
- Strutt & Parker o.b.o. Anderson Design & Build
- Thames Water
- 4.5. The table below details how the SPD has been amended as a result of comments from these consultees:

Topic	Amendment
Green & Blue Infrastructure	Improved/additional references to role of GI in relation to climate change, blue infrastructure and the possibility for new water bodies, greening of local centres, SANG guidance, linkages with the surrounding landscape to improve and encourage access, consideration of "green" routes, guidance on provision of sports facilities, HGGT GI Framework action plans, wider uses of GI, tree and hedgerow retention, SFRAs and flooding strategies, and waterway restoration and enhancement. Maps amended so that the area in the north of the site is referred to as a green buffer rather than for a specific SANG/BNG use.
Infrastructure	Improved/additional references to utilities infrastructure, need for developers to engage with water/wastewater bodies to ensure requirements are met, effects of development on emergency services, and the need for local centres to include a wide range of facilities such as GP healthcare, dentist, play areas and community rooms for faith activities, fitness activities, toddler groups, support groups, etc. Clarification that road capacity on the local and strategic networks is not intended to be prioritised by health facilities uses over residential uses.
Sustainable Movement	Improved/additional references to possibility of a cycling route through the green buffer towards Sheering, interim measures for sustainable modes and in particular for PAH, connection of PAH with sustainable transport network, establishing GI in sustainable transport and PRoW networks, effects on waterways/flooding arising from new roads or crossings

	Removal of reference to Campions roundabout regarding dwelling occupation.
Education	Improved/additional references to role of schools in meeting the community sports facility needs, primary school playing field being multipurpose and opportunities for natural play. Removal of school options as these will need further consideration at the masterplanning stage.
General	Amendments to ensure the SPD is not overly prescriptive. Improved/additional references to Section 106 requirements, Essex Design Guide, climate change and stewardship. Amendments to maps to improve clarity and address points raised by consultees.

4.6. There are greater details of amendments in the full schedules of comments and the Councils' responses at Appendices 5 and 6 (separate documents).

Survey Results

- 5.1. 97 surveys were completed; 94 via the online platform and 3 via hard copy. 96% of the respondents stated that they are local residents, with the remaining 4% being land owners, workers in the area or other interested parties.
- 5.2. A broad summary of the results for the closed questions is below. Full information can be found at Appendix 4.

Question	Responses		
Do you support the vision for the East of	39% of respondents support*		
Harlow masterplan guidance?	61% do not support*		
What is the most important vision theme for	Top responses of the five options:		
the masterplan guidance?	Water (29%)		
	Connection (24%), Health (24%)		
	Hospital (23%)		
What design and construction principles do	Top responses of the five options:		
you think the East of Harlow masterplan	Well laid out green spaces (32%)		
guidance should consider?	Well designed community buildings (21%)		
	Ease of walking and cycling (20%)		
Do you agree with the key routes and green	44% agree*		
spaces that the masterplan guidance	56% do not agree*		
proposes connections to?			
What would encourage future residents to	Top responses of the 12 options:		
cycle more at East of Harlow?	Off-road and segregated cycle paths (20%)		
	Safe cycle lanes (13%)		
	Well maintained road surfaces for cycling		
	(12%)		
	Secure storage/ parking at		
	home/work/stations/on-street (11%)		
	Safer roads (slower speeds, less traffic,		
	more considerate driving) (11%)		
	Promotion of local cycling routes (9%)		

The masterplan guidance shows potential key sustainable links to the site. Do you agree with these?	Yes (10%) Yes, but there are others to consider (43%) No, some links should not be considered (18%) No (29%)
Do you agree with the requirements for the	Yes (43%)
Sustainable Transport Corridor as set out in	No (44%)
the guidance document?	Don't know (14%)
Do you think the preferred route for the	Yes (20%)
Sustainable Transport Corridor will	No (57%)
encourage residents to use it?	Don't know (23%)
Do you agree with the guidance principles	Sound (52%)
for delivering schools on the site?	Not sound (48%)
What services and facilities should a local	Top responses of the 10 options:
centre provide?	Community facilities (16%)
	Shared green space (15%)
	Cafes and restaurants (14%)
	Education provision (12%)
	Retail (11%)
Do you agree with the guidance principles	56% agree*
for stewardship for the site?	42% disagree*

^{*}This is based on the upper and lower ranges of the answers, i.e. where a question asks "do you support...?" and the options range from 6 (support) to 1 (do not support), "support" in the table above would cover answers 6 to 4 and "do not support" would cover 3 to 1.

Appendix 1: Consultees

- Abbess Roding Parish Council
- Affinity Water
- Anglian Water
- Brentwood Borough Council
- Broxbourne Borough Council
- Buckhurst Hill PC
- Cadent Gas Limited
- Canal & River Trust
- Chigwell PC
- Conservators of Epping Forest
- Cornerstone Mobile Infrastructure
- Department for Education
- East Ambulance Services
- East Hertfordshire District Council
- Environment Agency
- Epping Forest District Council Councillors (58)
- Epping Society
- Epping Upland PC
- Essex County Council
- Essex Fire Services
- Essex Police
- Essex Wildlife Trust
- Fyfield PC
- Greater London Authority
- Harlow Civic Society
- Harlow College
- Harlow Council Councillors (33)
- Harlow Ethnic Minority Umbrella
- Haringey Council
- Hertfordshire County Council
- HGGT Board members (19)
- High Ongar PC
- Highways England
- Highways England South East
- Historic England
- Homes England
- House Builders Federation
- Hunsdon Parish Council
- Lambourne PC
- Landowners and agents (20)

- Lea Valley Regional Park Authority
- Little Hadham Parish Council
- London Borough of Enfield
- London Borough of Havering
- London Borough of Redbridge
- London Borough of Waltham Forest
- Loughton TC
- Matching TC
- MBL PC
- National Grid
- Natural England
- Nazeing Parish Council
- Network Rail
- Newham Council
- North Weald Parish Council
- NWB PC
- Ongar TC
- Princess Alexandra Hospital NHS Trust
- Robert Halfon MP
- Roydon Parish Council
- Sawbridgeworth Town Council
- Schools in local area
- Sheering Parish Council
- Sport England
- Stanford Rivers PC
- Stapleford Abbotts PC
- Stapleford Tawney PC
- Thames Water
- Theydon Bois PC
- Theydon Garnon PC
- Theydon Mount PC
- UK Power Networks
- Waltham Abbey Historical Society
- Waltham Abbey TC
- West Essex Clinical Commissioning Group
- Willingale PC
- Woodland Trust
- Other interested contacts (as per Local Plan databases of Harlow and Epping Councils) (approx. 100)

Appendix 2: Press Notice



What is planned?

DRAFT EAST OF HARLOW MASTERPLANNING GUIDANCE SUPPLEMENTARY PLANNING DOCUMENT

The partner authorities of Harlow and Gilston Garden Town are consulting on the East of Harlow Masterplanning Guidance Supplementary Planning Document (SPD). The SPD provides guidance for a developer producing a masterplan for the site, to ensure it reflects the Garden Town Vision, and once adopted it will be a material consideration in the determination of planning applications.

N. .. are seeking your views on the Masterplanning Guidance SPD. You can

view the document and respond online at engaage.hggt.co.uk Alternatively, you can email haveyoursay.@haat.co.uk or write to: "Freepost HGGT". There will also be a series of Q&A sessions, details of which will be made available on the website later in the consultation period. Hard copies of the SPD are available to view at Harlow Civic Offices, Epping Forest Civic Offices, Old Harlow Library and Harlow Central Library during normal opening hours.

The consultation runs from Monday 31 July to **5pm on Sunday 24 September.**Comments received after this date may not be accepted.

By responding, you give consent to the HGGT partnership authorities of Harlow District Council, Epping Forest District Council, East Herts District Council, Essex and Hertfordshire County Councils to hold & process your personal data in accordance with the Data Protection Act and the General Data Protection Regulation. Your name, organisation & comments may be available for others to view at Harlow or Epping Forest Council offices & on theirs or the HGGT website. The East of Harlow Masterplanning Guidance SPD has been prepared in accordance with The Town and Country Planning (England) Regulations 2012 (as amended).

What is your interest in the East of Harlow masterplan guidance area? ☐ I'm a local resident ☐ I'm a land owner ☐ I work in the area □ I'm a developer ☐ Other interested party The vision The vision themes currently focus on: • **Health** (wellbeing, physical, active) • Water (nature, ecology, landscape) • **Play** (joy and intergenerational) • Connection (mobility and social) • **Hospital** (innovative, sustainable) Pages 10 to 11 of the SPD describe the vision in more detail. Do you support the vision for the East of Harlow masterplan guidance? \square 3 \sqcap 1 \square 2 \Box 4 \Box 5 □ 6 I do not support the vision ------ I support the vision **Vision Theme** You may have thoughts based on your experience of Harlow or where you live, or how the vision for East of Harlow sits in the Harlow and Gilston Garden Town area. What is the most important vision theme for the masterplan guidance? ☐ Health (wellbeing, physical, active) ☐ Water (nature, ecology, landscape) ☐ Play (joy and intergenerational) ☐ Connection (social and mobility)

Design and construction principles

☐ Hospital (innovative, sustainable)

Appendix 3: Survey questions

A masterplan will not set out detailed designs at this stage but will establish principles for how development could look, supported by Design Codes.

You may want to consider successful city or town layouts or other sustainable places that encourage walking and cycling, well laid out green spaces or well-designed community buildings.

What design and construction principles do you think the East of Harlow masterplan guidance should consider? (choose as many as you like)

 □ Characterful placemaking □ Net-zero design and construction □ Well laid out green spaces □ Well designed community buildings □ Ease of walking and cycling 	
Key routes and green spaces	
The site will connect to important green infrastructure so that residents and wildlife can mov safely through well laid out green spaces.	'e
Please refer to page 25 of the SPD for more information.	
Do you agree with the key routes and green spaces that the masterplan guidance proposes connections to?	
You may wish to consider the areas around the site that you walk or cycle to and important green spaces close to the site which you use or are important for biodiversity.	
1 0 2 0 3 0 4 0 5 0 6	
Agree Disagree	
Cycling	
What would encourage future residents to cycle more at East of Harlow?	
 □ Off-road and segregated cycle paths □ Safe cycle lanes □ Promotion of local cycling routes □ Access to showers/changing at work □ Well maintained road surfaces for cycling □ Better signposting of safer cycle routes □ Training to help me ride a bike or increase my confidence □ Secure storage/ parking at home/work/stations/on-street □ Safer roads (slower speeds, less traffic, more considerate driving) □ Cycle maintenance courses □ Better cycle hire facilities □ None of the above 	

Key sustainable links

The masterplan guidance shows potential key sustainable links to the site. Do you agree with these?

If you have more to add on this point, please let us know at the final survey question.

□ Yes
☐ Yes, but there are others to consider
□ No
□ No, some links should not be considered
Sustainable Transport Corridor (STC) requirements
STCs will be walking/cycling/public transport routes connecting sites with major destinations across the town. They will be delivered across Harlow and within the new HGGT communities including East of Harlow.
The document sets out principles for the STC within the site, i.e. it must be safe, direct, convenient, attractive, pleasant, sociable, connect community assets etc.
Do you agree with the requirements for the STC as set out in the guidance document?
□ Yes
□ No
☐ I don't know
Do you think the preferred route for the Sustainable Transport Corridor will encourage residents to use it?
You may wish to consider the bottlenecks identified in the document (Hobbs Cross Road, Moor Hall Road and Junction 7a underpass), whether the route is direct, where bus stops could be positioned, whether there are any constraints the STC route should consider e.g. wooded areas. Please refer to page 36 of the SPD for more information.
□ Yes
□ No
☐ I don't know
School delivery
Cuidance principles for education are summarised as follows:

Guidance principles for education are summarised as follows:

- Must follow Essex County Council's guidance on schools
- Must provide 1 x Two Form Entry and 1 x Three Form Entry Primary schools and minimum 1 x Six Form Entry Secondary School
- Schools must be located as part of a local centre.
- Distribution of schools must work with the constraints of the site
- A primary school should be co-located with each secondary school
- The secondary school should be located centrally on the site, one primary at the south and one co-located. All schools must be near the western boundary close to existing neighbourhoods
- The centrally located schools must be close to planned local cycling and walking
- Schools environments must not be compromised by inappropriate land uses such as parking or hot food takeaways.
- Residential areas should not be more than 600 metres walk away from a primary school and 1500 metres away from a secondary school.

Please refer to page 43 of the SPD for more information.

Do you agree with the guidance principles for delivering schools on the site?							
□ 1	□ 2	□ 3	□ 4	□ 5	□ 6		
The school d	lelivery princi	ples are sour	nd	No	ot sound		
Local centre	e services ar	nd facilities					
What servic	es and facili	ties should a	a local cent	re provide? (choose as many as you like)		
You may wa	nt to think ab	out the faciliti	es you woul	d like to have	near you where you live.		
 □ Retail □ Cafes and □ Small sca □ Education □ A transpo □ Shared go □ EV charg □ Other 	 □ Cafes and restaurants □ Small scale workspace □ Education provision □ A transport hub □ Shared green space □ EV charging points 						
Unique feat	ures						
				l and Sheering sidered in a m	g are all unique in character, nasterplan.		
what is c	loseby and a ecologically s	cross the wid	er Garden T	own.This cou	onsider what exists on the site ld include for example; groups ts of ways; brooks or visually		
Please refer	to pages 5 ai	nd 19 of the S	SPD for more	e information.			
inform t	he developm	nent of a mas	sterplan tha	nt are not sho	or spaces that should own in the guidance? either locally or further afield.		
							

Stewardship principles

The guidance note states:

'It is essential that stewardship structures are considered at the earliest opportunity and inform each the development of each topic set out in this SPD. The Garden Town partners have developed a Draft HGGT Stewardship Charter setting out principles for stewardship across HGGT and this should inform the masterplanning preparation work and subsequent planning applications.' The principles from the document are extracted here in more detail:						
Please refer to page 12 of the SPD for more information.						
Do you agree with the guidance principles for stewardship for the site?						
□ 1	□ 2	□ 3 [□ 4	□ 5	□ 6	
Agree Disagree						
Any other comments						
Please let us know any other comments you have on the masterplan.						

Appendix 4: Detailed Survey Results (closed questions)

What is your interest in the East of Harlow masterplan guidance area?

Multiple choice-choose one-required

I'm a local resident

95.9% (93 choices)

Other interested party

2.1% (2 choices)

I'm a land owner

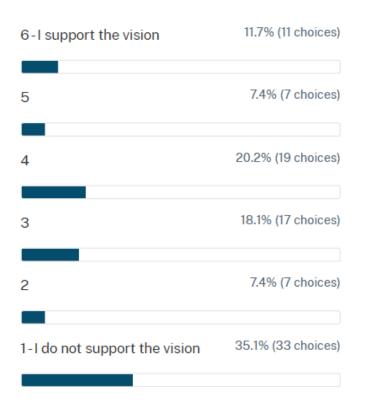
1% (1 choice)

I work in the area

1% (1 choice)

Do you support the vision for the East of Harlow masterplan guidance?

Linear scale-optional



What is the most important vision theme for the masterplan guidance?

Multiple choice-choose one-optional

Water (nature, ecology, landscape)

29.2% (26 choices)

Connection (social and mobility) 23.6% (21 choices)

Health (wellbeing, physical, active)

23.6% (21 choices)

Hospital (innovative, sustainable)22.5% (20 choices)

Play (joy and intergenerational)

1.1% (1 choice)

What design and construction principles do you think the East of Harlow masterplan guidance should consider?

Multiple choice-choose many-optional

32.4% (78 choices) Well laid out green spaces

Well designed community buildings

21.2% (51 choices)

Ease of walking and cycling

20.3% (49 choices)

Net-zero design and construction 13.7% (33 choices)

12.4% (30 choices) Characterful placemaking

Do you agree with the key routes and green spaces that the masterplan guidance proposes connections to?

Linear scale - optional
6 - Disagree 35.5% (33 choices)
5 5.4% (5 choices)
4 15.1% (14 choices)
2 4.3% (4 choices)
1-Agree 17.2% (16 choices)

What would encourage future residents to cycle more at East of Harlow?

Multiple choice-choose many-optional

Off-road and segregated cycle 20.1% (58 choices)

Safe cycle lanes 12.5% (36 choices)

Well maintained road surfaces for cycling 12.1% (35 choices)

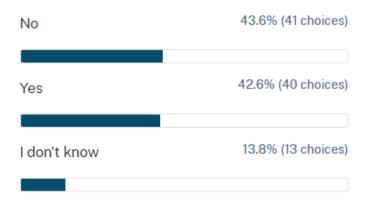
Secure storage/ parking at home/work/stations/on-street 11.1% (32 choices)

Safer roads (slower speeds, less traffic, 10.7% (31 more considerate driving)

Better signposting of safer cycle routes None of the above Better cycle hire facilities Access to showers/changing at work	7.6% (22 choices) 6.2% (18 choices) 4.5% (13 choices)
Better cycle hire facilities Access to showers/changing at	4.5% (13 choices) 3.5% (10
Access to showers/changing at	3.5% (10
	-
	choices)
Cycle maintenance courses	1.7% (5 choices)
Training to help me ride a bike or increase my confidence	1.4% (4 choices)
The masterplan guidance potential key sustainable site do you agree with the Multiple choice-choose many-option Yes, but there are others to consider	e links to the lese?
No	28.9% (26 choices)
	4700/
No, some links should not be considered	17.8% (16 choices)
Yes	10% (9 choices)

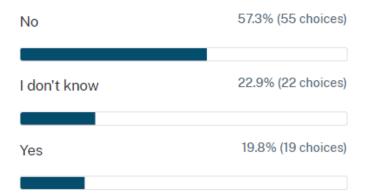
Do you agree with the requirements for the Sustainable Transport Corridor as set out in the guidance document?

Multiple choice-choose one-optional



Do you think the preferred route for the Sustainable Transport Corridor will encourage residents to use it?

Multiple choice-choose one-optional



Do you agree with the guidance principles for delivering schools on the site?

Linear scale-optional

6-The school delivery principles are 17.6% (16 not sound choices)

5 13.2% (12 choices)



What services and facilities should a local centre provide?

Multiple choice-choose many-optional

Community facilities	16.4% (63 choices)
Shared green space	15.4% (59 choices)
Cafes and restaurants	13.8% (53 choices)
Education provision	12% (46 choices)
Retail	10.7% (41 choices)
A transport hub	9.9% (38 choices)

EV charging points	8.1% (31 choices)
Small scale workspace	6% (23 choices)
Other	4.9% (19 choices)
I don't have a preference	2.9% (11 choices)

Do you agree with the guidance principles for stewardship for the site?

Linear scale-optional

6-I disagree	26.5% (22 choices)
5	10.8% (9 choices)
4	7.2% (6 choices)
3	20.5% (17 choices)
2	18.1% (15 choices)
1-l agree	16.9% (14 choices)

Appendix 5: Submitted Comments and Council Responses

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Respondent Name Mrs Lesley Perry

Organisation

EoH Document Comments

General Comments

•There is no acknowledgement of Harlow as being the first, and currently only, Sculpture Town. Any planning document should incorporate the requirement for new sculptures in the east of Harlow. This would fit with the existing premise of the New Town and also with the vision themes outlined in 2.7, particularly 'Health', 'Play' and 'Connection'.

Council	Res	ponse
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Council Response

11. Local Centres

Acknowledgement to Sculpture Town will be added to the SPD. The Harlow Local Development Plan addresses requirement for new sculptures in new development.
1. Introduction
Council Response
2. Context
Council Response
3. Stewardship
Council Response
4. East of Harlow Character Considerations
Council Response
5. Landscape and Green Infrastructure
Council Response
6. Sustainability and Build Quality
Council Response
7. Sustainable Movement
Council Response
8. Sustainable Transport Corridors
Council Response
9. All-Vehicle Access
Council Response
10. Educational Provision

Page 2 of 213	Rep ID	1		EoH Document Comments
Respondent Name M	rs Lesley	Perry	Organisation	
Council Response				
12. Combined Princip	les			
Council Response				
Other Comments				
Council Response				
Are there any attachmen	nts?	No		

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EoH Document Comments

Organisation Natural England

Respondent Name Betsy Brown

General Comments

Climate Change

We note that within the draft SPD Climate Change is referenced in relation to Strategic Flood Risk Assessment as well as its link to Green Infrastructure within the glossary. The SPD should also recognise and embed the important role that green Infrastructure and nature-based solutions play in aiding climate change adaptation throughout the document. Many habitats provide essential ecosystem services to allow adaptation to climate change e.g. natural flood management, as well as mitigation e.g. through tree planting and retaining peat as a carbon store. The development proposals should set out appropriate nature-based solutions for climate mitigation and adaptation such as woodland or wetland creation or peatland restoration. We refer you to the Climate Change Adaptation Manual, Carbon Storage and Sequestration by Habitat and National biodiversity climate change vulnerability model for further consideration, as well as the Garden City Principles referenced above.

Strategic Links and wider landscape

In order to further enhance environmental networks, the proposals within the SPD should seek to link in with other garden village proposals around Harlow. This will encourage ecological connectivity and demonstrate a more holistic approach i.e. embedding and sharing environmental principles across multiple, different developments.

Blue Infrastructure

Whilst there is reference to Green Infrastructure throughout the SPD it is noted that there is little reference or exploration of "Blue Infrastructure", despite the fact that water forms a key part of the vision statement. Further consideration could be given to Blue Infrastructure opportunities, such as new water bodies, within the design scheme in a way that could benefit both nature and people.

We have provided some further advice and guidance relating to Green Infrastructure and BNG in Annex A to this letter.

Council Response

Reference to the role of GI in relation to climate change will be added to the SPD.

Detailed nature-based solutions will be for the masterplan to address.

The SPD links in with other Garden Town developments around Harlow as much as possible, plus there are existing docs and guidance for the whole Garden Town including a HGGT Green Infrastructure Study which looks at opportunities to link GI (and a material consideration for applications). However, the areas are very different for a number of reasons so uniformity is only possible to an extent.

Blue infrastructure and the possibility for new water bodies will be added to the SPD.

1. Introduction
Council Response
2. Context
Council Response
3. Stewardship
Council Response
4. East of Harlow Character Considerations
Council Response

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Respondent Name Betsy Brown

Organisation Natural England

5. Landscape and Green Infrastructure

It is also positive to see direct reference to the Green Infrastructure (GI) framework and inclusion of 10% Biodiversity Net Gain (BNG) as a requirement for development.

Green Infrastructure

As stated, the emphasis on sustainable travel and encouraging walkable communities is welcomed. The "15 minute neighbourhood" concept is being encouraged as part of the new GI standards. This seeks to ensure that everyone has access to good quality natural greenspace within 15 minute's walking distance from their homes, in line with the Accessible Greenspace Standards and Green Flag Criteria. This has also been referenced within the Government's Environmental Improvement Plan. Natural England encourage the SPD to consider a commitment aligned with this target.

Good design of Green Infrastructure can improve the attractiveness of active travel routes and this should be referenced within the sustainable movement section. The SPD should also consider linkages with the surrounding landscape to improve and encourage access, and consideration of "green" routes that incorporate street trees and urban GI to improve attractiveness and connectivity.

Defra recently announced the decision to make Sustainable Urban Drainage systems mandatory by 2024 in a review document of recommendations for the implementation of Schedule 3 to The Flood and Water Management Act 2010. The SPD should directly reference this decision and strongly encourage the use of SUDs where appropriate.

Further to this we have identified additional opportunities to incorporate Green Infrastructure into the design of the town, specifically local centres. Local Centres are referenced with the SPD as the heart of residential areas. Natural England have been exploring the concept of Green Community Hubs, which could act as a focal point for nature-based activities and services, and incorporate innovative green infrastructure. This could include the following:

- Tree planting
- Food growing
- Active travel
- Green gyms

Biodiversity Net Gain

We welcome the inclusion of a 10% Biodiversity Net Gain (BNG) commitment for the development, which will become mandatory from November 2023. For a project of this scale, however, we would encourage developments to consider more ambitious BNG targets, as well as looking to embed GI standards for major developments within the SPD. For example, considering specific targets to increase tree canopy cover and urban greening.

We would also encourage the proposals to maximise BNG delivery onsite in line with the Town and Country Planning Association's Garden City Principles which describes:

"Development that enhances the natural environment, providing a comprehensive green infrastructure network and net biodiversity gains, and that uses zero-carbon and energy positive technology to ensure climate resilience"

SANG

We welcome proposals for Suitable Alternative Natural Greenspace (SANG) within the SPD. The East of Harlow masterplan area (both Harlow District and EFDC land) falls within the Zone of Influence (ZoI) for the Hatfield Forest strategic solution. As such, new residents from the East of Harlow masterplan area have the potential to negatively impact Hatfield Forest SSSI/NNR through recreational disturbance.

Using the standard SANG metrics of 8a per 1000 new population and 2.4 people per dwelling, the SANG for East of Harlow will need to be around 65ha, based on the current estimate of around 3350 new dwellings, in order to appropriately mitigate for potential negative recreational effects of the new development on Hatfield Forest

Respondent Name Betsy Brown

Organisation Natural England

SSSI/NNR.

We note that the East of Harlow Masterplanning SPD does not state the anticipated area of SANG to be delivered, but based on the maps accompanying the draft SPD, this appears to be around 20ha. Natural England views 20ha as being insufficient to mitigate potential negative recreational effects on Hatfield Forest SSSI/NNR.

The final version of the East of Harlow Masterplanning SPD should make clear the need for the total SANG space to be around 65ha to fully mitigate negative recreational impacts on Hatfield Forest SSSI/NNR. SANG space can be provided across more than one site within the masterplan area, but at least one site should be large enough to meet all of the essential criteria in Natural England's SANG Guidelines. Such criteria include but are not limited to:

- A minimum circular walk of 2.3-2.5km
- A minimum of 100m width within open spaces
- A need for a semi-natural feel with naturalistic space including open countryside and trees
- Provision of access points based on intended visitors to SANG
- Allowance of open space and off-lead areas for dogs
- •Car parking (1 space/ha) unless public transport is readily available
- Securing land in perpetuity for a minimum period of 80 years
- Diverall, across all SANG provision for a development area, the use of the standard metrics of 8ha of land per 1000 new population and 2.4 people per dwelling

It should be noted that the identification and design of new (bespoke) SANG will need to be agreed with Natural England and the Competent Authority as part of the masterplanning process.

Council Response

References to linkages with the surrounding landscape to improve and encourage access, and consideration of "green" routes that incorporate street trees and urban GI to improve attractiveness and connectivity, will be added to the SPD.

SuDS requirements are detailed in the HLDP; greater detail of type, location would be for the masterplan to address based on supporting evidence prepared by a developer.

Reference to the greening of local centres will be added to the SPD.

Requirements for BNG are detailed in the HLDP and the Harlow Open Spaces SPD.

The SPD is to be amended to remove the specific SANG reference from the open space in the north of the site because one is not designated in this location in the Epping Local Plan. The SPD cannot designate or allocate land for purposes. Instead, the SPD will clarify that the exact use of the open space is yet to be determined. Should it be decided at the masterplanning stage that a SANG will be provided on this site, then the guidance referenced here will be adhered to. The SPD will be amended to take note of this guidance and that the identification and design of new (bespoke) SANG will need to be agreed with Natural England and the Competent Authority as part of the masterplanning process.

6. Sustainability and Build Quality

Council Response

7. Sustainable Movement

Natural England is supportive of the approach of the SPD in incorporating sustainable travel into their policies, with an emphasis on encouraging walkable communities.

Council Response

Noted.

8. Sustainable Transport Corridors

Council Response

Page 6 of 213 Respondent Name	Rep ID 2 Betsy Brown	Organisation Natural England	EoH Document Comments
9. All-Vehicle Acces	ss		
Council Response			
10. Educational Pro	ovision		
Council Response			
11. Local Centres			
Council Response			
12. Combined Prince	ciples		
Council Response			
Other Comments			
Council Response			
•			
Are there any attach	ments? Yes		

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Respondent Name Cllrs Charles, Livings and Gar Organisation Harlow Council

General Comments

Introduction

Harlow needs more housing, but new developments must not negatively impact existing settled communities. The planned East of Harlow strategic housing site fails on all fronts. We believe the strategic housing site runs the risk of not only impacting existing communities, in particular Churchgate Street, but also the surrounding environment.

Recent flooding from the M11, down through the fields and into Churchgate Street caused significant water flow to build, which caused damage to homes and made Hobbs Cross Road impassable. This suggests that the construction of Junction 7A has altered the flow of water running off the fields bordering Churchgate Street. Building more homes at the scale proposed could further compound the flooding issues recently experienced, causing them to spread to other parts of the East of Harlow if the strategic housing site were to become a reality.

A new Harlow hospital is vital in order to meet the growing healthcare needs of the town's ever-increasing population and the parts of West Essex already served by the current hospital. We recognise the strategic importance of Harlow's part of the M11 corridor and fully support the construction of a new Harlow hospital.

The actions of housing developers in Gilden Park have shown that stricter conditions need to be applied to developers. All future Section 106 agreements need to be more proactively enforced by the council and developers need to be held better to account when they miss deadlines, particularly for community facilities and supporting infrastructure. This is not addressed in the draft supplementary planning document (SPD), but lessons must quickly be learnt.

It is our view that the East of Harlow strategic housing site fails fundamental sustainability questions, does not pay adequate attention to the existing needs of Churchgate Street residents who would be impacted the most, and is not in keeping with the overarching plan for the M11 corridor to be at the forefront of medical and wider technological innovation.

There is a need for more job creation that is linked to businesses with a life science and medical focus to complement what will be delivered at the new hospital site. It would be far more attractive for both Epping and Harlow Council to focus on building a business cluster on a site with a smaller footprint than the proposed housing to create more sustainable employment opportunities for future generations locally and in the surrounding area. Attracting more established med-tech companies, and other health innovation start-ups would help position Harlow as a key driver of economic growth in the East of England. Focusing on economic development is a far more exciting proposition that could achieve greater buy-in from the community.

In this consultation response, we set out an alternative vision for the East of Harlow. Pushing back against the ambition to build unsustainable housing to focus on putting in place facilities for expanding employment opportunities for future generations to take advantage of.

Conclusion

There is a far more compelling argument for the East of Harlow to become a zone for business and job creation if the draft SPD strategic focus is changed to meet such an ambition. The argument for more housing does not stack up. The connectivity with the M11 should be used to better advantage to boost the local economy, not put pressure on existing communities.

There is a need for a long-term view in terms of future job creation. Making available more employment land is one way to encourage business investment in Harlow. It is also disappointing that the document does not once mention the site's position in the regionally significant London and Cambridge corridor.

It is clear that environmental concerns have still not been adequately addressed. Recent flooding in Churchgate

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Respondent Name Cllrs Charles, Livings and Gar Organisation Harlow Council

Street means that closer scrutiny of the watercourses in and around Old Harlow need to be closely monitored as Junction 7A may have had a negative impact already on water flow, which could be exacerbated by more housing.

The preferred new hospital site should be the main focus of the draft SPD. Decisions made about the East of Harlow cannot be done in isolation of the new hospital plans and a far more integrated plan, including public transport upgrades and supporting infrastructure, should be focused on serving that site above anything else.

Too much emphasis on expensive transport schemes, like the sustainable transport corridor, are too long-term. There is a need to invest in better public transport that delivers quicker short-term impact to address the inequality of provision that exists today.

Council Response

The SPD seeks to ensure the masterplan will respect the existing communities surrounding the new East of Harlow Garden Community.

SuDS, including new ponds and swales, are likely to help with any future flooding. . Churchgate Street area flooding in 2023 was as a result of a very intense and short period of rain that impacted on the local brook within a known flood zone area (as per EA maps). This is with EA to decide whether further work/what work is required.

Support for the new PAH is noted.

The adherence to S106 agreements is not a matter for this SPD, but the Council's legal action against the developers at Gilden Park is likely to set an important precedent which will help to ensure developers adhere to planned delivery of infrastructure in the future.

The HLDP allocates suitable sites for future employment in accordance with Local Plan evidence base and the Enterprise Zones, as well as relocation of UK HSA, in Harlow provide new opportunities for employment and business including medical, engineering and technological.

The East of Harlow site was allocated for housing and associated ancillary uses in the Harlow and Epping Local Plans, which went through rigorous rounds of consultation, public examination and inspection by government. The south-east of the UK has some of the highest house prices in the country due to high demand and lack of supply. Issues such as people living longer than previous generations, higher rates of divorce in older people (resulting in a divorced couple requiring two homes instead of one), and birth rates historically being higher than death rates, has increased demand. The need for housing - including much needed affordable housing - is detailed further in the evidence base supporting the Harlow and Epping Local Plans.

Reference to the site's location in the London and Cambridge corridor will be added to the SPD.

The SPD integrates with plans for the new PAH as much as possible at this stage, and future masterplanning work will be aligned as much as possible.

The HGGT Transport Strategy, STC and associated modal shift/change are key strands of the HGGT vision to address potential increased vehicular movements arising from new development. The STC will provide fast, direct, safe walking, cycling and bus routes for residents across the town. For the eastern part of the STC it will provide sustainable travel opportunities for residents at East of Harlow, Newhall The STC will provide fast, direct, safe walking, cycling and bus routes for residents across the town. For the eastern part of the STC it will provide sustainable travel opportunities for residents at East of Harlow, Newhall and First Avenue in particular. Modal change is about allowing short car journeys to be completed using sustainable transport instead, thereby reducing the number of cars on the road overall. The allocation of the site has been informed by transport assessment evidence as part of the Local Planand further detailed transport assessments will be carried out by the developer. The HGGT IDP identifies what schemes and proposals are required from the development including those related to improving the highway network to accommodate growth.

1. Introduction

Council Response

2. Context

Abandoning the total 3,350 (Harlow and Epping Forest targets combined) new housing plan and replacing it with a

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Respondent Name Clirs Charles, Livings and Gar Organisation Harlow Council

new vision based on promoting enterprise along the M11 corridor is, in our view, a better approach. This will run at odds with the Epping and Harlow Council Local Plans that are both already in place and the strategic housing needs assessment for the area, but will instead further stimulate economic growth in the region, which is in our view a higher priority at this time. Junction 7A, although we opposed its construction at the time, not only allows quick access to the preferred site for the new hospital, it could be used as a link to a business park on a reduced footprint compared to the current designated housing land. Providing long-term employment opportunities and the chance for health-related business enterprises to effectively co-locate to the new hospital site would be a far more sensible approach.

The Gilden Park development has shown the major disruption caused when agreements are not adhered to by housing developers. We want the fundamental strategic principles of the East of Harlow site to be revisited as they conflict with the reality confronting the town right now. The need for more good quality jobs currently outweighs the desire for excessive housing development.

Focusing on a health and wellbeing campus as part of the East of Harlow vision is something we support as it matches the aims associated with the preferred site for the new hospital. Harlow has a strong link with medical innovation and is "...4 times the national average as a sector strong area for life sciences..."1 according to the district council's business website. More of an emphasis on leveraging Harlow's existing strength in life sciences is something we would like the Harlow and Gilston Garden Town (HGGT) executive team to explore with Harlow Council when finalising the vision.

It would also make better sense to reorientate the focus more around the new hospital site. A vision based on promoting Harlow as a major destination for businesses involved in the life sciences and the wider medical innovation space. There is potential to be more pro-enterprise in outlook, which the current vision does not communicate strongly enough.

There also seems to be a lack of consideration about the historic character of the settled communities that form the North East of Harlow at this time. It is important that the vision references this when it is finalised following the consultation process.

1 Harlow Business (2023), Harlow: Space to Start and Grow, available from: https://www.harlowbusiness.org/

Council Response

The East of Harlow site is allocated for housing and associated ancillary uses in the Harlow and Epping Local Plans, which went through rigorous rounds of consultation, public examination and inspection by government. The south-east of the UK has some of the highest house prices in the country due to high demand and lack of supply. Issues such as people living longer than previous generations, higher rates of divorce in older people (resulting in a divorced couple requiring two homes instead of one), and birth rates historically being higher than death rates, has increased demand. The need for housing - including much needed affordable housing - is detailed further in the evidence base supporting the Harlow and Epping Local Plans.

The HLDP allocates suitable and sufficient sites for future employment as per the evidence base for the Local Plan, and the Enterprise Zones in Harlow and relocation of the UK HAS provide new opportunities for employment and business.

The adherence to S106 agreements is not a matter for the SPD. However, in the case of Gilden Park, Harlow Council is currently taking legal action which is likely to set an important regional, if not national, precedent which will ensure developers provide infrastructure as agreed at the planning application stage. The SPD is clear that existing communities and their historic character will be respected when the landscape-led East of Harlow masterplan is prepared, in accordance with the HGGT Design Guide.

3. Stewardship

Council Response

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Respondent Name Clirs Charles, Livings and Gar Organisation Harlow Council

4. East of Harlow Character Considerations

Council Response

5. Landscape and Green Infrastructure

The impact of a housing site with a major footprint, in an area already prone to flooding, has not been properly factored into the SPD. Churchgate Street, which under the plans would border the East of Harlow site, faced significant flooding issues in May. This may have been caused by the run-off of water from the M11 into the fields bordering it, overwhelming the streams that pass through Churchgate Street. The local network of streams did not cope with the downpour of water on that occasion.

Building 2,600 homes in Harlow will impact how run-off water travels and could increase the risk of flooding in the local area. It is true that a commitment has been made not to build any development within Flood Zone 2 and 3 that form part of the council's own assessment, but we believe those assumptions need to be tested again and updated given the recent flooding that took place in Churchgate Street. Further run-off water hitting Pincey Brook will have implications further down the watercourse that flow through Old Harlow. This is acknowledged in the draft SPD, but the high level considerations are not enough to satisfy local concerns.

There needs to be a more comprehensive review of the watercourse from the M11 down through to Old Harlow. Without a more detailed assessment, we believe it would be unwise to consider any further major changes to the land bordering Old Harlow. Recent incidents point to an increased vulnerability of flooding, so more caution would be a sensible course of action.

As is pointed out in the draft SPD specific guidance about landscape character, the East of Harlow site is "...predominantly rolling agricultural farmland."2. Losing agricultural land in the farming belt between Old Harlow and Hatfield Heath has not been properly factored into the planning assumptions. There is a growing argument for increasing farming capacity because of food security concerns. Increasing crop yields should be more of a priority in this corner of West Essex and having sites available to do so may be more of a necessity in the future. It therefore makes no sense to reduce the amount of available farmland locally. The environmental benefits of preserving agricultural land for local wildlife, and the imbalance caused if not, are not properly thought out in the SPD, despite trying to encourage a focus on a range of green infrastructure, including wildlife corridors and other potential climate change initiatives.

Council Response

SuDS, including new ponds and swales, are likely to help with any future flooding. Churchgate Street area flooding in 2023 was as a result of a very intense and short period of rain that impacted on the local brook within a known flood zone area (as per EA maps). This is with EA to decide whether further work/what work is required.

Most of the farmland in question is Grade 3, meaning it is Good to Moderate and therefore not the best (which would be Grades 1 and 2). Around 70% of UK land is farmland. It was accepted at the examinations for the Harlow and Epping Local Plans, which allocated this site, that the loss of farmland is, on balance, acceptable in order for the districts to meet their identified housing targets.

The Green Belt Review for Harlow highlights evidence that residential gardens often have more wildlife than agricultural land, as farming processes over the years, such as use of chemicals and removal of hedgerows, have limited the amount of wildlife habitats. As highlighted in previous comments, there is a need for housing in Harlow including affordable housing and this site has been allocated in the Harlow and Epping Local Plans and agreed as being suitable by a government inspector.

6. Sustainability and Build Quality

Council Response

7. Sustainable Movement

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Respondent Name Clirs Charles, Livings and Gar Organisation Harlow Council

including a mini bus terminal as part of the preferred new hospital site.

The congestion caused by additional housing is a serious concern. Building on such a large scale could cancel out the additional capacity added to the road network in the East and at the M11.

Council Response

The HGGT Transport Strategy, STC and associated modal shift/change are key strands of the HGGT vision to address potential increased vehicular movements arising from new development. The STC will provide fast, direct, safe walking, cycling and bus routes for residents across the town. For the eastern part of the STC it will provide sustainable travel opportunities for residents at East of Harlow, Newhall and First Avenue in particular. Modal change is about allowing short car journeys to be completed using sustainable transport instead, thereby reducing the number of cars on the road overall. The allocation of the site has been informed by transport assessment evidence as part of the Local Planand further detailed transport assessments will be carried out by the developer. The HGGT IDP identifies what schemes and proposals are required from the development including those related to improving the highway network to accommodate growth.

8. Sustainable Transport Corridors

Council Response

9. All-Vehicle Access

The three proposed vehicular access points to the East of Harlow site will cause significant additional traffic movements on Gilden Way and other parts of the local road network. HGGT modal shift assumptions need to be tested further as car and van ownership in the town is not going to dramatically change in the near future. As car use does not show any signs of slowing down, the impact of three new access points on the existing road infrastructure in and around Old Harlow needs to be better thought through. The draft SPD states that highways authority approved base models and studies will be used, but there will need to be greater transparency about how that work is carried out to better understand the impact on the local network of adding three additional access points.

Council Response

The HGGT Transport Strategy, STC and associated modal shift/change are key strands of the HGGT vision to address potential increased vehicular movements arising from new development. The STC will provide fast, direct, safe walking, cycling and bus routes for residents across the town. For the eastern part of the STC it will provide sustainable travel opportunities for residents at East of Harlow, Newhall and First Avenue in particular. Modal change is about allowing short car journeys to be completed using sustainable transport instead, thereby reducing the number of cars on the road overall. The allocation of the site has been informed by transport assessment evidence as part of the Local Planand further detailed transport assessments will be carried out by the developer. The HGGT IDP identifies what schemes and proposals are required from the development including those related to improving the highway network to accommodate growth. The availability of data regarding base models etc. is not a matter for the SPD.

10. Educational Provision

Council Response

11. Local Centres

Council Response

12. Combined Principles

One of the most compelling arguments against the housing plan is the inability to put in place the necessary supporting infrastructure. The indicative plans for school provision, public transport and recreational space would

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Respondent Name Cllrs Charles, Livings and Gar Organisation Harlow Council

need to be put in place first. This is not adequately defined in enough detail in the draft SPD document and needs to be urgently revisited. Without a clear strategic timeline to put in place supporting infrastructure, the East of Harlow housing plan is simply not viable, even at this initial planning stage.

We also believe that the plan to have five traveller pitches, as set out in the extract of the Epping Forest Local Plan Policy (appendix one), should be abandoned as part of the East of Harlow plan. Harlow Council already meets the required pitch provision. The concern is that any issues associated with such pitch provision will have more of an impact on Old Harlow as opposed to Epping Forest given the proximity.

4. The future of the M11 corridor:

The danger is that the proposed strategic housing site is in direct conflict with the future vision for the M11 corridor. It has already been badged as an 'Innovation Corridor' because of the existing and growing med-tech base. Harlow sits at the centre of the corridor. It is important that the town sets an example for the rest of the communities that sit on the M11 and embrace what the 'Innovation Corridor' truly stands for. The town already has the enterprise zone and a tradition of attracting life sciences companies to set up base locally, but the key is to continue building on that sector base.

Harlow needs a more diverse base of different sectors to meet future employment needs. The East of Harlow site is perfectly positioned between London and Cambridge, that means any changes to the use of land bordering the M11 must take account of the rapidly changing needs of businesses and supply chain considerations. Placing employment land closer to the M11 would boost the capacity of businesses through, for example, better connection times to Stansted Airport, which could increase the likelihood of investment by companies delivering multi-national operations to want to base themselves in Harlow.

The HGGT executive team and Harlow Council cannot afford to lose the opportunity to take a leading role in shaping the future of the M11 corridor and work with partners to secure inward investment into the district as a result. Positioning the town's part of the M11 corridor as an area providing the best access to medical innovation will require a focus less on housing and more on building on the current key sectors that deliver employment in the town. That is also a potential route to increase overall living standards in Harlow too, but it will mean a rethink of the East of Harlow plans to achieve the strategic narrative to do so.

Council Response

Infrastructure will have to be provided in a phased approach based on the construction/occupation of dwellings. However, it is not appropriate for the SPD to provide detail on phasing of housing and phasing of infrastructure provision - this will come at the masterplan stage in detailed discussion with infrastructure providers.

The provision of the five traveller pitches is in alignment with the adopted Engine Forest Local Plan. Provision of

The provision of the five traveller pitches is in alignment with the adopted Epping Forest Local Plan. Provision of the pitches will ensure impact on existing areas is mitigated against.

The HLDP, existing employment areas and Enterprise Zones provide for a diverse base of different sectors to meet future employment needs. The Council and HGGT team have prepared Economic Development Strategies which set out the actions required to deliver employment, different growth sectors and skills across Harlow and the Garden Town. The Local Plan allocates sufficient sites for employment and housing as approved by a government inspector.

Other Comments

RECOMMENDATIONS:

- 1. Review the vision for the East of Harlow draft SPD and consider a more pro-enterprise approach. Go back to the negotiating table with Epping Forest District Council and the Government to refocus the strategic need on the local economy instead of increasing housing supply to the East of Harlow. There are alternative sites that can deliver more housing.
- 2. Include a commitment to review the flood risk associated with further major development and the impact it could have on communities that would border it, including Churchgate Street. Evaluate the risk today given the

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Respondent Name Clirs Charles, Livings and Gar Organisation Harlow Council

flooding incident that took place in May. This might involve expanding the flood risk zones to better protect existing communities.

- 3. Consider changing the focus of the overarching strategic direction for the East of Harlow site to major on creating a more modest plan for unlocking additional employment land as opposed to housing. Deliver on the aims of Harlow Council's relatively new economic development strategy. Ensuring residents have access to employment opportunities and community wealth building are two of the strategy's 2028 commitments that run pretty much in line with the current planning period that expires in 2033.
- 4. Work with Epping Forest District Council officers to remove the traveller pitch commitment included as part of their vision for the East of Harlow.
- Harlow already meets the required pitch provision. As these traveller pitches will have more of an impact on Old Harlow, officers from both council areas should revisit the allocation and move them to a more suitable location away from the M11 corridor.
- 5. Scrap the Sustainable Transport Corridor in favour of supporting a more conventional approach by backing a new mini bus terminal as part of the preferred new hospital site.
- This transport scheme will be expensive and not address the short-term public transport needs residents in Old Harlow want resolved right now. The energy and focus of the HGGT executive team and Harlow Council officers would be best served, for example, working with the bus operators to improve the existing service. There should be more planning to deliver a mini bus terminal at the new hospital site to boost public transport links.
- 6. Gear the strategic focus of the SPD around making sure the right infrastructure is in place to best serve where the new hospital is planned to go and the existing communities that form the East of Harlow on the M11 corridor. Continue to work on providing the best possible access to the new hospital site, look to reduce not increase the impact of traffic movements on Gilden Way, protect agricultural land as a key environmental commitment and make available more employment land to create jobs. Make sure the future Section 106 agreement is delivered with more binding commitments on deadlines to deliver supporting infrastructure.

Council Response

The HLDP allocates suitable sites for future employment and the Enterprise Zones in Harlow provide new opportunities for employment and business.

SuDS, including new ponds and swales, are likely to help with any future floodingChurchgate Street area flooding in 2023 was as a result of a very intense and short period of rain that impacted on the local brook within a known flood zone area (as per EA maps). This is with EA to decide whether further work/what work is required.

The provision of the five traveller pitches is in alignment with the adopted Epping Forest Local Plan. Provision of the pitches will ensure impact on existing areas is mitigated against.

The HGGT Transport Strategy, STC and associated modal shift/change are key strands of the HGGT vision to address potential increased vehicular movements arising from new development. The STC will provide fast, direct, safe walking, cycling and bus routes for residents across the town. For the eastern part of the STC it will provide sustainable travel opportunities for residents at East of Harlow, Newhall and First Avenue in particular. Modal change is about allowing short car journeys to be completed using sustainable transport instead, thereby reducing the number of cars on the road overall. The allocation of the site has been informed by transport assessment evidence as part of the Local Planand further detailed transport assessments will be carried out by the developer. The HGGT IDP identifies what schemes and proposals are required from the development including those related to improving the highway network to accommodate growth.

Infrastructure will have to be provided in a phased approach based on the construction/occupation of dwellings. However, it is not appropriate for the SPD to provide detail on phasing of housing and phasing of infrastructure provision - this will come at the masterplan stage.

Most of the farmland in question is Grade 3, meaning it is Good to Moderate and therefore not the best (which would be Grades 1 and 2). Around 70% of UK land is farmland. It was accepted at the examinations for the Harlow and Epping Local Plans, which allocated this site, that the loss of farmland is, on balance, acceptable in

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Respondent Name Cllrs Charles, Livings and Gar Organisation Harlow Council

order for the districts to meet their identified housing targets.

The Green Belt Review for Harlow highlights evidence that residential gardens often have more wildlife than agricultural land, as farming processes over the years, such as use of chemicals and removal of hedgerows, have limited the amount of wildlife habitats.

Are there any attachments?	No		

Respondent Name Graham Ellis

Organisation

General Comments

I refer to the above document dated 23rd July 2023.

My Practice of Chartered Surveyors, Graham Ellis Associates (GEA) are an Approved Consultant for Harlow Council and have been based in the Town since 1979.

I was educated in Harlow (as most of my staff were) and have lived here for over 50 years, so I am familiar with the infrastructure of the Town and the issues it has experienced in its development.

I currently live at [redacted], Elmbridge, Old Harlow CM17 OJX.

My house can be seen in Photograph No 7 on page 22 of your document.

GEA Project Managed the construction of Nos 21 and 22 Elmbridge in July 2014, for our Client Leach Homes, who originally built the Elmbridge Estate of 100 houses back in the 1960's.

We were informed, when we agreed to buy the property, that Planning Permission had been refused on 3 separate occasions previously for housing in the field, to the south of our site (Photo 7) and therefore it was decided by Leach to 'fill in the gap' left for possible access into the field, by constructing these two houses between Nos 20 and 23.

There is currently no access into this field either via Elmbridge or Hobbs Cross Road to the south of the field.

We bought the house on this basis, with superb views over open countryside, on the understanding that this field would not be built on in the future.

Anyone who lives in this area, will be aware of the horrendous problems with traffic build up through Churchgate Street and along Hobbs Cross Road, especially during term time, when the children are at school and any thoughts of increasing the volume of traffic in the vicinity, should be very carefully considered.

We already have 2 schools fronting on to Hobbs Cross Road, Churchgate School and St Nicholas, which are literally yards apart.

The thought of adding a third school in the field behind us, or indeed more housing, would in my opinion have an extremely detrimental effect on the local environment.

I have consulted other owners of properties in Elmbridge, who like me, are very unhappy about any further development in the field behind us and would raise serious objections to future plans, if indeed they come to fruition.

It is unclear from the information provided, exactly what you are proposing to be built in this field and would be grateful to receive some clarification.

I look forward to hearing from you.

Council Response

The East of Harlow site was allocated for housing and associated ancillary uses in the Harlow and Epping Local Plans, which went through rigorous rounds of consultation, public examination and inspection by government. The refusal of previous planning permissions does not necessarily mean planning permission would be refused in future.

Furthermore, the land was previously Green Belt, but Harlow's Green Belt Review identified that this land performed poorly as Green Belt and the housing need justified the removal of the Green Belt designation in this area. The south-east of the UK has some of the highest house prices in the country due to high demand and lack

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Respondent Name Graham Ellis

Organisation

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of supply. Issues such as people living longer than previous generations, higher rates of divorce in older people (resulting in a divorced couple requiring two homes instead of one), and birth rates historically being higher than death rates, has increased demand. The need for housing - including much needed affordable housing - is detailed further in the evidence base supporting the Harlow and Epping Local Plans.

The HGGT Transport Strategy, STC and associated modal shift/change are key strands of the HGGT vision to address potential increased vehicular movements arising from new development. The STC will provide fast, direct, safe walking, cycling and bus routes for residents across the town. For the eastern part of the STC it will provide sustainable travel opportunities for residents at East of Harlow, Newhall and First Avenue in particular. Modal change is about allowing short car journeys to be completed using sustainable transport instead, thereby reducing the number of cars on the road overall. The allocation of the site has been informed by transport assessment evidence as part of the Local Planand further detailed transport assessments will be carried out by the developer. The HGGT IDP identifies what schemes and proposals are required from the development including those related to improving the highway network to accommodate growth.

The exact land use, including schools, of individual parcels of land will be determined in the masterplan for the site.

site.
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4. East of Harlow Character Considerations
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5. Landscape and Green Infrastructure
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6. Sustainability and Build Quality
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8. Sustainable Transport Corridors
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12. Combined Principles		
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•		
Are there any attachments? No		

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Respondent Name Clirs S Carter, A Johnson, N P Organisation Harlow Council

General Comments

Introduction

More housing, of any description, is needed desperately, and East Harlow looks to be an ideal location and therefore to be welcomed. With a long narrow site like this, bordered on a long side by a motorway, access is not going to be easy.

It is intended that motor vehicle access for the entire site is through three gateways off the same road, running across the northern boundary.

The HGGT Transport Strategy calls for a modal shift of 60% of journeys starting or finishing in the development are not undertaken by car.

The answer to reducing car journeys is "A network should be created that works by providing reliable, high-quality alternatives to private vehicles". But nowhere in this document does it explain how such a network will be funded or operated, a crucial omission for a feature which is fundamental to the Garden Town principle.

With such unsustainable assumptions it is not surprising the original developers withdrew from the project. It may be possible to have some development on the site but not on the scale envisaged without causing considerable stress to the existing traffic, both locally and regionally.

In fact, there are no references to the Equality Act 2010 and the need to make reasonable adjustments, for example the need for fully accessible homes, streets free from clutter and safe for people with guide sticks and guide dogs. If these are not set out from the start of the Planning Guidance, it will be extremely difficult to introduce it later on.

Conclusion

East Harlow is still in a visionary stage, not properly thought through in terms of its practicality at that size. High quality and reliable public transport are the planners dream which is yet to reach fruition anywhere. East Harlow is trying to squeeze a quart into a pint pot with its sole access from the A1025. This Guidance is irrelevant to the more modest potential of the site and must be withdrawn.

Council Response

Epping Local Plans.

The operation of sustainable transport is not a matter for the SPD, but it is intended, for example, that bus rapid transport will at least initially be funded by the developers. This will be addressed at a later stage. However it is clearly set out in the Harlow and Gilston Garden Town Infrastructure Delivery Plan what the expectations are in regards to funding and delivering sustainable transport measures including the Sustainable Transport Corridor and policies are in place through the Local Plans for improved walking, cycling and bus provision to ensure that the impact of vehicles is mitigated. Transport evidence has been prepared to support the allocations in the Local Plan and detailed Transport Assessments will be required as part of the planning application process. The scale of the development at this site was set out in the adopted Harlow and Epping Local Plans based on the projected need required in Harlow and Epping. The East of Harlow site was allocated for housing and associated ancillary uses in the Harlow and Epping Local Plans, which went through rigorous rounds of consultation, public examination and inspection by government. The south-east of the UK has some of the highest house prices in the country due to high demand and lack of supply. Issues such as people living longer than previous generations, higher rates of divorce in older people (resulting in a divorced couple requiring two homes instead of one), and birth rates historically being higher than death rates, has increased demand. The need for housing including much needed affordable housing - is detailed further in the evidence base supporting the Harlow and

A reference to the Equality Act 2010 will be added to the SPD, but requirements for fully accessible homes, for

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Respondent Name Clirs S Carter, A Johnson, N P Organisation Harlow Council

example, are set out in the Harlow and Epping Local Plans, reflecting Building Regulation requirements. 1. Introduction **Council Response** 2. Context Council Response 3. Stewardship **Council Response** 4. East of Harlow Character Considerations **Council Response**

5. Landscape and Green Infrastructure

Council Response

6. Sustainability and Build Quality

Council Response

7. Sustainable Movement

Even with 40% of all journeys starting or finishing within the estate means that from 3,350 homes, in an area with no employment, shopping or leisure activities, that is still a large number of journeys that will start or finish by motor vehicle. But the motor vehicle is attacked at every opportunity, in low priority at junctions, and the long route round the development from the western-most junction on Gilden Way, the sole access to a long, narrow, site.

The proposed access by the Sustainable Transport Corridor is via the narrow, single carriageway London Road from Mark Hall roundabout to the start of Newhall. This is a vital route for traffic heading north from both Newhall and to a lesser extent, Church Langley. It is also the main access to Mark Hall school and the leisure centre, where the A414 is very busy at school start and finish times. How speedy and reliable will buses be trying to join the A414 at the Mark Hall roundabout against west bound motorway traffic and traffic from Gilden Park and East of Harlow – more traffic lights to provide priority? The route for the STC into Newhall and East if Harlow demands a rethink, compared with running it along the A1025 to the proposed site of the new PAH which would provide the speedy and reliable service much more easily and be more attractive to passengers,

A speedy, reliable, high quality public transport system is, of course, highly desirable but such facilities require a high level of public subsidy, such as Transport for London. Nowhere else in the UK receives such largesse and there is nothing in this guidance that suggests massive funding for public transport in East Harlow is forthcoming. So how can the Guidance put forward these proposals which everyone knows will be impractical and unsustainable?

Council Response

The HGGT Transport Strategy, STC and associated modal shift/change are key strands of the HGGT vision to address potential increased vehicular movements arising from new development. The STC will provide fast, direct, safe walking, cycling and bus routes for residents across the town. For the eastern part of the STC it will provide sustainable travel opportunities for residents at East of Harlow, Newhall and First Avenue in particular. Modal change is about allowing short car journeys to be completed using sustainable transport instead, thereby Page 20 of 213 Rep ID 5 EoH Document Comments

Respondent Name Clirs S Carter, A Johnson, N P Organisation Harlow Council

reducing the number of cars on the road overall. The allocation of the site has been informed by transport assessment evidence as part of the Local Planand further detailed transport assessments will be carried out by the developer. The HGGT IDP identifies what schemes and proposals are required from the development including those related to improving the highway network to accommodate growth, including upgrades to existing roads. The chosen route for the STC was considered the best out of the various options after consideration of impacts and other issues.

The London Road issue relates to the New Hall condition which was delayed until the new M11 J7a was completed and now awaits the adoption of the new access onto the A414.

The school and Leisure centre are easily accessible on foot or bike especially from Newhall, but also Church Langley, and supports these sustainable modes being used as it removes the through traffic from the route. Access to both is maintained by car via the A414.

Buses on the STC would be funded by the development initially and it is expected they will become self funding as the development grows. These buses would also benefit the residents of Newhall (and other existing Harlow residents along the route) by providing a fast and reliable bus service to both the town centre and beyond and also the new health and wellbeing campus once relocated.

8. Sustainable Transport Corridors

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Council Response

9. All-Vehicle Access

The single carriage A1025 will have seven junctions and crossings along its one and half mile route from Mark Hall roundabout to the roundabout intended for access to the new Princess Alexandra Hospital. That is one interruption every 375 yards, which is hardly in accordance with its role as the sole access road for the M11 junction 7a.

Motorway traffic emanates from across north Essex and East Hertfordshire, outside of the scope of the HGGT Transport Strategy and Sustainable Transport Corridors. New roads are being constructed across the Stort Valley to accommodate that traffic.

The new development of Gilden Park of over 1,000 homes also suffers from sole access from the A1025, already causing considerably delays. The new Princess Alexandra Hospital, likely to be sited at junction 7a, will create its own traffic from both staff and visitors, most of whom will not live close to the Strategic Transport Corridor in the Essex and Hertfordshire borders.

Heavy traffic on the A1025, difficult access into the estate and low priority for cars within the estate is not going to make East Harlow an attractive prospect to potential purchasers. It only requires a single road traffic incident on the single lane A1025 or M11 to isolate the entire estate, as occurs to the west at Church Langley, an estate of similar size also with only one access.

Church Langley was built with similar aspirations to reduce the use of the car, with substantial funding from the developers for new bus lanes along the two primary routes into the town centre, and along to the railway station. The A414 was widened from Church Langley to Second Avenue ("Clocktower" roundabout) – but the bus lanes are never used as the buses turn right at both roundabouts. Is the service 'reliable and high quality'? From prolonged experience the answer is a resounding no.

Like East Harlow, Church Langley has no employment, one supermarket and little recreation so there is a great need to travel, by car, for these needs. How will East Harlow fare better?

Council Response

HGGT is predicted on being a sustainable development and as such people will purchase properties in this knowledge and developers will be aware of this requirement. With multiple accesses onto Gilden Way, traffic will either be able to access towards the town centre and access the wider area or leave via J7a and then return.

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Respondent Name Clirs S Carter, A Johnson, N P Organisation Harlow Council

Church Langley was designed and built as a single estate without new facilities such as the STC. However, East of Harlow is being developed as part of a Garden Community and therefore benefits from Garden Town-wide resources and funding, with new infrastructure being created on a scale which may not have been feasible had it been developed as a single site in the way Church Langley was.

M11 J7a was designed to provide the second motorway access to Harlow and therefore helps to provide relief if either J7 gets blocked for any reason and vice versa.

The road has been designed with enough capacity to deal with traffic associated with the new development and this is supported by modelling.

The impact of the hospital is not as significant as a totally new development as it is a relocation. Being close to the M11 means that traffic which previously came from the M11 to access the hospital can in future do so without traversing the town to get there.

10. Educational Provision

From the Education pages Specific Guidance – Transport (ii) says "schools must be located away from main roads in a traffic free location . . . and limited public access by private vehicle" which discriminates against children and parents with physical disabilities. There is no reference in the Guidance suggesting that vehicular access must be maintained as reasonable adjustments for people with disabilities.

Council Response Limited public access by private vehicle will still be available for those with physical disabilities.
11. Local Centres
Council Response
12. Combined Principles
Council Response
Other Comments
Council Response
•
Are there any attachments? No

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Respondent Name Jean Prevost

Organisation

General Comments

Looking at the draft plans to build on land in area around Gilden Way and Churchgate Street. Churchgate Street is already feeling the impact on traffic since the houses built alongside Gilden Way. This older part of Harlow with its narrow road will suffer even more. The proposed new build will also affect the area of Matching regarding travelling to Harlow.

The roads are already seeing an increase in large lorries, vans and through traffic along Moorfields Road and local narrow lanes. More traffic will make the situation worse. As we have no public transport in Matching apart from the Community Bus 3 times a week people have to use cars to reach Harlow using Moorfields Road and Gilden Way.

I appreciate Harlow needs more housing but would feel happier if this project encompassed an extensive build of social housing which would benefit a lot more people young and old.

Council Response

Council Response

The HGGT Transport Strategy, STC and associated modal shift are key strands of the HGGT vision to address potential increased vehicular movements arising from new development and will support the delivery of improved bus services in this area as the STC will link the area to key parts of Harlow. The SPD also shows no left/right turns on existing roads for those accessing the new development to prevent traffic rat-running through existing settlements. The allocation of the site has been informed by transport assessment evidence as part of the Local Planand further detailed transport assessments will be carried out by the developer. The HGGT IDP identifies what schemes and proposals are required from the development including those related to improving the highway network to accommodate growth. Modal change is about allowing short car journeys to be completed using sustainable transport instead, thereby reducing the number of cars on the road overall. The target for social housing is set out in the Harlow Local Development Plan as 30% which will apply to this site.

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8. Sustainable Transport Corridors		
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3. Stewardship		
Council Response		
4. East of Harlow Character Considerations		
Council Response		
5. Landscape and Green Infrastructure		
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6. Sustainability and Build Quality		
Council Response		
7. Sustainable Movement		

I am writing concerning the east of Harlow proposals, most notably the proposal to close London Road for vehicles. As one of many Newhall residents, this would have awful repercussions for those who live there as there would be awful traffic jams joining the A414. Given the continuous building of homes, we actually need more roads instead of reducing these

I would urge this to be considered alongside the wider east of Harlow proposals.

Council Response

The HGGT Transport Strategy, STC and associated modal shift/change are key strands of the HGGT vision to address potential increased vehicular movements arising from new development. The STC will provide fast, direct, safe walking, cycling and bus routes for residents across the town. For the eastern part of the STC it will provide sustainable travel opportunities for residents at East of Harlow, Newhall and First Avenue in particular. Modal change is about allowing short car journeys to be completed using sustainable transport instead, thereby reducing the number of cars on the road overall. The allocation of the site has been informed by transport assessment evidence as part of the Local Planand further detailed transport assessments will be carried out by the developer. The HGGT IDP identifies what schemes and proposals are required from the development including those related to improving the highway network to accommodate growth.

The East of Harlow site was allocated for housing and associated ancillary uses in the Harlow and Epping Local Plans, which went through rigorous rounds of consultation, public examination and inspection by government. The south-east of the UK has some of the highest house prices in the country due to high demand and lack of supply. Issues such as people living longer than previous generations, higher rates of divorce in older people (resulting in a divorced couple requiring two homes instead of one), and birth rates historically being higher than death rates, has increased demand. The need for housing - including much needed affordable housing - is

detailed further in the evidence base supporting the Harlow and Epping Local Plans.
8. Sustainable Transport Corridors
Council Response
9. All-Vehicle Access
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Other Comments
Council Response
Are there any attachments? No

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Respondent Name Jane Carrington

Organisation

General Comments

I am part of the Ministry Leadership Team at St Mary's Church Churchgate Street, so this response comes not only from my personal understanding of the situation, but also from the concerns of many residents of Churchgate Street who attend the church.

I have read through this document and studied the maps. I found the maps difficult to understand because a lot of the colours from the key were very similar. Whilst the outline of the site was the same and gave some indication as to various geographical features, I still struggled to understand some of them even though we have lived in the area for over 40 years and have walked or cycled around a lot of it.

3350 Homes are a lot – almost as many as on Church Langley!

Council Response

The maps are to be amended when the final SPD is produced.

The East of Harlow site was allocated for housing and associated ancillary uses in the Harlow and Epping Local Plans, which went through rigorous rounds of consultation, public examination and inspection by government. The south-east of the UK has some of the highest house prices in the country due to high demand and lack of supply. Issues such as people living longer than previous generations, higher rates of divorce in older people (resulting in a divorced couple requiring two homes instead of one), and birth rates historically being higher than death rates, has increased demand. The need for housing - including much needed affordable housing - is detailed further in the evidence base supporting the Harlow and Epping Local Plans.

1. Introduction

P4 'Two main roads cut the site east to west, Moor Hall Road in the North and Hobbs Cross Road in the South.' In one sentence, Moor Hall Road and Hobbs Cross Road are referred to as main roads, and in the other, they are existing country lanes. They are not main roads - they are winding country roads that are access to Churchgate Street.

Council Response

This will be amended in the final SPD.

2. Context

"P11 The existing crossings will be enhanced and celebrated, allowing wider access to the eastern countryside." Does this mean crossings of the motorway. If it does, both existing road crossings of the motorway involve bridges - if these are widened, it still means that the roads around them are windy country roads.

Council Response

This will be clarified to explain that the crossings refer to crossings of the motorways.

3. Stewardship

Council Response

4. East of Harlow Character Considerations

"p13 iii. Existing country lanes should be acknowledged, with retention of Rights of Way and mature trees and hedgerows. "

I am pleased that mature trees and hedgerows should be retained. It would be good if these could be enhanced and used as a screen to cut down on additional noise and to visually screen the new building. Could this be done in advance of the building to allow them to develop before significant building begins?

"P14 Topics to Consider when Preparing the Masterplan i. Effect on historic settlement of Churchgate Street, considering its existing area, density and building heights."

Style of housing as well as height should be considered. Also there needs to be a green finger separating the new development from Churchgate Street. School playing fields will be fenced off and therefore not accessible to

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Respondent Name Jane Carrington

Organisation

locals, so whilst this may create a green buffer zone, it will not be somewhere where locals can exercise or walk their dogs. Green fingers and wedges are also needed for existing residents, not only the huge number of people who will be moving into the area.

Sir Frederick Gibberd designed Harlow so that housing developments could not be seen because they were built mainly in the lower areas of countryside, so when approaching Harlow, the town generally could not be seen. Housing is now being proposed on the high points, which makes it far more visible and intrusive.

"P14 iii. Presence of Flood Risk Zone 2 and 3 areas."

Churchgate Street has recently experienced unusual significant flooding opposite the junction of the private road leading from 'The Amazing Place' formally Hubbard Hall, with Hobbs Cross Road. All of this additional building and concreting over of the fields will make that more open to happening again. I could not see where Zone 2 and 3 were on the maps. Will anything be put in place to ensure that the new building will not increase the risk of flooding to existing residents and what will be put in place to help to prevent it?

Council Response

Landscaping and planting to assist with visual and noise screening will likely be planted early on to allow them to be more mature when the houses are occupied. However, this detail will be laid out in the masterplan or accompanying landscape scheme with the planning application.

Style of housing as well as height will be considered in the context of the existing area.

The exact location of green space around existing areas and in new areas will be established in the masterplan, but the SPD ensures that existing places will be suitably protected. There is already a significant green wedge designated within the development. The SPD requires the masterplan to be landscape-led, ensuring that open spaces and Green infrastructure are provided, while respecting and preserving the original landscape as much as possible. This also includes a mandatory net increase in biodiversity and the delivery of a new Green Wedge through the development for new and existing residents to enjoy..

The SPD states the expectation that school playing fields should be available to locals outside of school hours. While Sir Frederick Gibberd originally designed the New Town to be built within the landscape, he recognised that the town would continue to grow in the future (see the plaque to his work in the Water Gardens with associated quote) but note that the heights and landscape must be factored into a masterplan.

SuDS, including new ponds and swales, are likely to help with any future flooding. Churchgate Street area flooding in 2023 was as a result of a very intense and short period of rain that impacted on the local brook within a known flood zone area (as per EA maps). This is with EA to decide whether further work/what work is required.

The masterplan will need to be informed by appropriate flood assessments including drainage and mitigation measures put in place where necessary.

5. Landscape and Green Infrastructure

"P15 i. All masterplanning within the Garden Town must adopt a 'landscape led' approach to development in line with the HGGT Vision and reflecting Sir Frederick Gibberd's original masterplan for Harlow New Town.

ii. The masterplan should, therefore, respond to the distinctive landscape setting; expand and enhance the town's Green Wedge network; improve the Green Belt edge treatment; and support a sustainable and biodiverse environment. "

Green wedges were an important part of Harlow when it was first developed.

The land to the North of Harlow East is being designated as a buffer between this development and Sheering P17 - how about a buffer between Churchgate Street and Harlow East? There also needs to be a buffer established between New Hall and Churchgate Street. I note on page 69, that the field opposite what was Hubbard Hall and is now The Amazing Place, which separates New Hall from Churchgate Street was originally designated for housing, but the planning for that has time lapsed. With all of this additional development now encroaching on the countryside around Old Harlow, could that now be designated a green finger to link the green wedge running East / west through Harlow East development?

"P15 v. The existing landscape should shape the pattern of new development and the character of open spaces, using existing woodlands, hedges, trees, meadows and waterways as natural cues. vi. The green and blue

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Respondent Name Jane Carrington

Organisation

infrastructure network of the Garden Town and wider area must be protected and enhanced, and considered in an integrated way to meet sustainability, placeshaping and socio-economic objectives. "

If ponds or lakes are developed to allow for flood relief, could they be areas that the locals can enjoy with seats. The pond flood defences for Gilden Park have all been fenced off so locals cannot sit and enjoy the areas, whereas New Hall have a lovely pond area, but without seats!

Council Response

The exact location of green space around existing areas and in new areas will be established in the masterplan, but the SPD ensures that existing places will be suitably protected. The SPD requires the masterplan to be landscape-led, ensuring that open spaces and Green infrastructure are provided, while respecting and preserving the original landscape as much as possible. This also includes a mandatory net increase in biodiversity and the delivery of a new Green Wedge through the development for new and existing residents to enjoy..

Details regarding ponds or lakes will be set out in the masterplan including details on how green and blue infrastructure should be enjoyed by residents as well as acting as natural habitats.

6. Sustainability and Build Quality

Does this mean that they will have solar panels to assist not only with individual costs, but also to help feed back into the grid?

This big development alongside all the other developments locally are in the hottest, driest part of the country. How will there be sufficient water for these developments and how will the system cope with sewage from the area. The system is not coping already without all this additional building.

Will water butts be fixed to catch rain water for gardens? Will grey water from washing machines, baths, showers etc be used for gardens and flushing toilets?

Council Response

The installation of energy generating elements such as solar panels, as well as the impact on water infrastructure, will be considered at the masterplan stage when relevant infrastructure providers will be engaged to consider necessary expansion to cope with new demand from additional housing. The developer will need to submit a sustainability checklist setting out how they have considered these sorts of measures and comply with sustainability policies and design guides on climate change prepared by the authorities. Ch6 will be amended to include ref. to the need for strategies for water use, e.g. commitments for all new dwellings to have efficient water fittings and the installation of water butts/other greywater. They must also comply with the latest building regulations on energy efficient measures. The partners and developer will work with utility providers on water provision and are aware of the development sites in this area through the Local Plan process.

7. Sustainable Movement

P28 '50% of all trips starting and/or ending in the existing settlement area of Harlow Town should be by active and sustainable travel modes and 60% of all trips starting and/or ending in the new Garden Communities of Harlow & Gilston Garden Town should be by active and sustainable travel modes.'

Whilst this is a laudable aim, the chances of this happening with the pressures that families are under to get children to school, after school clubs and go onto work is not realistic! The sustainable transport route for buses is not likely to provide buses regularly enough or to places where people work in order for them to be a feasible alternative to the car. The amount of traffic that this size of development will create is huge. A bus connection to Gilden Way however would be welcomed, especially if it could be used for people from Churchgate Street (who are now limited to a minibus on limited days of the week rather than a daily bus service). It would also provide public transport for people living on Gilden Park.

For people to use public transport instead of cars, there needs to be a comprehensive bus service to all areas of the town. This is NOT present in Harlow at the moment.

As cyclists who have a car, but use the bikes for our 'go to' mode of transport, I like the idea of the development of additional cycle routes linking key areas of the town.

Council Response

Organisation

The HGGT Transport Strategy, STC and associated modal shift/change are key strands of the HGGT vision to address potential increased vehicular movements arising from new development. The STC will provide fast, direct, safe walking, cycling and bus routes for residents across the town. For the eastern part of the STC it will provide sustainable travel opportunities for residents at East of Harlow, Newhall and First Avenue in particular. Modal change is about allowing short car journeys to be completed using sustainable transport instead, thereby reducing the number of cars on the road overall. The allocation of the site has been informed by transport assessment evidence as part of the Local Planand further detailed transport assessments will be carried out by the developer. The HGGT IDP identifies what schemes and proposals are required from the development including those related to improving the highway network to accommodate growth.

8. Sustainable Transport Corridors

Access roads should be built before house building commences so that heavy lorries do not use Hobbs Cross Road, Churchgate Street or Moor Hall Road.

Council Response

Development traffic would not be allowed to use routes through Churchgate Street and developers would be expected to prepare a construction plan to show how they would bring the site forward. Text in SPD to be amended accordingly.

9. All-Vehicle Access

The proposed vehicular access routes will need to cut across Hobbs Cross Road and Moor Hall Road. This will increase the amount of traffic into Churchgate Street significantly. Presently, it has a village feel, with a tight knit community. The roads already become very congested especially at school drop off and pick up time. The village has a high proportion of retired people, and the 2 schools means that there are a lot of children also making their way through the area. I realise that the objective is to encourage people to walk, cycle or take public transport. However, realistically, people are going to take children to school on the way to work, so will jump into the car, thus vastly increasing the traffic and congestion around the area. Also, who will be running the transport? Will it be a reliable regular timetable that people will be able to rely on? If not - if it's anything like the bus 'service' around Harlow, the busses will be reduced as they are not profitable and then the service will be cut completely.

"P 39 v. All vehicle Primary Street should cross Moor Hall Road with signalised junction. No turning movements should be allowed from / into Moor Hall Road except bus and emergency access. Full modal filter should be incorporated to prevent all vehicle access to Hobbs Cross Road, including crossing of the Green Wedge. "How is the lack of turning movements going to be enforced?

It is important therefore that the access routes into the area don't just form a junction with existing roads (as people will not take any notice of signs that there is no access - like the Mulberry Green turning from Gilden Way - bollards had to be put along the road to prevent people turning right in and out of Gilden Way.) It would be preferable for the roads to be a bridge over Hobbs Cross Road and Moor Hall Road to give access to the new housing, with pedestrian / bike access from the bridge for people to access existing housing.

"P 39 v. There should preferably also be an additional Primary Street with T-Junction from Gilden Way, in conjunction with a Local Centre and primary school site, reflecting its secondary role. Traffic signal control should allow bus and active travel priority and to prioritise east / west traffic on Gilden Way"

Will there be a no right turn and bollards along Gilden Way, like the junction to and from Mulberry Green?

"ii. There should be no all vehicle, except emergency, access to Hobbs Cross Road. "

Quite a few motorists ignored the 'no right turn' in and out of Mulberry Green – permanent bollards had to be installed to prevent this. A bridge over the road will be the only way to prevent this happening on such a narrow road.

"iii. The Primary Street network should cross Hubbards Hall Drive (private road / track / public footpath) as a priority route. "

There should be no vehicle access to the private road / track / public footpath from this new access road. It is

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Respondent Name Jane Carrington

Organisation

totally unsafe leading onto Churchgate Street and Hobbs Cross Road. It also runs adjacent to the playing fields of the 2 existing schools, so would add to the pollution for the children in those playgrounds. Equal consideration should be given to people already living in the area.

"iv. Hubbard Hall Drive junction should be controlled as no turning towards Churchgate Street, with supporting junction design and traffic calming measures on Hubbards Hall Drive near junction."

The junction of this private road with Churchgate Street is on a very dangerous bend. There should be no turning in or out of there with Churchgate School and St Nicholas School to the right of the junction as you come out of it. Also additional residences are to be developed at the old Churchgate Manor Hotel, which will increase the traffic entering the road at this point. There is parking all along that road for when children enter and are picked up from school. Children cross the road to go into Elmbridge and Windmill Fields. This road cannot take additional traffic from the new development. At school start and finishing times it is totally congested and is already an accident waiting to happen. Hobbs Cross Road leading out of Harlow is a bendy road - not suitable as a rat run to the Junction 7 roundabout, and this would be likely to increase.

With the proposed primary school being built next to The Amazing Place, there is a high possibility that the private road would gain additional road use from parents with children in the new school - adding to the existing chaos on Churchgate Street / Hobbs Cross Road. It would also be an additional route for people living in New Hall to get to the junction 7 on the M11.

"v. The single secondary school should, therefore, be located in the central part of the site, with one primary school in the southern part and another close to the secondary school. All schools should be sited near the western boundary of the site, closer to existing neighbourhoods."

Why should they be near to existing neighbourhoods? A green finger needs to give opportunities for existing residents to continue to have access to green areas and a buffer to this high density housing that is proposed.

Council Response

The HGGT Transport Strategy, STC and associated modal shift/change are key strands of the HGGT vision to address potential increased vehicular movements arising from new development. The STC will provide fast, direct, safe walking, cycling and bus routes for residents across the town. For the eastern part of the STC it will provide sustainable travel opportunities for residents at East of Harlow, Newhall and First Avenue in particular. Modal change is about allowing short car journeys to be completed using sustainable transport instead, thereby reducing the number of cars on the road overall. The allocation of the site has been informed by transport assessment evidence as part of the Local Planand further detailed transport assessments will be carried out by the developer. The HGGT IDP identifies what schemes and proposals are required from the development including those related to improving the highway network to accommodate growth.

A bridge is unlikely to be feasible due to the high costs and significant amount of engineering works which would be required.

No-right turns or similar, enforced using physical barriers and possibly ANPR cameras, will be provided where necessary.

Schools are planned to be near existing neighbourhoods and walking/cycling/public transport routes to allow easier access and to avoid using the car to get to them.

Access to all the roads within Churchgate Street from routes travelling through the new development would only facilitate walking and cycling access. Text in SPD to be amended accordingly.

10. Educational Provision

Council Response

11. Local Centres

For an area of this size, the neighbourhood areas will need to involve doctors, dentist, supermarket, community hall, cafe as a minimum. Whilst school facilities can be used for community use, this is only outside of school hours. Community groups need areas where they can meet for self help groups, keep fit, toddler groups, faith groups etc during the day when the schools are not available. The local doctors and dentists cannot cope with the

Respondent Name Jane Carrington

Organisation

existing patient load. Park and playing field areas will be needed for children (apart from school facilities).

The centres appear to be very close to the existing village of Churchgate Street. This will mean that the higher density levels of housing will encroach hugely on the village. This usually means blocks of flats, which have flat rooves and will not be at all in keeping with the area. Please can consideration be given to the area where these houses are being built, so that the needs of existing residents are also thought through.

P53 Hatches - there is no mention of preschool provision; doctors; dentist; play areas; community rooms for use for faith activities; keep fit; toddler groups; support groups etc.

Council Response

The site will be supported by the right infrastructure in the right location including health, education, sustainable transport, access and highway improvements and all utility provision having considered any pressures in the local area. This is set out in the HGGT Infrastructure Delivery Plan. Infrastructure will have to be provided in a phased approach based on the construction/occupation of dwellings. However, it is not appropriate for the SPD to provide detail on phasing of housing and phasing of infrastructure provision - this will come at the masterplan stage in detailed discussion with infrastructure providers.

The SPD requires the masterplan to sensitively consider existing communities, including for issues such as building heights. In particular it states that the effects on existing settlements, such as the historic settlement of Churchgate Street, must be considered and any adverse impacts mitigated against, particularly regarding density and building heights.

The SPD will be amended to include reference to preschool provision; doctors; dentist; play areas; community rooms for use for faith activities; keep fit; toddler groups; support groups etc.

12. Combined Principles

"Density cue taken from New Hall. "

New Hall is totally out of keeping with Churchgate Street, which is why a buffer zone is required between them, but this density of housing is also out of keeping with the existing village. The density of housing on Gilden Park is more suitable as a comparison, but not the style of the flats / apartments on the edge of the roundabout with Gilden Way.

"Block design should be used to encourage walking"

There is a lot of crime on New Hall (as evidenced on the neighbourhood app). In my opinion block design is being suggested to fit as many houses onto the given space as possible - not for the well-being of the people who will be living there. People do not want to live in cramped areas and be overlooked by their neighbours — and it's not in keeping with the current area. The high density building in New Hall also means that the buildings are tall near the community hubs and this is not in keeping with the existing village.

Gilden Park is a much better layout than New Hall for comparison for the East Harlow building and has an enhanced community feel, where people do walk to places around the estate and to Harlow Old Town. There are numerous parks, where families congregate, children play out in the parks watched by parents from their houses and on talking to people who have moved into Gilden Park, they find it a very good community to be part of. Car parking is generally within central parking areas within blocks of housing, accessed through an arch or road rather than along the main roads around the estate. Traffic and parked cars are seen, but the design of the place has meant that this has been kept to a minimum. This is very much in contrast to New Hall. The blocked design on New Hall means there are a lot of problems with parking there and parking is on the streets, making it less safe for people crossing the roads.

Council Response

Housing density will be considered at the masterplan stage as will Secure By Design principles to ensure overlooking of spaces/homes etc. Densities will vary across the site, taking into account existing nearby facilities, communities and the landscape.

New housing will be guided by the HGGT Design Guide, the Harlow Design Guide and Addendum, and other

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Respondent Name Jane Carrington

Organisation

guidance, to ensure new development is safe, appropriately overlooked but with good privacy for residents, and is in-keeping with existing surrounding communities.

The 'cue taken from Newhall' does not mean that all aspects of Newhall will be replicated.

Other Comments

p62 (ii) five traveller pitches;

There is no reference to where these pitches might be. Harlow has had a lot of issues with travellers in the past, so this needs to be carefully considered.

Council Response

The exact location for any traveller pitches will be determined at the masterplan stage.

Are there any attachments? No

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Respondent Name Christine Baldwin

5. Landscape and Green Infrastructure

Organisation

General Comments

This appears to be over development of the area considerably stripping the countryside consequently adversely affecting the natural habits of nature it's beauty and ecosystem. The majority of roads in the area are already over stretched causing a plethora of vehicles crating poor quality air and major congestion. What are the plans for clean water supply and the structure fors for the disposal of human waste ie .. sewage.

Council Response

The East of Harlow site is allocated for housing and associated ancillary uses in the Harlow and Epping Local Plans, which went through rigorous rounds of consultation, public examination and inspection by government. The south-east of the UK has some of the highest house prices in the country due to high demand and lack of supply. Issues such as people living longer than previous generations, higher rates of divorce in older people (resulting in a divorced couple requiring two homes instead of one), and birth rates historically being higher than death rates, has increased demand. The need for housing - including much needed affordable housing - is detailed further in the evidence base supporting the Harlow and Epping Local Plans.

SuDS, including new ponds and swales, are likely to help with any future flooding. Churchgate Street area flooding in 2023 was as a result of a very intense and short period of rain that impacted on the local brook within a known flood zone area (as per EA maps). This is with EA to decide whether further work/what work is required.

The SPD requires the masterplan to be landscape-led, ensuring that open spaces and Green infrastructure are provided, while respecting and preserving the original landscape as much as possible. This also includes a mandatory net increase in biodiversity and the delivery of a new Green Wedge through the development for new and existing residents to enjoy..

The HGGT Transport Strategy, STC and associated modal shift/change are key strands of the HGGT vision to address potential increased vehicular movements arising from new development. The STC will provide fast, direct, safe walking, cycling and bus routes for residents across the town. For the eastern part of the STC it will provide sustainable travel opportunities for residents at East of Harlow, Newhall and First Avenue in particular. Modal change is about allowing short car journeys to be completed using sustainable transport instead, thereby reducing the number of cars on the road overall. The allocation of the site has been informed by transport assessment evidence as part of the Local Planand further detailed transport assessments will be carried out by the developer. The HGGT IDP identifies what schemes and proposals are required from the development including those related to improving the highway network to accommodate growth.

Water suppliers and infrastructure providers will be engaged at the masterplan stage to ensure appropriate upgrades, where necessary, take place. They are aware of the growth coming forward in the area and are planning for it as a rsult of their engagement in the Local Plan process.

planning for it as a rsult of their engagement in the Local Plan process.
1. Introduction
Council Response
2. Context
Council Response
3. Stewardship
Council Response
4. East of Harlow Character Considerations
Council Response

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Respondent Name Christine Baldwin	Organisation	
Council Response		
6. Sustainability and Build Quality		······································
Council Response		
7. Sustainable Movement		
Council Response		
8. Sustainable Transport Corridors		
Council Response		
9. All-Vehicle Access		
Council Response		
10. Educational Provision		
Council Response		
11. Local Centres		
Council Response		
12. Combined Principles		
Council Response		
Other Comments		
Council Response		
Are there any attachments? No		

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Respondent Name	Colin Reed	Organisation	
General Comment	s		
Council Response			
1. Introduction			
Council Response			
2. Context			
Council Response			
3. Stewardship			
Council Response			
	Character Considerations		······································
Council Response			
	Green Infrastructure		
Council Response			
6. Sustainability a			······································
Council Response			
7. Sustainable Mo	vement		
Council Response			
8 Sustainable Trai			

I have noticed that London Road, between Newhall and Old Harlow, is highlighted as a Sustainable Transport Corridor. I am fully aware that in 2020 planning permission was granted, despite significant local objection, for London Road to be closed to private vehicles, allowing only buses to pass. This was delayed following local pressure, but read with interest that Section 8 of this plan again highlights that 'private vehicles should normally be excluded', as well as stating that bus lanes should be 4 metres, each way, if implemented. I am all for better public transport, but closing London Road was, is and will always be an essential link to Old Harlow. More so when the A414 is at grid locked due to accidents or M11 closures, and closing London Road will repeat the same mistake as Church Langley where there is only one way in/out for thousands of homes. London Road must remain open to private vehicles.

Council Response

The HGGT Transport Strategy, STC and associated modal shift/change are key strands of the HGGT vision to address potential increased vehicular movements arising from new development. The STC will provide fast, direct, safe walking, cycling and bus routes for residents across the town. For the eastern part of the STC it will provide sustainable travel opportunities for residents at East of Harlow, Newhall and First Avenue in particular. Modal change is about allowing short car journeys to be completed using sustainable transport instead, thereby reducing the number of cars on the road overall. The allocation of the site has been informed by transport assessment evidence as part of the Local Planand further detailed transport assessments will be carried out by the developer. The HGGT IDP identifies what schemes and proposals are required from the development

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Respondent Name Colin Reed

Organisation

including those related to improving the highway network to accommodate growth.

London Road: Comments and concerns regarding the closure of London Road have been noted by the Council. The issue and opposition around this proposal is being carefully considered outside of the SPD process in consultation with Essex County Council as lochall access arrangement and Bus Gate proposals. The reference number for this application is HW/FUL/17/00130. The officers report and planning statement produced by the developer provides information on why the bus gate is to be implemented.

9. All-Vehicle Access		
Council Response		
10. Educational Provision		
Council Response		
11. Local Centres		
Council Response		
12. Combined Principles		
Council Response		
Other Comments		
Council Response		
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Are there any attachments?	No	

Respondent Name Hannah Bullock	Organisation
General Comments	
Council Response	
1. Introduction	
Council Response	
2. Context	
Council Response	
3. Stewardship	
Council Response	
4. East of Harlow Character Considerations	
Council Response	
5. Landscape and Green Infrastructure	
Council Response	
6. Sustainability and Build Quality	
Council Response	
7. Sustainable Movement	
Council Response	
8. Sustainable Transport Corridors	
Council Response	
9. All-Vehicle Access	
•	infrastructure has not. Traffic is a continuous problem already
significantly already with traffic issues in and arour	wide development on London Road. Golden Park has impacted nd Old Harlow.
Council Response	
	modal shift/change are key strands of the HGGT vision to arising from new development. The STC will provide fast,
	sidents across the town. For the eastern part of the STC it will ents at East of Harlow, Newhall and First Avenue in particular.
•	s to be completed using sustainable transport instead, thereby

reducing the number of cars on the road overall. The allocation of the site has been informed by transport assessment evidence as part of the Local Planand further detailed transport assessments will be carried out by

the developer. The HGGT IDP identifies what schemes and proposals are required from the development

including those related to improving the highway network to accommodate growth.

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Respondent Name Hannah Bullock	Organisation
10. Educational Provision	
Council Response	
11. Local Centres	
Council Response	
12. Combined Principles	
Council Response	
Other Comments	
Council Response	
•	
Are there any attachments? No	

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Respondent Name	JANE CARRINGTON	Organisation	
General Comment	s		
Council Response			
1. Introduction			
Council Response			
2. Context			

4. East of Harlow Character Considerations

The plan indicates that the most densely populated area will be adjacent to existing properties in Churchgate Street. Will the building be in keeping with the area? Will there be a green wedge to allow existing residents to still enjoy a bit of nature? (School playing fields will not provide that buffer as they will not be accessible to the general public). Please can consideration be made about looking at the development on Gilden Park rather than New Hall for building community. What will be done to help alleviate the flooding risk within Churchgate Street. With the additional concrete it will surely increase this risk - and there was bad flooding earlier this year at the bottom of Churchgate Street / Hobbs Cross Road.

Council Response

Council Response

3. Stewardship

Council Response

The masterplan will be required to ensure that new development will be in keeping with existing communities and consider their distance. There is a new designated Green Wedge, running east-west across the land, which will be part of the site and accessible for all residents of Harlow.

SuDS, including new ponds and swales, are likely to help with any future flooding. Churchgate Street area flooding in 2023 was as a result of a very intense and short period of rain that impacted on the local brook within a known flood zone area (as per EA maps). This is with EA to decide whether further work/what work is required.

The SPD will be amended to ensure that the masterplan considers best practices in the area with regards to maximising a community feel in new developments.

5. Landscape and Green Infrastructure

With all of the development planned, would it be possible for the field between New Hall and The Amazing Place to be used as a green wedge. It states in the plan that it was New Hall land that had been allocated for housing but planning time has lapsed. This would then link with the green wedge within these plans. Gilden Park has shown how important parks can be to encourage building of community and would be good to consider as a model for East of Harlow. Areas like the pond area at New Hall would be great to include in this new area. The New Hall Pond is a lovely area, which would be improved by seating around it. Unfortunately the flood defence pond areas on Gilden Park have fences around them for safety, but does not allow the public to enjoy the natural world in the same way. I agree with Sheila's comment regarding anticipatory planting being important to enhance existing hedgerows and additional green space needed between existing housing and new housing.

Council Response

The land referenced is outside the allocation for East of Harlow, but its use and relationship with the site is being considered and, depending on the outcome of those considerations, its use will be detailed in the masterplan.

The SPD requires the masterplan to be landscape-led, ensuring that open spaces and Green infrastructure are provided, while respecting and preserving the original landscape as much as possible. This also includes a

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Respondent Name JANE CARRINGTON

Organisation

EoH Document Comments

mandatory net increase in biodiversity and the delivery of a new Green Wedge through the development for new and existing residents to enjoy.. Accessible Green and Blue Infrastructure will be an important element of the masterplan.

6. Sustainability and Build Quality

Will solar panels and reuse of grey water from showers, washing machines etc to be used for watering gardens, flushing toilets be considered in the houses.

Council Response

This level of sustainability will be sought by Harlow and Epping Councils, in accordance with their Local Plans, but the exact amount and type and associated viability will be determined at the planning application stage. The site will also need to comply with the latest building regulations in respect of these sorts of measures.

7. Sustainable Movement

Churchgate Street and Hobbs Cross Road are totally congested during school run time, which also impacts traffic in and out of Churchgate Street from the new roundabout on Gilden Way. Residents report that it takes at least 30 minutes to get out of the area onto Gilden Way at these times. Hobbs Cross Road and Moor Hall Road are country roads not main roads.

They are windy roads and not suitable for the additional traffic that will inevitably come from a development of this size. To follow the ethos of this plan, there needs to be a bridge over Hobbs Cross Road and Moor Hall Road with possible walking and cycling access onto these roads, but no vehicle access from the new primary access roads into the area. Vehicle access to Churchgate Street / Hobbs Cross Road from the private road to That Amazing Place should not be allowed.

A physical boundary needs to be built so that pedestrians and cyclists can access Churchgate Street from any new access road through New Hall, by That Amazing Place, but no vehicles. The private existing road comes out on a very dangerous bend on Hobbs Cross Road very close to schools. If traffic were allowed on the private road - it would add additional pollution for children attending the existing Churchgate and St Nicholas Schools as it runs adjacent to their playing fields.

I notice on the plans that the new schools will not be built close to the motorway is due to the possibility of pollution. There is, I believe, also going to be additional 15 flats developed in the old Churchgate Hotel, which will bring extra traffic onto Hobbs Cross Road at the same point as the existing private road from That Amazing Place. Access Roads should be developed first, so that heavy building traffic does not go through Churchgate Street or Hobbs Cross Road.

Council Response

Status of Hobbs Cross and Moor Hall Roads will be clarified in final version of SPD.

Exact vehicular movements through the site, along with access for pedestrians and cyclists, will be established at the masterplan stage, considering issues such as those set out in this rep.

The HGGT Transport Strategy, STC and associated modal shift/change are key strands of the HGGT vision to address potential increased vehicular movements arising from new development. The STC will provide fast, direct, safe walking, cycling and bus routes for residents across the town. For the eastern part of the STC it will provide sustainable travel opportunities for residents at East of Harlow, Newhall and First Avenue in particular. Modal change is about allowing short car journeys to be completed using sustainable transport instead, thereby reducing the number of cars on the road overall. The allocation of the site has been informed by transport assessment evidence as part of the Local Planand further detailed transport assessments will be carried out by the developer. The HGGT IDP identifies what schemes and proposals are required from the development including those related to improving the highway network to accommodate growth.

Access to all the roads within Churchgate Street from routes travelling through the new development would only facilitate walking and cycling access. Text in SPD to be amended accordingly.

Respondent Name JANE CARRINGTON	Organisation
8. Sustainable Transport Corridors	
Council Response	
9. All-Vehicle Access	
Council Response	
10. Educational Provision	
Council Response	
11. Local Centres	
Council Response	
12. Combined Principles	
Council Response	
Other Comments	
Council Response	
•	
Are there any attachments? No	

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Respondent Name jill Spinks

Organisation

EoH Document Comments

General Comments

Again riding rough shod over local people's views. Gilden Way development has been a nightmare. Noise, rubbish, waste, no landscaping, no services (drs etc) and traffic nightmares. What guarantees do we have that these developers will not do the same? The Developers of Gilden Way are trying to sell off the land that was for community services. Before starting another area you need to get areas that you have started finished first. By the way whoever wrote this document should at least have managed to get it right it is GILDEN WAY not GILDEN ROAD, Just goes to show that whoever wrote this does not know the local area at all.

Council Response

The enforcement of S106 agreements, etc., is not for this SPD to determine. However, in the case of Gilden Park, Harlow Council is currently taking legal action which is likely to set an important regional, if not national, precedent which will ensure developers provide infrastructure as agreed at the planning application stage. The intention of this SPD is to avoid uncertainties over what is expected from the developers of the East of Harlow site and to have management in how the masterplan is developed.

Gilden Way is correctly referenced 12 times throughout the document, but in one place is mistakenly referred to as Gilden Road. This will be corrected in the final SPD.

1. Introduction
Council Response
2. Context
Council Response
3. Stewardship
Council Response
4. East of Harlow Character Considerations
Council Response
5. Landscape and Green Infrastructure
Council Response
6. Sustainability and Build Quality
Council Response
7. Sustainable Movement
Council Response
8. Sustainable Transport Corridors
Council Response
9. All-Vehicle Access
Council Response

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Respondent Name jill Spinks	Organisation	
10. Educational Provision		
Council Response		
11. Local Centres		
Council Response		
12. Combined Principles		
Council Response		
Other Comments		
Council Response		
Are there any attachments?	No	

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Respondent Name	Marcus Harrison	Organisation	
General Comment	es s		
Council Response			
1. Introduction			
Council Response			
2. Context			
Council Response			
3. Stewardship			
Council Response			
	Character Considerations		
Council Response			
	Green Infrastructure		
Council Response			
6. Sustainability ar	nd Build Quality		
Council Response			
7. Sustainable Mov	vement		
Council Response			
	g London Road is a terrible	idea. During term time, it is a struggle to	_
close off a route the meetings.	iat takes you directly to Ol	d Harlow or 7A doesn't make sense. I opp	oose this and will attend
Council Response			
address potential id direct, safe walkin provide sustainabl Modal change is al reducing the numb	increased vehicular mover lg, cycling and bus routes for le travel opportunities for bout allowing short car jou ber of cars on the road ove	ciated modal shift/change are key strand ments arising from new development. The for residents across the town. For the east residents at East of Harlow, Newhall and urneys to be completed using sustainable erall. The allocation of the site has been it anand further detailed transport assessm	ne STC will provide fast, stern part of the STC it will difference in particular. e transport instead, thereby informed by transport
		t schemes and proposals are required fro	_

including those related to improving the highway network to accommodate growth.

developer provides information on why the bus gate is to be implemented.

London Road: Comments and concerns regarding the closure of London Road have been noted by the Council. The issue and opposition around this proposal is being carefully considered outside of the SPD process in consultation with Essex County Council as lochall access arrangement and Bus Gate proposals. The reference number for this application is HW/FUL/17/00130. The officers report and planning statement produced by the

Respondent Name Marcus Harrison	Organisation
9. All-Vehicle Access	
Council Response	
10. Educational Provision	
Council Response	
11. Local Centres	
Council Response	
12. Combined Principles	
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Other Comments	
Council Response	
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Are there any attachments? No	

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Respondent Name Matt Bradley	Organisation
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1. Introduction	
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2. Context	
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3. Stewardship	
Council Response	
4. East of Harlow Character Considerations	
Council Response	
5. Landscape and Green Infrastructure	
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6. Sustainability and Build Quality	
Council Response	
7. Sustainable Movement	
Council Response	
8. Sustainable Transport Corridors	
Council Response	
boundary? There does not seem to be much consi with these proposals. There is a green wedge in the	through Hubbard Halls Farm adjacent to the existing Newhall deration to the existing residents of Newhall, Churchgate Street are middle of the new development but no green wedges leate Street) and the new development which will create one

EoH Document Comments

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Council Response

large estate with so separation.

The exact location of Green Infrastructure will be established at the masterplanning stage, ensuring that the creation of one large estate is avoided and to provide green spaces for residents to enjoy.

The HGGT Transport Strategy, STC and associated modal shift/change are key strands of the HGGT vision to address potential increased vehicular movements arising from new development. The STC will provide fast, direct, safe walking, cycling and bus routes for residents across the town. For the eastern part of the STC it will provide sustainable travel opportunities for residents at East of Harlow, Newhall and First Avenue in particular. Modal change is about allowing short car journeys to be completed using sustainable transport instead, thereby reducing the number of cars on the road overall. The allocation of the site has been informed by transport

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EoH Document Comments

Respondent Name Matt Bradley

Organisation

assessment evidence as part of the Local Planand further detailed transport assessments will be carried out by the developer. The HGGT IDP identifies what schemes and proposals are required from the development including those related to improving the highway network to accommodate growth.

The SPD requires the masterplan to sensitively consider existing communities. In particular it states that the effects on existing settlements, such as the historic settlement of Churchgate Street, must be considered and any adverse impacts mitigated against, particularly regarding density and building heights.

10. Educational Provision

10. Educational Provision
Council Response
11. Local Centres
Council Response
12. Combined Principles
Council Response
Other Comments
Council Response
•
Are there any attachments? No

Rep ID 16

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Respondent Name Norman Crossley

Organisation

EoH Document Comments

General Comments

The proposals do not seem to take into account the already existing disruption to Old Harlow residents, in particular those in the Churchgate Street area. For these residents access onto Gilden Way is already nightmarish at busy times, such as school arrivals and departures. At such times and others the build-up of traffic extends along Churchgate Street as far back as St.Nicholas school. The waiting time at the lights is then horrendous, as being a minor access only three or four vehicles are able to get through before the lights change. When the new proposals are in place the increased traffic flow will make things even worse. Surely Gilden Way cannot possibly cope with the increase in traffic these present proposals will bring?

Council Response

The HGGT Transport Strategy, STC and associated modal shift/change are key strands of the HGGT vision to address potential increased vehicular movements arising from new development. The STC will provide fast, direct, safe walking, cycling and bus routes for residents across the town. For the eastern part of the STC it will provide sustainable travel opportunities for residents at East of Harlow, Newhall and First Avenue in particular. Modal change is about allowing short car journeys to be completed using sustainable transport instead, thereby reducing the number of cars on the road overall. The allocation of the site has been informed by transport assessment evidence as part of the Local Planand further detailed transport assessments will be carried out by the developer. The HGGT IDP identifies what schemes and proposals are required from the development including those related to improving the highway network to accommodate growth.

1. Introduction
Council Response
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3. Stewardship
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4. East of Harlow Character Considerations
Council Response
5. Landscape and Green Infrastructure
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6. Sustainability and Build Quality
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7. Sustainable Movement
Council Response
8. Sustainable Transport Corridors
Council Response

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Respondent Name Norman Crossley	Organisation	
9. All-Vehicle Access		
Council Response		
10. Educational Provision		
Council Response		
11. Local Centres		
Council Response		
12. Combined Principles		
Council Response		
Other Comments		
Council Response		
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Are there any attachments? No		

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Respondent Name	paul porter	Organisation	
General Comments	5		
Council Response			
1. Introduction			
Council Response			
2. Context			
Council Response			
3. Stewardship			
Council Response			
	Character Considerati		
• •	en countryside , how		al existing residents that have been used cal traffic using small narrow country
Council Response			
Epping Local Plans The HGGT Transpo address potential i direct, safe walking provide sustainable Modal change is ab reducing the numb assessment eviden the developer. The including those rela	regarding such issue ort Strategy, STC and ncreased vehicular new g, cycling and bus roue travel opportunities oout allowing short core as part of the Local HGGT IDP identifies ated to improving the	es and mitigation measures put in passociated modal shift/change are movements arising from new developments for residents across the town es for residents at East of Harlow, I car journeys to be completed using ad overall. The allocation of the sitical Planand further detailed transpose what schemes and proposals are ne highway network to accommodate	key strands of the HGGT vision to lopment. The STC will provide fast, For the eastern part of the STC it will Newhall and First Avenue in particular. It is sustainable transport instead, thereby has been informed by transport ort assessments will be carried out by required from the development
5. Landscape and G	Green Infrastructure		
Council Response			
6. Sustainability an			
Council Response			
7. Sustainable Mov			
Council Response			
8. Sustainable Tran what are the STC for	nsport Corridors or traffic coming to th	he hospital from Bishops Stortford,	Stansted, Chelmsford and the villages If the planning, This just like the planning

of junction 7A This plan only takes into account routes to and from Harlow town centre?

Council Response

Rep ID 17

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Respondent Name paul porter

Page 51 01 213

7 EoH Document Comments

The STC is designed to provide access to a number of transport hubs in and around the centre of Harlow, which will allow onward journeys to be carried out via sustainable modes of transport.

Organisation

9. All-Vehicle Access

The increase in traffic in the once beautiful country lanes is out of control and was never factored in the design of junction 7A. This is developing on land that is green belt which was designed to stop the spread of towns engulfing local countryside which is disappearing at an alarming rate. The local narrow roads are being damaged by the buses, heavy goods vehicles and increased flow of traffic which the local authorities are ignoring, this will be completely ignored again which will make the problems even worse. How will the residents of Harlow who could walk to the hospital that was located centrally in the town centre access the new one .more congestion and pollution for the countryside.

Council Response

The Green Belt in this area was identified as being poorly-performing Green Belt and was subsequently removed in the new Local Plans for Harlow and Epping, which were subject to various consultations, public examination and inspection by government.

The intention of the sustainable movement intentions, as set out in the HGGT Transport Strategy, Harlow and Epping Local Plans, etc. is to ensure that there is an increase in use of sustainable modes of transport which will ease congestion and reduce pollution.

10. Educational Provision
Council Response
11. Local Centres
Council Boomana
Council Response
12. Combined Principles
Council Response
Countries Response
Other Comments
Council Response
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Are there any attachments? No

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Respondent Name Sheila Sullivan

Organisation

General Comments

Council Response

1. Introduction

Since the outline of HGGT was proposed, conditions have changed. In particular, water supply and water quality issues are becoming critical. Awareness of the overpopulation of this area has increased since we have experienced pressure on resources, infrastructure, open space, poor aesthetic quality of new urban spaces such as Gilden Way. The documents are difficult to view, especially the maps.

Local centres need to be completely re-thought. In Newhall traffic and parking around the New Ground and the Base local centres is dangerous, unpleasant and unsightly. Parking space is totally inadequate for those using the centres. Existing parking space has been removed and replaced with housing and in the near future, businesses, increasing the pressure. Local centres need to be designed with sensitivity for the benefit of nearby residents and users. Planting should be incorporated into the design. Additional parking for business/company traffic needs to be added.

Council Response

Water suppliers and infrastructure providers will be engaged at the masterplanning stage to ensure that any necessary infrastructure upgrades are identified. Utility providers have already been involved with the identification and allocation of the development sites, informing evidence and ensuring that these sites are withintheir future plans.

Detail of the local centres will be set out at the masterplan stage, including consideration of issues raised in this rep, such as parking and landscaping.

2. Context

Council Response

3. Stewardship

Council Response

4. East of Harlow Character Considerations

Council Response

5. Landscape and Green Infrastructure

The amount of green landscape is inadequate. The use of appropriate tree planting is not dealt with. Anticipatory planting should be used so that future residents have a healthy and beautiful space to live in.

Using the area between Newhall and Amazing Place as a green wedge is an excellent idea. Substantial areas of green are needed. Also, A wide band shielding housing from motorway noise and pollution should be planted with significant trees including native trees, which in time could form a soft skyline.

Council Response

The masterplan is required by the SPD to be landscape-led, respecting the existing landscape by providing usable areas of open space and other Green Infrastructure that can be used by residents of the area.

The land referenced (near That Amazing Place) is outside the allocation for East of Harlow, but its use and relationship with the site is being considered and, depending on the outcome of those considerations, its use will be detailed in the masterplan. Green Infrastructure in general will be an important part of the masterplan, as outlined by the SPD, which requires the masterplan to be landscape-led.

Tree planting and detailed landscaping will be set out at the masterplanning stage, including sufficient

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Page 53 of 213 Respondent Name Sh	·	Organisation	EoH Document Comments
andscaping alongside	e the M11, similar to	that to the east of the Churc	
5. Sustainability and			
Council Response			
7. Sustainable Mover			
	s that one way in and		inadequate. Traffic chaos on Church s heavily used and therefore problems will
The issue and opposiconsultation with Ess number for this appli developer provides in	tion around this proposex County Council as ication is HW/FUL/17, of formation on why the	osal is being carefully consid lochall access arrangement a /00130. The officers report a le bus gate is to be implemer	n Road have been noted by the Council. ered outside of the SPD process in and Bus Gate proposals. The reference nd planning statement produced by the nted.
3. Sustainable Transp			
Council Response			
9. All-Vehicle Access			
Council Response			
LO. Educational Provi			
Council Response			
11. Local Centres			
Council Response			
12. Combined Princip			
Council Response			
Other Comments			

Council Response

Are there any attachments? No

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Respondent Name Chris Colloff

Organisation Thames Water

General Comments

Council Response

1. Introduction

The proposed East of Harlow development will result is likely to result in a requirement for upgrades to the sewerage network. The references to infrastructure and comprehensive delivery in paragraphs 1.20 and 1.24 are supported. However, it is considered that paragraph 1.20 should include reference to utilities infrastructure. In addition, it is considered that text should be included to encourage developers to engage with Thames Water to discuss drainage requirements and ensure that any necessary infrastructure is incorporated into the masterplan and delivered ahead of the occupation of the relevant stage of development.

Council Response

The final SPD will include reference to utilities infrastructure. Text will also be added to encourage developers to engage with Thames Water to discuss drainage requirements and ensure that any necessary infrastructure is incorporated into the masterplan and delivered ahead of the occupation of the relevant stage of development.

2. Context
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7. Sustainable Movement
Council Response
8. Sustainable Transport Corridors
Council Response
9. All-Vehicle Access
Council Response
10. Educational Provision
Council Response

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Respondent Name Chris Colloff	Organisation Thames Water	
11. Local Centres		
Council Response		
12. Combined Principles		
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Other Comments		
Council Response		
Are there any attachments? No		

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Rep ID 20 EoH Document Comments

Respondent Name Julie Starkins

Organisation

General Comments

Dear Sir/ Madame

I'm writing to voice my major concern with the development proposal to the area. We have lived on Chalk Lane for just over two years & chose this area because of the semi rural village feel & its outstanding beauty of the surrounding farmland & the beautiful vista of St Mary's Church spire.

This farm land & hedgerow is a vital to the wildlife. Not to mention the substantial size heard of deer that live & roam the farmland , I see them daily.

Since living in the area the new road infrastructure was put into place along Gilden way. This has caused traffic to back up in the morning sometimes taking 15+ minutes to get through. Having more houses will make this problem much much worse. Also I'd like to add how much the Old Harlow / Churchgate Street area would be spoilt by an estate of new builds ,its traditional old style feel with beautiful buildings & architecture not forgetting the church of St Mary's.

My cottage in Chalk Lane dates back to pre 1900 & feel mine & homes like these will be overshadowed by new builds that just will not fit in with the area.

I have attached a picture of the traffic back up in Moor Hall Road.

Council Response

The Green Belt Review for Harlow highlights evidence that residential gardens often have more wildlife than agricultural land, as farming processes over the years, such as use of chemicals and removal of hedgerows, have limited the amount of wildlife habitats. The SPD requires the masterplan to be landscape-led, ensuring that open spaces and Green infrastructure are provided, while respecting and preserving the original landscape as much as possible. This also includes a mandatory net increase in biodiversity and the delivery of a new Green Wedge through the development for new and existing residents to enjoy..

The SPD requires the masteprian to consider existing communities, such as the ones mentioned in the rep, including ensuring that prominent views would not be spoilt and the style and design of neighbouring settlements are taking into considerations whilst also ensuring that new properties are more efficient and sustainable.

1. Introduction
Council Response
2. Context
Council Response
3. Stewardship
Council Response
4. East of Harlow Character Considerations
Council Response
5. Landscape and Green Infrastructure
Council Response
6. Sustainability and Build Quality
Council Response

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Respondent Name Julie Starkins	Organisation	
7. Sustainable Movement		
Council Response		
8. Sustainable Transport Corridors		
Council Response		
9. All-Vehicle Access		
Council Response		
10. Educational Provision		
Council Response		
11. Local Centres		
Council Response		
12. Combined Principles		
Council Response		
Other Comments		
Council Response		
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Are there any attachments? Yes		

Organisation Savills, o.b.o. Mr Robert Jones

Respondent Name Will Lusty

General Comments

On behalf of our client, Mr Robert Jones, I am writing in response to your consultation upon the East of Harlow Masterplanning Guidance Draft Supplementary Planning Document (the draft SPD) and thank you for this opportunity to comment upon the document.

Our client is the freehold owner of land at Moor Hall Road, as shown on the plan attached to this letter as Appendix 1, extending to a site area of approximately 3.95ha (the site). These representations are the latest submissions made on behalf of our client by way of engagement with Development Plan and Development Management processes in relation to his land, which has notably included engagement with the now adopted Epping Forest Local Plan 2011-2033 (Adopted March 2023) (the Epping Forest Local Plan) to highlight the deliverability of his land for inclusion of as part of the East Harlow Strategic Masterplan Area, which was achieved through the provision of evidence to the Examination of the Epping Forest Local Plan and specifically by way of Main Modification 21 (the representations made on our client's behalf are attached to this letter as Appendix 2).

Our client's land lies within the East Harlow Strategic Masterplan Area, as shown on the Policies Map of the Epping Forest Local Plan. The Policies Map shows the East Harlow Strategic Masterplan Area to be the subject of Allocation Reference SP4.3 concerning the East of Harlow Garden Community under Policy SP4 of the Adopted Local Plan concerning Garden Communities. Despite this, our client's land remains excluded from the development anticipated by the draft SPD, assumedly in error given the inclusion of the site within the East Harlow Strategic Masterplan Area is now well established in light of the modifications that were made by Epping Forest District Council to the Epping Forest Local Plan when this was emerging and now by the Epping Forest Local Plan as adopted as part of the Development Plan. This is significant and the principal point raised by the representations which must therefore be read as an objection to the draft SPD. We address this point further below, before going on to provide our comments upon the remainder of the document.

Land at Moor Hall Road

Our client's land at Moor Hall Road presents an excellent opportunity to accommodate part of the East of Harlow Garden Community development proposed by Policy SP4 of the Adopted Epping Forest Local Plan. The land is shown by the draft SPD to be the subject of no particular constraints and this is consistent with the findings of the work we have undertaken to consider the planning potential of the site and in developing illustrative masterplan proposals for its development as shown in the 'Pre-application Pack' document (April 2020) attached as Appendix 3.

It can be seen from the draft SPD that the site for the wider East of Harlow Garden Community is the subject of various constraints as considered by the Harlow & Gilston Garden Town (HGGT) Partnership in preparing the draft SPD and the principles for the East Harlow area. Indeed, the draft SPD anticipates the continuation of Harlow's Green Wedge network across the site in adopting a 'landscape led' approach in line with the HGGT Offices and associates throughout the Vision and the original masterplan for the Harlow Garden Town, alongside a network of other green spaces. Furthermore, land is required for a Sustainable Transport Corridor (STC) as a key feature underpinning the HGGT Transport Strategy to drive movement by sustainable means, in addition to Main Roads and other types of routes and street spaces comprised in the movement network. It is also necessary to retain existing features such as woodlands and water bodies, as well as set land aside for ecological mitigation in the form of a BNG / SANG. As such, there are various competing and constraining pressures upon the site for the site for the wider East of Harlow Garden Community and it is therefore critical that the full potential of the full extent of the site is assessed and utilised in an efficient way. It is noted that paragraph 125 of the National Planning Policy Framework (NPPF) requires that:

[&]quot; ... masterplans can be used to help ensure that land is used efficiently while also creating beautiful and sustainable places".

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Respondent Name Will Lusty

Organisation Savills, o.b.o. Mr Robert Jones

In view of the above and in duly making efficient use of land comprised in the wider East of Harlow site area, our client's land should be included in the development anticipated by the draft SPD. More specifically, this should be affected by way of inclusion of our client's land within the 'Development Plots' defined by the Combined principles diagram at Figure 12.1 of the draft SPD and also the proceeding plans and diagrams, as applicable. Indeed, it can be seen from the inclusion of our client's land within the East Harlow allocation that the suitability of our client's land for inclusion as part of the East Harlow allocation was recognised by the Local Plan Inspector and the local planning authority. Furthermore, it is evident from the submission attached as Appendix 3, that the site is a valuable opportunity for inclusion in the Development Plots anticipated by the draft SPD in a complementary and cohesive way as part of the proposed masterplan.

Our client recognises the importance of ensuring that the East Harlow site is brought forward in a collaborative way as identified at the outset of the document. To this end, our client continues to liaise with the owners of the land comprised in the wider East of Harlow Masterplan Area allocation with regards to the coordinated delivery of the East of Harlow allocation.

Council Response

Background noted.

The land referred to has not necessarily been excluded from the anticipated development in this area, but rather it was not clearly referenced in the SPD. The 'development plot' area will be removed from the maps to avoid confusion.

The Council agrees with the principle of using land efficiently to enhance and increase areas of green and blue infrastructure and encourage healthy more walkable neighbourhoods.

The SPD maps will be amended.

4	Localization	luction
1	Introd	liction

Council Response

2. Context

Local Policy

It is noted at paragraph 2.2 of the draft SPD that a number of documents are identified, to include those prepared by Harlow and Epping Forest District Councils and also the HGGT. We consider this section and indeed other similar instances in the document where documentation is listed would benefit from presentation that recognises that planning law requires that applications for planning permission be determined in accordance with the development plan, unless material considerations indicate otherwise. As such, this should see Development Plan documents listed first of all, followed by supplementary planning and other documentation to build upon and provide more detailed advice or guidance on policies in the Development Plan and thereafter by other documentation as material considerations, such as that produced by HGGT, such as the HGGT Vision and HGGT Design Guide. It is considered that the listing of documentation in this way can assist structured consideration of the due weight to be attached to the respective documents forming a broad and comprehensive range of material considerations alongside Development Plan policy itself.

East of Harlow Vision Statement

We welcome the Vision Statement for the East of Harlow in responding to the unique circumstances of the East of Harlow site and the positive driver this provides in creating a beautiful and sustainable new community. We consider one aspect of the envisaged development that should also be addressed as part of the vision is the importance of economic considerations and specifically the role of local opportunities for work as part the vision for East Harlow, such as small scale workspace that are envisaged in the Neighbourhood Centre and proposed hatch.

Council Response

The way the documents are listed in the SPD will be reviewed accordingly and adjusted where necessary.

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EoH Document Comments

Respondent Name Will Lusty

Organisation Savills, o.b.o. Mr Robert Jones

The Vision will be amended to include the importance of economic considerations and specifically the role of local opportunities for work, such as small scale workspace that are envisaged in the Neighbourhood Centre and proposed hatch.

3. Stewardship

Council Response

4. East of Harlow Character Considerations

Council Response

5. Landscape and Green Infrastructure

We welcome the articulation of guidance concerned with landscape and green infrastructure at Section 5 of the draft SPD shown in the Existing green and blue infrastructure and landscape character diagram as Figure 5.1 and also the corresponding potential landscape and green infrastructure diagram shown at Figure 5.3. This diagram is considered to appropriately identify those areas within the site that are constrained by existing conditions or that would cohesively involve extension of the existing network of greenspaces in Harlow in ensuring that the site is brought forward in a landscape-led way and according to the Vision for the HGGT.

We also welcome the identification of land to the north of the site with a density range of 30-40dph, as shown at Figure 5.6. This is considered to respond appropriately to the context to the northern part of the sites, with the south of the site being identified with a higher density of 40-50dph. It is considered that these ranges should be qualified as being indicative to allow for localised variation of density, as may be applicable in responding to localised context or particular opportunity presented by the masterplan.

It is noted at Figure 5.3 of the document that an area in the north of the East Harlow Masterplan Area is identified as Suitable Alternative Natural Greenspace / Biodiversity Net Gain. We also note at paragraph 4.21 of the Epping Forest Local Plan that the Epping Forest District Green Infrastructure Strategy (EFDGIS) includes guidance on the provision of Suitable Alternative Natural Greenspace at strategic sites and enhancing existing green infrastructure assets. However, it is not clear from the draft SPD whether the EFDGIS has been accounted for in identifying the area in the north of the East Harlow Area and how the amount of this area has been determined based on appropriate evidence. We therefore consider the draft SPD would benefit from the publication of supporting evidence to justify this aspect of the masterplan proposals.

Council Response

The SPD will be amended so that the area in the north of the site is referred to as a green buffer rather than for a specific SANG/BNG use.

6. Sustainability and Build Quality

Council Response

7. Sustainable Movement

Council Response

8. Sustainable Transport Corridors

The central role of Sustainable Transport Corridors (STC's) in delivering mode share targets for the Garden Town is recognised as a central part of the creation of a sustainable new community. These will present the opportunity for ease of sustainable movement across the East of Harlow area and into Harlow itself. In addition, and in ensuring for the efficient masterplanning of the site at the same time, it is considered that the STC's can also function as means for movement around the site and into Harlow by car in instances where movement by car

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EoH Document Comments

Respondent Name Will Lusty

Organisation Savills, o.b.o. Mr Robert Jones

is required. It is noted that measures to allow for the appropriate prioritisation and separation of buses along the STC can ensure it effectively functions in delivering sustainability objectives whilst also serving as a route for all transportation modes.

We note the recognition at page 35 of the draft SPD that there is only one point at which the STC could cross Moor Hall Road without disrupting existing development or having to go the edge of the site and we support this and the alignment of the STC that is proposed by the document.

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9. All-Vehicle Access

Council Response

10. Educational Provision

Council Response

11. Local Centres

We welcome the proposed strategy to establish a new Neighbourhood Centre and further hatch as part of the masterplan. Such centres can form a focal point for everyday life and support the overall vitality and vibrancy of the new community as well as underpinning its sustainability in minimising the need to travel to destinations further afield. We also welcome the locations proposed for these new centres as optimising accessibility whilst accounting for the constraints and opportunities affecting the site and in particular the proposed location of the Local Centre a short distance to the west of our client's site on Moor Hall Road.

We also note the specific objective at page 54 of the document to develop Moor Hall Road into a place as part of the local centre to break down potential barriers formed by the road and the inclusion of our client's land within the East Harlow site can contribute in fulfilling this objective

Council Response

Noted.

12. Combined Principles

Council Response

Other Comments

In conclusion, our client looks forward to the opportunity for continued engagement with the process for preparing the draft SPD and trusts that these representations will be taken into due account in further progressing the preparation of the draft SPD. Indeed, our client looks forward to developing a fully integrated and deliverable masterplan through this process with the other landowners in the East Harlow Masterplan area.

Council Response

Noted.

Are there any attachments?

Yes

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Respondent Name Roy Warren Organisation Sport England

General Comments

Council Response

1. Introduction

Council Response

2. Context

Council Response

3. Stewardship

Council Response

4. East of Harlow Character Considerations

Council Response

5. Landscape and Green Infrastructure

•It is surprising that the SPD does not provide guidance on the scale and nature of outdoor and indoor community sports facility provision to support the additional needs generated by the development. This is pertinent in view of the explicit requirement in the Local Plan policies relating to the East of Harlow for development to provide community infrastructure including indoor and outdoor sports facilities. The land take associated with sports facility provision combined with the linear nature of the development site and the range of other supporting infrastructure that will need to be accommodated requires a strategic approach to be taken through the masterplan. The SPD should provide guidance for the developers to avoid a scenario where sports facility provision is overlooked and not considered until an advanced stage of the masterplanning process which may then compromise the ability to make sufficient provision or propose suitable facilities that are responsive to community needs and sustainable to operate.

To address this, the Landscape & Green Infrastructure Chapter (or a new chapter) should set out guidance to inform the masterplan on the scale and nature of outdoor and indoor sports facility provision to be provided as part of the development. The policy/guidance context for this should be based on the recommendations in the Playing Pitch Strategies and Built Facility Strategies prepared by HDC and EFDC to support their adopted Local Plans. These strategies provide guidance (supported by Sport England and the sports governing bodies) on how to identify the scale and nature of demand generated by major new development including HGGT related growth. For example, Sport England's Playing Pitch Calculator and Sports Facility Calculator can be used for identifying the demand generated by the development. Consideration of the outputs in consultation with Sport England should then inform how needs should be addressed (i.e. on-site or off-site) and where on-site provision is appropriate, how this should be considered through the preparation of the masterplan. In particular, where on-site provision is required for outdoor sports facilities, it is advised that a single large facility is provided within the development rather than smaller dispersed facilities and that the opportunity to co-locate or share facilities with the proposed secondary school is explored.

To exemplify the recommended approach to considering the demand generated for outdoor and indoor sports facilities by this development, I have run the additional population generated by a development of 3,350 homes through the Playing Pitch Calculator and Sports Facility Calculator applying a typical dwelling occupancy ratio of 2.4 persons per dwelling $(3,350 \times 2.4 = \text{estimated } 8,040 \text{ population})$ and using EFDC's demand data (HDC's demand data can be used as an alternative) and I attach the outputs from the two calculators which set out the demand for playing pitches and sports halls/swimming pools generated by the additional population. As can be

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Respondent Name Roy Warren

Organisation Sport England

seen from the outputs, a development of this scale would generate significant additional demands e.g. approximately 6 football pitches (of different sizes), 1 cricket pitch and a substantial proportion of a new sports hall and swimming pool. Advice on how to interpret the data in the calculators can be provided upon request.

• Support is offered for the 'Specific Guidance' in section c relating to new open space networks supporting active lifestyles and good health through excellent walking and cycling routes (criterion viii). It is requested that this is supported by expecting development to have regard to 'Active Design' guidance principles which offers detailed advice and examples. This is pertinent in view of HDC's Local Plan (Policy L4: Health and Wellbeing) and EFDC's Local Plan (Policy SP2: Place Shaping) supporting the use of the Active Design principles.

Council Response

The finalised SPD will be amended to set out guidance to inform the masterplan on the scale and nature of outdoor and indoor sports facility provision to be provided as part of the development. The rep provides a useful summary of the outputs of the two calculators, i.e. that a development of this scale would generate significant additional demands comprising approximately 6 football pitches (of different sizes), 1 cricket pitch and a substantial proportion of a new sports hall and swimming pool.

The SPD will also refer to how needs should be addressed (i.e. on-site or off-site) and that where on-site provision is required for outdoor sports facilities, a single large facility should be provided within the development rather than smaller dispersed facilities, and that the co-locating or sharing facilities with the proposed secondary school is explored.

Section 'c' Specific Guidance will be amended to require development to have regard to 'Active Design' guidance principles which offers detailed advice and examples, which is important given HDC's Local Plan (Policy L4: Health and Wellbeing) and EFDC's Local Plan (Policy SP2: Place Shaping) supporting the use of the Active Design principles.

6. Sustainability and Build Quality

Council Response

7. Sustainable Movement

• Support is offered for the 'Specific Guidance' in section c relating to new open space networks supporting active lifestyles and good health through excellent walking and cycling routes (criterion vii). It is requested that this is supported by expecting development to have regard to 'Active Design' guidance principles which offers detailed advice and examples. This is pertinent in view of HDC's Local Plan (Policy L4: Health and Wellbeing) and EFDC's Local Plan (Policy SP2: Place Shaping) supporting the use of the Active Design principles. It is requested that criterion (vii) or a new criterion encourages mixed uses and the co-location of community facilities within the development to help support active travel objectives. This would be consistent with the guidance in the Education and Local Centres chapters.

Council Response

Section 'c' Specific Guidance will be amended to require development to have regard to 'Active Design' guidance principles which offers detailed advice and examples, which is important given HDC's Local Plan (Policy L4: Health and Wellbeing) and EFDC's Local Plan (Policy SP2: Place Shaping) supporting the use of the Active Design principles.

Amendment will also be made to encourage mixed uses and the co-location of community facilities within the development to help support active travel objectives. This would be consistent with the guidance in the Education and Local Centres chapters.

8. Sustainable Transport Corridors

Council Response

Respondent Name Roy Warren

Council Response

10. Educational Provision

- Support is offered for the 'Specific Guidance Location' in section d relating to schools being co-located with local centres (criterion vi) as this will reduce the number of trips residents will need to make and thereby make active travel more attractive.
- Support is offered for the 'Specific Guidance School Design' in section f in relation to connections with a comprehensive green infrastructure network, the shared use of school facilities and designing school halls/playing pitches without the need for the whole school to be open (criteria v-vii). However, as set out in our comments on the Landscape & Green Infrastructure chapter, the SPD provides guidance on meeting educational needs without any complementary guidance on how the masterplan should consider community sports facility provision. The SPD should provide guidance on what role the schools should play in meeting the community sports facility needs generated by the development so that the masterplan prepared by the developers can account for this as this will have land use and masterplanning implications. For example, should a dual use leisure facility (with indoor sports facilities) be provided on the secondary school site? Should community playing pitches/courts be co-located with the school's facilities so that ancillary facilities can be shared? Should a shared use artificial grass pitch be provided on the secondary school site to reduce the scale of natural turf playing pitch provision required in the development? etc.

Council Response

The finalised SPD will provide guidance on what role the schools could play in meeting the community sports facility needs generated by the development, using a number of options including a dual use leisure facility (with indoor sports facilities) on the secondary school site, community playing pitches/courts co-located with the school's facilities so that ancillary facilities can be shared, or provision of a shared use artificial grass pitch on the secondary school site to reduce the scale of natural turf playing pitch provision required in the development. Further engagement will be required at the pre-masterplan stage between Sports England, the developers and Essex County Council as education authority on this matter, therefore only limited detail can be added to the SPD at this point.

11. Local Centres

Are there any attachments?

Yes

• Support is offered for the 'Strategic Guidance' in section b as the mixed use and co-location of community facilities proposed combined with the accessibility by walking and cycling will encourage physical activity.

Council Response Noted.		
12. Combined Principles		
Council Response		
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Respondent Name Nina Farr

Organisation

EoH Document Comments

General Comments

I have attended a recent meeting regarding the new Harlow East development as I'm really concerned about how our beautiful rural setting is set to change drastically. We live at the above address and as you will see from our location we are set to have extensive housing and school developments from pretty much every angle around us. We live in a large grade 2 listed property which is situated in a cul de sac off the Moor Hall Road with very little traffic and we are devastated that this is about to change. our property is extremely close to the development boundary.

We live alongside a cluster of large houses and it seems such a shame to put another Harlow housing development right next to us completely changing the area we chose to live in. We are really concerned about the affordable housing and the characters that it will unfortunately bring, all I read about is increased crime at Newhall which will no doubt follow suit in this new development. We have had not one crime incident in the 7.5 years that we have lived here and don't know of any incidents of any neighbours either. We would really appreciate it if we don't have to pull on to the Moor Hall road and be faced with anything unsightly like the sea of st Georges flags that you often see on the balconies of the Gilden Park flats. We would really appreciate as much green space between our little hamlet and any new development, trees and tasteful screening would be appreciated.

Increased traffic from the Moor Hall road leading to Gilden way is already a problem since the new junction went in. I have no idea how this small junction can possibly cope if another school is put here or even schools as I've seen mentioned! Let alone the amount of houses set to go in too. It is imperative that access to the new houses does not come from the Moor Hall road.

It was noted that there are plans for 5 traveller sites?! If these go ahead we will be forced to move out of our home. Please, please, please don't put one anywhere near our homes.

We have noticed that the road traffic noise has increased since the new 7a junction has gone in, previously we couldn't see the motorway from our house but now all the trees have been cut down we can see it clearly. It would be good to have some noise reduction panels or dense trees put back in to dampen the noise. Isn't there noise reducing tarmac which can be used too?

Despite all of my concerns above we are looking forward to having some better pedestrian access, a pavement along the Moor Hall road would be welcomed, so we can walk to Churchgate Street and some decent transport links for our children would be good too, buses to train stations and Bishops Stortford etc. We are looking forward to seeing cycle paths to Harlow Mill station and a local shop with a post office would be a great addition too, coffee shops like new ground cafe in new Hall would be great too.

Thank you for taking the time to read our concerns, please don't let us lose our identity, the last thing we want is to just become a house on the edge of a new housing development.

Council Response

Affordable housing encompasses a range of housing types that help all people to affordably own a home, which has been an ambition for people in the UK for generations. This is particularly important in Harlow and the wider area, given the south-east of the UK has some of the highest house prices in the country due to high demand and lack of supply. Issues such as people living longer than previous generations, higher rates of divorce in older people (resulting in a divorced couple requiring two homes instead of one), and birth rates historically being higher than death rates, has increased demand. The need for housing - including much needed affordable housing - is detailed further in the evidence base supporting the Harlow and Epping Local Plans. The Harlow portion of the East of Harlow Garden Community will help deliver affordable homes for Harlow residents as well as a range of other benefits and opportunities. Lack of affordable

The SPD requires the masterplan to ensure existing nearby communities are considered and respected in the planning of the new development, including the preservation of their identities.

The HGGT Transport Strategy, STC and associated modal shift/change are key strands of the HGGT vision to

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Respondent Name Nina Farr

Organisation

EoH Document Comments

address potential increased vehicular movements arising from new development. The STC will provide fast, direct, safe walking, cycling and bus routes for residents across the town. For the eastern part of the STC it will provide sustainable travel opportunities for residents at East of Harlow, Newhall and First Avenue in particular. Modal change is about allowing short car journeys to be completed using sustainable transport instead, thereby reducing the number of cars on the road overall. The allocation of the site has been informed by transport assessment evidence as part of the Local Planand further detailed transport assessments will be carried out by the developer. The HGGT IDP identifies what schemes and proposals are required from the development including those related to improving the highway network to accommodate growth.

The locations of traveller pitches within the Epping portion of the site will be determined at the masterplanning stage.

Noise reduction measures will be considered at the masterplanning and/or planning application stage but is a requirement of Local Plan policy if identified as an issue.

The planned local centres will feature a range of facilities and uses, but the exact occupiers of units cannot be determined through the planning process aside from stating the use that the units should be in (e.g. for a retail use or for a community use, etc.).

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Are there any attachr	nents?	No		

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Respondent Name Lyn Packer

Organisation

EoH Document Comments

General Comments

Having looked closely at the current consultation documents I would like to make a general comment. These documents do not provide enough detail to encourage informed comment. In particular the maps do not show road names in the main and existing residential areas are likewise unnamed making it extremely difficult to comment effectively.

I hope and expect that when subsequent documents are circulated on further aspects of the planning this will be rectified in order to enable the community to make sense of the proposals.

I appreciate that the current documents focus on the eastern developments but a plan showing the proposed routes for the sustainable travel corridors is included. It is virtually impossible to envision where and how these will be placed from the maps provided. In general it would be entirely deplorable if these 'corridors' were to interfere with the green wedges enshrined in Sir Frederick Gibberd's original master plan. These areas are well used by the population of Harlow for recreation and the cycleways are fully utilised for walking and cycling. Some of the green wedges are protected environmental areas. To have major transport links running through these areas seems dangerous to pedestrians and cyclists and disruptive to wildlife.

Council Response

This SPD is a high-level document which sets out expectations for what the detailed masterplan should contain. Maps will be amended in the final SPD to show street names more clearly, where this is possible without making the maps too congested. However, greater detail can only be addressed at the masterplanning stage. The Green Wedges in Harlow are preserved as per the Harlow Local Plan and will continue to be used for walking and cycling routes. The Local Plan includes a new Green Wedge running through the East of Harlow site. Some routes of the wider STCs will involve the use of Green Wedges, mostly near existing roads which have always been part of the Green Wedges and used for walking and cycling routes which are a key element of the STCs. Safety issues will be considered as part of the STC design.

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Are there any attachments? No		

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Respondent Name Yolande Clarke

Organisation

General Comments

My interest in what is planned for development east of Harlow lies in the fact that we in Gilston, north of Harlow, are also being developed as part of HGGT and I am interested in how planning for development EoH may have relevance for what is planned north of Harlow.

For this reason I look forward to receiving updates on this development as it progresses. It will also be interesting to see how much the four HGGT communities will be in consultation with one another. I hope that there will be full liaison between all those involved in all four communities.

This leads me to wonder who is going to be in overall charge of this new, very much larger HGGT. Will Harlow become like Luton, which is an independent kind of administrative body, no longer being in Essex or Hertfordshire, nor run by the variety of town, district and county councils who seem to be involved at present. I gain the impression that all these administrative bodies would become extremely unwieldy if formed into one, and I doubt whether it would be a workable enterprise.

But I have noted over the months and years in Harlow, knowledge of the area of Gilston and Eastwick remains notably scanty. During the Covid-19 pandemic lockdown, it was good to welcome horseriders, walkers, joggers and cyclists into the area to be able to have their hour of exercise as laid down by the Government, bus I was astonished to discover the large number of people who were enhanced to discover our villages, may of whom saying, "I live in Harlow but I never knew these places existed". I do hope that as time goes on there will be a growing familiarity between the varoius areas' inhabitants, particularly where there are administrative boundaries to be traversed.

Otherwise it will be difficult for people living in HGGT to see themselves as all members of the same community, the same town, particularly if Harlow expands to the size of a city.

Thank you for allowing us to provide comments to this, and I look forward to being kept in touch.

Council Response

The HGGT is a partnership body between all the authorities which is overseeing the development of all the new Garden Communities around Harlow, which will help to ensure there are similarities between them whilst ensuring each area has a different feel and look while respecting the existing landscape and existing communities.

The future administration of the area is not a matter for this SPD. However, it should be noted that currently there are no plans to alter district or county boundaries. However common goals and ambitions are being established through the partnership to be instilled within the communities such as stewardship of spaces, green infrastructure connections, contributions towards strategic infrastructure, design considerations etc. The HGGT partnership is seeking to raise awareness of the Green Infrastructure opportunities, etc. available to the residents of Harlow and surrounding areas.

1. Introduction		

Council Response

2. Context

Council Response

3. Stewardship

I noted in particular the idea that people should see themselves as part of an area, that they will come to feel a responsibility towards such bodies as Community Land Trusts. I think even now, with Harlow being comparatively small in comparison to what it will become, it is hard for residents to feel they share ownership of anywhere in

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Respondent Name Yolande Clarke

Organisation

their local area. There will need to be much education and encouragement to assist people to claim this kind of responsibility. One way in which this process can be enhanced is to help foster a civic pride in Harlow as a whole. This has been a problem for many years, really since the building of Harlow New Town in the late 1940s and since.

The bombed-out people from East End London were delighted with their new homes. They were thrilled with bathrooms and lavatories that were inside the houses rather than having to be shared, and kitchens that were modern and easier to use, and gardens for children to play in. But over the intervening years Harlow has gradually become shabby and a bit run-down, with shops closing and increased problems of litter, vandalism, general crime, drug-dealing and so forth. This has not been helped by councils having to cut back their expenditure, the cost-of-living crisis and a marked rise in poverty. There is a need for people to start feeling good about Harlow in general.

Council Response

Further information about stewardship can be found in the HGGT Draft Stewardship Charter which was recently consulted on and is highlighted within the SPD.

The Harlow Local Plan, corporate priorities of Harlow Council and the HGGT vision all recognise the importance of regeneration in Harlow and aim to ensure it takes place, by providing the necessary mechanisms. Regeneration is now underway in Harlow, most notably in the town centre currently. The regeneration across the district, once progressed further, will foster greater civic pride among residents and visitors.

4. East of Harlow Character Considerations

Council Response

5. Landscape and Green Infrastructure

Council Response

6. Sustainability and Build Quality

Council Response

7. Sustainable Movement

I'm interested in the idea of the STCs and Sustainable Movement. To encourage people to be interested in the concept, we need a bus station that is user-friendly and attractive, with an information hub that has a helpful person or two always on hand, and plenty of written information. There will always be a sizeable minority who cannot drive, and another sizeable minority who finds new technology too difficult. This latter minority may well expand as people who are now middle-aged but reasonable tech-savvy develop mental health issues as they age and discover computers are increasingly complicated.

There will always be a need for sources of printed material, especially as a way to welcome tourists to this part of the world who need quick references. Not everyone owns a smartphone. If sustainable movement is to make any headway, the bus station must be overhauled and sources of information vastly improved. Travellers should not need to have to rely on bus drivers taking a break to supply information. This is not fair on them, and most drivers don't know the arrangements for other bus companies, only the ones they work for.

I hope it goes without saying that strenuous efforts must be made to ensure that down at Harlow Town Station the ticket office should not be closed under any circumstances. This idea is a national disgrace and will impact every place in the country that has a railway station. I am pleased that Harlow's MP is not in favour - we can only hope common sense will prevail.

Council Response

There are plans for the bus station to be redeveloped and more information can be found on the Council's website.

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Are there any attachments?

No

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Respondent Name Yolande Clarke

Organisation

The Council is always commited to ensuring that people without access to the internet or smartphones - for whatever reason - are still able to seek the information they require in Council-owned/managed facilities. The Council is unable to use the SPD process to comment on railway station ticket offices.				
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•	nt who has just moved in. Me my wife and 2 young children Rebekah ommunity atmosphere here. Children and families are all outside ament to how the area has been built.
I would recommend that this new development children at the heart of the area.	ent be based on the design of Gilden park putting the people and
maximising a community feel in new develo	
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Are there any attachments?	No		

Respondent Name Lesley Davison	Organisation
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I oppose the closing of London Road northbound to accommodate a proposed bus route. It will have an exceptionally detrimental effect on thousands of Newhall residents travelling north of the town. Already at peak times in the morning, Newhall residents have difficulties joining the A414 heading north, via the Link Road, as traffic is queuing across the traffic lights junction. So, at present, the London Road exit eases traffic pressure on this junction. Has anyone realised that there will be no vehicular access to Mark Hall Gym and this car park is the one the parents of the Mark Hall students use to drop them off and pick them up? Has any consideration been given to the increase in environmental pollution caused by an increase in idling, and queueing traffic, caused by moving more vehicles onto roads that are already severely congested; roads that surround a school?

Council Response

London Road: Comments and concerns regarding the closure of London Road have been noted by the Council. The issue and opposition around this proposal is being carefully considered outside of the SPD process in consultation with Essex County Council as lochall access arrangement and Bus Gate proposals. The reference number for this application is HW/FUL/17/00130. The officers report and planning statement produced by the developer provides information on why the bus gate is to be implemented.

The HGGT Transport Strategy, STC and associated modal shift/change are key strands of the HGGT vision to address potential increased vehicular movements arising from new development. The STC will provide fast, direct, safe walking, cycling and bus routes for residents across the town. For the eastern part of the STC it will provide sustainable travel opportunities for residents at East of Harlow, Newhall odal change is about allowing

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Respondent Name Lesley Davison

Organisation

short car journeys to be completed using sustainable transport instead, thereby reducing the number of cars on the road overall. The allocation of the site has been informed by transport assessment evidence as part of the Local Planand further detailed transport assessments will be carried out by the developer. The HGGT IDP identifies what schemes and proposals are required from the development including those related to improving the highway network to accommodate growth.

9. All-Vehicle Access
Council Response
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Are there any attachments? No

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28 EoH Document Comments

Organisation Newhall Projects

Respondent Name Chris Hatfield

6. Sustainability and Build Quality

Council Response

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General Comments

Background

Newhall Projects Limited is a delivery vehicle and developer which specialises in enabling the provision of residential and community uses. Presently Newhall Projects is developing the Newhall neighbourhood to the east of Harlow together with national and regional house builders and housing associations to deliver approximately 2,200 new dwellings alongside open space, leisure, local amenities, and community uses. The Newhall development extends to circa c.l02ha of land, with phase

2 circa 60% complete. Newhall is likely to be fully developed out within the next 10 years.

By way of background, outline planning permission was granted (LPA Ref: HW/PL/04/00302) in June 2012 for Phase II New Hall Farm and Hubbards Hall Farm. Subsequent variations and Reserved Matters have been approved for the scheme's detail. Whilst all of the land owned or controlled by Newhall now has full or reserved matters permission (except LC1/LC2 for 64 apartments and 4 commercial units which has a resolution to grant planning permission subject to S106 agreements), the Hubbards Hall land controlled by others did not come forward.

The illustrative masterplan for the outline planning permission provided information for the general layout of the scheme, key design features, community/leisure requirements, and bus routes including the provision for future bus link to the east.

In September 2022, Harlow granted Reserved Matters (LPA Ref: HW/REM/20/00255 and HW/REM/20/00218) to Countryside PLC for phase 3B and 3C of residential development, including associated infrastructure works. The approved layout allows internal bus routes along the access road (which then link up to earlier consented phases to form a loop to and from London Road through the Newhall development), and for onward connection for a bus connection to Harlow East.

Council Response
Noted.

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Respondent Name Chris Hatfield Organisation Newhall Projects

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7. Sustainable Movement

Council Response

8. Sustainable Transport Corridors

Whilst Newhall Projects is generally supportive of the proposals for Harlow East, including the delivery of additional schooling places and the objective for creating a Sustainable transport corridor (STC) to connect the masterplan areas to support sustainable urban growth in Harlow, we have concerns about several aspects outlined in the draft SPG. The strategic guidance is prescriptive at Section 8b in terms of the requirements for the corridor's creation, and furthermore the specific guidance set out at Section 8c is also prescriptive. We also note the tested route option at Appendix 3.

The Newhall Phase 3B and Phase 3C Reserved Matters approval only provides a highway layout up to the RM boundary. It has been designed in a mmmer which could allow future pedestrian/cycle and bus access to the east but not for other vehicles. However, there is a strip of land between the reserved matters boundary and the outline boundary in the ownership of Newhall Projects which would need to be delivered. The details approved in the Reserved Matters identifies a bus route access link which could be provided here and the junction which abuts the redline and has been designed to allow a future connection. Whilst it is not part of the Reserved matters approval for Newhall phase 3B and 3C as it falls outside the outline planning permission redline the link has been approved by the Council pursuant to condition clearances for these phases. Private land is needed to facilitate this bus connection.

The junction which goes up to the Reserved Matters redline has not been designed or modelled for other modes of transport passing to the east, other than buses. A Newhall access road up to this point has been designed and has full planning permission as a residential distributor road forming one of four main accesses into the Newhall site from London Road and is open to private vehicles, buses, pedestrians, and cyclists, so it not designed as a STC. Until adoption of this access, road there is no ability to redesign this road corridor. We note in Section 8Ciii of the draft SPG that other vehicles "should normally be excluded" from the STC. Without further information being made available we have concerns that the access roads and connecting streets across Newhall could be negatively impacted upon with this approach. The Newhall streets have not been designed to accommodate a significant uplift in vehicles, which we would expect the SPG proposal to generate. This is of concern to us and our residents from a placemaking and safety perspective. There is no clarity on the frequency of the buses, nor the volumes of other traffic which will be entering our site as a result of the Harlow East extension, and so we are not able to understand highway impacts.

Parts iii to vi sets out a range of design specification requirements for the STC, which we have not factored into our masterplan design, or the full planning permission obtained. Given that we are outside of Harlow East's redline as defined in the draft SPG we would like confirmation that these do not apply to our developments as built or emerging. Furthermore, many of our routes are now constructed or under construction and are unable to be retrofitted to the specific STC design requirement.

With regard to Appendix 3, we note that the authors of the draft SPG have tested routes for the STC, which include test options on Newhall Projects land outside of the SPG's area boundary. In particular, we refer to the two prongs going into our local centre to the south and across residential areas to the north. It appears that the northern route was selected as this is shown in Figure 7.1. Figure 7.1 itself is misleading as it doesn't show the full extent ofNewhall and particularly the granted development which hasn't yet been built out, or land which could come forward under a new application (as per the expired pennission). The STC location does not appear to be shown in the consented position of the Newhall access road or future bus link and is potentially therefore misleading I incorrect.

Whilst we appreciate the intention of this specific guidance, we as landowners and master developers of Newhall through which access is envisioned have not been consulted in the drafting of the SPG as to how this could affect

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Respondent Name Chris Hatfield

Organisation Newhall Projects

Newhall and the planning permissions in place; how this STC could be delivered; and the potential impacts on our development area or the approved access routes across our land which the STC could take. Given that the success for the SIC is largely reliant on Newhall land and existing access roads, this lack of prior involvement is disappointing.

Notwithstanding the above, we have no further comments on the delivery of much needed new housing and the growth of Harlow, the promotion of walking and cycling routes (but we would like more information), the provision of green infrastructure and landscaping. We welcome the proposed new community infrastructure - schools, local centre

Council Response

Essex County Council are aware of the issues raised here. For clarity the STC route does not have to be buses, walking and cycling only. The STC facilitates their free easy movement so specific changes to the design of the route within Newhall are not expected to be necessary. The link into the East of Harlow Garden Community would however only be for buses, walking and cycling and there would therefore be no additional car based traffic that would use the Newhall route to access that development.

The maps will be significantly altered prior to the final version of the SPD being produced.

The route through the site was also part of its permission showing a link to the boundary and Essex County Council had discussions with the developer over this in terms of exactly where this would be and the routing of the road to it

9. All-Vehicle Access
Council Response
10. Educational Provision
Council Response
11. Local Centres
Council Response
12. Combined Principles
Council Response
Other Comments
Council Response
•
Are there any attachments? No

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Respondent Name	Melissa White	Organisation	
General Comments	s		
Council Response			
1. Introduction			
Council Response			
2. Context			
Council Response			
3. Stewardship			
Council Response			
4. East of Harlow C	Character Considerations	s	
Council Response			
	Green Infrastructure		
Council Response			
6. Sustainability an	nd Build Quality		
Council Response			
7. Sustainable Mov	vement		
Council Response			
8. Sustainable Trar	nsport Corridors		
newhall way due to much more time fo work. Newhall resid	o the congestion. Closing or their travel causing inc dents would need to rea	g London road would mean that no convenience to those residents dro arrange nursery schedules, work so	A414 is impossible to join onto via ewhall residents will have to allow opping kids at school and going to chedules to accommodate this extra eople this is going to affect is huge.
opposition around Essex County Coun	this proposal is being can neil as local highway autl comments, but this part		
9. All-Vehicle Acces	ss		
Council Response			
10. Educational Pro			

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Respondent Name Melissa White	Organisation	
Council Response		
11. Local Centres		
Council Response		
12. Combined Principles		
Council Response		
Other Comments		
Council Response		
•		
Are there any attachments? No		

Page 82 of 213 Respondent Name	Steve Town	30 send	Organisation	EoH Document Comments	
General Comments Council Response					
1. Introduction Two key concerns a		oposals:			
opening a window	results in cor ution ribbon	ntinuous traffic r	noise throughout the	o a busy noisy road where, in the summer, day and night. Why would anyone plan to d be creating thousands of low quality	
2. The road change plans for London Road effectively cut off NewHall from Old Harlow and add significantly to journey times for anyone leaving the development by car. You can already see the congestion in the new widened A414, closing London Road will make that worse.					
Plans, which went The site was chose enhanced and adde boundary between As part of the mass be put in place to r Church Langley dev policies of the Harl Comments and cor opposition around Essex County Coun	through rigo n for a numb ed to over the the edge of terplanning a reduce impact relopment w ow and Eppi ncerns regard this proposa cil as local his comments, b	rous rounds of oper of reasons, in the course of the Harlow and the and planning ap- cts of pollution a which is also near ing Local Plans. ding the closure all is being careful ighway authorite but this particula	consultation, public encluding its proximity development of this encluder Green Belt. plication stages, mitigand noise from the Mr the M11. These will of London Road have ally considered outsider. The Council has proper issue does not affective.	cillary uses in the Harlow and Epping Local xamination and inspection by government. To existing infrastructure which will be site. The M11 also provides a natural gation measures will be identified which will 11. This is similar to what happened for the be required to adhere to the amenity been noted by the Council. The issue and e of the SPD process in consultation with ovided some historical context in its ct the principles included in the SPD or	
2. Context					
Council Response					
3. Stewardship					
Council Response					
4. East of Harlow C					
Council Response					
5. Landscape and Green Infrastructure					

Council Response

Council Response

6. Sustainability and Build Quality

Respondent Name Steve Townsend	Organisation
7. Sustainable Movement	
Council Response	
8. Sustainable Transport Corridors	
Council Response	
9. All-Vehicle Access	
Council Response	
10. Educational Provision	
Council Response	
11. Local Centres	
Council Response	
12. Combined Principles	
Council Response	
Other Comments	
Council Response	
-	
Are there any attachments? No	

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Respondent Name	Martin Harris	Organisation	
General Comments			
Council Response			
1. Introduction			
Council Response			
2. Context			
centres are properly	developed and funded of	-	fordable housing, and that community . Experience of developers delaying, ided.
Council Response			
in accordance with t example, requires a established level.	the Harlow and Epping L level of 30% affordable	ocal Plans and subject to viabil housing. The developer would	then have to meet the exact
	•	structure in the right location in mprovements and all utility pro	
pressures in the loca provided in a phase appropriate for the	al area. This is set out in d approach based on the SPD to provide detail on	the HGGT Infrastructure Delive e construction/occupation of do n phasing of housing and phasir	ery Plan. Infrastructure will have to be wellings. However, it is not ng of infrastructure provision - this will
	pian stage in detailed dis	scussion with infrastructure pro	
3. Stewardship			
		rong as possible. We also need old consents and charge for main	to avoid developers leveraging intenance upkeep in the long run.
Council Response			
The HGGT Draft Ste	wardship Charter is also	ailed later in the masterplanni relevant and has recently beer	
	naracter Considerations		
Would be wise to co	onsider noise abatement	measures due to M11	
Council Response			
Plans which seek to required.	ensure amenity of resid	lents is protected, mitigation ag	nce with the Harlow and Epping Local gainst noise from the M11 will be
5. Landscape and Gr			
Council Response			
6. Sustainability and			
Council Response			
7. Sustainable Move			
Council Response			

Page 85 of 213	Rep ID	31		EoH Document Comments
Respondent Name	Martin Har	ris	Organisation	
8. Sustainable Tran STC in principle an as to funding for su	excellent pr	oposal s	subject to due consideration of feed	dback, however important to be realistic
_		-	-	development across the Garden Town as ney which was awarded to the Garden
9. All-Vehicle Acces	SS			
Council Response				
10. Educational Pro				
Council Response				
11. Local Centres				
and not proceeding	g. This needs	to be s	safeguarded against. There needs to	ents shows risks of developers deferring be consultation with community groups nurches could be important for their
Council Response				

The details of the local centres will be explored fully at the masterplanning stage - and local residents and

The adherence to S106 agreements is not a matter for this SPD, but the Council's legal action against the

developers at Gilden Park is likely to set an important precedent which will help to ensure developers adhere to

community groups will be further consulted at that stage.

No

planned delivery of infrastructure in the future.

12. Combined Principles

Council Response

Other Comments

Council Response

Are there any attachments?

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Respondent Name Joe Ephgrave

Organisation

EoH Document Comments

General Comments

This design is scandalous and does not take into consideration the views of residents of Harlow. No matter what we comment, you won't listen! It is clear that if you want this so called Garden Town to go ahead - the housing must be situated in the Gilston Area. Now directly speaking about the East of Harlow part - this area should not have any more housing - instead the focus should be on a huge and once in a lifetime opportunity which is the M11 Innovation Corridor. Harlow needs more employment land and the East of Harlow provides the opportunity to be the part of the Garden Town that is not about greedy house developers and just lining your pockets - it should be about utilising this land only for investment in jobs, businesses and the local economy + the new hospital. By taking out the housing in this part of the plan which is simply to make profit for developers - Harlow has a chance to build the neccessary infrastructure of jobs, businesses etc on this part of the Garden Town to truly utilize its Innovation Corridor Status. Failing to listen here will result in the downfall of Harlow even more than currently. You have a huge opportunity to build the houses on the Gilsten part of the Garden Town and the growth of the economy on the East of Harlow. This will also mean a reduction in the amount of houses which will be much more beneficial for Harlow residents and for motorists who need to use their cars for their jobs outside of Harlow. Do not put sustainable transport methods in replace of cars etc. Sustainable Transport should be side by side to the motorists. You are ruining the motorists lives with your agenda. I will personally speak with you if you wish for me to provide a much better plan than you are providing the locals.

Council Response

The East of Harlow site was allocated for housing and associated ancillary uses in the Harlow and Epping Local Plans, which went through rigorous rounds of consultation, public examination and inspection by government. The south-east of the UK has some of the highest house prices in the country due to high demand and lack of supply. Issues such as people living longer than previous generations, higher rates of divorce in older people (resulting in a divorced couple requiring two homes instead of one), and birth rates historically being higher than death rates, has increased demand. The need for housing - including much needed affordable housing - is detailed further in the evidence base supporting the Harlow and Epping Local Plans. The Harlow portion of the East of Harlow Garden Community will help deliver affordable homes for Harlow residents as well as a range of other benefits and opportunities. Lack of affordableAs part of the wider Garden Town, housing is already planned north of Harlow. The housing at the East of Harlow site is also required to meet the identified needs for Harlow and Epping residents.

The HLDP allocates suitable sites for future employment in accordance with Local Plan evidence base and the Enterprise Zones, as well as relocation of UK HAS, in Harlow provide new opportunities for employment and business including medical, engineering and technological.

The intention is not to replace cars. The HGGT Transport Strategy, STC and associated modal shift/change are key strands of the HGGT vision to address potential increased vehicular movements arising from new development. The STC will provide fast, direct, safe walking, cycling and bus routes for residents across the town. For the eastern part of the STC it will provide sustainable travel opportunities for residents at East of Harlow, Newhall and First Avenue in particular. Modal change is about allowing short car journeys to be completed using sustainable transport instead, thereby reducing the number of cars on the road overall. The allocation of the site has been informed by transport assessment evidence as part of the Local Planand further detailed transport assessments will be carried out by the developer. The HGGT IDP identifies what schemes and proposals are required from the development including those related to improving the highway network to accommodate growth

accommodate growth
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Council Response
2. Context
Council Response

As Stewardship Council Response 4. East of Harlow Character Considerations Council Response 5. Landscape and Green Infrastructure Council Response 6. Sustainability and Build Quality Council Response 7. Sustainable Movement Council Response 8. Sustainable Transport Corridors Council Response 9. All-Vehicle Access Council Response 10. Educational Provision Council Response 11. Local Centres Council Response 12. Combined Principles Council Response Other Comments Council Response	Page 87 of 213 Rep ID 32	Organisation	EoH Document Comments
Council Response 4. East of Harlow Character Considerations Council Response 5. Landscape and Green Infrastructure Council Response 6. Sustainability and Build Quality Council Response 7. Sustainable Movement Council Response 8. Sustainable Transport Corridors Council Response 9. All-Vehicle Access Council Response 10. Educational Provision Council Response 11. Local Centres Council Response 12. Combined Principles Council Response Other Comments Council Response	Respondent Name Joe Ephgrave 3. Stewardship	Organisation	
4. East of Harlow Character Considerations Council Response 5. Landscape and Green Infrastructure Council Response 6. Sustainability and Build Quality Council Response 7. Sustainable Movement Council Response 8. Sustainable Transport Corridors Council Response 9. All-Vehicle Access Council Response 10. Educational Provision Council Response 11. Local Centres Council Response 12. Combined Principles Council Response Other Comments Council Response			
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6. Sustainability and Build Quality Council Response 7. Sustainable Movement Council Response 8. Sustainable Transport Corridors Council Response 9. All-Vehicle Access Council Response 10. Educational Provision Council Response 11. Local Centres Council Response 12. Combined Principles Council Response Other Comments Council Response			
6. Sustainability and Build Quality Council Response 7. Sustainable Movement Council Response 8. Sustainable Transport Corridors Council Response 9. All-Vehicle Access Council Response 10. Educational Provision Council Response 11. Local Centres Council Response 12. Combined Principles Council Response Other Comments Council Response			
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11. Local Centres Council Response 12. Combined Principles Council Response Other Comments Council Response .			
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Other Comments Council Response	12. Combined Principles		
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•	Other Comments		
Are there any attachments? No	Council Response		
	Are there any attachments? No		

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Respondent Name Norman Crossley

Organisation

EoH Document Comments

General Comments

Council Response

1. Introduction

Item 1.23. There is no longer an overall site promoter (1.7) and this could be a huge disadvantage to a project where totally cohesive overall planning and development vision is essential. Item 1.23 states a strong preference for a single comprehensive delivery (good), yet opens the door to the strong possibility that the overall scheme could be delivered by an unknown number of developer/builders (bad), probably operating under the camouflage of a consortium (eg. Gilden Park), where there are known problems of differing standards between developers. Harlow had a Master Planner of outstanding repute in Sir Frederick Gibberd. Why should we now tolerate a mishmash of different designs and standards. We deserve improvement of what we have, not diminishment. The Vision Statement is laudable in its ambition, but sceptics would say that people behave and live the way they are, and not as the planners would like them to be. Consequently, assumptions made in the vision document in respect of enhanced aspiration in respect of physical transport such as cycling and walking may well be wide of the mark. As a cyclist myself who uses local cycle tracks, I can testify that they are virtually free of cyclists at any time of day.

Council Response

There is ongoing work to ensure that the site is delivered in the most efficient and comprehensive way. At the time of writing, further details cannot be provided due to confidentiality reasons. However, it is expected that detail will be provided in the final version of the SPD and in other places such as the HGGT website. The masterplan, which is being guided by this SPD and other guidance (such as the HGGT Design Guide) will ensure any mix of designs on the site are cohesive and complement each other and existing nearby settlements. The HGGT Transport Strategy, STC and associated modal shift/change are key strands of the HGGT vision to address potential increased vehicular movements arising from new development. The STC will provide fast, direct, safe walking, cycling and bus routes for residents across the town. For the eastern part of the STC it will provide sustainable travel opportunities for residents at East of Harlow, Newhall odal change is about allowing short car journeys to be completed using sustainable transport instead, thereby reducing the number of cars on the road overall. The allocation of the site has been informed by transport assessment evidence as part of the Local Planand further detailed transport assessments will be carried out by the developer. The HGGT IDP identifies what schemes and proposals are required from the development including those related to improving the highway network to accommodate growth. This is not only important for reducing traffic but improving heath and mitigating against Climate Change.

2. Context

This is an admirable mission statement, reflecting perhaps the way we would all like to live. As an aspiration it is wonderful, wholesome and hopeful. But reality isn't like that. You cannot change the way that people live and behave by planning. The car is king in our society, and to imagine that people are going to walk, cycle, or take the bus from choice is optimistic in the extreme. We already have a good cycle track network in Harlow, but the cycle tracks are now virtually unused. Fifty years ago in Harlow the cycle tracks were full of people on bikes travelling to and from work from necessity, but as the car became increasingly affordable cycle use diminished to almost zero. This, however much we would like to change it, is the present reality. It is unlikely to change, and certainly not by planning to do so.

Council Response

The HGGT Transport Strategy, STC and associated modal shift/change are key strands of the HGGT vision to address potential increased vehicular movements arising from new development. The STC will provide fast, direct, safe walking, cycling and bus routes for residents across the town. For the eastern part of the STC it will provide sustainable travel opportunities for residents at East of Harlow, Newhall odal change is about allowing short car journeys to be completed using sustainable transport instead, thereby reducing the number of cars on the road overall. The allocation of the site has been informed by transport assessment evidence as part of the Local Planand further detailed transport assessments will be carried out by the developer. The HGGT IDP

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Respondent Name Norman Crossley

Organisation

identifies what schemes and proposals are required from the development including those related to improving the highway network to accommodate growth. The intention is not to remove cars but provide worthwhile choice in how people travel so that sustainable and healthychoices can be made especially for those journeys where walking, cycling and using public transport is easier, cheaper and quicker then sitting in traffic in the car.

3. Stewardship

The Stewardship principles in section 3 pg. 12 are laudable, but in particular 3.2 and 3.4 are optimistic in the extreme. Funding cuts and ongoing austerity measures by central government have already damaged local organisations, trusts and the like beyond measure. Where is the evidence that the aspirations of stewardship as set out can even remotely be met?

Council Response

Exact funding can only be identified at a later stage, but the developers will be required to contribute alongside central government funding. Options of how stewardship can be delivered are set out in the HGGT Stewardship Charter and alrady form part of the proposals for Gilston to the north of Harlow.

4. East of Harlow Character Considerations

It became obvious from the public meeting in St. Mary's church on October 10th that traffic congestion is a major concern. As traffic density on Gilden Way is due to increase even further, both from the M11 Junction 7a and from Harlow East development, it is essential that the present problems at the Gilden Way/Churchgate/ Gilden Park roundabout be urgently addressed. Planners at the meeting said that they are well aware of the problem, but what is being done about it? A roundabout that worked beautifully before it was re-modelled needs to be restored in respect of the removal of traffic lights. Shortly after the new system was installed the lights were switched off for a couple of days or so, during which traffic flowed beautifully and without hindrance. There really is no need for the lights. Traffic flow at the roundabout at Mark Hall school is essentially the same as that at this one and works fine. So why the distinction for Gilden Park/ Churchgate users? It doesn't make sense, and needs urgent reappraisal.

Council Response

Gilden Way is outside the scope of this specific SPD. This issue should be raised with ECC directly.

5. Landscape and Green Infrastructure

On the fairly realistic assumption that there won't be a single overall developer, but a probable consortium of builder/ developers, can developers dividing up the spoils be trusted to deliver the Landscape objectives? It will be difficult, if not impossible, for conglomerates to agree on a corporate vision for creating beauty in landscape. Profit is the driving motive, and this prevails against other considerations.

I'm not sure this is the right place for my comment, but I don't know which other chapter suits either. Public surface water drainage provision along Hobbs Cross Road and lower Churchgate Street is a current major concern following recent severe flooding. Rainwater run-off from Hubbard Hall access road and higher Churchgate Street contributed considerably to the flooding, as the roadside gullies weren't able to cope with the level of rainfall. Much of this is due to negligent maintenance by the local authority. As the Harlow East development is geographically higher elevation than Hobbs Cross/ lower Churchgate the increased impermeability of development is only going to increase this trend. Upgrading of the surface water drainage along Hobbs Cross/ Churchgate Street may have to be done.

Council Response

There is ongoing work to ensure that the site is delivered in the most efficient and comprehensive way. At the time of writing, further details cannot be provided due to confidentiality reasons. However, it is expected that detail will be provided in the final version of the SPD and in other places such as the HGGT website. Developers will be required to adhere to this SPD and other guidance when producing the masterplan. The purpose of the SPD is to drive forward a comprehensive masterplan leading to a comprehensive outline application for the site that developer or developers will need to adhere to including landscaping in a

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Respondent Name Norman Crossley

Organisation

comprehensive way.

SuDS, including new ponds and swales, are likely to help with any future flooding. Churchgate Street area flooding in 2023 was as a result of a very intense and short period of rain that impacted on the local brook within a known flood zone area (as per EA maps). This is with EA to decide whether further work/what work is required.

6. Sustainability and Build Quality

The aspirations stated on pg.26 items b(iv)(v) are so unspecific as to be useless. Surely British Standards and Building Codes need to be specified as an absolute minimum? How can 'High Quality' be defined in reference to build quality and the durability of materials. The requirement is much too wishy-washy and needs strict and specific standard requirement. Every builder would tell you that they build to high quality, but it wouldn't be true.

Council Response

Further details regarding build quality are set out in other HGGT guidance, including the Sustainability Checklist. The Local Plans of Harlow and Epping also have policies regarding sustainability and build quality. The relevant national Building Regulations would automatically be required to be met. The SPD will be updated to reflect the need for design codes to be prepared for the site.

7. Sustainable Movement

For starters, I totally agree with everything that Jane Carrington has written. In the main she has taken the words out of my mouth. The STC concepts are most confusing to the uninitiated. Not to be a Highway, yet buses, cars (limited), bicycles and pedestrians all to use it? How is that not a Highway? I can't see where 'active and sustainable transport' is defined. What is this?

You cannot change people by planning to change lifestyle, as the aims, objectives and strategies reflected in the documents aim to do. Car use is so ingrained that it will still be the number one mode of transport, however much you may wish to change this. Some of the assumptions made therefore are very wide of the mark and won't be met. Who will run the wonderful new bus services the plan hinges on, and who will fund it? And where is the provision for the elderly and disabled? Or will houses only be sold to the upwardly mobile?

Council Response

More details on the STC and how it will function can be found in the HGGT Transport Strategy.

Sustainable travel is travel made using more sustainable methods, such as by bus or by bike, thereby reducing emissions. Active and sustainable transport is travel which involves some form of physical activity, such as walking, cycling or scootering. These definitions will be added to the SPD glossary.

The HGGT Transport Strategy, STC and associated modal shift/change are key strands of the HGGT vision to address potential increased vehicular movements arising from new development. The STC will provide fast, direct, safe walking, cycling and bus routes for residents across the town. For the eastern part of the STC it will provide sustainable travel opportunities for residents at East of Harlow, Newhall odal change is about allowing short car journeys to be completed using sustainable transport instead, thereby reducing the number of cars on the road overall. The allocation of the site has been informed by transport assessment evidence as part of the Local Planand further detailed transport assessments will be carried out by the developer. The HGGT IDP identifies what schemes and proposals are required from the development including those related to improving the highway network to accommodate growth.

New sustainable transport methods or bus services are planned to be at least partially funded by the developers of the site in the early years of its operation. Further details on the operations and management of the services will be established at a later stage and cannot be addressed in this SPD.

The new development will have to adhere to Local Plan requirements, for example in the Harlow Local Plan which requires a certain amount of houses in a development to be designed to be accessible by those with mobility issues. There will still be a requirement for cars to access some services and for those with reduced mobility but the intention is to provide a quality bus service and cycling and walking infrastructure so that sustainable and healthy choices can be made by those who can make some journeys in a sustainable way.

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Respondent Name Norman Crossley Organisation

Council Response

9. All-Vehicle Access

Council Response

10. Educational Provision

Pg.45. Option 1. Centralising the schools into an 'education cluster' is surely madness of the first order? The ensuing traffic congestion will be chaotic. Witness eg. First Avenue gridlock when Burnt Mill Academy is loosed in the afternoon. Or Hobbs Cross Road/ Churchgate Street when St. Nicholas and Churchgate Primary are loosed. Pg.43. The potential location of the Primary School nearest to Churchgate Street will add even further to the present chaotic traffic problems caused by the above schools. Should access be allowed to Hobbs Cross Road from the proposed new school this would be adding fuel to the fire. As it is, something has to surely give at the traffic light access to Gilden Way from Churchgate Street, as there is presently gridlock at school loosing time. The traffic light change time only allows around four vehicles through on each change. Option 4 is probably best for the new Primary School.

Council Response

The exact locations of the schools have yet to be established and are indicative in the SPD. Essex County Council will be providing further evidence and justification for the best location. The SPD will therefore be amended to remove the school options and state that locations are to be decided.

11. Local Centres

I agree with Martin that there should be consultation with local church leaders and diocesan authorities as well as other faiths. The size of the development warrants more religious provision.

Council Response

The Infrastructure Delivery Plan for the Garden Town did not identify the specific need for a church or similar at this site in its requirements for community facilities. Local organisations, including churches, however, will be consulted at the masterplanning and planning application stages and there would be opportunity then to provide comment on this issue.

12. Combined Principles

Council Response

Other Comments

Appendix 2: Harlow Local Development Plan Policy HS3 Str. Hsng. Site E of Harlow

I take issue with (h). Harm can always be avoided, given the will and determination to do so. Harm by definition must be avoided. The present wording gives carte blanche to developers to find mitigating circumstances for doing what they want.

Appendix 4: School option testing

Much has been written by contributors in previous chapters about school siting. Educational clusters must be avoided at all costs on grounds of traffic congestion alone. It's a mad idea.

Council Response

Policy HS3 is a policy within the Harlow Local Plan which was consulted on prior to 2019, examined in 2019 and adopted in 2020. The point referred to specifically refers to harm caused to the significance of a heritage asset or its setting. The policy ensures developers mitigate against any adverse impacts on the significance or setting. It is considered that, on balance, mitigation is acceptable where the significance or setting of a heritage asset may be adversely impacted. Such mitigation would have to be appropriate. This only refers to a historic asset's significance or setting and does not refer to the asset itself; the policy rquires assets themselves to be conserved

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Respondent Name Norman Crossley

Organisation

or enhanced.

The exact locations of the schools have yet to be established and are indicative in the SPD. Essex County Council will be providing further evidence and justification for the best location. The SPD will therefore be amended to remove the school options and state that locations are to be decided.

Are there any attachments?	Nο			

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EoH Document Comments

Respondent Name Mr Stephen J Cumber

Organisation

General Comments

- •The volume of housing is extreme. Essentially this is creating another town almost the size of Church Langley.
- Pressure on Moor Hall Road and Hobbs Cross Road, which are essentially country lanes, will result in traffic backlog and accidents.
- Praffic increase through Churchgate Village. This road is simply not able to take any more traffic. There are two schools, a nursery and a toddler group, plus accommodation for older people which means that this is an area of risk to the public. Churchgate Street should be made a '20 is plenty' route.
- ■ bridge over Hobbs Cross Road and Moor Hall Road would avoid additional pressure on inappropriate country lanes. There is already planning granted for a development off of Moor Hall Road.
- Any planning permission should require electric charging points on each house, solar panels and water butts as a minimum to support sustainability.
- Establishment of the infrastructure before people start moving into houses we need to learn from Gilden Park where there is still no school, shop or community building! So GPs, Dentist, and transport first.
- Blease identify where new public art/sculptures will be sighted in line with the Sculpture Town ethos.

Council Response

The East of Harlow site was allocated for housing and associated ancillary uses in the Harlow and Epping Local Plans, which went through rigorous rounds of consultation, public examination and inspection by government. The south-east of the UK has some of the highest house prices in the country due to high demand and lack of supply. Issues such as people living longer than previous generations, higher rates of divorce in older people (resulting in a divorced couple requiring two homes instead of one), and birth rates historically being higher than death rates, has increased demand. The need for housing - including much needed affordable housing - is detailed further in the evidence base supporting the Harlow and Epping Local Plans.

The HGGT Transport Strategy, STC and associated modal shift/change are key strands of the HGGT vision to address potential increased vehicular movements arising from new development. The STC will provide fast, direct, safe walking, cycling and bus routes for residents across the town. For the eastern part of the STC it will provide sustainable travel opportunities for residents at East of Harlow, Newhall and First Avenue in particular. Modal change is about allowing short car journeys to be completed using sustainable transport instead, thereby reducing the number of cars on the road overall. The allocation of the site has been informed by transport assessment evidence as part of the Local Planand further detailed transport assessments will be carried out by the developer. The HGGT IDP identifies what schemes and proposals are required from the development including those related to improving the highway network to accommodate growth.

Electric charging points etc. will be required to be provided in accordance with the Harlow and Epping Local Plans and national policy and guidance on sustainability.

Ch6 will be amended to include ref. to the need for strategies for water use, e.g. commitments for all new dwellings to have efficient water fittings and the installation of water butts/other greywater.

The site will be supported by the right infrastructure in the right location including health, education, sustainable transport, access and highway improvements and all utility provision having considered any pressures in the local area. This is set out in the HGGT Infrastructure Delivery Plan. Infrastructure will have to be provided in a phased approach based on the construction/occupation of dwellings. However, it is not appropriate for the SPD to provide detail on phasing of housing and phasing of infrastructure provision - this will come at the masterplan stage in detailed discussion with infrastructure providers.

The adherence to S106 agreements is not a matter for this SPD, but the Council's legal action against the developers at Gilden Park is likely to set an important precedent which will help to ensure developers adhere to planned delivery of infrastructure in the future.

In accordance with the Harlow Local Plan, new public art will be required to be provided. However, the exact location will be decided at the masterplanning and planning application stages.

It is unlikely that a bridge will able to be provided due to the significant cost and engineering of such a project. Public art and scuplture is a policy requirement of the Harlow Local Plan and forms part of the vision document for the Garden Town given Harlow's scuplture town status. Therefore it will be an important component of this site.

Page 94 of 213 Rep ID Respondent Name Mr Stephen 1. Introduction		Organisation	EoH Document Comments
Council Response			
2. Context			
Council Response			
3. Stewardship			
Council Response			
4. East of Harlow Character ConBuilding close to Churchgate Stspecial area should be maintain	nsiderations creet Village should ed.	d be in keeping or a buffer area create s is against the Gibberd Masterplan.	ed. The character of this
location of housing, to ensure t landscaping buffers. The Gibberd masterplan is refle Higher density housing will only transport hubs.	heir existing chara ected in the Harlov y be provided whe	ve to existing settlements and considence is maintained. This may include we Local Plan, which this development ere it can be justified, such as close to	buffers and/or t will have to adhere to. community facilities or
5. Landscape and Green Infrasti • ■ ood conditions in Churchgate account. These caused serious d	ructure : Street/Sheering F lamage to housing	Road, as in late 2022 do not seem to h g and pressure on emergency services erows. Additional new planting is requ	nave been taken into e.g. the police.
landscaping schemes. The SPD in Green infrastructure are provid This also includes a mandatory development for new and exist Harlow and Epping Local Plans of SuDS, including new ponds and flooding in 2023 was as a result within a known flood zone area required.	requires the maste ed, while respecti net increase in bid ing residents to er on issues such as a swales, are likely of a very intense (as per EA maps)	the masterplanning stage following erplan to be landscape-led, ensuring ing and preserving the original landscodiversity and the delivery of a new onjoy The development will be requirable in the point of a new of the following against noise. It is to help with any future floodingCh and short period of rain that impacted. This is with EA to decide whether for	that open spaces and cape as much as possible. Green Wedge through the red to comply with the urchgate Street area ed on the local brook urther work/what work is
6. Sustainability and Build Qual			
Council Response			
7. Sustainable Movement			
Council Response			

8. Sustainable Transport Corridors

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Respondent Name Mr Stephen J Cumber	Organisation	
Council Response		
9. All-Vehicle Access		
Council Response		
10. Educational Provision		
Council Response		
11. Local Centres		
Council Response		
12. Combined Principles		
Council Response		
Other Comments		
Council Response		
Are there any attachments? No		

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Respondent Name Diane Kent

Organisation

EoH Document Comments

General Comments

I have read through the document and found it very difficult to understand.

I feel that 3350 houses are far to many nearly as much as church Langley.

Moor hall and Hobbs cross road are referred to as main roads they are not main roads but windy country lanes that are access to church gate street.

I don't see any planes for doctors or dentists or any community hubs for the local community.

Council Response

The SPD will be amended to clarify the status of Moor Hall Road and Hobbs Cross Road, i.e. not main roads. The site will be supported by the right infrastructure in the right location including health, education, sustainable transport, access and highway improvements and all utility provision having considered any pressures in the local area. This is set out in the HGGT Infrastructure Delivery Plan. Infrastructure will have to be provided in a phased approach based on the construction/occupation of dwellings. However, it is not appropriate for the SPD to provide detail on phasing of housing and phasing of infrastructure provision - this will come at the masterplan stage in detailed discussion with infrastructure providers. However, for clarity the SPD will be amended to make specific reference to health facilities and other facilities.

1. Introduction
Council Response
2. Context
Council Response
3. Stewardship
Council Response
4. East of Harlow Character Considerations
Council Response
5. Landscape and Green Infrastructure
Council Response
6. Sustainability and Build Quality
Council Response
7. Sustainable Movement
Council Response
8. Sustainable Transport Corridors
Council Response
9. All-Vehicle Access

	Rep ID 35		EoH Document Comments
Respondent Name	Diane Kent	Organisation	
Council Response			
	considerable concerns would be better if the		ol in Close proximity to church gate and o reduced congestion and give parents
will be providing fu	irther evidence and jus		cative in the SPD. Essex County Council The SPD will therefore be amended to
11. Local Centres			
Council Response			
12. Combined Prince	ciples		
Council Response			
Other Comments			
Other Comments Council Response			

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ep ID 36 EoH Document Comments

Respondent Name Dr Amik Aneja

Organisation Old Harlow Health Centre

General Comments

I am the Senior Partner at Old Harlow Health Centre, the Clinical Director for Harlow North Primary Care Network, as well as the Harlow Locality lead for the Herts and West Essex Integrated Care Board.

The proposed development is within the catchment area for our practice. We are a CQC outstanding practice based in Old Harlow. I have read the masterplan for the East of Harlow development. My patients are discussing the development with me during their appointments.

I would like to meet with you to discuss the provision of General Practice for this population as well as Section 106 monies to support our estate to provide CQC outstanding care to the future residents. The transport links within the document do not include any travel to Old Harlow. We note that there is a link to Newhall, however, it would be important to ensure that the residents can travel to their General Practice.

Council Response

The provision of General Practice healthcare will be considered at the masterplanning stage. However, the SPD will be amended to make specific reference to GP healthcare in the infrastructure required at the local centres. Similarly, the masterplanning stage and planning application stages will also consider the exact routes of transport links and the possibility of using S106 funding for the improvement of existing facilities. All surgeries will be contacted at the relevant time when the draft masterplan is produced by the developer.

1. Introduction
Council Response
2. Context
Council Response
3. Stewardship
Council Response
4. East of Harlow Character Considerations
Council Response
5. Landscape and Green Infrastructure
Council Response
6. Sustainability and Build Quality
Council Response
7. Sustainable Movement
Council Response
8. Sustainable Transport Corridors
Council Response

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Respondent Name	Dr Amik Aneja	Organisation Old Harlow Health Centre
9. All-Vehicle Acces	SS	
Council Response		
10. Educational Pro	ovision	
Council Response		
11. Local Centres		
Council Response		
12. Combined Prince		
Council Response		
Other Comments		
Council Response		
•		
Are there any attachr	nents? No	

Organisation Historic England

General Comments

Thank you for consulting us on the HGGT - East of Harlow Masterplanning Guidance SPD. As the Government's adviser on the historic environment Historic England is keen to ensure that the protection of the historic environment is fully taken into account at all stages and levels of the local planning process, and therefore welcome the opportunity to comment on this document.

SUMMARY

It is Historic England's view that the heritage impacts have not been adequately assessed as part of the preparation of the draft SPD. A Heritage Impact Assessment (HIA) is required by Harlow Local Development Plan policies HGT1 and HS3, and this work has not been undertaken. This should be prepared now so that it can inform the draft SPD.

DETAILED COMMENTS

There are a number of heritage assets adjacent to, surrounded by, or close to the East of Harlow strategic site. These include a number of listed buildings (House 20m NW of Stephen's Cottages, Hatches, Thatched Cottages, Spiers Farm, Pump, Franklins Farmhouse, Hubbard's Hall and range of two service buildings and two barns at Sheering Hall all listed at grade II as well as Sheering Hall itself to the north of the site which is listed at grade II*), and the grade II Parish Church of St Mary and St Hugh to the west.

Given this sensitivity it is disappointing that heritage is only referred to briefly in the SPD, deferring to guidance contained within the Harlow and Gilston Garden Town Design Guide. However, this document was published November 2018, prior to the adoption of the Harlow Local Development Plan, December 2020. Policies HGT1 and HS3 of the Local Plan commits to the preparation of a Heritage Impact Assessment to inform the design of the Garden Town Community. For ease of reference the relevant policies are reproduced below:

Policy HGT1 Development and Delivery of Garden Communities in the Harlow and Gilston Garden Town

20) a Heritage Impact Assessment will be required to inform the design of the Garden Town Community to ensure heritage assets within and surrounding the site are conserved or enhanced and the proposed development will not cause harm to the significance of a heritage asset or its setting. Only where harm cannot be avoided should appropriate mitigation measures be incorporated into the design as identified through the Heritage Impact Assessment.

Policy HS3 Strategic Housing Site East of Harlow

(h) a Heritage Impact Assessment will be required to inform the design of the Garden Town Community to ensure heritage assets within and surrounding the site are conserved or enhanced and the proposed development will not cause harm to the significance of a heritage asset or its setting. Only where harm cannot be avoided should appropriate mitigation measures be incorporated into the design as identified through the Heritage Impact Assessment.

However, to our knowledge, and having looked at the Draft SPD, no such Heritage Impact Assessment (HIA) has been undertaken. This is disappointing given our previous clear advice to the local authority. Whilst the Harlow and Gilston Garden Town Design Guide does include some reference to the historic environment in relation to land east of Harlow (including mention of the Conservation Area and the need for a buffer around Hubbard's Hall there is no reference in the document to Sheering Hall grade II* to the north of the site allocation, nor to a number of other grade II listed buildings within the site itself. It is also unclear what evidence was used to formulate the criteria in the design guide in the absence of a heritage impact assessment. The mitigation proposed, reducing density and an appropriate layout, is without evidence as to whether it is appropriate and there is no evidence of avoidance of harm in the first instance. This should have been established though a HIA,

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EoH Document Comments

Respondent Name Andrew Marsh

Organisation Historic England

which could also explore opportunities for enhancement.

Given this work (HIA) is likely to influence not only the precise details of design, layout and appearance of the new buildings and spaces that will be delivered, but also high-level decisions regarding their layout and design, then the HIA should be prepared now so that it can inform this draft SPD. If this is not feasible, then it should be prepared prior to the further site-wide masterplanning so that it can inform this work. This front-loading of evidence will mean that the appropriate design principles can be integrated into the masterplan at an early stage providing a clear design vision and will ensure that development will be sympathetic to local character and the historic environment. It will also reduce uncertainty for developers, minimising abortive work and the amount of negotiation required over any subsequent planning applications, as well as ensuring a unified design response to avoid any sense of piecemeal and un-co-ordinated development.

CONCLUSION

In preparation of the forthcoming SPD we encourage you to draw on the knowledge of local conservation officers, the county archaeologist and local heritage groups, particularly in relation non-designated heritage assets that might be affected.

We'd like to stress that this response is based on the information provided by the Council in its consultation. Please note that absence of a comment on an allocation or document in this letter does not mean that Historic England is content that the allocation or document forms part of a positive strategy for the conservation and enjoyment of the historic environment or is devoid of historic environment issues. To avoid any doubt, this does not affect our obligation to provide further advice and, potentially, object to specific proposals, which may subsequently arise as a result of this plan, where we consider that these would have an adverse effect upon the historic environment.

Council Response

The SPD is clear that the masterplan for development must ensure that existing settlements and buildings will have to be protected and their character considered and maintained. For listed buildings specifically, the development would be required to adhere to the relevant policies in the Harlow and Epping Local Plans. While the HGGT Design Guide was adopted in 2018, the guidance remains valid as does the setting and historic nature of the area.

As required by the HLDP policy, the production of a Heritage Impact Assessment will be carried out to inform the development's design by the developer. The design will be considered at the masterplanning stage, so the HIA will inform the masterplan and design and be undertaken by the developer to inform that process. A HIA requirement is also set out on page 66 of the document.

will inform the masterplan and design and be undertaken by the developer to inform that process. A HIA requirement is also set out on page 66 of the document.	
1. Introduction	
Council Response	
2. Context	
Council Response	
3. Stewardship	
Council Response	
4. East of Harlow Character Considerations	
Council Response	

Other Comments

Council Response

Are there any attachments?

No

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Respondent Name Sarah Swift

Organisation

General Comments

Council Response

1. Introduction

Council Response

2. Context

It is good to see that affordable housing is anticipated (key workers, those in need etc) but this is not specified anywhere in the plan (eg % of homes that will be). Will this be specified to developers so that it cannot be fallen back on? Harlow residents need to be able to afford them.

Council Response

The Harlow and Epping Local Plans specify the percentage requirement for affordable housing. In the Harlow Local Plan, this is set at 30% and the Epping Forest Local Plan is 40%. The exact figure and type of affordable housing will be negotiated at the masterplanning and planning application stages as this will be subject to viability.

3. Stewardship

Council Response

4. East of Harlow Character Considerations

"How will existing country lanes be acknowledged? - does this include their character (ie Hobbs Cross Rd & Moor Hall Rd) as small lanes? I am concerned that roads will become impossible to use with additional traffic - when they are already heavily congested in the morning & afternoon.

C iv – It's good to see that community infrastructure (in addition to schools) will be provided but can this be more clearly specified – eg doctor, dentist, pharmacy, local shops etc. There needs to be an early threshold for these to be built. The current experience of Newhall and Gilden Park is that they have been continually delayed making it hard for families.

D II'm glad to see you noting that the effect on the Churchgate Street settlement. Housing density in the areas adjoining Churchgate Street needs to be sympathetic to existing development. Consideration also needs to be given to how Churchgate is linked appropriately so that it doesn't lose its connectivity to other areas. 4 iiiPlease also consider the recent flooding in Churchgate Street with the drainage being inadequate and additional run off coming from Newhall flooding the brook."

Council Response

The SPD will be amended to make reference to specific examples of community infrastructure. Infrastructure will have to be provided in a phased approach based on the construction/occupation of dwellings. However, it is not appropriate for the SPD to provide detail on phasing of housing and phasing of infrastructure provision - this will come at the masterplan stage in detailed discussion with infrastructure providers. The adherence to S106 agreements is not a matter for this SPD, but the Council's legal action against the developers at Gilden Park is likely to set an important precedent which will help to ensure developers adhere to planned delivery of infrastructure in the future.

Housing density will only be higher in appropriate places and density is included in the SPD's requirement for the masterplan to be sensitive to existing settlements, preserving their character. Exact details of detailed links/treatment with Churchgate Street will be provided at the masterplan stage.

SuDS, including new ponds and swales, are likely to help with any future flooding. Churchgate Street area flooding in 2023 was as a result of a very intense and short period of rain that impacted on the local brook within a known flood zone area (as per EA maps). This is with EA to decide whether further work/what work is required.

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Respondent Name Sarah Swift

Organisation

5. Landscape and Green Infrastructure

"b ii & iiiGreat that you are looking for the development to respond to the natural landscape. The Gilden Park development seems to be more sympathetic to the garden village and topography approach than that at Newhall and it would be good if this could be encouraged here.

c iii reat that the plans are to deliver at least 10% biodiversity net gain. How will this be measured? — and can the biodiversity plans be worked on at the same time as the building works so that the net gain isn't overlooked & so that habitat loss through the building phase is reduced as much as possible?

c vi Can green wedges be developed alongside and at the same time as housing comes on stream to give the new residents enhanced access to green space? On Gilden Park they seem to have been left till the end meaning children have not had safe places to play.

C xi Is there any plan for screening between the Churchgate Street development and the East of Harlow development? How will the two be distinct – but also have access between them?

E vAs well as the site specifics with woods etc consideration needs to be given to the topology adjacent to the site with Churchgate Street & Newhall's impact on the overall landscape – eg the streams and any additional impact on the water course."

Council Response

The SPD requires the masterplan to be landscape-led, ensuring that open spaces and Green infrastructure are provided, while respecting and preserving the original landscape as much as possible. This also includes a mandatory net increase in biodiversity and the delivery of a new Green Wedge through the development for new and existing residents to enjoy.. In this regard, the development would differ from Newhall and Gilden Park because plans for these were established prior to the use of specific Garden Town principles (the Harlow area did not become a Garden Town until 2017).

Biodiversity net gain (BNG) is intended to deliver a net gain compared to what is on the site at a particular base date, using specific survey methods to assess this. Further guidance and legislation on this is due to be released by central government but has been delayed, as BNG was due to come into force on large sites in Nov 2023 but has been pushed back to at least Jan 2024. However, this should be well established before masterplanning work on this site progresses and will be a legal requirement under the Environment Act.

The exact timing of the delivery of new Green Infrastructure (GI), and links to it, will be established at the masterplanning and planning application stage in accordance with the phasing of other infrastructure delivery. Screening between the development and Churchgate Street - and consideration of the area's topography - would come under the SPD's requirement that the masterplan must sensitively consider existing settlements, and will therefore be considered at the masterplan stage. The SPD will be amended, however, to make specific reference to the use of landscaping and GI as an example of this.

Impacts on existing water courses, in terms of flooding, will be considered in further flood risk assessments at the masterplanning and planning application stages but the Local Plans that allocated these sites have been informed by Strategic Flood Risk Assessments already to ensure that the principle of development is accepted.

.....

6. Sustainability and Build Quality

Obviously we want build quality to be high - but as noted below how will it be measured? Can more soakaways be built & planned into gardens to alleviate surface run off? Gilden Park seems to do this better than New Hall.

Council Response

The quality of the build encompasses a large range of details and this will be considered at the planning application stage, then Building Control checks later in the development of the site will ensure that the relevant qualities have been met.

In accordance with the Harlow and Epping Local Plans and national planning policy, etc., soakaways and other measures (i.e. SuDS) will be required as part of the development. SuDS, including new ponds and swales, are likely to help with any future flooding. .

7. Sustainable Movement

Great that you want to reduce use of cars – but this will only be possible if more community facilities are provided in the area eg shops & supermarket. The STC will only work if it is quick, frequent and takes people where they

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Respondent Name Sarah Swift

Organisation

EoH Document Comments

want to go - which may not be central Harlow. Consideration should also be given as to how transport links to Old Harlow and Harlow Mill station are developed and not just links to Harlow Town Centre as these links could remove cars from the roads too. Decent access routes need to be developed as well or congestion will make travel even more difficult than it is already.

Council Response

As part of the local centres in the development, community facilities will be provided. This will also act as a hub so that walking, cycling and public transport can access the services and facilities in areas where homes can get to them sustainably.

The STC route will run across Harlow and not just connect with central Harlow and there will be opportunities for existing and other bus routes provided by the developer (other than the STC) bus routes to connect into the network and access other services.

As part of S106 financial contributions raised by the development, there may be opportunity for transport links to Old Harlow etc. to be improved. This will be further established at the masterplan and planning application stages.

8. Sustainable Transport Corridors

See earlier comments on the STC in chapter 7. As with comments below, consideration for all the settlement areas that will be affected needs to be given. Residents travel all over the area and the STC will only work for a proportion of journeys. Closing main link junctions will exacerbate pollution and car travel time.

Council Response

The HGGT Transport Strategy, STC and associated modal shift/change are key strands of the HGGT vision to address potential increased vehicular movements arising from new development. The STC will provide fast, direct, safe walking, cycling and bus routes for residents across the town. For the eastern part of the STC it will provide sustainable travel opportunities for residents at East of Harlow, Newhall odal change is about allowing short car journeys to be completed using sustainable transport instead, thereby reducing the number of cars on the road overall. The allocation of the site has been informed by transport assessment evidence as part of the Local Planand further detailed transport assessments will be carried out by the developer. The HGGT IDP identifies what schemes and proposals are required from the development including those related to improving the highway network to accommodate growth and the provision of bus services that are not only the STC route but connect to other key areas across the town.

9. All-Vehicle Access

I don't see how this is all going to work with the existing access points to Gilden Way and other routes that are already busy. In looking at how traffic is kept off Hobbs Cross road, attention needs to be given as to how this will affect those accessing Churchgate Street and the two existing schools. This area is heavily used and priority needs to be given to ensuring that continued easy access is maintained, particularly bearing in mind the existing school traffic which is heavy.

.....

Council Response

Access to existing areas is to be maintained.

The HGGT Transport Strategy, STC and associated modal shift/change are key strands of the HGGT vision to address potential increased vehicular movements arising from new development. The STC will provide fast, direct, safe walking, cycling and bus routes for residents across the town. For the eastern part of the STC it will provide sustainable travel opportunities for residents at East of Harlow, Newhall odal change is about allowing short car journeys to be completed using sustainable transport instead, thereby reducing the number of cars on the road overall. The allocation of the site has been informed by transport assessment evidence as part of the Local Planand further detailed transport assessments will be carried out by the developer. The HGGT IDP identifies what schemes and proposals are required from the development including those related to improving the highway network to accommodate growth.

10. Educational Provision

I have considerable concern at the siting of a primary school in close proximity to Churchgate Primary and St

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Respondent Name Sarah Swift

Organisation

Nicholas' schools as outlined in Options 1 and 4. The suggestion to build closer to Hubbards Hall would give more space between the existing primary schools which should be considered (Newhall Primary as well as Churchgate Primary & St Nicholas'). Congestion is already significant in Churchgate Street and on & off Gilden Way & Hobbs Cross Road at school times.

Council Response

Noted. The exact locations of the schools have yet to be established and are indicative in the SPD. Essex County Council will be providing further evidence and justification for the best location. The SPD will therefore be amended to remove the school options and state that locations are to be decided.

11. Local Centres

Consideration needs to be given to how other areas of housing will link to the facilities eg Newhall & Churchgate Street & how the new build can easily walk/cycle etc to these other areas - eg a lit path to Churchgate Street for the pub and church which are used extensively for community and social purposes. Lit - so people can walk home at night!

Council Response

The SPD requires the masterplan to consider existing settlements including access to existing services and facilities and Green Infrastructure routes. At the masterplanning stage, therefore, it will be expected that such links to existing settlements, including walking/cycling links, are provided. Detailed design issues such as lighting will be addressed at the later planning application stage using Secure by Design principles.

12. Combined Principles				
Council Response				
Other Comments				
Council Response				
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Are there any attachments?	No			

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Respondent Name	Martin Harris	Organisation	
General Comments	S		
Council Response			
1. Introduction			
Council Response			
2. Context			
Council Response			
3. Stewardship			
Council Response			
	Character Consideration		
well	·	wn" lanes to some extent becam which need to be addressed.	e cycle paths / footpaths, which works
Council Response	g are indeed concerns w	which need to be addressed.	
direct, safe walking provide sustainable short car journeys the road overall. The Local Planand furth identifies what schule highway networks SuDS, including new flooding in 2023 way within a known florequired.	g, cycling and bus route e travel opportunities for to be completed using some he allocation of the site her detailed transport a nemes and proposals are ork to accommodate grow w ponds and swales, are as as a result of a very is and zone area (as per EA	es for residents across the town for residents at East of Harlow, I sustainable transport instead, to has been informed by transports will be carried out re required from the developme rowth. The likely to help with any future intense and short period of rain A maps). This is with EA to decide	lopment. The STC will provide fast, For the eastern part of the STC it will Newhall odal change is about allowing hereby reducing the number of cars on rt assessment evidence as part of the by the developer. The HGGT IDP nt including those related to improving floodingChurchgate Street area that impacted on the local brook le whether further work/what work is
	Green Infrastructure		
Council Response			
6. Sustainability an			
Council Response			
7. Sustainable Mov			
Council Response			
8. Sustainable Tran	nsport Corridors		
യSarah Swift I ver	y much agree. There ne	eeds to be encouragement of jou	irneying on foot etc between the

Council Response

various estates, areas etc

Rep ID Page 108 of 213 **EoH Document Comments** Respondent Name Martin Harris Organisation The SPD requires the masterplan to consider existing settlements. At the masterplanning stage, therefore, it will be expected that such links to existing settlements, including walking/cycling links, are provided. 9. All-Vehicle Access Council Response 10. Educational Provision Council Response 11. Local Centres This also raises the wider issue of community infrastructure generally. New build should not simply be tagged onto older areas. How will the communities work, doctors, dentists etc etc. All need securing carefully. Also issue of links between builds. I can work anywhere in Harlow "New Town" virtually the whole way through greenery. How will people walk around, etc. Will residents be able to walk to a "pint of milk" etc. These practicalities will determine car use etc @Sarah Swift Indeed yes, vital if we wish to build communities ad encourage non-car use. (NB: Sarah Swift's comment was "Consideration needs to be given to how other areas of housing will link to the facilities eg Newhall & Churchgate Street & how the new build can easily walk/cycle etc to these other areas - eg a lit path to Churchgate Street for the pub and church which are used extensively for community and social purposes. Lit - so people can walk home at night!") **Council Response** The creation of a Garden Community of this scale and proximity to Harlow provides the opportunity for new housing to be provided in a suitable and sustainable area, with its own infrastructure and the upgrading of existing infrastructure. The site will be supported by the right infrastructure in the right location including health, education, sustainable transport, access and highway improvements and all utility provision having considered any pressures in the local area. This is set out in the HGGT Infrastructure Delivery Plan. Infrastructure

will have to be provided in a phased approach based on the construction/occupation of dwellings. However, it is not appropriate for the SPD to provide detail on phasing of housing and phasing of infrastructure provision - this will come at the masterplan stage in detailed discussion with infrastructure providers.

The SPD requires the masterplan to consider existing settlements. At the masterplanning stage, therefore, it will be expected that such links to existing settlements, including walking/cycling links, are provided. The SPD requires the masterplan to be landscape-led, providing Green Infrastructure, including making use of the Green Wedge which has been extended eastwards across the site, connecting it up with the rest of Harlow's Green Wedge network and other Green Infrastructure. Issues such as lighting will be addressed at the later planning

plication stage.	application stage.
. Combined Principles	12. Combined Principles
uncil Response	Council Response
her Comments	Other Comments
uncil Response	Council Response
	•
e there any attachments? No	Are there any attachments?

Rep ID 40

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Respondent Name David Gould

Organisation

General Comments

Insufficient guidance on ensuring that there won't be detrimental impact on the existing narrow roads (Moor Hall road and Hobbs Cross road) and local communities especially Churchgate Street. The Churchgate Steet roundabout off Gilden Way is a prime example of past failure. The traffic light sequencing is not sufficiently adaptive to cope with the morning and evening peak school periods. This problem has been raised for over a year but no action has been taken.

Council Response

The SPD requires the masterplan to sensitively consider existing communities. In particular it states that the effects on existing settlements, such as the historic settlement of Churchgate Street, must be considered and any adverse impacts mitigated against, particularly regarding density and building heights. The addition of references to the need for design codes throughout the document means that specific design details can be carefully considered and agreed by the Councils, in consultation with stakeholdeThe HGGT Transport Strategy, STC and associated modal shift/change are key strands of the HGGT vision to address potential increased vehicular movements arising from new development. The STC will provide fast, direct, safe walking, cycling and bus routes for residents across the town. For the eastern part of the STC it will provide sustainable travel opportunities for residents at East of Harlow, Newhall and First Avenue in particular. Modal change is about allowing short car journeys to be completed using sustainable transport instead, thereby reducing the number of cars on the road overall. The allocation of the site has been informed by transport assessment evidence as part of the Local Planand further detailed transport assessments will be carried out by the developer. The HGGT IDP identifies what schemes and proposals are required from the development including those related to improving the highway network to accommodate growth. The Churchgate Street roundabout, while near to the East of Harlow site, is not for this SPD to address and is an Essex County Council matter.

1. Introduction

Can already see the good aspirations being watered down with the relaxation of having a single overall design authority, to piecemeal development. What processes will be put in place to ensure that infrastructure and community facilities will be delivered as planned, and not reneged on. Suggest milestones that there is no progression to the next phase until the previous phase has been fully completed. (No community facilities in Gilden Park and no bus service)

Council Response

The aim of the SPD is to ensure there is uniform guidance for producing a single comprehensive masterplan for the site, bringing forward development in a manner which is cohesive and not piecemeal.

The site will be supported by the right infrastructure in the right location including health, education, sustainable transport, access and highway improvements and all utility provision having considered any pressures in the local area. This is set out in the HGGT Infrastructure Delivery Plan. Infrastructure will have to be provided in a phased approach based on the construction/occupation of dwellings. However, it is not appropriate for the SPD to provide detail on phasing of housing and phasing of infrastructure provision - this will come at the masterplan stage in detailed discussion with infrastructure providers.

The adherence to S106 agreements is not a matter for this SPD, but the Council's legal action against the developers at Gilden Park is likely to set an important precedent which will help to ensure developers adhere to planned delivery of infrastructure in the future.

2. Context

I am most concerned about the impact this development will have on the supply of water and the adequate drainage of surface water. There has been surface water flooding on Sheering Road/Moor Hall road for the last 30 years or more. Complaints are ignored and nothing is done. I fear the new development will make matters even worse.

Council Response

SuDS, including new ponds and swales, will help with any future flooding and are a requirement for the site as part of Local Plan policy..Churchgate Street area flooding in 2023 was as a result of a very intense and short

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EoH Document Comments

Respondent Name David Gould

Organisation

period of rain that impacted on the local brook within a known flood zone area (as per EA maps). This is with EA to decide whether further work/what work is required.

The partners and developer will work with utility providers on water provision and are aware of the development sites in this area through the Local Plan process.

3. Stewardship

Good aspirations, but little confidence in delivery. (many areas of Gilden Park open spaces are scruffy and unkempt and I understand the residents have to pay for this - hence my doubts)

Council Response

The HGGT Stewardship Charter, which is currently in draft form and was recently consulted on, provides more information on a robust framework for addressing stewardship. Reference to stewardship is also made in the Harlow Local Plan in respect of the new garden communities.

4. East of Harlow Character Considerations

My main concern is that the current problems with traffic congestion and flooding in the Churchgate Street area will be made worse rather than better by the new development.

Council Response

The HGGT Transport Strategy, STC and associated modal shift/change are key strands of the HGGT vision to address potential increased vehicular movements arising from new development. The STC will provide fast, direct, safe walking, cycling and bus routes for residents across the town. For the eastern part of the STC it will provide sustainable travel opportunities for residents at East of Harlow, Newhall odal change is about allowing short car journeys to be completed using sustainable transport instead, thereby reducing the number of cars on the road overall. The allocation of the site has been informed by transport assessment evidence as part of the Local Planand further detailed transport assessments will be carried out by the developer. The HGGT IDP identifies what schemes and proposals are required from the development including those related to improving the highway network to accommodate growth.

SuDS, including new ponds and swales, are likely to help with any future flooding..Churchgate Street area flooding in 2023 was as a result of a very intense and short period of rain that impacted on the local brook within a known flood zone area (as per EA maps). This is with EA to decide whether further work/what work is

5. Landscape and Green Infrastructure

Council Response

6. Sustainability and Build Quality

What is the definition of high quality? Most developer housing is built down to a cost. What about defining minimum levels of heat insulation to make heat pumps a viable option, sound insulation on flats/apartments and semidetached houses., solar panels, EV charging points. Parking provision above the statutory minimum to keep cars off the streets, think of multi-generational occupancy and allowance for visitors.

Council Response

Quality is addressed in greater detail in the Harlow and Epping Local Plans. The SPD will reference the need for design codes to support the masterplan/planning application process.

Issues such as insulation are addressed by the Building Regulations, set nationally by government. Provision of EV charging points is covered by policies in the Harlow and Epping Local Plans. Through these and the HGGT sustainability guidance and checklist, developers are encouraged to go beyond the minimum Building Regs requirements in terms of sustainability and provision of items such as solar panels.

Car parking will be provided in accordance with the Harlow and Epping Local Plans and Essex County Council parking policy/guidance which is being updated to reflect Garden Town aspirations of sustainable modal choice. Rep ID 40

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Respondent Name David Gould

Organisation

7. Sustainable Movement

Make provision to entice people to walk, cycle, or use buses, but don't penalise people who have to use cars because the facilities are inadequate for their particular needs

Council Response

The HGGT Transport Strategy, STC and associated modal shift/change are key strands of the HGGT vision to address potential increased vehicular movements arising from new development. Rather than penalising car users, modal change is about allowing short car journeys to be completed using sustainable transport instead, thereby reducing the number of cars on the road overall. The allocation of the site has been informed by transport assessment evidence as part of the Local Planand further detailed transport assessments will be carried out by the developer. The HGGT IDP identifies what schemes and proposals are required from the development including those related to improving the highway network to accommodate growth.

8. Sustainable Transport Corridors

When M11 J7a was being discussed, it was stated that the ideally need link road from J7a to join up with the A414 dual carriageway at Eastwick would be implemented as part of the future development of Harlow and the Gilston Garden town. Where is this in the plan? It would remove a lot of the traffic off the Gilden Way.

Council Response

It is assumed that this comment references the northern bypass which has been considered and tested through transport modelling undertaken as part of the Local Plan. At present there is not a need for the northern bypass and sustainable transport interventions are likely to be more effective at removing traffic from the network especially give the cost of a bypass as well. However if it is ever considered necessary then an additional arm off the J7a roundabout can be delivered. This is not directly related to the principles of this SPD and site.

9. All-Vehicle Access

Making Moor Hall road into a "main road" is a very bad idea. Where it merges into Sheering road, it is already a very tricky junction when coming to the junction from the North. It also necessitates turning right at the Tjunction down to the Churchgate Street/Gilden way roundabout which already suffers severe delays at peak school times.

Council Response

The terminology of "main road" etc. in the SPD is to be reviewed before it is finalised.

10. Educational Provision

Do not site any more schools near to Hobbs Cross road and Churchgate Street. The current traffic congestion is awful, any new schools will make it even worse.

Council Response

The exact locations of the schools have yet to be established and are indicative in the SPD. Essex County Council will be providing further evidence and justification for the best location. The SPD will therefore be amended to remove the school options and state that locations are to be decided.

11. Local Centres

The existing Doctor and Dentist facilities in Old Harlow are now overstretched as a result of Gilden Park. Provision of additional facilities needs to be made a mandatory part of the plan.

Council Response

The site will be supported by the right infrastructure in the right location including health, education, sustainable transport, access and highway improvements and all utility provision having considered any pressures in the local area. This is set out in the HGGT Infrastructure Delivery Plan. Infrastructure will have to be provided in a phased approach based on the construction/occupation of dwellings. However, it is not appropriate for the SPD to provide detail on phasing of housing and phasing of infrastructure provision - this will come at the masterplan stage in detailed discussion with infrastructure providers. Reference will be made

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EoH Document Comments

Respondent Name David Gould

Organisation

within the SPD however on the need for appropraite healthcare provision such as dentists and doctors. The adherence to S106 agreements is not a matter for this SPD, but the Council's legal action against the developers at Gilden Park is likely to set an important precedent which will help to ensure developers adhere to planned delivery of infrastructure in the future.		
12. Combined Principles		
Council Response		
Other Comments		
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•		
Are there any attachments?	No	

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EoH Document Comments Organisation

Respondent Name Peter Vickers

General Comments

Since the opening of Junction 7a of the M11, residents of Lower Sheering have experienced a noticeable increase of traffic using both Sheering Mill Lane and Lower Sheering Road as a 'rat run' to and from this junction. This has included large commercial vehicles especially Lower Sheering Road on the country lane end despite signage restricting its use.

To date, nothing is being done about it and I feel it is only a matter of time before a serious accident will happen.

The situation is serious and I can only foresee it getting much worse when the new development proceeds.

I understand that housing and the proposed hospital are needed but consideration must be given to the local residents of Lower Sheering to ensure they are not impacted by this development.

Council Response

Council Response

the road opening at a point (Summer 2022) when traffic flows were returning to normal pre-pandemic levels, having been at a reduced level since the start of the pandemic in 2020. This is backed up by traffic data. The SPD requires the masterplan to sensitively consider existing communities. In particular it states that the effects on existing settlements, such as the historic settlement of Churchgate Street, must be considered and any adverse impacts mitigated against, particularly regarding density and building heights. The HGGT Transport Strategy, STC and associated modal shift/change are key strands of the HGGT vision to address potential increased vehicular movements arising from new development. The STC will provide fast, direct, safe walking, cycling and bus routes for residents across the town. For the eastern part of the STC it will provide sustainable travel opportunities for residents at East of Harlow, Newhall and First Avenue in particular. Modal change is about allowing short car journeys to be completed using sustainable transport instead, thereby reducing the number of cars on the road overall. The allocation of the site has been informed by transport assessment evidence as part of the Local Planand further detailed transport assessments will be carried out by

the developer. The HGGT IDP identifies what schemes and proposals are required from the development

including those related to improving the highway network to accommodate growth.

Essex County Council have stated that the apparent increase of traffic since the opening of the new J7a is due to

1. Introduction
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4. East of Harlow Character Considerations
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6. Sustainability and Build Quality

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7. Sustainable Movement		
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8. Sustainable Transport Corridors		
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9. All-Vehicle Access		
Council Response		
10. Educational Provision		
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11. Local Centres		
Council Response		
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Other Comments		
Council Response		
Are there any attachments? No		

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Respondent Name Brian Carroll

Organisation

EoH Document Comments

General Comments

Traffic

Since the building of Gilden Park and the new M11 junction the traffic in the hamlet of Churchgate Street, especially at peak times, has gone up exponentially, with cars backed up from the new roundabout as far back as the old Churchgate Hotel. A survey of traffic using Churchgate Street and also Gilden Way needs to be done now so that steps can be taken to alleviate the problem, if possible. Increasing the number of houses in the area is going to make the problem worse.

Another problem in Churchgate Street is air quality. Stationary traffic with idling engines waiting in a long queue to pass through Churchgate Street is obvious going to affect the health of the people living there. Even with the increasing use of electric cars there will also be more petrol and diesel vehicles if there are more houses built nearby.

A new hospital is due to be built in the area too and this will increase the traffic on Gilden Way and therefore affect traffic waiting to get on the new roundabout.

The present road infrastructure is not coping with the current traffic. All the roads are narrow and I cannot see a new housing estate feeding even more traffic onto them.

It has been suggested that people on the proposed new estate will use buses. Residents there will continue to use cars for convenience. Any buses will have to use narrow and windy roads not really built for them. In any case it Is the bus companies that control whether buses will run, not the local councils.

Sociable/Affordable Housing and Local Services

I believe that when houses were to be built on the Churchgate Hotel site some were to be "affordable". Did this happen? No. When the new Gilden Park was to be built there were going to be services such as schools and doctors built for the new residents. Did this happen? No. Twenty per cent of the new houses on the proposed new estate are supposed to be "affordable". This would amount to be over 600 houses. Looking back on the previous developers and councils track records I cannot see this happening.

From my comments you will see that the suggestion of having yet another housing estate in the area, after Church Langley, New Hall and Gilden Park is not a good idea and certainly not thought through properly.

Council Response

Essex County Council have stated that the apparent increase of traffic since the opening of the new J7a is due to the road opening at a point (Summer 2022) when traffic flows were returning to normal pre-pandemic levels, having been at a reduced level since the start of the pandemic in 2020. This is backed up by traffic data. The HGGT Transport Strategy, STC and associated modal shift/change are key strands of the HGGT vision to address potential increased vehicular movements arising from new development. The STC will provide fast, direct, safe walking, cycling and bus routes for residents across the town. For the eastern part of the STC it will provide sustainable travel opportunities for residents at East of Harlow, Newhall and First Avenue in particular. Modal change is about allowing short car journeys to be completed using sustainable transport instead, thereby reducing the number of cars on the road overall. It is acknowledged that not all people will be able to cease using their cars and this is not expected. The allocation of the site has been informed by transport assessment evidence as part of the Local Planand further detailed transport assessments will be carried out by the developer. The HGGT IDP identifies what schemes and proposals are required from the development including those related to improving the highway network to accommodate growth. The increased use of sustainable transport will assist in improving air quality.

New sustainable, public transport will be provided on the new Sustainable Transport Corridors which will be provided as part of the Garden Town developments.

The Harlow and Epping Local Plans set the requirements for the level of affordable housing. For example, in the Harlow Local Plan this is set at 30% and in Epping this is 40%. The exact figure and type will be negotiated with the developers at the masterplanning and planning application stages and is subject to viability.

The adherence to S106 agreements is not a matter for this SPD, but the Council's legal action against the developers at Gilden Park is likely to set an important precedent which will help to ensure developers adhere to planned delivery of infrastructure in the future.

The East of Harlow site was allocated for housing and associated ancillary uses in the Harlow and Epping Local

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Respondent Name Brian Carroll

Organisation

Plans, which went through rigorous rounds of consultation, public examination and inspection by government. The south-east of the UK has some of the highest house prices in the country due to high demand and lack of supply. Issues such as people living longer than previous generations, higher rates of divorce in older people (resulting in a divorced couple requiring two homes instead of one), and birth rates historically being higher than death rates, has increased demand. The need for housing - including much needed affordable housing - is detailed further in the evidence base supporting the Harlow and Epping Local Plans.

detailed further in the evidence base supporting the Harlow and Epping Local Plans.
1. Introduction
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2. Context
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3. Stewardship
Council Response
4. East of Harlow Character Considerations
Council Response
5. Landscape and Green Infrastructure Flooding Churchgate Street was flooded badly this year, and so have other nearby places. As far as I can see no action has been done to ensure this does not happen again. I understood the local council were going to do something about it. Having another large housing estate nearby is going to make the problem worse.
Council Response SuDS, including new ponds and swales, are likely to help with any future flooding and will be a requirement for the new development site Churchgate Street area flooding in 2023 was as a result of a very intense and short period of rain that impacted on the local brook within a known flood zone area (as per EA maps). This is with EA to decide whether further work/what work is required.
6. Sustainability and Build Quality
Council Response
7. Sustainable Movement
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8. Sustainable Transport Corridors
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9. All-Vehicle Access
Council Response

10. Educational Provision

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11. Local Centres		
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12. Combined Principles		
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Are there any attachments? No		

Respondent Name David and Judith Blake	Organisation
General Comments	
Council Response	
1. Introduction	
Council Response	
2. Context	
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3. Stewardship	
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4. East of Harlow Character Considerations	
Council Response	
The field is within the area for the East of Harlow Mere we live it is in a type of valley, there are also When it rains, the field acts as a sponge and the word Cross Road. If there is building on the field there will be no sponding down into Churchgate Street. The recent flooding in Churchgate Street could have We have more photos and a video if needed. Council Response SuDS, including new ponds and swales, are likely the development. Churchgate Street area flooding rain that impacted on the local brook within a knowhether further work/what work is required.	the Thatched Cottages that are listed next to a field. Master Plan. o water courses on either side of Hobbs Cross Road. ater runs down into the water courses on either side of Hobbs onge effect. The water courses will flood and cause flooding, we started from where we are as for photos attached. to help with any future flooding and will be a requirement of g in 2023 was as a result of a very intense and short period of own flood zone area (as per EA maps). This is with EA to decide
6. Sustainability and Build Quality	
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7. Sustainable Movement	
Council Response	
8. Sustainable Transport Corridors	
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10. Educational Pro	ovision		
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11. Local Centres			
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12. Combined Prince	ciples		
Council Response			
Other Comments			
Council Response			
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Are there any attachi	ments? Yes		

Organisation

General Comments

Having read the East of Harlow Planning document thoroughly, I would like to make several comments and observations. I have not attempted to cross-reference these to sections of the document as most of them apply to several sections. I appreciate a lot of thought has gone into the planning to fit into the landscape and existing buildings, but I hope you will find the following observations helpful to consider - many based on experience of earlier East of Harlow development.

- In order to build a community it is essential to ensure that facilities are the centre of the developments like the original design of Harlow built round service areas with shops, medical facilities, schools, meeting halls, cafes/restaurants/pubs etc.
- Thurch Langley Medical Practice was overloaded when Potter Street surgery closed. Please do not risk overloading existing facilities further by not making sufficient provision for the new homes.
- Will the water supply for Harlow be sufficient to cater for increased housing, and at the other end of the scale, have the drainage requirements been fully investigated in view of recent floods in the area due to earlier building.
- Will there be a separate agreement for bin collections to the rest of Harlow? Will new bin lorries be purchased and new staff employed to cover the increased requirements? The existing staff do a good job, but might they have to cut corners if their workload increases.
- Will there be bike lanes/routes as in the rest of town, and bike stands to securely place bikes outside community facilities?
- Will there be a guarantee that there will be affordable housing and council housing? I understand this was promised for Gilden Park, but did not happen and the council had to threaten action.
- Parking: How will this be handled? In New Hall there is a big problem with this, and even in Church Langley, many people do not use their garages and parking areas, preferring to park on the road, which causes problems for lorries and service vehicles and can be dangerous for children. This needs consideration if the new developments are not to become as congested as many other areas of Harlow.
- •Building work: What will be done to minimise the impact of heavy lorries etc. travelling through existing housing areas and the noise of the building on current residents nearby?
- Country Lanes: Please ensure these are retained as they are perhaps like some of those around Harlow (e.g. Clock Tower to The Stow) where these have been turned into footpaths and cycle routes with hedgerows and woodland borders rather than roads for cars.
- Pootpaths: When Church Langley was built there was an effort by a Ramblers Association member to ensure that existing footpaths (marked on the OS map) were retained and signposted, both during building and afterwards. Are there plans to do this on the new development, which covers an area with a significant number of footpaths?
- To reduce the use of cars, there is a need for local facilities (see above) and a good (frequent and reliable) bus service including a link to the railway stations (as for Church Langley).
- Traveller pitches are mentioned ... this needs careful consideration regarding location. I worked next to an existing one in the Pinnacles and there were some problems for colleagues in a building overlooking the site being hassled by the travellers and feeling afraid. I believe the company subsequently vacated the building in question.

Council Response

The SPD indicates the pontential location of the local centres which will have various community facilities, ensuring they are easily accessible by all residents of the development using a variety of transport methods but mostly walking, cycling and public transport.

The site will be supported by the right infrastructure in the right location including health, education, sustainable transport, access and highway improvements and all utility provision having considered any pressures in the local area. This is set out in the HGGT Infrastructure Delivery Plan. Infrastructure will have to be provided in a phased approach based on the construction/occupation of dwellings. However, it is not appropriate for the SPD to provide detail on phasing of housing and phasing of infrastructure provision - this will come at the masterplan stage in detailed discussion with infrastructure providers.

The partners and developer will work with utility providers on water provision and are aware of the development sites in this area through the Local Plan process.

SuDS, including new ponds and swales, are likely to help with any future flooding and will be a requirement for the site.. Churchgate Street area flooding in 2023 was as a result of a very intense and short period of rain that

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Respondent Name Hilary Huntington

Organisation

EoH Document Comments

impacted on the local brook within a known flood zone area (as per EA maps). This is with EA to decide whether further work/what work is required.

The levels of affordable housing are set in the Harlow and Epping Local Plans (e.g. the Harlow Local Plan requires 30% and Epping is 40%), but the exact figure and type will be negotiated at the masterplanning and planning application stages and is subject to viability. The Council's legal action against the developers at Gilden Park is likely to set an important precedent which will help to ensure developers adhere to plans in future.

The exact locations of any traveller pitches will be considered at the masterplanning stage but will be within the Epping portion of the site as it is a requirement of the Epping Forest Local Plan.

Amenity for existing residents and potential mitigation, including noise etc., will be considered at the planning application stage and will have to be in accordance with the relevant policies in the Harlow and Epping Local Plans which cover protection of amenity.

The development will include bike lanes and routes. Provision of bicycle facilities will be considered at the planning application stage but is an important component of the HGGT Transport Strategy.

Bin collections will be considered at the planning application stage, in consultation with the relevant departments at Harlow Council.

Car parking will be provided in accordance with the Harlow and Epping Local Plans and Essex County Council parking policy/guidance which I scurrently being updated to reflect the Garden Town developments across Essex. The SPD requires the masterplan to be landscape-led, ensuring that open spaces and Green infrastructure are provided, while respecting and preserving the original landscape (such as original lanes) as much as possible. This also includes a mandatory net increase in biodiversity and the delivery of a new Green Wedge through the development for new and existing residents to enjoy...

Any diversions of footpaths due to building work would be considered at the planning application stage.

1. Introduction			
Council Response			
2. Context			•
Council Response			
3. Stewardship			
Council Response			

4. East of Harlow Character Considerations

• Elease ensure the "village" character of Churchgate Street is retained. This is a conservation area and needs to be respected. It looks from the plan as if there will be a lot of building next to Churchgate Street. It would be good if this is low level and not like the large blocks of flats on the new "throughabout" on Gilden Way, which would completely spoil the look of the "village" and its character.

Council Response

The SPD requires the masterplan to sensitively consider existing communities, including in terms of design and amenities of existing residents. Design codes will be developed as part of the application process. In particular it states that the effects on existing settlements, such as the historic settlement of Churchgate Street, must be considered and any adverse impacts mitigated against, particularly regarding density and building heights.

5. Landscape and Green Infrastructure

- Prom the maps, it looks as if some of the woodland will become development sites. Will all the woodland be retained - perhaps along the lines of Brenthall Woods between Church Langley and New Hall? Will there be enough green spaces, play areas etc. as in Church Langley? Will new trees be planted? What will be done to protect wildlife and wildlife corridors?
- Will there be gardens or will houses open straight onto roads and pavements as in New Hall, which is not

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EoH Document Comments

Respondent Name Hilary Huntington

Organisation

desirable as there is a lack of privacy for residents and drainage problems.

Council Response

The SPD requires the masterplan to be landscape-led, ensuring that open spaces and Green infrastructure are provided, while respecting and preserving the original landscape as much as possible. This also includes a mandatory net increase in biodiversity and the delivery of a new Green Wedge through the development for new and existing residents to enjoy. Open spaces will be a key part of the site (requirements are set out in the HGGT Infrastructure Delivery Plan) and a new Green Wedge has been designated across the site to assist with this. The development will be required to adhere to the policies in the Harlow and Epping Local Plans, which place emphasis on the importance of Green Infrastructure, open space and play provision.

The exact design of housing, including size and location of gardens, will be established at the masterplanning

The exact design of housing, including size and location of gardens, will be established at the masterplanning and planning application stages.

6. Sustainability and Build Quality
Council Response
7. Sustainable Movement
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8. Sustainable Transport Corridors
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9. All-Vehicle Access
Council Response
10. Educational Provision
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11. Local Centres
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12. Combined Principles
Council Response
Other Comments
Council Response
Are there any attachments? No

Organisation Sheering Parish Council

General Comments

I have already filled in the response form personally, but I feel that the area at the end for comments does not allow for a detailed response easy to compose.

I therefore respond on behalf of Sheering Parish Council.

The hospital is a contentious issue, as the land designated is not part of the discussion and is to be sited in the Pincey Brook valley where the original Sheering settlement in the 11th century was sited.

To access the hospital, a tunnel has to be built under the link road. Why was this not considered before when this was constructed rather than as an afterthought?

The hospital should be to the south of the link road, away from the valley, with car parking positioned (hidden) between Mores Wood and the link road.

All residents are concerned that there will be an increase in traffic and, at their public meeting with officers, made their feelings very clear that the current traffic situation is unacceptable without a further increase in traffic from the development making it worse.

The location of the site for the travellers is not indicated.

We look forward to further interactions on the masterplan and an opportunity to comment further.

Council Response

The local authorities have been in discussion with the Hospital over a number of years including through the examination process and the provision of a healthcare camput is identified as a requirement for the East of Harlow site in the Epping Forest Local Plan. The Epping Forest Local Plan was only recently adopted and funding agreed from Government, this being after the plans were approved for the J7a designs. The authorities need to consider the location of the hospital carefully given the need for homes to be built and other community facilities within the East of Harlow allocation and that new homes are considered more appropriate to the south of the link road (so as not to be separated by the link road in order to access schools, local centres and green spaces etc) rather than to the north. It also would be able to have its own dedicated access arrangement off the J7a roundabout separate from all other uses to the south. The location of the Gypsy and Traveller site will be determined through the masterplan process but will be identified within the Epping Forest portion of the site as per their Local Plan policy.

The HGGT Transport Strategy, STC and associated modal shift/change are key strands of the HGGT vision to address potential increased vehicular movements arising from new development. The STC will provide fast, direct, safe walking, cycling and bus routes for residents across the town. For the eastern part of the STC it will provide sustainable travel opportunities for residents at East of Harlow, Newhall and First Avenue in particular. Modal change is about allowing short car journeys to be completed using sustainable transport instead, thereby reducing the number of cars on the road overall. The allocation of the site has been informed by transport assessment evidence as part of the Local Planand further detailed transport assessments will be carried out by the developer. The HGGT IDP identifies what schemes and proposals are required from the development including those related to improving the highway network to accommodate growth.

1. Introduction
Council Response
2. Context
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3. Stewardship
Council Response

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Respondent Name Lesley Paine

Organisation Sheering Parish Council

4. East of Harlow Character Considerations

The masterplan for the residential development should take account of existing scales and design of buildings. Many residential buildings in Sheering village are terraced houses and suit first time buyers. No buildings should be over 2 storeys to maintain the scale.

Council Response

The SPD requires the masterplan to sensitively consider existing communities and take into account design cues of the wider area. In particular it states that the effects on existing settlements, such as the historic settlement of Churchgate Street, must be considered and any adverse impacts mitigated against, particularly regarding density and building heights. The addition of references to the need for design codes throughout the document means that specific design details can be carefully considered and agreed by the Councils, in consultation with stakeholdeThe SPD will be updated to reflect the need for Design Codes to support the process.

5. Landscape and Green Infrastructure

Our response to the Main Modification documents was to request a 'build to' line at the M11 J7a link road to protect the rural nature of Sheering Village. This has been achieved in part by removing land from the green belt and designating it as SANG.

Although conversations with the HGGT team have confirmed that this land will be protected and retained as land not to be developed, this needs to be protected in some way so that it cannot be developed in the future.

There is no mention of archaeological investigations which would need to be undertaken in this area to protect any historic status. Indeed, there are ancient ringworks to the north of Pincey Brook local to the site indicating a timber castle and a Roman coffin was found nearby. No account has been taken of the loss of habitat as this is a chalk stream with varied wildlife and flora.

Many people in Sheering grow their own vegetables and several have allotments outside of the area. They would really appreciate local allotments in the SANG.

Council Response

The SPD will be amended so that the final version refers to the land in the north of the site as a 'green buffer', as the SPD cannot specifically designate the land as a SANG (neither Local Plans evidenced the need for a SANG at East of Harlow and further discussions needed with Natural England and National Trust on this).

Future development would need to be in accordance with the masterplan for the site which, as set out in the Epping Local Plan and detailed in the SPD, will preserve the land in the north as a green buffer.

Archaeological investigations would need to be carried out at the planning application stage, which is usual process for a development of this size and type and is a requirement of local policy.

The Harlow Local Plan identifies allotment provision in the Green Wedge. The exact use of open spaces on the site, including possibility of allotment provision, will be explored at the masterplanning stage.

6. Sustainability and Build Quality

The residential developer should consider community heating systems and the most sustainable ways to develop the site and reuse materials and rainwater. Although MMC is now the buzz word, the recent issues with RAAC have made people wary of system building and would prefer traditional construction methods.

The masterplan contract for designers should be tendered and the best ones selected to deliver a quality result.

Council Response

Community heating systems, materials, use of rainwater, etc., will be considered at the masterplanning and planning application stages. These will need to be in accordance with Building Regulations, the Harlow and Epping Local Plans, and should consider the HGGT Sustainability and Guidance Checklist which seeks the most sustainable development.

Contracts for the design of the masterplan are an issue for the developer.

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EoH Document Comments

Respondent Name Lesley Paine

Organisation Sheering Parish Council

7. Sustainable Movement

Council Response

8. Sustainable Transport Corridors

Residents believe that a sustainable transport system will not deter drivers and that this will fail. It will be as a result of S106 donations and will therefore not be in place in advance of the building programme. In fact the questionnaire asked whether residents would cycle from the village to the new development. Many residents are too old to cycle; if they are ill and need the hospital, they certainly will not be cycling there.

However, Sheering Village has to bus all their secondary school children as there is no local school within walking or safe cycling distance. Safe cycling through the SANG to a secondary school, would be ideal.

Council Response

The HGGT Transport Strategy, STC and associated modal shift/change are key strands of the HGGT vision to address potential increased vehicular movements arising from new development. The STC will provide fast, direct, safe walking, cycling and bus routes for residents across the town. For the eastern part of the STC it will provide sustainable travel opportunities for residents at East of Harlow, Newhall odal change is about allowing short car journeys to be completed using sustainable transport instead, thereby reducing the number of cars on the road overall. The allocation of the site has been informed by transport assessment evidence as part of the Local Planand further detailed transport assessments will be carried out by the developer. The HGGT IDP identifies what schemes and proposals are required from the development including those related to improving the highway network to accommodate growth. Infrastructure will have to be provided in a phased approach based on the construction/occupation of dwellings. However, it is not appropriate for the SPD to provide detail on phasing of housing and phasing of infrastructure provision - this will come at the masterplan stage in detailed discussion with infrastructure providers.

The possibility of a cycling route through the green buffer towards Sheering will be explored in the subsequent stages and the SPD will be amended to make reference to this. This will consider catchment areas for schools and therefore safe sustainable access to schools for local children.

9. All-Vehicle Access

Council Response

10. Educational Provision

Council Response

11. Local Centres

Local residents want public facilities included in the development for the use of Sheering residents. They want council run community facilities including health centre, dental services and elderly social care. Local healthcare facilities are already stretched and so they need to be incorporated in the area. There are already small independently owned shops in Sheering, but Lower Sheering is without a local shop and post office, so this sort of facility would be appreciated by residents.

Walking through the SANG and cycling along Pincey Brook also needs to have facilities such as toilets and café if possible.

Council Response

The site will be supported by the right infrastructure in the right location including health, education, sustainable transport, access and highway improvements and all utility provision having considered any pressures in the local area. This is set out in the HGGT Infrastructure Delivery Plan. Infrastructure will have to be provided in a phased approach based on the construction/occupation of dwellings. However, it is not appropriate for the SPD to provide detail on phasing of housing and phasing of infrastructure provision - this will

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ID 45 EoH Document Comments

Respondent Name Lesley Paine

Are there any attachments?

No

Organisation Sheering Parish Council

come at the masterplan stage in detailed discussion with infrastructure providers. The developers may also be required to provide contributions to the improvement of existing nearby facilities - the SPD will be amended to clarify this.

clarify this.

The SPD will be amended to make specific reference to the following with regards to the local centres in the development: preschool provision; doctors; dentist; play areas; community rooms for use for faith activities; keep fit; toddler groups; support groups etc.

12. Combined Principles

Council Response

Other Comments

Council Response

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Respondent Name Keith Young Organisation

General Comments

Not sure what category this question sits comfortably in but I have taken an educated guess it may be this category.....My question is this... What percentage of the overall homes being built in the East of Harlow Development Plan will be (1) Affordable Housing (2) Local Authority/ Council owned homes, as there is a higher demand for these two categories and should take preference to any others?

EoH Document Comments

Council Response

The level of affordable housing is set in the Harlow and Epping Local Plan policies, which for Harlow for example is 30% and 40% for Epping Forest. The exact level and type of affordable housing will be negotiated with the developer later in the process, e.g. at the planning application stage and be subject to viability testing.

1. Introduction

Council Response

2. Context

Council Response

3. Stewardship

Ch 3 Stewardship para 3.4 states ... "It should be noted that the highway authority will only adopt roads as public highways where there is a demonstrable wider public benefit and constructed to an adoptable standard." This appears to be a case of 'sloping shoulders' and avoiding the legal responsibility to maintain the highways to be built, in the future! The Master Plan needs to identify and clearly name who will be adopting the highways and when so that the future legal responsibility to service and maintain the highways is legally assured, otherwise the highways will fall into total disrepair. If the highways are not adopted then Harlow District Council will be denying any legal responsibility and Essex Highway Authority will be denying legal responsibility for the highways if the highways are not adopted. Consequently nothing will be done and Essex County Council will take their lions share of the Community Charge from new residents, and do nothing to maintain the highways for residents. Not adopting the highways is a recent phenomenon in these austere times, where Local and County Councils can legally avoid having to spend money maintaining the highways. Remember the highways by legal definition include from one side to the other the hedges, verges, footpaths and the roadway. It affects not just road users but pedestrians too. 'Parcels of land', also need to be adopted where the owner is identified, where a legal responsibility is required to maintain and service that land. In the East of Harlow Development these areas also need to be identified as being adopted, and who adopted by. If this is not done, you will have neighbour disputes over who owns what land because these 'parcels of land' will end up being unkempt and unsightly attracting potentially vermin, rubbish and anti social behaviour, causing not just an eyesore but potentially attracting anti social behaviour. All people, whether local, or not so local use public highways to get from 'A' to 'B' and therefore is demonstrably of wider public benefit. If they are not adopted then a Judge could look upon a case of Judicial Review favourably on the grounds of 'Irrationality' with them not being adopted as the utility of land is of significant importance in Land Law. I cannot emphasise the importance of the highways being adopted and the name of the Authority who will be adopting them and when in the Draft East of Harlow Development Plan. Is this going to happen and at what stage if it is?

Council Response

The issue of stewardship is being considered in greater detail in the HGGT Stewardship Charter, the draft of which was recently consulted on. Specific stewardship requirements for the EoH site, including for public open spaces and community buildings, will be considered at the masterplanning and planning application stages. It is common that cul-de-sacs in developments are not adopted highways and it is for the residents to fund their upkeep, which would be made clear at the time of house purchase. The highway authority will adopt main roads through the development so as long as they meet certain criteria which will be determined through the masterplanning and planning application process.

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EoH Document Comments

Respondent Name Keith Young

Organisation

4. East of Harlow Character Considerations

Page 67 Para 7.50 of the Strategic Master Plan states that "if the Secondary School is not required within the Harlow district part of the site then consideration will be given to appropriate alternative development and associated infrastructure, having regard to the policies in the Local Plan and the balances of uses within the Strategic Site as a whole." If the Secondary School is not built as alluded to in the above paragraph then what is to be built in its place? The land area is fairly large and nothing is alluded to in respect of what would replace the school. Whatever does would have a profound impact on the overall Master Plan for the East of Harlow Development?

Council Response

The exact locations of the schools have yet to be established and are indicative in the SPD. Essex County Council will be providing further evidence and justification for the best location. The SPD will therefore be amended to remove the school options and state that locations are to be decided. If the secondary school is not required in the Harlow part of the site then it would be expected that alternative infrastructure or development, as outlined in Para 7.50 of the Harlow Local Plan, would instead be provided. It would be for the masterplan to establish what this would be considering the need for infrastructure and the need to provide a minimum of 3,3350 homes across the entire site.

5. Landscape and Green Infrastructure

Council Response

6. Sustainability and Build Quality

Can you guarantee that the houses, retail and commercial properties to be built, will be subject to the 'Secure By Design' system, involving the Police in order to design crime out of the proposed area?

Council Response

The police will be involved with the design of the buildings at the planning application stage, to ensure that 'Secure by Design' is implemented and buildings and streets are as safe as they can be, and designed to ensure they feel safe as well as being safe.

7. Sustainable Movement

Harlow bus service is definitely not fit for purpose. The buses are dirty, smelly, old and limited in capacity and destination. Since de-regulation in 1981 the bus service has spiralled downwards and is very expensive compared with other countries eg Spain, France, Germany etc. In order to prevent the East of Harlow Development neighbourhood from becoming a 'transient community', commuting by car via the M11 to Cambridge or London for work, Harlow needs a bus service that will connect all neighbourhoods via a single bus route to ensure the East of Harlow development neighbourhood feels and identifies as part of Harlow. In addition to this, as Sir Frederick Gibberd incorporated into his Master Plan for Harlow, there needs to be sufficient suitable employment in Harlow for the proposed neighbourhood to really feel part of Harlow and contribute to the economic prosperity of our town. If we do not, I fear a 'transient community' will develop with no local 'roots' being laid down and no sense of belonging will ensue for the new community. Will there be a new bus service directly connecting the new community with all parts of Harlow, not just via Harlow Town centre, Harlow Town railway station, and the Pinnacles? What percentage of additional employment in Harlow will be provided for the new community to work locally?

Sustainable Movement Chapter 7 (c) (iv) states "car use must be discouraged as much as possible in line with modal shift targets". No matter what you do you are not going to persuade people not to use their car. 70% of change Programmes fail because of opposition to cultural change. What are you going to do to 'prevent' people from using their cars effectively? I would suggest a reliable frequent tram network throughout Harlow linking in with the new community. This would reduce any carbon foot print and be environmentally clean. If you act quickly you could tap into the current 'de facto government' 'Levelling Up' programme. How viable would this be?

Council Response

The new sustainable transport options will serve all important destinations in Harlow.

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EoH Document Comments

Respondent Name Keith Young

Organisation

New employment sites, which will bring jobs to Harlow, are identified in the Harlow Local Plan. Various options for public transport have been considered, and the STC, with bus rapid transit, etc. is considered to be the most viable. More information is provided in the HGGT Transport Strategy. The HGGT Transport Strategy, STC and associated modal shift/change are key strands of the HGGT vision to address potential increased vehicular movements arising from new development. The STC will provide fast, direct, safe walking, cycling and bus routes for residents across the town. For the eastern part of the STC it will provide sustainable travel opportunities for residents at East of Harlow, Newhall odal change is about allowing short car journeys to be completed using sustainable transport instead, thereby reducing the number of cars on the road overall. The allocation of the site has been informed by transport assessment evidence as part of the Local Planand further detailed transport assessments will be carried out by the developer. The HGGT IDP identifies what schemes and proposals are required from the development including those related to improving the highway network to accommodate growth.

8. Sustainable Transport Corridors

Council Response

9. All-Vehicle Access

What plans have you to restrict the types and volume of vehicles travelling along the road between Churchgate Street and Foster Street (between Junction 7A and Junction 7 of the M11). When traffic is at a standstill between junction 7A and Junction 7 of the M11, the road between Churchgate Street and Foster Street becomes a 'rat run' and cannot accommodate the large lorries or the sheer volume of traffic.

Council Response

Any restrictions regarding types of vehicles at certain times of day, etc., would be advised via signage and enforced through measures such as the use of ANPR cameras.

10. Educational Provision

Council Response

11. Local Centres

I note that there is a 'Hatch' to be built on the East of Harlow Development plan. these often attract anti social behaviour, noise, litter, rowdiness, damage and anti social behaviour after school and into the evening. This is why Church Langley have no Hatches of small shops. What provision have you in mind to negate these things from happening bearing in mind that the police have insufficient resources to deal with the demands of the public appropriately.

Council Response

When designing a new development, the best method for reducing crime is to ensure it is designed in a way that reduces crime as much as possible. The police will be involved with the design of the buildings at the planning application stage, to ensure that 'Secure by Design' is implemented and buildings and streets are as safe as they can be, and designed to ensure they feel safe as well as being safe.

12. Combined Principles

Council Response

Other Comments

Council Response

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Rep ID 46

Respondent Name Keith Young

Are there any attachments?

No

Organisation

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EoH Document Comments

Respondent Name Annelise Furnace

Organisation Sawbridgeworth Town Council

General Comments

"Given the proximity and size of this development site, which includes the new hospital and mentions 2,600 homes with capacity for a minimum 750 homes allocated in Epping Forest, this development will have a substantial effect on Sawbridgeworth: -Sawbridgeworth Town Council, together with East Herts Council and Hertfordshire County Council, must be consulted and involved in the master planning process -The LCWIP and the sustainable transport corridor must include walking and cycling links to Lower Sheering and into Sawbridgeworth - Traffic assessments must include the development's impact on Sawbridgeworth's roads and railway station."

Council Response

The allocation of the site has been informed by transport assessment evidence as part of the Local Planand further detailed transport assessments will be carried out by the developer. The HGGT IDP identifies what schemes and proposals are required from the development including those related to improving the highway network to accommodate growth. The relevant councils will be consulted at the masterplanning and planning application stages, including Sawbridgeworth TC, ECC and HCC.

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Council Response
2. Context
Council Response
3. Stewardship
Council Response
4. East of Harlow Character Considerations
Council Response
5. Landscape and Green Infrastructure
Council Response
6. Sustainability and Build Quality
Council Response
7. Sustainable Movement
Council Response
8. Sustainable Transport Corridors
Council Response
9. All-Vehicle Access
Council Response

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10. Educational Provision	
Council Response	
11. Local Centres	
Council Response	
12. Combined Principles	
Council Response	
Other Comments	
Council Response	
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Are there any attachments? No	

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ID 48 EoH Document Comments

Respondent Name Anne Donaldson

Organisation

General Comments

Firstly, thank you for consulting our village, and for meeting us this week. I found this helpful, especially to understand the process. However, I found the documents not easy to follow. At the next stage please could the same map be used underneath the diagrams so it would have been easier to identify where things are. Please could the wording be simpler and not so official.

- 1. Water supply: This is a dry part of Engand, as you know. I heard someone explain that the planning team are in consultation with Affinity about the water supply. I assume, and indeed hope, that planning permission would not be granted until Affinity can assure enough supply for what might be a little over 9,000 people (especially if the houses on the other side of the M11 are considered) and a major hospital
- 2.It is great to include community elements, such as the hubs, the schools, allotments, play areas, and green spaces. Please could these be built early in the scheme and the developers not allowed to sell lots of houses first and the community elements become an afterthought. Well done to the Council for legally challenging the Gilden Park developers for doing this.
- 3. The same is true of social housing. So often I have seen developers sell just about all other houses and build the social housing last, if not willingly pay a fine to build fewer social houses. So please could these be an enforceable trigger point.

Council Response

The maps in the final SPD will be amended to ensure more consistent use of a base map. All infrastructure and provision of housing will have to be provided in a phased approach. For infrastructure this will be based on the occupation of dwellings once they are completed. However, it is not appropriate for the SPD to provide detail on phasing of housing and phasing of infrastructure provision - this will come at the masterplan stage in detailed discussion with infrastructure providers. The partners and developer will work with utility providers on water provision and are aware of the development sites in this area through the Local Plan process.

1. Introduction
Council Response
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4. East of Harlow Character Considerations
Council Response

5. Landscape and Green Infrastructure

10. Harlow was built with the principle of green wedges or fingers separating the different communities. This is frequently mentioned in the document, and said to be important. It says that the opportunity to access and expand the Green Wedge needs to be maximised.... Despite there being a mention of needing a buffer to protect Sheering there is no such buffer to protect Churchgate. At the moment there's only the Secondary school playing field. That is not what is usually thought as a wedge/finger. For those the public needs to be able to walk through the wedge/finger so that the wedge/finger is a community facility. Please could this be rethought, to follow the principles stated in the document.

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Rep ID 48 EoH Document Comments

Respondent Name Anne Donaldson

Organisation

Council Response

The Green Wedge referred to is the main one running east-west which will perform the functions of the Green Wedge as set out in the Harlow Local Plan. The SPD requires the masterplan to sensitively consider existing communities, which will require suitable landscaping etc. to provide buffers around existing settlements - this could include Green Fingers in suitable locations. In particular it states that the effects on existing settlements, such as the historic settlement of Churchgate Street, must be considered and any adverse impacts mitigated against, particularly regarding density and building heights. This will be detailed in the masterplanning stage. The SPD will be amended to clarify reference to landscaping/open space buffers.

6. Sustainability and Build Quality

Council Response

7. Sustainable Movement

11.At the meeting it was asked that that there should be clear routes from the new site to Churchgatestreet in order to access the Queens Head and the church. The church was mentioned not just for church members and worship, but because the buildings are used by various community groups at various times through the days of the week (elderly and lonely, toddlers and their carers, residents association, schools etc etc.

12. There was also a request that the new bus routes should include Churchgatestreet as the previous bus was stopped when they could no longer turn right into Mulberry Green. The reply was that there would be a route through the new site – but the gentleman said that would go through Churchgatestreet, yet the route he described circles around Churchgatestreet but does not actually involve any part of the village at all.

16.Is the possible access route off Gilden Way shown on Fig7.1 supposed to be for pedestrians or vehicles? As drawn it follows the footpath already used by folks, so enhancing it for pedestrians would be great – but if it's for vehicles it would swamp so much wildlife areas.

Could I suggest a bit of swapping? Could the STC (less busy and less polluting than the vehicular access) come in from the roundabout with London Rd, run south of and parallel to Gilden Way, then follow the red dots way and turn to enter the site north of Hubbards Hall / Amazing Place, and the vehicular access come in via the Newhall route and enter the site south of Hubbards Hall / Amazing Place? The 2 routes would not cross over, the wildlife, woodland, hedgerows etc (all mentioned in the principles as being important to enhance) would be affected but less so. It would also remove the need for another junction on the A1025, with all the chaos those cause, and have an access off London Rd, whilst near Gilden Way.

17. Im rather sceptical about preventing right hand vehicular turns at junctions. In my limited experience they rarely work, and have little chance of working if those junctions allow buses to turn! So how are the junctions with Moor Hall Rd and Hobbs Cross Road going to be protected, and the junction with Hubbards Hall Drive?

Council Response

The exact routes of new public transport services will be established at the masterplanning and planning application stages, considering issues raised such as the ones raised in this rep. The continued use of existing bus services across Harlow are a matter for Essex County Council and the bus operators.

The access route off Gilden Way will be for vehicles (but will also include suitable pedestrian/cycling space). Pedestrian and cycling links across the site will be considered as part of the masterplan. As required by the SPD, the masterplan is landscape-led, ensuring that open spaces and Green infrastructure are provided, while respecting and preserving the original landscape as much as possible. This also includes a mandatory net increase in biodiversity and the delivery of a new Green Wedge through the development for new and existing residents to enjoy.. The route of the STC has been carefully considered and the preferred option chosen while taking into account all considerations including the ability for it to service existing services and facilities and residents in some of the existing developments such as Newhall, as well as the school and the Enterprise Zone. The final routing however will be carefully considered in the Masterplan. Regarding restrictions, Essex County Council will be able to implement a number of solutions such as cameras and physical barriers to enforce

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Respondent Name Anne Donaldson

8. Sustainable Transport Corridors

restrictions such as no-right turns.

Council Response

9. All-Vehicle Access

15.I wonder if just 3 access roads are enough for something like 7,000 cars? Even less so when considering the additional cars generated by the new schools. But there's nowhere to put another access. So maybe should the number of dwellings be reconsidered and scaled down a little? Doing so might also make it possible to provide the green buffer for Churchgatestreet

Council Response

The East of Harlow site was allocated for housing and associated ancillary uses in the Harlow and Epping Local Plans, which went through rigorous rounds of consultation, public examination and inspection by government. The south-east of the UK has some of the highest house prices in the country due to high demand and lack of supply. Issues such as people living longer than previous generations, higher rates of divorce in older people (resulting in a divorced couple requiring two homes instead of one), and birth rates historically being higher than death rates, has increased demand. The need for housing - including much needed affordable housing - is detailed further in the evidence base supporting the Harlow and Epping Local Plans. The Harlow portion of the East of Harlow Garden Community will help deliver affordable homes for Harlow residents as well as a range of other benefits and opportunities. Lack of affordableTherefore the authorities cannot reduce the number of homes down and the need for three access points has been considered carefully with the local highway authority. These discussions however will continue with any developer and Essex County Council to ensure access arrangements are sufficient and deliverable.

10. Educational Provision

4.The schools

Schools are obviously a necessity. You say the calculations indicate those needed are a 1x2 entry, and 1x3 entry Primary schools, and a Secondary school means 420 + 630 + 900 = 1,950 children. Equivalent to 5 Primary schools and a Secondary proposed to be right next to an existing Primary (210 children) and St Nicholas school (500 children) That means 2,660 children all trying to travel to and from the same area at the same times. As someone said at the meeting, that's a nightmare scenario!

5.diii talks of an 'all through' school. Why? Elsewhere schools approx. 1mile apart have been able to share building and staff resources, so why not build these nearby but not nextdoor to each other? The schools seem close enough for parents to drop siblings at Primary and Secondary schools even if not nextdoor

6.div says the schools should be situated near existing neighbourhoods. Why? di says they should be part of a local centre, so that it can act as a focus for the community. Surely that would be better than on the periphery. The proposed sites seem to be distant from the community hub or centre.

7. Option 2 at least puts one Primary school near those in the south of the site. The others make them have an unnecessarily long journeys to school.

8.I have a suggestion

move the northern school to be near the wood (great opportunities for the children) and the STC, which would therefore also be near the hub

move the southern school as suggested, near Hubbard Hall / Amazing Place and the STC put the Secondary school to adjoin Moor Hall Rd, the STC, and the hub

Thus no school is right next to any other, all are spread through the site, all are near the STC and near a hub. So traffic generated by the 3 proposed schools and the 2 existing schools is spread, all communities are served, the new schools are still close enough to work together, families can still take siblings to the Secondary school and

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EoH Document Comments

Respondent Name Anne Donaldson

Organisation

facilities along the STC

9. There was a comment about encouraging parents not to use cars to get to school. My experience is that that doesn't happen. A school where I used to live was up a country lane but with an estate 100m away with a footpath linking the two. But parents still drove all the way round rather than walk the 100m. When asked why, they said because they were on their way to work or shops.....

Council Response

The exact locations of the schools have yet to be established and are indicative in the SPD. Essex County Council will be providing further evidence and justification for the best location. The SPD will therefore be amended to remove the school options and state that locations are to be decided. There are many reasons why all-through schools are beneficial, and these not only relate to dropping off children in the same location, which often does reduce the need to use the car to get from one to another. It also supports the childs education as they know the area, setting, curriculum and teachers well all through their education.

11. Local Centres

13. The community hubs appear rather small areas. Yet surely they need to include not just shops (grocery and pharmacy etc) but doctors, maybe a library, and a meeting room for toddler groups, mental health groups, groups for the elderly and lonely, and other groups that need to meet during the day and so cannot use the school facilities. Also play facilities etc

14.Are just 2 hubs sufficient for that size of population? Or are you thinking of incorporating a hub into the hospital plans?

.....

Council Response

The local centres will include provision of units for a variety of facilities, including preschool provision; doctors; dentist; play areas; community rooms for use for faith activities; keep fit; toddler groups; support groups, etc. This will not only benefit new residents on the site but also provide facilities to support the potential needs of villages and residents around the site. The exact facility provision will be established at the masterplanning and planning application stages.

The site will be supported by the right infrastructure in the right location including health, education, sustainable transport, access and highway improvements and all utility provision having considered any pressures in the local area. This is set out in the HGGT Infrastructure Delivery Plan which identified the specific needs of this site and other HGGT sites based on expected population, etc.

. Combined Principles
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e there any attachments? No

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EoH Document Comments

Respondent Name Olivier Spencer

Organisation AM Planning o.b.o. Tinneys

General Comments

1. Lawful Scope of an SPD

The planning regime is a creature of statute. A Local Planning Authority (LPA) is authorised to act in the manner prescribed by statute. In this specific context, Harlow District Council (HDC) and Epping Forest District Council (EFDC), as LPAs, are constrained by the s.17 of the Planning and Compulsory Purchase Act 2004 and the Town and Country Planning (Local Planning) (England) Regulations 2012 (the "LP Regulations") in respect of the documents which must be prepared as local plans or development plan documents (a "DPD"). It is unlawful for an LPA to purport to adopt a policy document as an SPD, where those statutory provisions require it to be prepared as a DPD.

LP Regulations 5 and 6 prescribe the documents which must be brought forward by an LPA as DPDs. Those include, amongst other matters, documents which contain statements regarding:

- the allocation of sites for a particular type of development or use (LP Reg 5(1)(a)(ii)); or
- •development management and site allocation policies, which are intended to guide the determination of applications for planning permission (LP Reg 5(1)(a)(iv)).

There are elements of the SPD the subject of consultation which clearly meet the criteria of LP Regulations 5 and 6 and therefore clearly ought to be promoted by the LPAs as a DPD. Their adoption in an SPD would be unlawful within the statutory regime. Should the LPAs require further guidance, there are two helpful cases which illustrate the approach summarised above, they are:

Skipton Properties v Craven District Council [2017] EWHC 534 (Admin); and William Davis Limited & Others v Charnwood Borough Council [2017] EWHC 3006 (Admin)

2. Guidance on Use of an SPD

The definition of 'Supplementary planning documents' in Annex 2 of the NPPF (2023) confirms that SPDs can add further detail to the existing policies in a development plan and can be used to provide further guidance for development on specific sites. They are capable of being a material consideration in planning decision but are not part of the development plan and must not introduce or create new policies. However, they are not, as outlined above, capable of providing site allocation policies. This definition is also reiterated in paragraph 61-008 of the National Planning Practice Guidance (PPG) (2019).

There are several areas where the draft SPD far exceeds its remit and creates new policies or allocates uses that are not set out in either the Harlow Local Development Plan (2020) or the Epping Forest District Local Plan (2023).

For example, paragraph 5(c)(xv), figure 5.3 and figure 12.1 in the draft SPD appear to allocate a Suitable Alternative Natural Greenspace (SANG) to the north of the Pincey Brook. However, the provision of SANG is a strategic matter to be identified and, if necessary, allocated in a local plan. Neither adopted local plan or their evidence base (see below) requires SANG provision on this site. The Epping Forest District Local Plan (2023) explicitly seeks SANG provision in the South Epping Masterplan Area (Policy P1) and the North Weald Bassett Masterplan Area (Policy P6), and the Epping Forest Green Infrastructure Strategy (2021) also seeks SANG provision at the Latton Priory and Water Lane sites (page 111), but neither requires such provision at East of Harlow (Policy SP4). Clearly it is inappropriate for an SPD to introduce a new policy or allocate a new use that is not required in the corresponding DPD policy.

There are also several areas where the draft SPD seems to determine the location and extent of land uses or points of access within the East of Harlow site, including but not limited to:

pages 4, 11, 24 and 57 in relation to the relocation of the PAH;

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- pages 4, 39 and 40 in relation to the three proposed vehicular accesses;
- pages 35, 36 and 57 for the preferred route of the Sustainable Transport Corridor (STC); and
- pages 4, 14 and 57 regarding a restriction on new development to the north of the PAH.

This is contrary to Policy SP4(J) in the Epping Forest District Local Plan (2023) which confirms that the extent of development across the masterplan area and the position of any 'build to' line will be agreed through the preparation of a Strategic Masterplan for East of Harlow. Therefore, these decisions should be made through the Strategic Masterplan itself, not the Masterplanning Guidance document.

EFDC has repeatedly told promoters of other sites elsewhere in the District that matters of land use and access cannot be determined until the conclusion of a masterplanning process, including a Planning Performance Agreement (PPA) to pay for a series of topic-based meetings attended by the District and County Councils, other key stakeholders and statutory consultees, followed by Quality Review Panel advice, reviews of draft documents, member briefings, public consultation and final endorsement at Cabinet. Despite this, the draft SPD attempts to predetermine matters of land use and access on the East of Harlow site, ahead of the process which is meant to inform them. It would be irrational for the HGGT Group to follow that approach for this strategic allocation.

In summary the HGGT Group must decide whether it wants to produce:

(i)an SPD that provides further guidance on the adopted local plan policies – in which case the introduction of SANG and determination of land uses and points of access should be removed from the document; or (ii)a DPD that introduces new policies / allocations and defines land uses – in which case it must go through the more rigorous process required for that type of document.

Summary

In summary, these representations:

- 1. Highlight the risk of a possible legal challenge if the SPD is adopted with its current content.
- 2.Identify where the document exceeds the scope of an SPD, in particular where it appears to create new policies or allocate uses.
- 3. Dbject to the identification of a 'fixed' location for the new PAH.
- 4. Request that flexibility is maintained for an all-vehicle access to the northern part of the site.
- 5. Object to the suggestion that the new PAH should be given priority to use any available highway capacity.
- 6.Object to the apparent allocation of a SANG and/or area for BNG on the northern part of the site.
- 7. Request that any restriction on extent or 'line' of development to the north is left to the Strategic Masterplan stage.
- 8. Note that there has been no meaningful engagement with landowners on the SPD to date.
- 9. Make it clear that the PAH should not be allowed to circumvent any comprehensive PPA and single Strategic Masterplan process.
- 10. Seek amendments to any pedestrian and cycle connections shown to the east of the M11 to ensure they correspond with the location of existing PRoW and public highway only.
- 11. Request that consequential changes are made to the Vision Statement in the SPD.

The Tinney Family is keen to engage further with officers to discuss these issues in more detail and to facilitate changes to the draft SPD. This will help ensure that a final document can be produced that is genuinely collaborative and will support the successful delivery of the East of Harlow Strategic Housing Site.

Council Response

It is not the intention of the Councils to produce a DPD and to allocate sites or uses, as relevant allocations and policy requirements were made in the Harlow and Epping Local Plans. As you recognise, it is not the purpose or the legal possibility of an SPD to allocate sites or uses and the SPD will be reviewed to ensure that this is not the case.

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Identification of SANG: It is necessary that the East of Harlow development provides appropriate access to green space to offset recreational pressure on Hatfield Forest, as recognised by Natural England. While neither the Harlow nor Epping Local Plans allocate specific land for this purpose for East of Harlow, the requirement for such a SANG is established via the Habitat Regulations and case law and the potential need identified in Policy WE4 of the Harlow Local Plan. The location of this green space, i.e. in the northern part of the site, is important due to the requirement for a green buffer between the development and Sheering - see below comment regarding this. The SPD will be amended however so that it refers to the EFDC Local Plan requirement for a green buffer, rather than a SANG.

Relocation of PAH: A statement of common ground with the landowners' consortium (Sept 2020) stated that all parties agree that the new PAH is likely to be delivered north of the M11 J7a link road and the location may be determined in advance of the strategic masterplanning process being completed. This site is still considered to offer advantages over alternative plots, including: it ensures that the residential areas of the masterplan are contiguous, coherent and not separated by the J7a link road; there can be restriction on development further to the north due to Flood Risk and establishment of a gap between East of Harlow and Sheering; it is a suitable sized site with opportunity for dedicated access from roundabout; it has proximity to M11 junction. The final version of the SPD will be amended to clarify these points. It is recognised that the draft SPD is showing a level of detail for PAH in terms of built form that is not necessary given the scope of the Masterplan principles SPD document and this will be reviewed to ensure a consistent approach. Discussions will continue with landowners, PAH and the partner authorities but given pressure on the capacity of the existing hospital and funding arrangements, it is not appropriate the SPD dictate that the hospital must be delivered alongside the masterplan process for the rest of the site.

Three proposed vehicular accesses and preferred STC route: clarity will be given to state that these are indicative. However, it should be noted that access routes etc. were identified in the Harlow Local Plan and these were shown to be indicative, i.e. subsequent work was to set the exact routes and these were not to be determined through the Local Plan or another DPD; therefore the SPD is not introducing a new policy on this.

Restriction on new development to the north of PAH: the primary reason for the area on the northern tip of the site being shown as a green area is to reflect the EFDC Local Plan policy that relates to the establishment of a 'build-to' line to appropriately safeguard the settlement edge of Sheering and prevent coalescence with Harlow. The SPD will be amended so that it refers to the EFDC Local Plan requirement for a green buffer. There is already text in the SPD in chapter 5 which states 'a buffer is required between Sheering Village and the north of the site to prevent coalescence'.

1. Introduction

Council Response

2. Context

11. The Vision Statement

The Tinney Family respectfully request that the following changes are made to 'the Vision Statement' on pages 10-11 of the draft SPD:

- •The 4th paragraph in the Vision Statement shouldn't assume that the new PAH will be situated in proximity to the Pincey Brook for the reasons set out at point 3 of this letter. There will need to be a formal decision by the NHS Trust to relocate the hospital and it will also need to acquire the land necessary to make this possible. Moreover, the final location will be a matter for the Strategic Masterplan document.
- •Reference in the 5th paragraph of the Vision Statement to '3,350 new homes' should read'at least 3,350 new homes' or 'a minimum of 3,350 new homes' to reflect the minimum 750 homes identified in Policy SP4(A) of the

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Epping Forest District Local Plan (2023) and the approximate 2,600 homes identified in Policy HGT1 of the Harlow Local Development Plan (2020).

•Although it may be possible to utilise the M11 buffer zone mentioned in the 2nd paragraph of the Vision Statement as an ecological reserve, it is questionable whether this could simultaneously form a spine for infrastructure and movement. As set out in point 6 of this letter, areas for ecology or biodiversity net gain are not necessarily compatible to human activity and movement.

Council Response

The Vision Statement will be amended.

Agreed that 5th paragraph will be changed to "a minimum of 3,350 new homes" to reflect the "minimum" and "approx." wording of the HC & EFDC Local Plans.

The wording regarding the M11 buffer zone becoming a spine for infrastructure and movement has been amended to focus on the spine being for ecological purposes, considering the LWS to the east of Chalk Lane and the Green Wedge which abuts the motorway. Info will also be added to Ch5 on this.

3. Stewardship

Council Response

4. East of Harlow Character Considerations

Council Response

- 5. Landscape and Green Infrastructure
- 6. Area for SANG & BNG

As mentioned above, paragraph 5(c)(xv), figure 5.3 and figure 12.1 in the draft SPD attempt to allocate a SANG and/or area of Biodiversity Net Gain (BNG) to the north of the Pincey Brook. The Tinney Family object to this on several grounds:

- •The provision of SANG is a strategic matter to be identified and, if necessary, allocated in a local plan. In this regard it is notable neither adopted local plan requires SANG provision on this site or had any corresponding need set out in its local plan evidence base. Therefore, it is inappropriate for an SPD to introduce a new policy or allocate a new use that is not required in the corresponding DPD policy.
- Taken together, bullet points (xv) and (xvi) on page 17 of the draft SPD imply that an area of SANG and/or BNG has been identified on the northern part of the site to provide a buffer between Sheering Village and the northern extent of new development, to prevent coalescence. If so, this is flawed because the purpose of SANG and BNG is not to prevent settlements merging into one another. That is the job of a Green Wedge or Green Belt the latter being a designation which EFDC proposed and supported the removal of via its Local Plan.
- •BANG and BNG are not necessarily compatible with one another. The purpose of SANG is to create recreational space that attracts residents and visitors of new developments away from designed protected sites. Whereas BNG sites are intended to deliver measurable improvements in biodiversity by creating or enhancing habitats in association with development. Attracting a greater number of visitors to a particular part of the East of Harlow site is likely to be at odds with any attempt to increase biodiversity in that same area.
- •Although the East of Harlow Strategic Housing Site will likely need to provide an area (or areas) for biodiversity enhancement and net gain on-site, until more detailed work has

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been undertaken as part of the Strategic Masterplan process, including topic-based meetings and discussions with statutory consultees, it is too soon to designate this on any part of the site.

In summary the area of SANG and/or BNG shown in figures 5.3 and 12.1 of the draft SPD should be removed and labelled as "potential development parcel to be determined via the Strategic Masterplan". This should apply equally to all areas currently shown in purple in figure 12.1 of the draft SPD which are after all for the Strategic Masterplan to establish the extent of development.

While it is accepted that the settlements of Harlow and Sheering should be kept separate and distinct – and the extent of that separation is something for the key parties to discuss and agree as part of the Strategic Masterplan process – the SPD shouldn't seek to allocate SANG, BNG or any other land use designation (such as a Green Wedge, Green Buffer or Country Park) as a means of doing this. The whole of the East of Harlow site has been removed from the Green Belt by the respective local plans and as Green Belt boundaries can only be altered in exceptional circumstances and where fully evidenced and justified, it is inappropriate for a Masterplanning Guidance document to try to place a blanket restriction on development to the north of the site. This point is expanded [in Point 7 under 'Other'].

Council Response

Identification of SANG: See comments under 'General'. It is also important to note that the open space can still be effective at providing coalescence between the development and Sheering; it does not have to be a designated Green Wedge or Green Belt to perform this function. Green Wedges and Green Belts perform a variety of other functions and preventing coalesence is just one of them. The open space is not appropriate for designation as Green Wedge or Green Belt; hence the reason it was removed from the Green Belt and not designated as Green Wedge. It is also not necessarily the case that an open space would be used for both SANG and BNG as these could be conflicting uses on the same site. It is not accepted that the space should be labelled as a potential development parcel (see comments under 'General' regarding restriction of development in the north of the site).

6. Sustainability and Build Quality

Council Response

7. Sustainable Movement

10. Foot & Cycle Connections to the East

The Tinney Family acknowledges the desire in the 2nd paragraph of the Vision Statement to enhance and celebrate existing crossings of the M11 to allow wider access into the countryside to the east.

However, the improved pedestrian and cycle connections suggested in paragraph 5(c)(vii) and shown on figures 5.2, 5.3, 5.7, 7.1 and 12.1 of the draft SPD should be limited to existing Public Rights of Way (PRoW) and public highway. These enhanced connections must not utilise private drives / roads or lead to trespass over private land, which could otherwise compromise existing agricultural uses and operations to the east of the M11.

In this regard the pedestrian and cycle connection arrows shown to the east of the M11 on figures 5.2, 5.3, 5.7, 7.1 and 12.1 should be amended to correspond with the location of existing PRoW and public highway only.

Council Response

Paragraph 5(c)(vii) and relevant maps will be amended to clarify that they are indicative and enhanced connections must consider existing land ownership and existing land uses and operations to the east of the M11.

8. Sustainable Transport Corridors

Council Response

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9. All-Vehicle Access

Access to the North

Notwithstanding the above, if the PAH does relocate to the East of Harlow site and specifically to the land between the M11 J7a link road and the Pincey Brook, then a pre-requisite for the Tinney Family will be to ensure that an all-vehicle access is safeguarded through the hospital site to the land to the north. This will be necessary to provide access to the north and ensure flexibility in the event that sensitively planned and well landscaped development is deemed appropriate in this location at the Strategic Masterplan stage. This may include the extension of the STC to the northern part of the site allocation.

As such, the Tinney Family objects to the references at page 29 and 33 of the draft SPD that the STC should terminate / end at the PAH. Instead the draft SPD ought to refer simply to the STC entering the site through New Hall to the south and continuing northwards to serve all necessary parts of the East of Harlow site.

Council Response

Text re termination of STC - amended to "7.3.2.The STC enters the site through Newhall in the south and it will need to be designed to ensure it is accessible to the northern most point of development "

10. Educational Provision

Council Response

11. Local Centres

Council Response

12. Combined Principles

Council Response

Other Comments

3. Fixed Location for PAH

The draft SPD accepts the relocation of the PAH to the East of Harlow site as a fait accompli and fixes the location of the new hospital between the M11 J7a link road and the Pincey Brook – as set out in paragraph 1.3 and figures 1.2, 5.3, 5.6, 5.7, 7.1, 8.2, 9.1, 10.1-10.4, 11.2 and 12.1-12.2 of the document.

Although Policy SP4(I) in the Epping Forest District Local Plan (2023) allocates "the provision of appropriate community and health facilities including approximately 14 hectares of land for a health and wellbeing hospital campus" at the East of Harlow site, the relocation of the PAH is not a foregone conclusion. Importantly, at the time of writing, the PAH hasn't formally decided to move to East of Harlow as the redevelopment of the existing hospital remains an option and there is no agreement in place for the PAH Trust / NHS England to buy this land from the Tinney Family.

Redevelopment of the existing hospital site could provide several benefits including, but not limited to:

- •Dne of HGGT's central aims is to regenerate central Harlow and not to 'hollow out' the town centre. Notably the existing hospital site immediately abuts the town centre boundary. Therefore redevelopment of the existing PAH would regenerate a key site within central Harlow and in doing so enhance the vitality and viability of the adjoining town centre.
- Redeveloped PAH campus would retain and increase retail and leisure expenditure in the town centre from hospital employees, patients and visitors. Although the existing hospital site is allocated in Policy HS2 of the Harlow Local Plan (2020) for 550 dwellings, the number of residents a development of this size is likely to

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accommodate will be far less than the number of daily hospital employees, patients and visitors.

- This benefit could be particularly important at The Harvey Centre, which HDC purchased last year and will be relying on for long-term income to repay its investment in the town centre.
- Redevelopment of the existing hospital site would better accord with HGGT's sustainable transport objectives, with a greater number of public transport, pedestrian and cycle routes available near the town centre, thereby increasing the likelihood of modal shift for the PAH.

Even if the PAH formally decides to relocate and an agreement is reached in due course to purchase land at East of Harlow, Policy SP4 and Map 2.5 in the Epping Forest District Local Plan (2023) does not 'fix' a particular location for the new hospital within the East of Harlow masterplan area. No detailed work has been undertaken to assess potential locations for a new hospital within the wider site and the draft SPD does not consider any reasonable alternative locations. The work undertaken for the previous site promoter, Miller Homes (as referred to in paragraph 1.18 of the draft SPD), merely presented one option for the future relocation of the PAH and demonstrated how the wider site allocation 'could be' delivered for the purpose of the Examination in Public (EiP) of both local plans. It was not intended to be a definitive or final plan.

Furthermore, as explained in point 2 above, Policy SP4(J) in the Epping Forest District Local Plan (2023) confirms that the extent of development across the masterplan area will be agreed through the preparation of a Strategic Masterplan for East of Harlow. The precise location for any relocation of the PAH should not be set out in the draft SPD, which is meant to be a masterplanning guidance document, it should be left for the preparation of the Strategic Masterplan.

Paragraph 2.137 in the Epping Forest Local Plan (2023) explicitly states that:

"The allocation provides an opportunity to accommodate the relocation of the Princess Alexandra Hospital, subject to the completion of further technical assessment work. In this context, the District Council will work cooperatively with all relevant stakeholders to ensure the future provision of high quality healthcare facilities and services to serve the wider area. These facilities will respond effectively to planned and sustained growth."

Notably and as set out in point 8 below, the LPAs and the HGGT Group have not worked co- operatively with the Tinney Family, as landowners, thus far.

5. Priority for Traffic Numbers

The East of Harlow Strategic Housing Site was identified in the Epping Forest Local Plan (including its Issues & Options document (July 2012)) and the Harlow Local Plan (including its Emerging Strategy and Further Options document (April 2014)) as, first and foremost, a residential-led mixed- used development opportunity. The 'potential relocation' of the PAH to East of Harlow was not mentioned until the Epping Forest District Draft Local Plan was published in October 2016, even then it was apparent that the approximate 750 homes (in Epping Forest District, with a further 2,600 homes envisaged within Harlow District) and the other supporting employment, retail and community uses were the primary driver for the draft allocation in this area.

It is therefore wholly unreasonable for pages 38-39 of the draft SPD to 'give priority' to the PAH for use of available traffic capacity and to prevent any residential access design from the new Campions roundabout until the PAH access from the same roundabout has been implemented. These restrictions were not set out in Policy SP4 of the Epping Forest District Local Plan (2023) and exceed the scope of what should be included in an SPD.

As stated above, there is no agreement in place for the PAH Trust / NHS England to buy the land north of the M11 J7a link road from the Tinney Family and no detailed work has been undertaken to assess potential locations for a new hospital within the wider site. Even if such an agreement is reached in due course and it is demonstrated that this is the most suitable location for the PAH, placing such draconian restrictions on the residential-led

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Organisation AM Planning o.b.o. Tinneys

mixed-used element of the site risks undermining the deliverability of most of the local plan allocation.

This is irrational given that EFDC:

(i)can only currently demonstrate a 1.43-year housing land supp* which is far below the minimum five years required in the NPPF; and

- (ii) has delivered just 35% of its Housing Delivery Test requirement** over the published three-year period to 2021.
- * This was confirmed in the Appeal Decision (ref. APP/J1535/W/22/3302594) at 73 Lindsey Street, Epping, in December 2022, where the local authority signed a Statement of Common Ground agreeing to a supply of just 1.43 years. A full copy of the Appeal Decision is included at Appendix 4.
- ** Figures for 2022 do not appear to have been published yet, but the Government's Housing Delivery Test 2021 measurement, accessible at https://www.gov.uk/government/publications/housing-delivery-test-2021-measurement, indicates that 35% of Epping Forest's housing requirement was delivered between 2018 and 2021.

Far greater emphasis must be placed on housing delivery if EFDC is to overcome these issues and in the case of East of Harlow, the residential-led mixed-used element of the development must be free from the arbitrary restrictions currently suggested in pages 38-39 of the draft SPD.

Furthermore, officers at ECC have confirmed that the new Campions roundabout was designed and modelled for both a residential-led development and a new hospital, with traffic assumptions and allowances made for both. Therefore, if the PAH does relocate to East of Harlow, it should be expected to comply with the assumptions in ECC's model, not take up as much highway capacity as it wants and compromise the rest of the strategic site.

7. Development to the North

The 4th bullet point on page 4 of the draft SPD advises that no further development should take place to the north of the new PAH and page 14 refers to a restriction on development north of the PAH.

The Tinney Family submits that there should be no restriction in the SPD on potential development to the north of the site. Policy SP4(J) in the Epping Forest District Local Plan (2023) directs that "... Through the preparation of the Strategic Masterplan, the extent of development across the Masterplan Area and the position of a 'build-to' line will need to be agreed in order to appropriately safeguard the settlement edge of Sheering." Therefore the extent or 'line' of any development to the north of the site is a matter to be discussed and agreed with the landowners as part of the Strategic Masterplan – it is not something for the HGGT Group to unilaterally decide on in a Masterplanning Guidance document.

It is also notable that EFDC proposed and supported the removal of the whole of the East of Harlow site from the Green Belt. One of the purposes of the Green Belt in paragraph 138 of the NPPF (2023) is to prevent neighbouring settlements merging into one another. With this in mind, it makes

no sense to remove the northern part of the site from the Green Belt and then effectively try to 're- green' the whole area by preventing any development there in the SPD.

The Tinney Family considers that this part of the site should be suitable for some sensitively planned and well landscaped residential-led development, of course having regard to any heritage, landscape and flood risk constraints that exist. In principle some sensitively planned development could be accommodated here while still

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Organisation AM Planning o.b.o. Tinneys

ensuring that Harlow and Sheering do not coalesce. This, as with the extent of all development parcels, is a detailed matter to be established at the Strategic Masterplan stage.

Therefore, references on page 4 and 14 of the draft SPD to preventing development to the north of a new PAH should be removed.

8. Landowner Engagement

Paragraph 2.5 in the draft SPD confirms that officers from Essex County Council (ECC), EFDC and HDC held a series of 'vision' workshops at the beginning of this project, covering the East of Harlow site.

It is notable that despite being a major landowner, the Tinney Family were not involved in these workshops and there has been no meaningful engagement with landowners between adoption of the Epping Forest District Local Plan and launch of the publication of the draft SPD. This does not comply with the requirement in paragraph 129 of the National Planning Policy Framework (NPPF) (2023), for design guides contained in SPDs to "... be based on effective community engagement and reflect local aspirations for the development of their area...".

This shortcoming should be addressed by working closely with the Tinney Family over the coming months and before the final version of the document is produced.

For the HGGT Group's information, the collaboration agreement between the various main landowners at East of Harlow has ended, allowing the Tinney Family to move forward more proactively. Therefore, paragraph 1.7 in the draft SPD will need to be updated.

9. Single Strategic Masterplan

Policy SP4(D & J) in the Epping Forest District Local Plan (2023) requires the East of Harlow site to be subject to a single Strategic Masterplan. Officers have subsequently confirmed that they therefore expect one PPA for the whole site, which all major landowners should sign up to. Despite

this, it appears that the PAH may be allowed to pursue their own PPA, pre-application discussions and potentially a planning application, ahead of this process.

Clearly this is inappropriate. All parties and all proposed uses should be treated equally. If one comprehensive PPA is needed to set the framework and programme for the preparation of a single Strategic Masterplan, then the PAH should not be allowed to circumvent that process or pursue a planning application on land it does not own and has not been subject to a Strategic Masterplan.

It is noted that paragraph 6.25 of the 'infrastructure and delivery' chapter of the Epping Forest District Local Plan (2023) refers to planning applications for the hospital campus potentially coming forward in advance of "... the endorsement of the Strategic Masterplan for East of Harlow...". However, this is not set out in any of the Local Plan's policies or their supporting commentary. In fact Policy SP4(J) appears to contradict this suggestion when stating that the East of Harlow Garden Community "... will be subject to the preparation of a single Strategic Masterplan..." and that ".... through the preparation of the Strategic Masterplan, the extent of development across the Masterplan Area and the position of a 'build-to' line will need to be agreed...". In situations where local plan policy and commentary conflict, it is the policy that should have primacy.

In any event paragraph 6.25 only suggests that a planning application for the new hospital could come forward

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Organisation AM Planning o.b.o. Tinneys

ahead of 'endorsement' of the Strategic Masterplan, not in advance of its preparation entirely.

Therefore the draft SPD should make it clear that all major parties, including the PAH, are expected to be part of one comprehensive PPA and the single Strategic Masterplan process.

Council Response

PAH relocation and use of existing site: The plans for the relocation of PAH to a new site in the East of Harlow are at a more advanced stage than has previously been the case, and the government has confirmed funding is available to facilitate this. See the Council Response under 'General' for more information on the choice of location of the new PAH. The current PAH site has been allocated as the largest non-strategic housing site in Harlow's Local Plan. This is now expected to come forward as a housing site and will make a significant contribution to meeting Harlow's housing needs. The Harlow Local Plan process and examination considered the allocation of this site and the associated pros and cons of retention as a hospital, etc. It has also been indicated by the NHS Trust that redevelopment of the existing hospital to provide a new hospital would not be feasible for a number of reasons, partly due to the difficulty in providing sufficient hospital services on-site while developing a new hospital. It is the intention as well, as set out by other recent consultations, that the provision of a central healthcare hub in the town centre will be required to support needs in the centre of Harlow and that some 'back-office' functions will still be kept in a central location where there is sustainable access, close to where workers may live and to support the vitality of the town centre.

Road prioritisation: Road capacity on the local and strategic networks is not intended to be prioritised by health uses over residential and this will be made clear in the SPD. Further, more detailed transport assessment will be required and will need to consider cumulative impact on overall transport capacity to at least the local plan end dates of 2033. As stated in this rep, ECC have confirmed that the new Campions roundabout was designed and modelled for both a residential-led development and a new hospital, with traffic assumptions and allowances made for both. The SPD will be amended accordingly.

Northern part of site: See other Council responses to this for this rep.

While para 6.25 of the Epping Local Plan is not directly policy, it can be considered as implementation of policies given it refers to how planning applications will be handled.

Are there any attachments?	Yes	

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Respondent Name Christine Merrick

Organisation

EoH Document Comments

General Comments

We strongly oppose the building of 3000 new homes.

We live in Mulberry Green, our garden backs onto Gilden Way. the traffic on Gilden Way has quadrupled since the opening of junction 7a. There has already been numerous accidents and some quite bad. To cross at the crossing to Sheering Rd can sometimes be dangerous as vehicles choose to jump lights. There are bollards to stop turns into Mulberry Green, so why are there not bollards to stop cars turning right into Other right turns. There needs to be cameras along Gilden way.

Council Response

The East of Harlow site was allocated for housing and associated ancillary uses in the Harlow and Epping Local Plans, which went through rigorous rounds of consultation, public examination and inspection by government. The south-east of the UK has some of the highest house prices in the country due to high demand and lack of supply. Issues such as people living longer than previous generations, higher rates of divorce in older people (resulting in a divorced couple requiring two homes instead of one), and birth rates historically being higher than death rates, has increased demand. The need for housing - including much needed affordable housing - is detailed further in the evidence base supporting the Harlow and Epping Local Plans.

1. Introduction
Council Response
2. Context
Council Response
3. Stewardship
Council Response
4. East of Harlow Character Considerations
Council Response
5. Landscape and Green Infrastructure
Council Response
6. Sustainability and Build Quality
Council Response
7. Sustainable Movement
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8. Sustainable Transport Corridors
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9. All-Vehicle Access

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Council Response			
10. Educational Provision			
Council Response			
11. Local Centres			
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12. Combined Principles			
Council Response			
Other Comments			
Council Response			
•			
Are there any attachments?	No		

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Organisation Strutt & Parker o.b.o. Anderson Design & Build Lt

Respondent Name David Fletcher

General Comments

Overview

Anderson Design & Build Ltd is currently promoting land South of Moor Hall Road, which is the parcel of land immediately to the east of Churchgate, Harlow (please refer to the location plan in Appendix A). It forms a physically discrete part of the East of Harlow strategic allocation (Reference SP4.3) and it is situated to the far west of the Harlow East Masterplan Area, subject to the current consultation. The parcel of land controlled by Anderson Design

& Build Ltd is a very small part of the masterplan area and measures approximately 1.8 hectares and narrows from the north to the south.

A planning application was submitted in December 2022 and is currently under determination by Harlow Council for full planning permission for the erection of 38 dwellings with associated works, including access, parking and cycle infrastructure, landscaping, public art and public open spaces (Planning Application Reference HW/FUL/22/00547). Following the submission of the application, we have had detailed and positive discussions with Harlow Council and Essex County Council and the application is due to be determined later this year.

As assessed in detail within the planning application, the application as submitted would not prejudice the strategic objectives of the masterplan for Harlow East as set out within polices HS3 (Strategic Housing Site East of Harlow) and HGT1 (Development and Delivery of Garden Communities in Harlow and Gilston Garden Town) of the Adopted Harlow Local Development Plan (2020).

The proposals are also considered important to set a precedent for high quality homes, significant Biodiversity Net Gain and policy-compliant affordable housing provision. Due to the site's location, which abuts the settlement boundary, it is considered that this site can be delivered independently without impeding on the wider delivery and strategic policy objectives for the HS3 area.

The proposals also fully align with Infrastructure Delivery Plan (IDP) that supported the Adopted Local Plan. The proposals will forward fund the delivery of key infrastructure, which includes a commitment to providing a circa £400,000 contribution towards enhancement of walking and cycling provision between the site and Harlow town.

addition, the proposals will facilitate the delivery of a cycleway/footpath link, which is part of the identified LCWIP route. The application is at an advanced stage in its determination process and it is understood that the application will be determined in 2023 given that all statutory consultee comments have been satisfactorily addressed.

Consultation Response to Draft SPD

Anderson Design & Build Ltd hase no objection to the preparation of the SPD. It is understood that the SPD is being prepared in order to assist with accelerating the delivery of the development in Harlow East.

It is also recognised that the draft SPD was prepared around the same time as the discussions that Anderson Design

& Build Ltd hase had with Harlow Council and Essex County Council in respect to the current planning application at land adjacent to Moor Hall Farm. It is regrettable that the plans were published with no forewarning or consultation with our client, but they have instructed us to nonetheless engage and work closely with the HGGT to ensure that the final SPD is as effective as possible.

Council Response

Noted. The planning application is due to be determined and it would not be appropriate for comments on it to be provided here.

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education provision. Within chapter 10, 4 options	orimarily to chapter 10 of the document, which relates to are presented in respect of the location of the education land

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Our comments in respect of the draft SPD relate primarily to chapter 10 of the document, which relates to education provision. Within chapter 10, 4 options are presented in respect of the location of the education land uses on the site. Options 1, 2 and 3 propose a primary or secondary school to be located on the Moor Hall Road application site that is currently the subject of a planning application submitted by Anderson Design & Build Ltd. For a number of reasons, the site at Moor Hall Road is not considered to be an appropriate location for a school. In this regard the SPD in its current form is not sound. It is considered as minimum all three options need to be adjusted so that the secondary or primary school boundary is to the east of the Moor Hall Road application site.

For a number of reasons the application site is not considered appropriate for a school as follows:

1. Proximity to Moor Hall Road

All three of the options propose that the northern boundary of the school fronts onto Moor Hall Road. Moor Hall Road is a key distributor road and will be busier in terms of road traffic than the roads within the development. One of the key requirements of Essex County Council Education Site Suitability Checklist is to ensure that schools

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are situated away from busier roads, with access focused on pedestrians and cyclists. Providing the schools adjacent to Moor Hall Road, therefore conflicts with this objective.

2. Shape of Education Site

Essex County Council Education use a Site Suitability Checklist for assessing the suitability of proposed school sites. One of the key criteria is to have a site that is 'roughly rectangular in shape.' Options 1, 2 and 3 in the consultation are all irregularly shaped land that does not comply with Essex County Council's Education Site Suitability Checklist. One of the reasons for this is that the land being promoted by Anderson Design & Build Ltd at Moor Hall Farm is situated further west than the remainder of the land allocated within the site. This issue could be addressed in part by moving the proposed school sites slightly to the east of the Moor Hall Road site. This would enable a more regular boundary along the west boundary of the proposed school site. The siting of school infrastructure, be it built form of playing fields, would not be physically possible on and withing our client's site due not only to its modest size, but also the location of its boundary features, which includes a watercourse and an established hedgerow.

3. Deliverability

The school locations for options 1, 2 and 3 are situated on land controlled by multiple parties, which will be submitting separate planning applications. In respect of Anderson Design & Build Ltd, the land being

promoted by them would be solely for education use under options 1, 2 and 3 of the masterplan. Anderson Design & Build Ltd will not be party to an application on the wider land to the east and they will also not be party to any Section106 agreement in respect of the land within the wider site. Therefore the only method of acquiring the land to the south of Moor Hall Farm for education use would be by compulsory purchase. It is considered that it would be very difficult for the HGGT to justify compulsory purchase of the Anderson Design & Build Ltd land for education use, given that it is clear that alternative more appropriate school locations exist elsewhere within the masterplan.

The current application made on behalf of Anderson Design & Build Ltd Moor Hall Farm will have a number of very significant public benefits, ensure the early delivery of housing on the site, and assist Harlow Council in meeting their housing delivery targets. In addition, it will also ensure the forward funding of key infrastructure for Harlow East development. Relocating the high-level location diagram indicator for the Secondary and or Primary School to the east will in no way prejudice the ability of the existing community to access the schools with good footpath/cycleway connectivity being provided through the Moor Hall Road development site.

It is therefore considered that the indicative school locations for Options 1, 2 and 3 within the draft SPD should be amended to exclude the land south of Moor Hall Road, being promoted by Anderson Design & Build, for the reasons contained within this letter. Alternatively, Option 4 should be pursued as the more suitable locations for the primary and secondary schools. In its current form options 1-3 are not considered to be positively prepared, justified, effective or deliverable and the proposals are unsound in their current form.

Council Response

Noted. The planning application is due to be determined and it would not be appropriate for comments on it to be provided here. The exact locations of the schools have yet to be established and are indicative in the SPD. Essex County Council will be providing further evidence and justification for the best location. The SPD will therefore be amended to remove the school options and state that locations are to be decided.

11. Local Centres

Council Response

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12. Combined Princip	les	
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•		
Are there any attachmen	nts? Yes	

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Respondent Name Mark Norman

Organisation Highways England

General Comments

Thank you for notifying National Highways of the above consultation. National Highways has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN). The SRN is a critical national asset and as such we work to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity.

It will be critical that services and infrastructure come forward as planned in a co-ordinated as and when demand occurs. This is always difficult to achieve.

It would be helpful if the M11 J7a was shown on all plans.

Council Response

Infrastructure will have to be provided in a phased approach based on the construction/occupation of dwellings. However, it is not appropriate for the SPD to provide detail on phasing of housing and phasing of infrastructure provision - this will come at the masterplan stage in detailed discussion with infrastructure providers. The plans in the final SPD will be amended so a clearer and consistent base map is used, including showing J7a.

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7 Sustainable Movement

We welcome this document as it stretches current ambitions on sustainable mode targets. It will be important that the success or otherwise of these policies is monitored and a strategy implemented to bring back the targets or that alternative mitigation is triggered in order that a detrimental impact on the highway network is avoided. Care must be taken in the design of the development to not only prevent pedestrian access to the M11, but also to deal with the issues of noise and air quality. Care must also be taken to ensure there are no increase in risk of flooding or subsidence because of the development. We have not reviewed the other documents that need to read in conjunction with this document, as such some of the comments included with in this response may have been addressed elsewhere.

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Respondent Name Mark Norman

Organisation Highways England

Council Response

The HGGT Transport Strategy provides greater detail on modal shift/change, which will be monitored accordingly. Issues of noise and air quality will be addressed at the planning application stage, in accordance with the Harlow and Epping Local Plan policies which seek to protect the amenities of residents (including issues such as noise and air quality). SuDS, including new ponds and swales, are likely to help with any future flooding.

8. Sustainable Transport Corridors

Council Response

9. All-Vehicle Access

It is noted that the development is proposed to be served by three points of vehicular access, should one of these be dedicated to public transport and cycles only?

Council Response

It is considered that three vehicular access points are required in addition to the public transport provision.

10. Educational Provision

In section C vi reference is made to max walking distances, these should be qualified to confirm it is actual walking distance and not as the crow flies, as the actual walking distance can be considerably longer with some site layouts.

Council Response

Noted - this will be amended along with other similar references.

11. Local Centres

Council Response

12. Combined Principles

Council Response

Other Comments

It is strongly recommended that a monitor and manage approach is adopted and that a suitable mitigation strategy is thought about now as to what needs to be done if mode share targets are lower than expected and how that will be funded/implemented to bring the targets back to the expected.

Council Response

This will need to be considered at a higher level, i.e. for the whole of the Garden Town, and not an issue specifically for this SPD although how this site delivers it's own mode share targets and monitors its delivery over the phases of the scheme will form part of the on-going discussions during the masterplan and application stages.

Are there any attachments?

No

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Respondent Name Craig Noel

EoH Document Comments

Organisation CBRE and Strutt & Parker o.b.o. Swires & Collins

General Comments

Introduction

This consultation response is prepared on behalf of the Collins' family and the Swire Trusts who together control the overwhelming majority of the land south of the A1025 link road at East Harlow, which represents the area allocated in the Epping Forest and East Harlow Local Plans for residential development and supporting physical, social and green infrastructure. For ease of reference, these responses refer to the landowners as the East Harlow Collaboration Landowners, or EHCL for short.

EHCL very much welcome the opportunity to respond to the consultation on the draft Masterplanning Guidance, acknowledging that it is a positive initial step towards achieving a strategic masterplan framework across the East of Harlow element of the Harlow and Gilston Garden Town (HGGT).

EHCL look forward to introducing their new master developer partner to the Local Authorities in the very near future (and prior to the formal adoption of the SPD).

Concluding Comments

EHCL welcome the publication of the draft Masterplan Guidance in the form of a draft SPD and are pleased to have the opportunity to contribute to it at this consultation stage.

There are many aspects of the Masterplan Guidance which are welcomed – not least the bringing together of relevant policy context and identifying appropriate areas for focus for masterplanning work to follow. Also endorsed is the focus on the stewardship, place making and sustainability as key elements for a successful new settlement.

Our main concern at this stage is to ensure that the guidance on masterplan preparation does not exceed its own brief by precluding outcomes at too early a stage, in the absence of a sufficiently robust evidence base to support such a prescriptive approach. A proper role for this SPD is to identify matters for assessment and consideration via the masterplan process,

commencing with a strategic masterplan framework across the project area. There are a number of cases where a more prescriptive approach has crept into the draft without a full and proper justification. If left unamended, the overriding objective of the SPD (to bring forward the masterplanning process) may well be inadvertently frustrated.

It is in that spirit that EHCL present these representations. As one of the key owners of land within the allocation it is essential that EHCL maintain a dialogue with you over the draft SPD prior to its adoption in due course.

Council Response

Noted. SPD amendments are to be made to ensure it is not inadvertently overly prescriptive.

1. Introduction

Scope and Purpose

We fully endorse the rationale for preparation of a Masterplanning Guidance SPD and in particular, support the scope of the guidance as set out in the 'summary of scope' and

'background to this guidance' sections. The draft SPD helpfully brings things together in one place the formal policy considerations from the two Local Plans and the relevant guiding principles from the suite of documents prepared by HGGT. It notes that:

'applicants, agents, developers, design team, consultants and contractors will use the guidance to produce a Masterplan showing and describing how the area will be developed. By agreeing guidance for the principles of the site that all the Local Authorities find acceptable in advance, the Garden Town hopes to accelerate the eventual

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Masterplanning process'.

This approach is specifically endorsed. Indeed many of our subsequent comments will refer back to the desirability of accelerating the masterplan process itself, seeking to ensure that the draft SPD does not inadvertently introduce obstacles to achieving that. If the SPD is adopted as currently drafted, it would be problematic in that respect.

While on the topic of the scope and nature of the SPD, EHCL reach a different conclusion as the need to update and revise the SPD (1.25). EHCL are concerned that a constantly evolving SPD will not deliver the clarity that is needed for the document to be of benefit. If it is to properly fulfil its purpose, then the SPD should be a document that helps to "kick start" the masterplanning process. Thereafter, the preparation of a strategic masterplan framework would become the main iterative element. We found it difficult to align a formal review process with the agreed aim to expedite masterplan preparation and believe that Local Authority resources would be better directed at the forward-looking strategic masterplan framework process itself.

Another theme under this section is the material on comprehensive delivery (1.20-1.24). EHCL agree that the strategic masterplan framework should properly embrace all elements of the land allocation in the two Local Plans, and that includes the hospital/wellbeing campus and the land to be kept open to the north of it. However it is inevitable that subsequent planning applications will come forward separately for the PAH scheme. The range of stakeholders in respect of the matter is likely to be wider and consultation and feedback arrangements will need to be specific to the hospital campus and its range of uses and users.

That is not to say that matters such as appropriately-targeted key worker housing should not form part of the options for consideration for the residentially-led proposals on the majority of the site. Properly managed, there should be no disadvantage in allowing proposals to come forward under separate applications and with separate Section 106 legal agreements provided that they accord with the strategic framework masterplan and anticipated delivery arrangements. Indeed, returning to the overarching theme, to do so is likely to expedite the overall masterplanning and development process to the public benefit.

Council Response

It is agreed regarding the future status of the SPD that the masterplan would be the iterative document rather than the SPD itself.

2. Context

Council Response

3. Stewardship

Stewardship and Sustainability

EHCL welcome the commitment to sustainable development and long-term stewardship as set out in Sections 3 and 6 of the draft SPD. The landowners have long-term connections with this part of Harlow and wish to ensure that the East of Harlow scheme includes an appropriate focus on place making to secure a valuable built legacy for future generations.

This perspective will underpin the choice of master-developer and we see a firm alignment with the theme set out in the draft Masterplanning Guidance in this regard.

Council Response

Noted. The draft HGGT Stewardship Charter, which was recently consulted on, contains more information about stewardship.

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Council Response

5. Landscape and Green Infrastructure

Green Infrastructure

High quality green infrastructure provision is acknowledged as one of the fundamental building blocks of a Garden Town and the EHCL are enthusiastic about ensuring that the tradition established at Harlow is continued. With that in mind, the Green Wedge concept is supported acknowledging that the detail around this will be a product of the masterplan discussions. Care will need to be exercised in managing site infrastructure (including transport network creation) within the green wedge feature, albeit that such provision is likely to be necessary in order to meet the 60% target on trip modes and other sustainability objectives.

The demands on green infrastructure are many and varied, and making best use of available land is likely to involve "layering" GI areas for more than one purpose (where these are mutually compatible) to achieve the greatest public benefit.

At this stage (and in the acknowledged absence of a suitable evidence base on landscape character, capacity and suitability for such layering) it would seem premature to unduly restrict or be overly prescriptive as to the range of layered uses that areas of green infrastructure are likely to be able to accommodate. Instead, it is for the strategic framework masterplan (and subsequent detailed masterplans) to test the capacity and ability of such areas to deliver on mitigation, landscape enhancement, accessible open space, biodiversity gain and more formal recreation facilities, including school playing fields. As a case in point, we note that the land to the north of the proposed hospital is shown variously as 'Park/BNG' (figure 5.2 – potential green and blue connections) and 'BNG/SANG' (figure 5.3 – potential landscaping and green infrastructure). We believe it would be wrong at this stage to seek to specify appropriate SANG provision (for example) in one location until such time as the evidence base establishes the suitability of all available green infrastructure for those purposes. With SANG provision, linking that more closely with the sustainable transport corridor network (STC) may help to limit the parking provision necessary to support effective SANG use and increase the number of residential properties within active travel distance of such provision. It is therefore necessary that the relevant SANG notation is removed from figure 5.3 and the amendment of the text at 5.c.xv, or a wider acknowledgement of a potential suitability of other land for such provision across the project area.

We therefore endorse the inclusion of land availability for the delivery of BNG and SANG as an appropriate topic for consideration during masterplan preparation (5.e.vii refers) but without the provision focussing entirely on the land north of Pincey Brook.

EHCL also acknowledge that landscape assets and features will have a leading role in seeking to govern the routing of the STC network (5.c.i) and believe that this commitment may not have been given the fullest weight in the presentation of STC corridor options set out in Section 8.

Council Response

Noted and agreed that GI will be multi-functional as GI by definition is supposed to serve a range of purposes. Regarding the identified SANG, the SPD will be amended so that it refers to the EFDC Local Plan requirement for a green buffer, rather than a SANG, BNG or any other specific use. This will ensure the open space could be used for a variety of purposes which will be fully explored and identified at the masterplan and planning application stages.

6. Sustainability and Build Quality

Council Response

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Council Response

8. Sustainable Transport Corridors

Sustainable Transport Corridor

The provision of a sustainable transport corridor network with sufficient flexibility to be adaptable to the future travel needs and modes is supported by EHCL as an important component in achieving both a sustainable future for East of Harlow as well as a means of improving the lives of future residents.

We support the draft guidance at 7.b.iii that East of Harlow should target a network of such corridors. In that regard, perhaps a little too much focus has been placed on the single STC route connecting PAH beneath the link road underpass, through the site and on towards Newhall. While this is undoubtedly an important desire line for transport movement, we believe

it needs to function as a network to ensure it is more fully integrated with existing movement corridors and routes.

Indeed, looking at the STC on a network basis is likely to be more effective in supporting the phased delivery of the main STC corridor over the length of the project, facilitating interim links with the existing transport network and developing new ones as the project progresses.

We welcome the flexibility set out in 7.c.ii as to the approach to connecting the STC network with Gilden Way. As to the topics for Masterplanning, we believe that some vehicular access across the Green Wedge will be an inevitable requirement in order to achieve a properly integrated development and would suggest that 7.d.iii be amended to refer to routes crossing the Green Wedge rather than simply 'vehicles'.

There would appear to be a different emphasis at 8.c.i which is prescriptive about a Gilden Way STC connection, contrary to the more flexible approach referred to in Section 7 and the latter is very much preferred. We note the guidance in respect of lane widths (8.c.ix) but would also encourage flexibility in relation to potential future transport technology so as not to unduly restrict the functionality of STCs.

On Pages 34 and 39 of the Draft SPD, reference is made to the "possible use of CPO". Whilst it is not essential that reference to CPO is included, if any reference is to remain it should include a firmer commitment to their use in assisting in the delivery of the STC network as fundamental component of the wider HGGT project (not simply the East of Harlow element). The use of CPO powers in this context would fully accord with the direction provided under Paragraph 121 of the NPPF (2023) which states:

"Local planning authorities, and other plan-making bodies, should take a proactive role in identifying and helping to bring forward land that may be suitable for meeting development needs, including suitable sites on brownfield registers or held in public ownership, using the full range of powers available to them....This should include identifying opportunities to facilitate land assembly, supported where necessary by compulsory purchase powers, where this can help to bring more land forward for meeting development needs and/or secure better development outcomes."

The absence of the proactive use of CPO at East Harlow risks protracting the delivery programme for the site and/or less desirable development outcomes across the HGGT area. Thus the potential use of CPO powers should be extended more widely to achieving appropriate site accesses. In this respect Clause 8.b.viii ought to be amended to refer to potential support with CPO powers where necessary.

Overall, the Masterplanning Guidance should acknowledge the need to provide an effective phasing for delivering a full STC network, acknowledging that at initial stages of the East Harlow project the STC will need to rely for functionality on existing infrastructure in part, and may need to develop an integrating network which can be retained if appropriate as part of the final completed STC network.

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remain able to demonstrate they have alternatives that meet the same or better outcomes.

The reference to the CPO will remain as it is to allow flexibility at later stages. The SPD cannot, in any case, be overly prescriptive in this regard.

9. All-Vehicle Access

Access

Section 9 of the draft Masterplanning Guidance deals with potential development access points and figure 9.1 identifies three potential vehicular accesses.

EHCL believe that it would be wrong to be overly prescriptive at this stage as to the location of the access points. In particular, access is potentially available onto A1025 via Mayfield Farm (which currently sits outside the site allocation but which is under the control of EHCL). In addition, the arrangements for routing access point number 1 as indicated on figure 9.1 should be treated flexibly as there may be more appropriate or achievable routes to access the southern part of the site. As with the Mayfield Farm land referenced above, EHCL also control land immediately to the east of Newhall which sits outside the redline area in the Harlow Local Plan allocation that which might widen route options. Therefore 9.d.v is potentially over prescriptive and we would support the approach set out in 9.e as to the topics for consideration in the masterplan process. Ultimately it will be for a full modelling exercise to identify the suitability of each access point on the network – work yet to be undertaken.

EHCL are specifically concerned about the 'specific guidance' set out at 9.c concerning access at Campions roundabout, and in particular, the provisions at i – iii.

The first provision (i) states that PAH should have priority for available junction capacity, the second (ii) that the PAH access must be physically provided before a design for the access to the residential area is finalised and that the roundabout should be operational 'before dwellings are occupied'. There are a number of issues with including this drafting within the SPD.

Firstly, these provisions assume a priority that is not evident in Local Plan policy. The provision of a health and wellbeing hospital campus is one of a number of requirements of Policy SP4.3 in the Epping Forest Local Plan, but there is no policy justification to give that particular element of the allocation priority in the manner contemplated in the SPD. Moreover, the approach at (ii) assumes that planning permission will be in place for the PAH access in advance of the first phase of residential development for the northern part of the residential allocation and this is by no means certain. It would be inappropriate to hold back much needed new housing if there were delays or funding difficulties in the future associated with the PAH scheme which in turn (and by virtue of the approach advanced in the draft SPD) prevented the delivery of the access to the northern part of the housing allocation from a new roundabout junction.

In terms of antecedence, it is noteworthy that the new M11 7a motorway junction and link road were projects that came forward with the specific intent of supporting the future expansion of Harlow and in particular the HGGT projects. This infrastructure was planned long before the NHS took a decision over their preferred new hospital site. The latter relies directly on infrastructure planned to meet Harlow's future housing needs. It is unclear therefore how the priorities in this respect appear if anything to have been reversed in the draft SPD.

Finally, notwithstanding the above, given the availability of other potential access points to serve the northern housing allocation area, the suggested prohibition on occupation of dwellings prior to the construction of Campions roundabout (iii) is illogical. This reference should certainly be deleted.

Separately, figure 9.1 (in common with other figures in the draft SPD (e.g. figure 5.7 and figure 7.1)) indicate a series of 'M11 pedestrian crossings.

At least one of the crossing points in figure 9.1 does not appear to exist at present, and there is also some inconsistency in the location of the arrows in the various figures included in the draft SPD, such that it is unclear

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whether existing crossing points are being referenced, or new crossings proposed.

While it makes sense to seek to utilise existing over and under bridges to enhance connectivity to the east, we do not believe it to be necessary or desirable to introduce entirely new crossing points in the form of overbridges or underpasses across the M11 road infrastructure. It would be helpful if the SPD clarified the intent in this regard as far as topics for consideration in the masterplan work.

Council Response

Three proposed vehicular accesses: clarity will be given to state that these are indicative. However, it should be noted that access routes etc. were identified in the Harlow Local Plan and these were shown to be indicative, i.e. subsequent work was to set the exact routes and these were not to be determined through the Local Plan or another DPD.

Road prioritisation: Road capacity on the local and strategic networks is not intended to be prioritised by health uses over residential. Further, more detailed transport assessment will be required and will need to consider cumulative impact on overall transport capacity to at least the local plan end dates of 2033. As stated in this rep, ECC have confirmed that the new Campions roundabout was designed and modelled for both a residential-led development and a new hospital, with traffic assumptions and allowances made for both. The SPD will be amended accordingly.

Regarding the crossings shown, the maps in the SPD will be amended significantly prior to the document being finalised.

Reference to Campions roundabout regarding dwelling occupation will be deleted.

10. Educational Provision

Education

In the first instance, EHCL note that the draft SPD predated the publication by government in August 2023 of the pupil yield dashboard as part of its review of the guidance 'Delivering schools to support housing growth'. It may be worthwhile for the authors to reassess the education requirements for East of Harlow as set out in Section 10 of the draft SPD.

The majority of the rest of Section 10 deals with options for school location. As school travel is a key contributor to traffic movements particularly at peak times, the ability to access schools by public transport and active travel means ought to be a principal factor in determining the school location with the objective of realising the 60% target for such travel modes. A similar approach should be taken in relation to local centres.

Council Response

The exact locations of the schools have yet to be established and are indicative in the SPD. Essex County Council will be providing further evidence and justification for the best location. The SPD will therefore be amended to remove the school options and state that locations are to be decided.

11. Local Centres		
Council Response		
12. Combined Principles		
Council Response		
Other Comments		
Council Response		
Are there any attachments?	No	

Respondent Name Craig Noel

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Organisation CBRE and Strutt & Parker o.b.o. Swires & Collins

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EoH Document Comments

Respondent Name Aarti O'Leary

Organisation Lawson o.b.o. PAH NHS Trust

General Comments

1.On behalf of The Princess Alexandra Hospital NHS Trust (PAH), we welcome the opportunity to engage with the preparation of the East of Harlow Masterplanning Guidance Draft Supplementary Planning Document (SPD) (July 2023) and are pleased to submit our representations on the Document for your consideration, as set out below.

PAH Background & Summary Position

- 2.As the Harlow & Gilston Garden Town (HGGT) Group is aware, PAH is progressing a Business Case for the delivery of its preferred development option comprising a new and modern state-of-the-art acute Hospital, in the form of a Health and Well-Being Campus on approximately 19 hectares of land located north of the adjacent M11 Motorway Junction 7a and south of Pincey Brook.
- 3. The Hospital development will involve a substantial investment in local healthcare facilities. It is a vital and significant component of local health and community infrastructure required to serve the existing and new Garden Town communities and wider catchment population area.
- 4.The PAH development and relocation strategy is embodied in the adopted Epping Forest District (EFDC) (2023) Local Plan and the adopted Harlow (HDC) Local Plan (2020). This strategy is also reflected in the Harlow and Gilston Garden Town Vision (2018) and Design Guide (2018), which have been endorsed by the planning authorities as material planning considerations. The draft SPD also incorporates the Hospital relocation strategy, providing for a further necessary layer of planning certainty, which PAH broadly supports.
- 5.A Planning Performance Agreement (PPA) is in place between PAH, Epping Forest District Council (EFDC), Harlow District Council (HDC) and Essex County Council (ECC) to progress the planning elements of the Hospital at the pre-planning application stage in advance of a related planning application(s) on the identified site, currently programmed to be submitted to the Local Planning Authorities in 2024. As part of this process, significant masterplanning and related traffic modelling have been progressed and agreed with the authorities, the output of which is broadly reflected in the draft SPD, as referred to above.
- 6.Consequently, with the above background position in mind, our representations are essentially supportive of the draft SPD, although we have drawn attention to parts of the document which, in our view, require refinement and revision in the interest of consistency and deliverability.

Council Response

Background noted.

- 1. Introduction
- 1. Introduction

Summary of Scope

15. The following text should be added to the last bullet point at paragraph 1.5, last bullet point - "and broad location of development" after "PAH integration".

Background to this Guidance

- 16. Paragraph 1.13 currently does not read correctly. We suggest adding in reference to the SPD being a material consideration to the determination of planning applications, as this would be particularly relevant to PAH's position if planning applications are submitted prior to the strategic masterplan being endorsed, as acknowledged in paragraph 6.25 of the adopted EFDC Local Plan, which is likely to be the case.
- 17. At paragraph 1.15, reference to main components needs to be changed from 'four' to 'three'.

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Respondent Name Aarti O'Leary

Organisation Lawson o.b.o. PAH NHS Trust

18. At paragraph 1.18, reference should be added to the SPD also taking account of the masterplanning work undertaken by PAH through an on-going Planning Performance Agreement (PPA).

Comprehensive Delivery

19.The text at paragraph 1.20 assumes planning applications will need to demonstrate how comprehensive delivery of site wide infrastructure can be achieved and not frustrated, including infrastructure to serve the entire allocated site or a wider area than a single planning application/ ownership interest. It is considered that this approach is too onerous and unreasonable to achieve through a single planning application for a specific development, such as the new hospital. Therefore, it is requested that the text be revised to refer to the need for individual developments to take account of site specific and wider infrastructure needs and to explain how the development would not preclude other development identified in the masterplan area from coming forward.

20. At paragraph 1.23 reference is made to the LPA's strong preference for a single planning application being prepared across the allocation as a whole with a single S106 agreement. This aspiration is considered to be unrealistic and unworkable in the context of the extensive masterplan area. For example, it would be unreasonable for PAH's planning application for a new hospital to additionally cover the allocated housing, commercial and community uses included within the strategic site allocation for East of Harlow. Consequently, it is requested that the text here is revised to refer to the need for a phased approach to the delivery of development and acknowledge that individual planning applications are likely to come forward, which would need to take account of the SPD guidance and strategic masterplan when prepared.

Council Response

Paras 1.5, 1.13, 1.15, 1.18, 1.23 will be amended accordingly.

Para 1.20 will be amended to make reference to the ability for the hospital to come forward ahead of the strategic masterplan for the whole site, as per the Epping Local Plan.

2. Context

21. At paragraph 2.7 (East of Harlow Vision Statement) the words 'seamlessly' and 'through food growing' should be removed from the vision statement as, although the hospital will be designed to blend with the landscape, it will inevitably be visible when seen from various viewpoints, and it is unlikely that food growing will be part of the hospital's function.

Council Response

Para 2.7 will be amended accordingly.

3. Stewardship

22. PAH acknowledges and supports the concept of good stewardship, including management arrangements for the publicly accessible areas to be provided within the proposed health and wellbeing campus, referred to at Paragraph 3.4 vii, which could be secured through a suitable management plan. However, it is considered that the content of Paragraph 3.5, which states "The NHS estate (Princess Alexandra Hospital) should not be precluded from this where relevant" is superfluous and it is, therefore, requested that it should be deleted from the document.

Council Response

Para 3.5 and associated text will be clarified to state that the NHS estate (PAH) will be involved with the stewardship arrangements.

4. East of Harlow Character Considerations

23. At point vi of Section D (Topics to Consider when Preparing the Masterplan), we suggest adding the words "Links to" before "development of the new Princess Alexandra Hospital" to make the scope of the policy criteria clear, as PAH is developing the layout and environs of the campus separately from the wider masterplan

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Respondent Name Aarti O'Leary

Organisation Lawson o.b.o. PAH NHS Trust

development, although the draft SPD considerations and requirements are of course being taken into account as part of the hospital's plans.

Council Response

Point vi will be amended accordingly.

5. Landscape and Green Infrastructure

Whilst it is acknowledged that the green dotted lines in Figure 5.2 (Potential Green and Blue Connections) illustrating walking/ cycling links to the greenspace are indicative, it is requested that the route through the proposed hospital area is split and located towards the eastern and western sides of the campus rather than through the Hospital's main development blocks.

25. The shade of green used in Figure 5.3 (Potential Landscape and Green Infrastructure) to identify the hospital site, appears very similar to the shade used for the Green Wedges, which could become confusing. Whilst the hospital site may include a Green Wedge along the southern bank of Pincey Brook, the main part of the site will contain a development area, which should be distinguished from the Green Wedges. Therefore, it is requested that a different colour is used for the hospital site for clarity.

Council Response

Maps will be clarified to ensure that the route through the hospital campus is not fixed and that it may be required to be flexible.

6. Sustainability and Build Quality

Council Response

7. Sustainable Movement

- Reference is made in part iii of Section C (Specific Guidance) to three points of access that have been modelled. However, it should be noted that the traffic modelling undertaken for PAH, which took account of the wider proposed development, was undertaken on the basis of four points of access, including limited access via Churchgate Street, which we assume would have been included as part of the modelling referred to in the draft SPD. Therefore, it is requested that the fourth point of access is referred to in section C. iii for completeness, which allows for local access to Gilden Way.
- 27. It is requested that a further topic is added to the list at Section D (Topics to Consider when Preparing the Masterplan) to allow for the phasing of development and infrastructure provision as follows:

"viii. Phasing plans to allow for development to come forward in stages taking account of wider infrastructure requirements and linkages."

Council Response

Section D will be amended accordingly.

The access onto Churchgate Street was for a small number of properties that may front onto that road and they were a test on minimal number to assess impacts. If this number were to be varied or indeed removed in terms of the overall development numbers there would be a very limited wider impact, but this would be determined as the development comes forward in more detail.

8. Sustainable Transport Corridors

Interim Transport Measures

9.Two points arise here. Firstly, there will be a need to plan for interim arrangements, to provide for suitable bus and pedestrian/ cycleway access and connections, consistent with an overarching transport strategy and development of STC routing. PAH is currently preparing such an interim arrangement in liaison with the planning

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Respondent Name Aarti O'Leary

Organisation Lawson o.b.o. PAH NHS Trust

and transport authorities, which again needs to be acknowledged in the draft SPD concerning phasing of infrastructure.

Sustainable Transport Corridor (STC) Provision, Safeguarding & Land Assembly

- 10. Secondly, assistance with land assembly from the authorities to provide for the STC route could also be required to enable a continuous link to be provided as part of the overall development end state within the masterplan area. Such assistance could take the form of a Compulsory Purchase Order(s) (CPO) if the land required to provide the STC links cannot be otherwise negotiated.
- 11. With this in mind, attention is drawn to Paragraph 2.74 of the adopted EFDC Local Plan, which states that the Council may use its CPO powers to help assemble land where necessary to implement proposals in the Local Plan or where strong justification for their use exist. A similar reference is included in the adopted Harlow Local Plan at Paragraph 19.4. It is therefore, requested that further reference to the use of suitable CPO powers where necessary is included in the draft SPD. This approach would also be consistent with Paragraph 121 of the NPPF (2023).
- 12. Similarly, it is requested that reference is made in the draft SPD to the need to safeguard routes identified for the provision of STCs, as reflected by Policies T2 and Sp4F of the adopted EFDC Local Plan and Policy SIR1 of the HDC Local Plan.

At Section B (Strategic Guidance) criterion ii, which refers to STCs being "direct, justifying why they deviate if they have to...", needs to be redrafted as it currently does not make sense.

- 29. Criterion dv. of Section D (Topics to Consider When Preparing the Masterplan) refers to the use of Compulsory Purchase Orders (CPOs), which we agree is an important consideration and tool for helping to deliver the STCs. It is requested that this sentence is expanded to additionally refer to route safeguarding and CPO action in line with Policy T2, Policy SP4 F and paragraph 2.74 of the adopted EFDC Local Plan and Policy SIR1 and paragraph 19.4 of the adopted Harlow Local Plan as follows:
- "v. Safeguarding of routes and possible use of Compulsory Purchase Orders, if needed to assist land assembly and delivery of the eastern STC route."
- 30. This approach would also be consistent with the content of Paragraph 121 of the NPPF (2023 concerning facilitating land assembly to help bring land forward to meet development needs.
- 31. The wording in Section E (STC Bottlenecks & Options Testing) Criterion ix is unclear concerning the proposed route and also conflicts with the Figure on Page 68 in Appendix 3 and therefore, requires amendment.

Council Response

It is accepted that interim measures for sustainable modes will be required, in particular for PAH. SPD text will be amended accordingly to reference this.

dv. of Section D, regarding CPOs, will be amended accordingly.

Section E will be removed as the detail on STC options is being removed from the SPD.

The access onto Churchgate Street was for a small number of properties that may front onto that road and they were a test on minimal number to assess impacts. If this number were to be varied or indeed removed in terms of the overall development numbers there would be a very limited wider impact, but this would be determined as the development comes forward in more detail.

9. All-Vehicle Access

13. Finally, concerning the provision of vehicular access to Gilden Way from the masterplan area, it is noted that the draft SPD confines the links to three points identified in Figure 9.1. However, the traffic modelling for PAH, which took account of the wider proposed development, was undertaken on the basis of four points of

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Respondent Name Aarti O'Leary

Organisation Lawson o.b.o. PAH NHS Trust

access, including limited access via Churchgate Street. Whilst it is acknowledged that there could be some redistribution to the other points of access, for consistency, it is requested that limited local access via Churchgate Street should be acknowledged and allowed for in the draft SPD as discussed with ECC.

Criterion v. explains that all vehicle accesses onto the masterplan site (shown on Figure 9.1 points 1, 2 & 3 to Gilden Way) are expected to be delivered by the developers. However, the traffic modelling for PAH, which took account of the wider proposed development, was undertaken on the basis of four points of access, including limited access via Churchgate Street. Whilst it is acknowledged that there could be some redistribution among the identified three points of access, for consistency it is requested that limited local access via Churchgate Street should be acknowledged and allowed for in the draft SPD as discussed with ECC.

Council Response

The access onto Churchgate Street was for a small number of properties that may front onto that road and they were a test on minimal number to assess impacts. If this number were to be varied or indeed removed in terms of the overall development numbers there would be a very limited wider impact, but this would be determined as the development comes forward in more detail.

10. Educational Provision
Council Response
11. Local Centres
Council Response
12. Combined Principles
Council Response
Other Comments Development Phasing

7.In summary, there is a need for the draft SPD to acknowledge and allow for development to come forward in phases and as separate planning applications, rather than as part of a single application with masterplan-wide infrastructure, as referred to in the document. An obvious example is the delivery of the Hospital, acknowledged in Paragraph 6.25 of the adopted EFDC Local Plan, which states that planning applications for the hospital campus may come forward in advance of the endorsement of the strategic masterplan for East of Harlow in order to meet strategic need, although they will need to address the strategic masterplan considerations set out in policy. It is also conceivable that the same principle could apply to other developments in the masterplan area.

8.It is agreed that the delivery of a sustainable transport strategy is a key objective to achieve across the masterplan area, particularly with the inclusion of the eastern Sustainable Transport Corridor (STC). However, as the STC link is a significant piece of infrastructure, which crosses several land ownerships both within and outside of the masterplan area, it is likely that STC may not be completed in its entirety before or in tandem with early development phases, including the opening of the hospital.

Council Response

The intention of the SPD is not to provide detail on phasing, as this is to be established at the masterplanning and planning application stages. However, Chapter 1 will be amended as requested by this rep to refer to phasing (albeit not in detail).

Are t	here	any	attac	hments?	
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Organisation NHS Property Services

Respondent Name Marc Hoenen

General Comments

Foreword

NHSPS is wholly owned by the Department of Health and Social Care. NHSPS manages, maintains and improves NHS properties and facilities, working in partnership with NHS organisations to create safe, efficient, sustainable, modern healthcare and working environments. NHSPS has a clear mandate to provide a quality service to its tenants and minimise the cost of the NHS estate to those organisations using it. Any savings made are passed back to the NHS.

About NHS Property Services

In April 2013, the Primary Care Trust and Strategic Health Authority estate transferred to NHSPS, Community Health Partnerships and NHS community health and hospital trusts. All organisations are looking to make more effective use of the health estate and support strategies to reconfigure healthcare services, improve the quality of care and ensure that the estate is managed sustainably and effectively.

NHSPS support NHS commissioners to deliver a local health and public estate that can be put to better use. This includes identifying opportunities to reconfigure the estate to meet commissioning needs, as well as opportunities for delivering new homes (and other appropriate land uses) on surplus sites. The ability to continually review the healthcare estate, optimise land use, and deliver health services from modern facilities is crucial. The health estate must be allowed to develop, modernise or be protected in line with integrated NHS strategies. Planning policies should support this and be prepared in consultation with the NHS to ensure they help deliver estate transformation.

An important part of this is ensuring the NHS continues to receive S106 and Community Infrastructure Levy (CIL) developer contributions to mitigate the impacts of growth and help deliver transformation plans.

Planning Policy on Infrastructure Funding and Delivery

Planning Policy on Infrastructure Funding and Delivery National policy (NPPF paragraphs 55 to 58) and guidance set an expectation for development proposals that impact on local infrastructure to mitigate their impact to be considered sustainable. There is a well-established connection between planning and health. Residential developments often have very significant impacts in terms of the need for additional healthcare provision for future residents, meaning that a planning obligation requiring that the development contributes to, or delivers, improved and/or new healthcare facilities is often necessary.

Harlow Local Development Plan Policy HS3 (Strategic Housing Site East of Harlow) outlines the requirement for healthcare facilities to serve new development, however this is not further elaborated on within East of Harlow Masterplan Guidance SPD, unlike primary and secondary schooling. Policy IN6 Planning Obligations sets out that applications will be permitted if provision is secured for related infrastructure, be that through on-site provision of financial contribution in lieu. Despite the identification of healthcare facilities in Policy HS3 the masterplan does not reference the need for developer contributions towards health care provision, and this should be addressed in the SPD.

Detailed comments

The NHS as a whole is facing significant constraints in terms of the funding needed to deliver healthcare services, and the level of projected population growth in the East of Harlow Masterplanning Guidance SPD will add further pressure to the system. Given health infrastructure's strategic importance to growth and sustainable development, health infrastructure should be considered at the forefront of the council's planning policies for infrastructure provision. The NHS, Council and other partners must collaborate to plan the infrastructure and necessary funding requirements to support the projected population growth in the Garden Communities. A vital

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EoH Document Comments

Respondent Name Marc Hoenen

Organisation NHS Property Services

part of this is ensuring that the NHS has the resources required to develop additional healthcare infrastructure where necessary. We suggest that healthcare is explicitly identified and that funding for primary care infrastructure through developer contributions will be provided, in order to ensure the Council meets the objectives of the Local Plan as a whole.

Conclusion

NHSPS respectfully request that the above comments are taken into consideration during finalisation of the SPDs. This will make sure that the SPDs effectively address the healthcare needs of the new residents of the garden communities. Please do not hesitate to contact me if you have any questions about our response or wish to discuss these matters further.

Council Response

Background info is noted.

The SPD is being amended in general so that it is less prescriptive. This will include removing the options for schooling because the locations are yet to be decided. The SPD will be amended to refer to developer contributions towards health care provision, in particular in the Local Centres chapter.

contributions towards health care provision, in particular in the Local Centres chapter.
1. Introduction
Council Response
2. Context
Council Response
3. Stewardship
Council Response
4. East of Harlow Character Considerations
Council Response
5. Landscape and Green Infrastructure
Council Response
6. Sustainability and Build Quality
Council Response
7. Sustainable Movement
Council Response
8. Sustainable Transport Corridors
Council Response
9. All-Vehicle Access
Council Response

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Respondent Name	Marc Hoenen	Organisation NHS Property Services	
10. Educational Pro	ovision		
Council Response			
11. Local Centres			
Council Response			
12. Combined Prin	ciples		
Council Response			
Other Comments			
Council Response			
•			
Are there any attach	ments? No		

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Respondent Name Anne Denby

Organisation Canal & River Trust

EoH Document Comments

General Comments

We are the charity who look after and bring to life 2000 miles of canals & rivers. Our waterways contribute to the health and wellbeing of local communities and economies, creating attractive and connected places to live, work, volunteer and spend leisure time. These historic, natural, and cultural assets form part of the strategic and local green-blue infrastructure network, linking urban and rural communities as well as habitats. By caring for our waterways and promoting their use we believe we can improve the wellbeing of our nation. The Canal & River Trust (the Trust) is a statutory consultee in the Development Management process, and as such we welcome the opportunity to input into planning policy related matters to ensure that our waterways are protected, safeguarded, and enhanced within an appropriate policy framework.

Our waterways should be acknowledged within the policy document, as significant blue/green infrastructure, which can serve as a catalyst for regeneration; a sustainable travel resource for commuting and leisure; a natural health service acting as blue gyms and supporting physical and healthy outdoor activity; an ecological and biodiversity resource; a tourism, cultural, sport, leisure and recreation resource; a heritage landscape; a contributor to water supply and transfer, drainage and flood management.

Council Response

Background info noted.

The SPD will be amended to include references to blue infrastructure and the area's waterways.

1. Introduction
Council Response
2. Context
Council Response
3. Stewardship
Council Response
4. East of Harlow Character Considerations

Council Response

5. Landscape and Green Infrastructure

The Trust is the owner and navigation authority for the River Stort which is located to the north-west of the SPD area. It is approximately 2.8km (1.75miles) from Moor Hall Road to the Stort at Harlow Mill via road and approx. 1.44km (0.9miles) from Manor Lane via footpaths. The Stort Navigation and its towpath will therefore be easily accessible and beneficial to the new community for recreation and commuting.

The towpath is a free recreational resource offering a key east to west traffic free route for walking / cycling and it can be an attractive commuter route, providing a safe, convenient, and attractive walking and cycling network to promote health and well-being, consistent with the aims of the NPPF. The towpath provides a key connection to the rest of the Harlow and Gilston Garden Town (HGGT) with good connections to stations at Harlow Town, Harlow Mill and Sawbridgeworth depending on direction of travel.

The Trust generally seeks to maintain its assets in a "steady state", and in the case of towpath maintenance, this is based on current usage. Where new development has the likelihood to increase usage the Trust's maintenance liabilities will also increase, and we consider that it is reasonable to request a financial contribution from developers to either cover increased maintenance costs, or to upgrade the towpath surface to a standard which is

Respondent Name Anne Denby

Organisation Canal & River Trust

more durable and thus able to accommodate increased usage without adding to the Trust's future maintenance costs.

Given the proximity to our network and the likelihood that the development would result in additional users of our towpath for recreation and commuting we request mitigation such as towpath surfacing, wayfinding and access point improvements are provided by the development (via planning contributions or works in kind) to ensure that the waterway corridor is able to cope with the additional expectation and burdens.

Promotion and improvement of walking and cycling routes is a key part of the vision for the HGGT and the expectations for this development to contribute to the wider sustainable transport links and social/green infrastructure should be clearly referenced in any future Masterplan. This should include the Stort Navigation towpath between Harlow Mill and the access to Pishiobury Park to support recreational resources, or preferably, Sawbridgeworth for commuting.

These improvements may not necessarily need to be full towpath surfacing, as the Trust have requested for the Gilston villages, though some improvements will be required to mitigate the impact of the proposed development. This should be reflected in the MasterPlanning Guidance SPD to ensure it is considered at the earliest opportunity. The Trust are also happy to engage with applicants/developers and currently offer a free preapplication service which could also be referenced within the SPD.

Whilst the majority of the built development proposed within the East of Harlow SPD area would be some distance from the River Stort Navigation there may be long views to the development from the waterway. The SPD states that further surveys will be required in relation to landscape survey information/assessment and the waterway should be considered as a receptor within any future Landscape and Visual Impact Assessments.

Council Response

Background info noted.

10. Educational Provision

The SPD cannot be overly prescriptive regarding issues such as financial contributions. However, it will be amended to ensure that reference is made to the importance of financial contributions for blue infrastructure. The SPD already emphasises the need for the masterplan to consider the promotion of sustainable transport and provision of Green Infrastructure. The SPD also requires the masterplan to be landscape-led, ensuring that open spaces and Green infrastructure are provided, while respecting and preserving the original landscape as much as possible. This also includes a mandatory net increase in biodiversity and the delivery of a new Green Wedge through the development for new and existing residents to enjoy..

The SPD will be amended to refer to the Stort Navigation in the context of landscape assessments.				
6. Sustainability and Build Quality				
Council Response				
7. Sustainable Movement				
Council Response				
8. Sustainable Transport Corridors				
Council Response				
9. All-Vehicle Access				
Council Response				

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Respondent Name Anne Denby	Organisation Canal & River Trust	
Council Response		
11. Local Centres		
Council Response		
12. Combined Principles		
Council Response		
Other Comments		
Council Response		
•		
Are there any attachments? No		

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Respondent Name Cllr Nathan Parsad

Organisation Sawbridgeworth Town Council

General Comments

Sawbridgeworth Town Council acknowledges the effort and thoroughness embedded within the East of Harlow Masterplanning Guidance Draft (SPD). Our response integrates concerns and comments from various parts of the document from a Sawbridgeworth perspective and we hope these are of use.

In summary, Sawbridgeworth Town Council appreciates the intricacies and extensive planning presented in the document. Our feedback is aimed at enhancing and fine-tuning the masterplan to ensure that the East of Harlow develops sustainability and considers surrounding areas, including Sawbridgeworth.

We look forward to seeing the final SPD materialise and will continue to engage collaboratively.
Council Response Noted.
1. Introduction Council Response
2. Context Council Response
3. Stewardship Council Response

4. East of Harlow Character Considerations

Council Response

5. Landscape and Green Infrastructure

2. Green Spaces & Biodiversity: We commend the plans to integrate green spaces, particularly the Green Wedge and Gilston Park Estate. Green corridors and habitats should be preserved and enhanced for biodiversity, providing residents with natural spaces for recreation and improving mental well-being.

Council Response

Noted. The SPD requires the masterplan to be landscape-led, ensuring that open spaces and Green infrastructure are provided, while respecting and preserving the original landscape as much as possible. This also includes a mandatory net increase in biodiversity and the delivery of a new Green Wedge through the development for new and existing residents to enjoy...

6. Sustainability and Build Quality

- 3. Sustainable Growth: The phased approach to development is important, ensuring as far as possible new areas grow with necessary infrastructure. We encourage the inclusion of renewable energy, water conservation measures, and sustainable waste management to promote a truly sustainable community.
- 8. Sustainability: The guidance documents from various councils provide a holistic framework for development. Incorporating green infrastructure, emphasising walking and cycling, and the active focus on sustainability resonate with our priorities.

Council Response

Noted. The masterplan will have to accord with other documents, as well as the SPD, including the Harlow and Epping Local Plans and the HGGT Sustainability Guidance and Checklist, which seek high levels of sustainability

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Respondent Name Cllr Nathan Parsad

Organisation Sawbridgeworth Town Council

in new developments, including the provision of renewable energy.

7. Sustainable Movement

5.Accessibility: We value the comprehensive plans for the Sustainable Transport Corridor (STC) and supporting Mobility Hubs. The pedestrian-first approach aligns with our sustainability objectives, yet it's imperative to continually review these strategies to accommodate actual usage and changes.

.....

Council Response

Noted. Monitoring will be carried out at a high-level by HGGT and ECC.

8. Sustainable Transport Corridors

Council Response

9. All-Vehicle Access

Council Response

10. Educational Provision

7.Education: The planning for both primary and secondary educational facilities is welcome. Their strategic placement, considering accessibility and the potential for shared amenities will be appreciated.

Council Response

Noted. The exact locations of the schools have yet to be established and are indicative in the SPD. Essex County Council will be providing further evidence and justification for the best location. The SPD will therefore be amended to remove the school options and state that locations are to be decided.

11. Local Centres

6.Local Centres: The designated spaces for social interactions, commercial ventures, and community gathering points within the local centres are promising. Their strategic positioning, integrating commercial and residential spaces, and emphasis on flexibility mirror our vision for a vibrant, integrated community.

Council Response

Noted.

12. Combined Principles

Council Response

Other Comments

1.Congestion & Pollution: We welcome the emphasis on public transport, cycling, and walking. However, the anticipated increase in vehicular traffic raises concerns about congestion and consequent pollution. Measures should be implemented to ensure that any potential increases in traffic do not adversely impact the environment or quality of life for residents. We do not consider Sheering Lower Road to be suitable for increased vehicle movements. We also feel the plan would benefit from a wider look at transport connectivity with our other large populations such as Bishop Stortford and Harlow such as railway connectivity – such as within the scope of this SPD.

4.Healthcare Provision: We are particularly enthusiastic about the introduction of the new Princess Alexandra Hospital's 'Health and Wellbeing Campus'. Its integration into the wider landscape, notably through Princey Brook's reed beds and waterways and the green networks of the Garden Town, is welcome. The dual role of the hospital as not only a healthcare provider but also a centre for jobs and retail, accentuates the importance of a holistic approach to health and well-being. By facilitating inclusive community-building activities like food growing,

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EoH Document Comments

Respondent Name Cllr Nathan Parsad

Organisation Sawbridgeworth Town Council

health initiatives, outreach, and promoting local living, it underscores a progressive and forward-thinking model for healthcare institutions. We welcome this approach.

Council Response

Noted.

The HGGT Transport Strategy, STC and associated modal shift/change are key strands of the HGGT vision to address potential increased vehicular movements arising from new development. The STC will provide fast, direct, safe walking, cycling and bus routes for residents across the town. For the eastern part of the STC it will provide sustainable travel opportunities for residents at East of Harlow, Newhall odal change is about allowing short car journeys to be completed using sustainable transport instead, thereby reducing the number of cars on the road overall, which will help to improve air quality which is continually improving as emissions from cars improve over time. The allocation of the site has been informed by transport assessment evidence as part of the Local Planand further detailed transport assessments will be carried out by the developer. The HGGT IDP identifies what schemes and proposals are required from the development including those related to improving the highway network to accommodate growth. It is possible that improvements to existing nearby infrastructure will be part of the East of Harlow development, but this will be determined at the masterplanning and planning application stages.

Are there any attachments?	No		

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Respondent Name Rachael Donovan

Organisation Hertfordshire and West Essex ICB

General Comments

Thank you for consulting the Hertfordshire and West Essex Integrated Care Board (HWE ICB) on the draft East of Harlow Masterplanning, Supplementary Planning Document (SPD).

The NHS HWE ICB is a statutory body with responsibility for commissioning NHS health services. In line with the Health and Care Act 2022, the HWE ICB and our partner NHS Trusts and NHS Foundation Trusts work in collaboration with local Health and Wellbeing Boards to arrange and provide NHS services to:

- Improve the general health and wellbeing of Hertfordshire and west Essex residents and improve health care services in the area.
- Packle the inequalities which affect people's physical and mental health, such as their ability to get the health services they need, and the quality of those services help tackle health and wider inequalities.
- get the most out of local health and care services and make sure that they are good value for money.
- Delp the NHS support social and economic development in Hertfordshire and west Essex.

The HWE ICB and NHS system partners, including the Princess Alexandra Hospital (PAH) have reviewed the draft East of Harlow Masterplanning Guidance, SPD. Please note that Lawson Planning Partnership Limited on behalf of the PAH has responded to this consultation under separate cover.

Background to this Guidance

The HWE ICB supports the need for, and development of Masterplanning Guidance for the strategic site, known as Land East of Harlow, and recognises the importance of this SPD to inform the masterplanning process and ultimately the design and development of this site.

Further, the HWE ICB supports and recognises the role this document will play in aiding the Councils future assessments of the emerging masterplan and in turn planning application(s) coming forward.

Council Response

Background noted.

1. Introduction

It is suggested that the words 'material planning consideration' are used instead of 'material planning weight' [paragraph 1.13].

Comprehensive Delivery

The HWE ICB supports the representatins made by the PAH in relation to paragraphs 1.20 and 1.23. Please refer to the PAH's consultation response and the request that the text be revised to refer to the need for individual developments to take account of site specific and wider infrastructure needs and to explain how the development would not preclude other development identified in the masterplan area from coming forward. The HWE ICB also agrees with the PAH's concern over the workability of the LPAs preference for a single planning application to be prepared across the allocation as a whole, alongside a single Section 106 Agreement, and supports the suggested text change to 'a need for a phased approach to the delivery of development'.

Paragraph 1.20, list of bullet points – please add 'community infrastructure including primary, community and mental health, and acute healthcare, including the ambulance service.'

Council Response

Amendments will be made to Chapter 1.

2. Context

Respondent Name Rachael Donovan

Organisation Hertfordshire and West Essex ICB

The Vision for Land East of Harlow, [pages 10/11] is supported in principle; specifically, the reference to 'Land East of Harlow will be a healthy and happy place to live....'. The provision made within the Masterplanning Guidance for green infrastructure, community facilities, plus sustainable modes/choice of travel (needed also to access NHS services for patients, visitors and staff) will help support the delivery of a well-designed place that in turn supports residents physical and mental wellbeing. This is supported.

The Vision also includes the new Princess Alexandra Hospital's 'Health and Wellbeing Campus'. The Vision says, 'It will blend seamlessly into the wider landscape, through the reed beds and waterways of Pincey Brook and green networks of the Garden Town'. The word 'seamlessly' should be removed as it is superfluous. However, it is suggested that the guidance could be strengthened to include a landscape design principle which seeks to ensure the sensitive treatment of the interface between the new built form (PAH new hospital) with the landscape beyond, to the north.

Council Response

Noted.

Vision will be amended accordingly.

3. Stewardship

Stewardship

The HWE ICB supports the importance of, and need to put into place long term stewardship arrangements to include, amongst other assets, the management of physical community assets. This chapter should be strengthened by including information which clarifies the process, next steps and engagement of delivery partners, to include PAH, over possible stewardship options

Council Response

Stewardship is being dealt with in more detail under the HGGT Stewardship Charter, which is in draft format and recently consulted on. The chapter will be amended to make greater reference to this charter and the need to for engagement of delivery partners, to include PAH, over possible stewardship options

4. East of Harlow Character Considerations

East of Harlow Character Considerations

c. Specific Guidance [page 13] – please add iv. 'New community infrastructure will be provided, including two local centres, two primary schools and a secondary school, the new Princess Alexandra Hospital/ Health and Wellbeing Campus and primary, community and mental healthcare.'

Council Response

Amendment will be made to Ch11.

5. Landscape and Green Infrastructure

Council Response

6. Sustainability and Build Quality

Council Response

7. Sustainable Movement

Sustainable Movement

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Respondent Name Rachael Donovan

Organisation Hertfordshire and West Essex ICB

c. Specific Guidance [page 29] – please add vii. 'Active and sustainable modes of transport must connect communities with each other and to key community assets including schools, local centres and the new Princess Alexandra Hospital/ Health and Wellbeing Campus and primary, community and mental healthcare.'

Council Response

Amendment will be made accordingly.	

8. Sustainable Transport Corridors

Council Response

9. All-Vehicle Access

Council Response

10. Educational Provision

Council Response

11. Local Centres

Local Centres

It is disappointing to read that the draft East of Harlow Masterplanning Guidance, SPD makes no reference to primary, community and mental healthcare infrastructure, needed to meet the healthcare needs arising from this strategic site. This is surprising, particularly given Local Plan Policies, as listed in Appendices 1 and 2, make clear that provision should be made for appropriate community and health facilities. This is a clear omission and needs addressing throughout the document, and particularly within the chapter on Local Centres. Also, it should be noted that the new Princess Alexandra Hospital/ Health and Wellbeing Campus, does not include primary healthcare.

Planned housing growth in West Essex and East Hertfordshire, and significantly those that form the Harlow Gilston Garden Town will impact on health infrastructure within the area, including GP surgeries.

It is clear from the work the HWE ICB has undertaken to date to assess future patient capacity, needed to accommodate planned housing growth, that there is a need to increase GP surgery capacity, as well as community and mental health services in the area, including for the strategic site, Land East of Harlow. Options to increase GP surgery capacity to be explored further include; re-configuring, extending or relocating GP premises to provide sufficient space to increase resources and clinical services, to keep the patient lists open, as well as creating new GP practices.

The HWE ICB is looking at various options that will help increase resources and clinical services and is working closely with NHS system partners, GP practices and the Primary Care Network to assess the need for increased health and care facilities and services in response to the Land East of Harlow development and the wider planned housing growth in west Essex and east Hertfordshire.

The HWE ICB will continue to work closely with Harlow Council and Epping Forest District Council to ensure GP and community and mental health service needs, arising from new developments, are met.

Council Response

The text regarding local centres is to be amended to make greater reference to health facilities. However, the suggestions in this rep will also be included.

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Respondent Name	Rachael Donovan	Organisation Hertfordshire and West Essex ICB
Council Response		
Other Comments		
Council Response		
•		
Are there any attachr	ments? No	

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EoH Document Comments

Respondent Name Claire Sanders

Organisation Essex County Fire & Rescue

General Comments

This document outlines Essex Fire and Rescue Service's initial response to the consultation for the proposed development.

Essex County Fire and Rescue Service has a statutory duty to provide Response, Prevention and Protection functions within the community. Therefore, we would welcome any opportunities to enable further development and enhancement of these provisions.

If further information or clarification on any of the points presented is required to support the developers, please contact the Service via future.infrastructure.risk@essex-fire.gov.uk

National Fire and Rescue Priorities - Home Office

The priorities for fire and rescue authorities set out in the National Fire and Rescue Framework for England July 2018 are to:

- •Make appropriate provision for fire prevention and protection activities and response to fire and rescue related incidents
- Dentify and assess the full range of foreseeable fire and rescue related risks their areas face
- © ollaborate with emergency services and other local and national partners to increase the efficiency and effectiveness of the service they provide
- •Be accountable to communities for the service they provide
- •Develop and maintain a workforce that is professional, resilient, skilled, flexible and diverse

The Fire and Rescue Plan – Essex County Fire and Rescue Service

The Fire and Rescue Plan sets out the priorities for fire and rescue services in Essex and a series of strong, tangible commitments to how we will help keep our communities safe.

The plan brings together the Service, partners and the public to build safe and secure communities and other efficient and effective prevention, protection and response activity.

The activities in this plan set out a clear direction for development of the Service and how, by working closer together with other emergency services and wider partners, we can deliver a better service while being closer to the communities we serve.

Our priorities are:

- ●Prevention, protection and response
- Improve safety on our roads
- Pelp the vulnerable to stay safe
- •Promote a positive culture in the workplace
- •Develop and broaden the roles and range of activities undertaken by thService
- •Be transparent, open and accessible
- Collaborate with our partners
- •Make best use of our resources

Essex Design Guide

The Essex Design Guide provides high level direction for new developments which we would like to draw your attention to:

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Respondent Name Claire Sanders

Organisation Essex County Fire & Rescue

- •Continuation of road design to ensure safe and timely access and egress to and from new developments.
- Continuation of road design to include turning circle provision plus future consideration to appliance sizes to ensure adequate space to manoeuvre on a development.
- Consideration for installation of an approved suppression system with better safety and more design freedom. Sprinkler considerations would help to isolate fire to the source and to ensure better safety for occupants / emergency services / reduce insurance costs. This may also afford developers more design freedom and scope for capacity in respect of distance from buildings to fire appliance access points.
- Continued consultation with Water Authorities for fire hydrant / water main provisions and consideration to ensure sufficient strategically placed resources are made available for operational firefighting and with appropriate water pressure considerations.
- •Ensure new fire hydrant installations are fully operational before permitting residents to occupy dwellings.
- •Ensuring new fire hydrants are not installed within private driveways / gardens.
- Continuation of at least 3 forms of fire hydrant asset indication. Hydrant indicator plate / post, painted FH cover and painted adjacent kerb. In the absence of a kerb then a thermoplastic yellow road 'H' applied to the road surface.
- Section 106 agreement at planning application stage to ensure that the developer will bear the costs for any new fire hydrant installations deemed necessary by the Fire Authority where the new development exceeds 10 dwellings.
- Where applicable door sets to carry dual certification ensuring compliance with fire and security regulations. Such recommendations align with both the Independent Review of Building Regulations and Fire Safety in the wake of and the review and recommendations resulting from the Grenfell Fire tragedy of 2017.
- Eire resistant cladding considerations that may fall outside of Building Control matters.

Initial Response to Consultation Document

Having reviewed the consultation document, at this time Essex County Fire and Rescue Service would ask that the following are considered during the continued development of the East of Harlow HGGT SPD:

- •Description seems to deliver Fire Safety and Education visits, with the shared use of an electric charging point.
- •Adherence to the requirements of the Fire Safety Order and relevant building regulations, especially approved document B.
- Installation of smoke alarms and/or sprinkler systems at suitably spaced locations throughout each building.
- Implementation of vision zero principles where there are introductions of or changes to the road network.
- •Appropriate planning and mitigations to reduce risks around outdoor water sources.
- Suitable principles in design to avoid deliberate fire setting.
- Consideration for road widths to be accessible whilst not impeding emergency service vehicle response through safe access routes for fire appliances including room to manoeuvre (such as turning circles).
- •Access for Fire Service purposes must be considered in accordance with the Essex Act 1987 Section 13, with new roads or surfaces compliant with the table belw [see attachment] to withstand the standard 18 tonne fire appliances used by Essex County Fire and Rescue Service.
- Implementation of a transport strategy to minimise the impact of construction and prevent an increase in the number of road traffic collisions. Any development should not negatively impact on the Service's ability to respond to an incident in the local area.
- R risk reduction strategy to cover the construction and completion phases of the project.
- Implementation of a land management strategy to minimise the potential spread of fire either from or towards the development site.
- Exploring opportunities around the application for Section 106 funding.
- •Exploring opportunities around provision of co-located Emergency Service facilities and / or further discussions around Fire Station specific requirements within the remit of the development and wider Harlow area.

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EoH Document Comments

Respondent Name Claire Sanders

Organisation Essex County Fire & Rescue

Essex County Fire and Rescue Service welcomes the opportunity to continue these conversations as the development progresses to ensure opportunities to reduce risk and improve the emergency service provision are realised.

Council Response

Background noted.

The Essex Design Guide, as well as the Harlow Design Guide, its Addendum and the HGGT Design Guide are referred to in the SPD.

Local Centres chapter will be amended to include "Use of community spaces as a hub for our Prevention teams to deliver Fe Safety and Education visis." and "•Exploring opportunities around provision of co-located Emergency Service facilities and / or further discussions around Fire Station specific requirements within the remit of the development and wider Harlow area."

The development, by default, will be required to adhere to Building Regulations.

Smoke alarms, sprinklers, construction, land management strategy, reducing risks around outdoor water sources, design principles to avoid deliberate fire setting, etc. are details to be considered at the masterplanning and/or planning application stage.

The sustainable movement chapter will be amended to include "Implementation of vision zero principles where there are introductions of or changes to the road network." and "Consideration for road widths to be accessible whilst not impeding emergency service vehicle response through safe access routes for fire appliances including room to manoeuvre (such as turning circles)." and "•Access for Fire Service purposes must be considered in accordance with the Essex Act 187".

There is an HGGT Transport Strategy already in place.

Section 106 funding is referenced in the SPD and will be a key provider of funds for infrastructure on the site.

1. Introduction
Council Response
2. Context
Council Response
3. Stewardship
Council Response
4. East of Harlow Character Considerations
Council Response
5. Landscape and Green Infrastructure
Council Response
6. Sustainability and Build Quality
Council Response
7. Sustainable Movement
Council Response

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8. Sustainable Transport Corridors	
Council Response	
9. All-Vehicle Access	
Council Response	
10. Educational Provision	
Council Response	
11. Local Centres	
Council Response	
12. Combined Principles	
Council Response	
Other Comments	
Council Response	
•	
Are there any attachments? Yes	

Respondent Name Tai Tsui

General Comments

Thank you for consulting Essex County Council (ECC) on the draft East of Harlow Masterplanning Guidance. ECC welcome the pro-active steps taken by the local planning authorities to preparing a masterplanning guidance for East Harlow which will no doubt help to achieve sustainable and comprehensive development in the area.

As one of the five partners of the Harlow and Gilston Garden Town (HGGT) partnership, ECC has been closely involved in discussions around the planning and delivery of the East Harlow allocation and have inputted in earlier drafts of this consultation document. ECC will continue to work closely with partners and stakeholders on the East of Harlow allocation, as well as other major development schemes across the Harlow and Gilston Garden Town.

ECC is supportive of the overarching objectives set out in the consultation document. We do however have a number of observations and recommendations on aspects of the documents including on issues around transport, education, green infrastructure and the need to be able to deliver the net-zero carbon quality of new build which is the same price as Governments Future Homes Standard homes required from 2025. Our comments are collated into a table format for ease of use

The redline boundary along the A1025 may need to be checked. The document shows the line going along the western side of the A1025 in the vicinity of The Campions roundabout whereby ECC believe the boundary should run up the eastern side of the A1025.

Specific reference should be made in relation to tackling Climate Change and achieving zero carbon development. See later comments for detail.

The SPD should make it explicit that development will be expected to make reasonable and proportionate contributions toward infrastructure schemes needed to mitigate impacts of the East Harlow allocation as a whole. The HGGT IDP is a good point of reference but full S106 requirements will need to be assessed and determined at the detailed planning stage.

Council Response

Background noted.

A1025 redline boundary will be reviewed and amended if necessary.

Detailed comments are considered under the relevant chapter headings.

The SPD will be amended to include reference to S106 requirements.

1. Introduction

Pg 4, point 4 The term 'development' may need to be clarified. According to the Town and County Planning Act any material change of use of land and building is counted as

'development' in town planning sense. The area in question (area north of the proposed hospital development) is current for agricultural use and the consultation document indicated the area should be reserved for BNG/SANG. Clarification may be required on whether this a change of use from agricultural to BNG/SANG constitutes 'development'.

Fig. 1.2 Clarification needed on what the curvy white lines (the thinner ones) on the map represent.

Para 1.22 Additional wording recommended – '...at a point in time when it is required to meet needs, achieve HGGT principles, and mitigate impacts, having regard to the allocation...'

Para 1.3 We would recommend including a new bullet point mentioning the Green and Blue infrastructure provision, such as the green wedges and local wildlife sites etc shown on the map. This should help setting a clear scope for the G&BI provision in the masterplanning and development of the site, aligning with Para 1.5.

Para 1.15 For consistency throughout the document should para 1.15 say Green and Blue Infrastructure

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Respondent Name Tai Tsui

Organisation Essex County Council

Para 1.20 Suggest adding Green and Blue Infrastructure Assets to this list, alongside and in addition to strategic greenspace.

Council Response

Pg 4, point 4 will be amended to refer to "BUILT development".

Fig. 1.2 will be amended.

Paras 1.22, 1.15, 1.20 will be amended accordingly.

Re. para 1.3: the SPD is to be amended to include greater reference to blue infrastructure elsewhere in the SPD.

2. Context

Para 2.2 We would strongly recommend making reference to the Essex Design Guide, in particular the Climate Change section given the importance of delivering to the TCPA Garden City standards.

Para 2.1 While not specifically a policy, reference should also be made to the Essex GI Strategy (2020) and Essex GI Standards (2022).

Council Response

Paras 2.2 and 2.1 will be amended accordingly.

.....

3. Stewardship

Page 12, point vi '...to demonstrate viability in perpetuity' maybe unreasonable and could considered replacing the word 'perpetuity' with 'longer-term'

Para 3.4 Recommend adding stewardship/maintenance of proposed and existing G&BI assets as part of this list. This could be through a Green Infrastructure Strategy for the site, Landscape and Ecology Management Plan or as part of other management and maintenance plans.

Council Response

Page 12, point vi - perpetuity is also referred to elsewhere in the SPD. This is to be retained to ensure strength of wording.

Para 3.4 to be amended accordingly.

4. East of Harlow Character Considerations

.....

Council Response

5. Landscape and Green Infrastructure

5.b.iii Early collaboration and engagement with other stakeholders should also be sought early in the design process.

5.c.iii Recommend strengthening policy wording – remove "developments should deliver" and change to 'must deliver'. Else this will be trumped by other strongly worded policies.

ECC GI team recommends that the Masterplan SPD requests applicants strive for more than 10% BNG, and that it is delivered on-site wherever possible. Using GI & B Infrastructure as a tool for delivery.

5.c.iv Recommend strengthening policy wording – remove "The action plans arising from the HGGT GI Framework should be" and change to need to be considered. Else this will be trumped by other strongly worded policies.

5.c.vi ECC GI team recommends adding other uses such as natural play features, community orchards, species rich grassland/wildflower meadows to also be included.

5.c.vii Recommend strengthening policy wording – remove "The masterplan should " and change to need to

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Respondent Name Tai Tsui

Organisation Essex County Council

include. Else this will be trumped by other strongly worded policies.

5.c.viii To add to this list – ECC GI team recommends development of active travel lanes through GI. [See further detail below].

ECCs GI team supports the provision and protection of active travel and Public Right of Way (PRoW) networks. ECCs GI team recommends that the Masterplan SPD supports and encourages opportunities to enhance and establish green infrastructure along sustainable transport and PRoW networks to both encourage active travel and create a green corridor for wildlife. This could include, but not be limited to, the integration of nature focused SuDS; native hedgerows, tree and shrub planting; incidental 'play on the way' features / trails; informal sport (outdoor gym/fitness trails); and areas for seating to stop and rest.

5.c.xiv Additional wording required "Mature trees and hedgerows should be retained, protected and enhanced and inform the structure of new neighbourhoods."

5.c.xvii Recommend additional wording 'long-term maintenance and stewardship of open spaces must be considered from the start with relevant plans and proposals submitted to and approved by respective local planning authorities' ..

The ECC Recommends this is a Landscape ecological management and maintenance plan (LEMMP) and work schedule for a minimum of 10 years.

Details should include who is responsible for GI assets (including any surface water drainage system) and the maintenance activities/frequencies.

We would also expect details on how management company services for the maintenance of GI assets and green spaces shall be funded and managed for the lifetime of the development to be included.

Failure to provide the above required information before commencement of works may result in reducing the value of the development, becoming an undesirable place to live that may increase the impacts from climate change, such as flood risk or air pollution from the site.

Council Response

5.b.iii, 5.c.iv, 5.c.vi, 5.c.vii, 5.c.viii, 5.c.xiv, 5.c.xvii will be amended accordingly.

5.c.iii - text amended re date of BNG becoming mandatory. Going beyond 10% will be referenced but weight is limited given the SPD cannot set policies. The Harlow and Epping Local Plans, however, include policies relating to BNG.

6. Sustainability and Build Quality

ECC recommend that the principles of the need to tackling Climate Change and achieving zero carbon development, and where possible specific requirements, should be added to this section.

Please refer to the relevant section in the latest ECC Design Guide as well the as draft policy wordings (see appendix A) that ECC is preparing, and is being applied in the other Graden Communities, and is being used in our response to all local plans and major developments.

6.a It is recommended that the Essex Design Guide is referred to which provides recommendations for sustainable build including GI.

Reference and consultation with the Essex GI Strategy (2020) and Essex GI Standards (2022) is strongly recommended.

Council Response

It is considered that tackling climate change, etc., is already addressed in the relevant Local Plans, HGGT

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EoH Document Comments

Respondent Name Tai Tsui

Organisation Essex County Council

Sustainability Guidance and Checklist, other Design Guides, etc. However, stronger reference will be made to the relevant section in the latest ECC Design Guide as well the as draft policy wordings (see appendix A) that ECC is preparing, and is being applied in the other Graden Communities, and is being used in our response to all local plans and major developments.

6.a will be amended accordingly.

Ref. to Essex GI Strategy and Standards will be added.

7. Sustainable Movement

Fig. 7.1 Some elements could be clarified. E.g., it is unclear where the Hatfield Peverel 10KM zone is, and the Hatfield Peverel 10KM could s also be easily confused with Bush Fair 'key walking route'

7d. Suggest addition 'How sustainable and active mode of transport will be encouraged, and car use be discouraged to enable modal shift and implement behavioural change.'

7.c.v, vii, viii & X page 28 ECC Gi Team welcomes the connectivity to encourage active travel and would encourage the opportunities the enhance and establish green infrastructure along sustainable transport and PRoW networks to both encourage active travel and create a green corridor for wildlife. This could include, but not be limited to, the integration of nature focused SuDS; native hedgerows, tree and shrub planting; incidental 'play on the way' features / trails; informal sport (outdoor gym/fitness trails); and areas for seating to stop and rest.

7.d ECCs GI team recommends the use of the National Green Infrastructure Framework S2-Accessible Greenspace Standard (previously known as Accessible Natural Green Space Standard (ANGSts)) to help with ensuring suitable active travel routes and that everyone has access to good quality green and blue spaces close to home (within fifteen minutes walk) for health and wellbeing and contact with nature.

The Essex Design guide also provides guidance on walkable neighbourhoods where new neighbourhoods and streets are designed to promote the use of walking, cycling and sustainable transport. These places are planned to reduce the need to travel and include a mix of uses, green spaces and facilities to support the new development (within 15 – 120 minutes walking distance).

Council Response

Fig. 7.1 - will be amended.

7.d, 7.c.v, vii, viii & X page 28 will be amended accordingly.

.....

8. Sustainable Transport Corridors

8bi. While ECC encourage quality space making, it should be noted that any 'non- standard' highway feature / design / material needs to be carefully considered in terms of their long-term maintenance and ownership responsibilities. ECC will consider, on a case-by-case basis, whether it would adopt (as public highway) any such non-standard highway features.

8c. The East Harlow allocation is predicated on assumptions that it will achieve 60% mode share. Failing to achieve this target would mean additional traffic on the local road network which may be unacceptable.

The STC is a key feature in achieving such step change in travel behaviour. In order to maximise the benefit of the STC, we recommend that the SPD should give a clear indication of the phasing requirement for the development, and such requirement be linked to the delivery of, and connection to, the STC network.

Based on the preferred STC routing as shown in figure 12.1, ECC expects the STC to start from the south of East Harlow site and connecting through to the new PAH hospital. If the STC is to be delivered in phases, we would expect the first section to be in the southern part of the site and therefore connect into existing Harlow road network. We will also expect residential development will be phased in a similar manner so each phase will enjoy the benefit of a functioning STC from the start. Starting development from the south also means that occupiers will benefit from adjacency to existing established communities, services and facilities before on-site provision

Organisation Essex County Council

Respondent Name Tai Tsui

catches up.

8d & 9e. It is noted that the SPD will recommend the installation of tree planting. It is recommended that streets trees should be used alongside other additional tree planting. The Essex Forest Initiative provides opportunities for developers to work with ECC on tree planting. NPPF Paragraph 131 states "Planning policies and decisions should ensure that new streets are tree-lined,that appropriate measures are in place to secure the long-term maintenance of newly-planted trees...". To also consider dual street furniture/seating (i.e., a bench including a planter): The design of the street furniture and bin stores can contribute to the landscape character, reduce clutter of an area or street and act as a green corridor/link to the wider landscape scale GI network.

Council Response

8bi, 8d and 9e to be amended accordingly.

8c. - phasing - it is not the intention for the SPD to provide detail on phasing; this will be for the masterplanning and planning application stages. However, the ECC suggestion on phasing for the STC will be added for info.

9. All-Vehicle Access

9e & 8d. It is noted that the SPD will recommend the installation of tree planting. It is recommended that streets trees should be used alongside other additional tree planting. The Essex Forest Initiative provides opportunities for developers to work with ECC on tree planting. NPPF Paragraph 131 states "Planning policies and decisions should ensure that new streets are tree-lined,that appropriate measures are in place to secure the long-term maintenance of newly-planted trees...". To also consider dual street furniture/seating (i.e., a bench including a planter): The design of the street furniture and bin stores can contribute to the landscape character, reduce clutter of an area or street and act as a green corridor/link to the wider landscape scale GI network.

Council Response

9e & 8d to be amended accordingly.

10. Educational Provision

10.d All schools should be located within predominately traffic free 'school zones'. Of prime importance is the area outside the main pupil entrance, which must be entirely traffic free (not abutting, car parking, roads or shared surfaces). Although this issue is addressed under the transport section, it is fundamental to the acceptability of any school sites and should be a primary determinate of the options.

We would therefore propose the following amendments:

Point 'iv': The secondary school land should, therefore, be located in the central part of the site, with one primary school in the southern part and another abutting the secondary school land to facilitate the option of an all-through school. All schools should be located away from the eastern boundary of the site, closer to existing neighbourhoods and outside the current and/or future 55db LAeq noise contour of the M11.

Location options

All school site options as shown risk failing ECC's criteria that school sites must be broadly rectangular. A possible way to address this matter at this stage could be to make the school site boundary less specific, as well as making direct reference to the ECC Developer's Guide and the need for full evaluation of options.

Other observations:

- ●Page 44 (option 1): Not considered to be appropriate because provision is bunched in one part of the GC.
- Page 46 (option 2): Not considered to be appropriate because the primary and secondary parts of the potential all-through school site are spit by a road.
- •Page 48 (option 3): Most likely to work but the all-through primary school land would need a buffer between it and the road to the north.
- •Page 50 (option 4): Not considered to be appropriate as this is not providing an all-through school site; the secondary school land is next to the M11. One primary school seem to be in an off-site location which will require clarification.

Organisation Essex County Council

Respondent Name Tai Tsui

Before ECC can commit to any prefer school locations we will expect full evaluations of potential school sites to be carried out in line with section 4.2 & 4.3 of the Deve lope rs' G u ide.

ECC welcome the provision of a playing field as part of the primary school site. For this, we would expect the school playing field are designed to ensure multi- purpose and functional use and not just concrete grounds or sport field. To provide green spaces for natural play, sensory, areas that enhanced biodiversity and contribute to climate change mitigation and adaptation (flood and water mitigation, shading, air quality etc.) that all together can contribute to the curriculum, for example PE, science, English, maths, outdoor learning and forest schools. It will improve staff and pupil health, wellbeing, learning and chances in life. In 2021, Department for Education announced a new initiative designed to put climate change at the heart of education, young people will be empowered to take action on the environment. By 2023, teachers will have access to a model science curriculum designed to teach children about nature and their impact on the world. In addition, children will be encouraged to get involved in the natural world by schools enhancing their school grounds for biodiversity.

10.f

ECC recommends that specific guidance should include the provision of and opportunity for natural play. Children's engagement with a natural play space, outdoor learning and forest school areas, (including within school grounds) has a multitude of positive impacts on their learning and physical and emotional wellbeing. This needs to include reference to protecting, enhancing or creating school green space. Studies have found that connecting children with nature and green spaces benefits their intellectual, emotional, social and physical development, giving them the best possible start in life and improving employability.

It is expected play strategies to be formed by the character and function of the green spaces. It should be imaginatively designed and contoured using landforms, level changes and water, as well as natural materials such as logs or boulders, which create an attractive setting for play.

Council Response

10.d - to be amended to provide greater ref to traffic free school zones, etc., accordingly. The SPD will be amended to remove the school options and state that locations are to be decided. Clarification will be provided regarding primary school playing field being multi-purpose.

10.f to be amended accordingly.

11. Local Centres

Council Response

12. Combined Principles

Council Response

Other Comments

Appendix 3

A number of STC options presented in appendix 3 are seemingly unviable/undeliverable. ECC's understanding is that the emerging preferred STC route option is best represented in figure 12.1 of the consultation document. Illustrating discounted / undeliverable route options could create unnecessary confusing for the audience.

Council Response

Appendix 3 will be removed.

Are there any attachments?	Yes		

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EoH Document Comments

Respondent Name Becki Ingram

Organisation Environment Agency

General Comments

Cross Cutting Comments

Chalk Catchments

The East of Harlow sits within the Upper Lee catchment, which is a chalk stream catchment. Chalk streams are rare and valuable habitats which are often referred to as England's rainforests. In England there are over 280 chalk streams, which is approximately 85% of their global distribution. Their pure, clear, constant water from underground chalk aquifers and springs, flowing across gravel beds, make them perfect sources of clean water.

All activities within chalk stream catchments can impact the health of chalk streams within them. The Catchment Based Approach (CaBA) have developed a Chalk Stream Restoration Strategy (CSRS) which highlights the issues faced by chalk streams, as well as ways on a catchment-scale, we can protect and enhance these habitats. Taking a catchment-based approach will have wider benefits to the area and downstream reaches of the River Stort. We would therefore like to see all plans for the East of Harlow being written in accordance with the recommendations of the following strategy. See the links below for more details:

- Bhalk Stream Restoration Strategy Main Report
- ©halk Stream Restoration Strategy Implementation Plan

Part of protecting chalk streams on a catchment-scale also involves embracing ambitious policies and targets for litres per person per day. By doing this, the burden on an already highly water-stressed area can be reduced. Measures to help reduce water consumption will help lower required abstractions, putting less pressure on chalk catchments.

In addition to the above we expect the Stort Catchment Partnership and Herts & Middlesex Wildlife Trust to be included and engaged with through present and future stages of masterplanning.

Final Comments

Thank you for contacting us regarding the above SPD. Our comments are based on our available records and the information submitted to us.

Council Response

SPD will be amended to refer to engagement with Stort Catchment Partnership and Herts & Middlesex Wildlife Trust at the masterplanning stage.

1. Introduction

Council Response

2. Context

Strategic Flood Risk Assessments

We request that reference be made in Section 2 (Part 2.2) of this SPD to Strategic Flood Risk Assessments (SFRAs). Epping Forest and Harlow Councils both have SFRAs which should be incorporated into this Masterplan, and they must be used in conjunction with other policy and guidance when informing the development and design choices within future masterplanning. Existing, as well as future updates and iterations, must be used when planning for future flood risk.

Flood Risk Management Plans

The Thames River Basin District Flood Risk Management Plan 2021 to 2027 is a document that should be considered and is not currently mentioned in this SPD. Harlow Council helped prepare and develop the Thames River Basin District Flood Risk Management Plan 2021 to 2027, along with neighbouring risk management authorities. Whilst this plan may be out of date when this development takes shape, future iterations must also be considered. For reference, the plan aims to help us:

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- Identify measures (actions) that will reduce the likelihood and consequences of flooding from all sources, focusing on rivers, the sea and surface water.
- Improve resilience, which is the capacity of people and places to plan for, better protect, respond to, and to recover from flooding, whilst informing the delivery of existing flood programmes.
- Work in partnership with our stakeholders to explore wider resilience. These measures include a drive for more nature-based solutions, property flood resilience and sustainable drainage systems (SuDS).
- adapt to a changing climate through developing long-term, adaptive approaches.

Other

More generally, we would like to see the National Flood and Coastal Erosion Risk Management Strategy for England, the Thames River Basin Management Plan, and the Chalk Stream Restoration Strategy incorporated into this SPD, or listed as documents that it will be in accordance with. The latter two documents are further touched upon in comments below.

Council Response

SPD will be amended to refer to SFRAs, the National Flood and Coastal Erosion Risk Management Strategy for England and The Thames River Basin District Flood Risk Management Plan 2021 to 2027.

3. Stewardship

Council Response

4. East of Harlow Character Considerations

Section 4: East of Harlow Character Considerations

In Section 4 (Part d.) we welcome the reference to Flood Risk zones, however we would like to see this strengthened by making a more holistic commitment to protecting and enhancing the water environment for the benefit of people and nature. Alongside this,

we would also like to see the inclusion of Climate Change as a key consideration. This will have an impact on all parts of the SPD and future masterplanning, from habitat protection and drainage, to build location and design.

Council Response

Further references to Blue infrastructure and climate change will be added to the SPD as a result of comments made by other organisations/people.

5. Landscape and Green Infrastructure

Section 5: Landscape and Green Infrastructure

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We welcome the inclusion of this section. However, we wish to see the wording broadened out to include blue as well as green infrastructure.

Watercourses

Within the red line boundary of the site there are two main rivers, the Pincey Brook and the Harlowbury Brook. Both rivers are tributaries of the River Stort, meaning that their health has a direct impact on the health of the River Stort. The River Stort is a sensitive chalk stream and should be treated with care, in accordance with the UK Biodiversity Action Plan. We note that in Section 5 (Part d.ii) the Pincey Brook is listed as a key asset, however Harlowbury Brook is missing and needs to be included in this section as well. We also request in Fig 5.1 that the Harlowbury Brook and its associated flood zones are added to the map. At present, the omission of the Harlowbury Brook is a concern, given that this is a Main River and an important asset within this site in terms of flood risk, well-being, and the natural environment.

Asset Maintenance

The Harlowbury Brook is partially culverted/partially open channel through the site, and is primarily maintained by ourselves. This river will need to be factored into all potential development and an appropriate buffer zone of at least 8 metres from the top of bank maintained, to ensure that we are able to fulfil our regular maintenance

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schedules.

The Pincey Brook is third party maintained (i.e., not maintained by ourselves). This means that the Pincey Brook will need to be maintained by the developer/appropriate third party and a management/maintenance plan agreed by the riparian owner to ensure that this happens. For example, due to the proximity of the new hospital site to the Pincey Brook, the landowner may become the riparian owner of the Pincey Brook for that particular stretch. Because of this, we strongly recommend including asset maintenance into Section 5 as a topic to consider.

Biodiversity

We note and welcome in Part c. viii the acknowledgement that there is not yet enough detail for the site with regards to ecological data. We would encourage specific mention here be made to the submission of a Preliminary Ecological Appraisal to accompany future planning applications as a minimum. These surveys identify features of importance on a site (species and habitats) and recommend further specific surveys. These surveys should be used to form a clear picture of the ecological status of the watercourse and its buffer zones on the development site, and in turn how the development will mitigate against any deterioration/impacts. If invasive non-native

species are found, then these should be dealt with appropriately in line with government guidance. Please note that Yellow Archangel, Buddliea and Himalayan Balsam are all common in the area.

We note the inclusion of Biodiversity Net Gain (BNG) within this section (Part c. iii) and are the inclusion of a minimum 10% uplift in line with national guidance. Biodiversity net gain complements and works with the biodiversity mitigation hierarchy set out in NPPF paragraph 175a. We feel the wording could be strengthened to reflect this. The provision of BNG has now been moved forward to January 2024. In line with BNG provision, we would also expect reference to be made to Local Nature Recovery

Strategies. Although we accept that these are in early stages of development, we would expect them to be mentioned and included for the benefit of guiding future development and BNG provision.

As well as establishing buffer zones for rivers, we would like to see buffers around existing wildlife sites within the area e.g., Pincey brook meadows, Pincey Brook complex, and New Hall Reedbeds. We strongly recommend that the SPD includes an intention where possible to connect some of these areas with habitat corridors so that they do not become isolated islands of biodiversity of limited quality/value on their own. For example, there is a newly created pond alongside the M11 by Sheering Hall which takes the surface runoff from the M11 and discharges this into the Pincey Brook. This could be incorporated into a larger protected area for wildlife (whilst retaining access for maintenance). Smaller more focussed ideas/intentions could fall very neatly in line with wider Local Nature Recovery Strategy preparation currently taking place. Please also note the Upper Lee Catchment Partnership priority actions and measures for 2022 to

2027, one of which includes Landscape masterplan development for the lower Stort Valley, including mitigation and enhancement projects in and around this area (Stort & Navigation, Harlow to Lee Waterbody).

River Restoration/Enhancement Potential

The development of sites neighbouring the Pincey Brook and Harlowbury Brook provide excellent opportunities for river restoration and/or enhancement work to be done. This would improve the overall health of the river/s, helping the waterbodies to reach 'Good' Water Framework Directive (ater) status, which neither of the waterbodies currently do. We recommend that this is considered in plans for these sites. Using a 'Working With Natural Processes' and/or a 'Nature Based Solutions' approach to restoring and enhancing these rivers will help make them more resilient to the impacts of climate change. This can help protect local communities from extreme weather events such as flooding. Natural Flood Management (NFM) is another way in which this can be done.

We note the requirement for Sustainable Alternative Natural Greenspace (Part c. xv). Exploring NFM opportunities within this area, including aspects like green SuDS could be hugely beneficial to the wider space. Amongst other benefits, it would provide an excellent opportunity for flood risk mitigation further downstream of the catchment.

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Epping Forest Local Plan explicitly states that environmental enhancements to open sections of river/watercourse and de-culverting should be an objective of any new development (DM17, paragraph B). We would expect to see reference made to this in the SPD to encourage future restoration and enhancement opportunities of rivers within the Upper Lee catchment. Improved rivers will have wider benefits for the whole of Harlow, along with communities downstream, as residents and visitors will be able to enjoy the benefits of an improved water environment for generations to come.

Access & Recreation

We note in this section that a footpath is proposed to the Pincey Brook area (Part c. x), and that blue/green infrastructure should be considered in an 'integrated' way (Part vi). We welcome opportunities to improve access to our rivers, however this needs to be balanced with the provision of buffer zones and ecological sensitivities. Access may need to be limited in more sensitive areas along these reaches. Further ecological survey work should be conducted to inform future decision making to this end. Access and recreation can still be achieved whilst also ensuring suitable space for the river to function naturally and for sensitive areas of high ecological value to be safeguarded.

Flood Risk

We note that potential school locations (classed as 'More Vulnerable' development) in Fig 5.1 are proposed near Harlowbury Brook. Harlowbury Brook and associated flood zones must be included in all green and blue infrastructure plans and considered within future planning applications. This will ensure compliance with flood risk related national and local planning policies. There is a high probability that the reduced permeability/infiltration rates from the development will increase detriment to properties from flood risk on Harlowbury Brook and Pincey Brook. Therefore, in the future, it would be prudent to assess the impact of additional hardstanding near the watercourses, which is likely to increase drainage needs and reduce soil absorption.

We note within Fig 5.6 that Princess Alexandra Hospital appears to be proposed within Flood Zone 3 of the Pincey Brook. This seems to contradict Epping Forest Local Plan Policy SP4 (Garden Communities) referenced within Appendix 1 (point v.) that states "except for essential infrastructure and water compatible development, no built development will be permitted on land within Flood Zone 2 and 3 in the Council's latest Strategic Flood Risk Assessment". Ideally, we wish to see this honoured and for built development to be kept outside of Flood Zones 2 and 3 wherever feasibly possible (in accordance with the sequential approach as outlined in paragraph 162 of the NPPF). We do not hold detailed modelling for Pincey Brook, and so any future proposals will need to provide their own modelling for this watercourse. Please note that hospitals are classed as 'More Vulnerable' development, as outlined in Annex 3 of the NPPF.

We welcome nature-based solutions/working with natural processes when considering flood risk and SuDS development e.g., attenuation ponds, swales, rain gardens etc. There are already flood management schemes being explored downstream of the site in Harlow, therefore we will expect the applicant to explore further ideas of NFM and slow-the-flow schemes onsite. Having these early conversations is vital in preparing for a changing climate and being resilient for future severe weather events.

It is important to note that we class Harlow as a 'Community as Risk' within the wider Hertfordshire and North London Area. It is also a Lee2100 priority area (100 year strategic plan for the River Lee & Tributaries - see the Lee2100 programme, within the Thames River Basin Management Plan). This is a full analysis in the Lower Lee and Upper Lee Management Catchments considering potential capital, environmental and natural schemes. It includes strategic asset management taking into account the impact of climate change and growth, opportunities for reducing carbon, building climate resilience and adaptation in the Lee Valley London. This is important information for future developers, who should take the localised site into account when assessing flood risk. Development may impact, and therefore need to mitigate, flood risk in these areas, which are already at risk due to complex socio-economic factors and a significantly urbanised landscape. Proposals will need to demonstrate that they will not be of detriment to existing and future communities.

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Buffer Zones

We note in Part c. xii that planting is proposed in strategic locations to screen and filter views/enhance key vistas/provide buffers to roads. This needs to be widened to include the provision of a minimum 8 metre buffer zone clear from any built development placed from the top of the bank of main rivers. This allows access to the channel for maintenance and improvement works, along with acting as a natural buffer during periods of heavy rainfall or flooding. They can absorb and store excess water, reducing the impact of floods downstream and preventing soil erosion. These zones function as natural floodplains, which not only protect adjacent areas from flooding but also create valuable wetland habitats that support a wide array of species. This is in line with policy PL11 (clause 3) of the Harlow Local Development Plan and policy DM17 (clause A) of the Epping Forest Local Plan. Buffer zones also have the following additional benefits:

- 1. Habitat Diversity: Buffer zones provide space for diverse habitats that are essential for various plant and animal species and provide numerous additional ecosystem services. These areas offer a range of environmental conditions, from wet to dry, which allows a wide variety of flora and fauna to thrive.
- 2. River Corridor Connectivity: Ensuring that buffer zones are maintained will protect connectivity between the river channel and riparian habitats, which is vital for establishing a healthy river corridor. This corridor serves as a natural wildlife passage, allowing species to move freely between different locations and habitats, accessing essential resources, along with preventing species isolation. This enhances overall biodiversity and ecological resilience within the chalk stream ecosystem. Preserving this connectivity will contribute to the long-term sustainability of chalk streams and safeguard the intricate web of life they support.
- 3. Flood Regulation: Buffer zones act as natural buffers during periods of heavy rainfall or flooding. They can absorb and store excess water, reducing the impact of floods downstream and preventing soil erosion. These zones function as natural floodplains, which not only protect adjacent areas from flooding but also create valuable wetland habitats that support a wide array of species.
- 4. Channel Maintenance: Providing buffer zones allows access to the channel for emergency (in the event of an incident) and regular scheduled maintenance works. This is important for preventing flooding and channel deterioration along with maintaining assets.
- 5. Water Quality: The presence of buffer zones helps improve water quality in rivers. Vegetation in these areas filters out pollutants and excess nutrients, acting as a natural purification system. As water flows through these zones, it undergoes a process of filtration, ensuring that rivers remain pristine and support healthy aquatic life.
- 6. Erosion Control: Marginal vegetation and root systems play a vital role in stabilising the banks of rivers. Buffer zones allow this marginal vegetation to grow. They help prevent erosion and protect the stream from excessive sedimentation, which can be detrimental to aquatic habitats and fish spawning grounds.
- 7. Restoration Potential: Buffer zones bordering rivers allows room for any restoration works in the future through providing adequate access to the channel and the space to enhance the channel or surrounding environment and/or habitats.

Council Response

Further references to Blue infrastructure will be added to the SPD as a result of comments made by other organisations/people.

- 5d.ii Harlowbury Brook will be added alongside Pincey Brook
- Fig 5.1 Harlowbury Brook and its associated flood zones will be added to the map

Ch5: SPD will be amended to state that Harlowbury Brook is a partially culverted/partially open channel through the site, primarily maintained by the EA, and will need to be factored into all potential development and an appropriate buffer zone of at least 8 metres from the top of bank maintained, to ensure that EA are able to fulfil their regular maintenance schedules.

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Ch5: SPD will be amended to state that Pincey Brook is third party maintained and will need to be maintained by the developer/appropriate third party and a management/maintenance plan agreed by the riparian owner to ensure that this happens. The example given will also be included ("e.g. due to the proximity of the new hospital site to the Pincey Brook, the landowner may become the riparian owner of the Pincey Brook for that particular stretch.")

Ref. will be added to:

- Preliminary Ecological Appraisal to accompany future planning applications
- LNRSs
- establishing buffer zones for rivers
- buffers around existing wildlife sites within the area e.g., Pincey brook meadows, Pincey Brook complex, and New Hall Reedbeds;
- an intention where possible to connect some of these areas with habitat corridors so that they do not become isolated islands of biodiversity of limited quality/value on their own
- the Upper Lee Catchment Partnership priority actions and measures for 2022 to 2027, one of which includes Landscape masterplan development for the lower Stort Valley, including mitigation and enhancement projects in and around this area
- opportunities for river restoration and/or enhancement work to be done at the Pincey Brook and Harlowbury Brook to improve their overall health, helping make them more resilient to the impacts of climate change including flooding (using a 'Working With Natural Processes' and/or a 'Nature Based Solutions' or Natural Flood Management (NFM))
- NFM/slow-the-flow opportunities within a possible SANG and in other parts of the site, , e.g. SuDS which would assist with flood risk mitigation further downstream of the catchment
- Epping Forest Local Plan requirement for environmental enhancements to open sections of river/watercourse and de-culverting to be an objective of any new development (DM17, paragraph B).
- that the EA class Harlow as a 'Community as Risk' within the wider Hertfordshire and North London Area this should be considered in flood risk assessments.

As per ECC's rep, SPD will be clarified that this BNG will be a requirement once the legislation is in place.

C.x: Further flood risk assessments are to be carried out at the masterplan and planning application stages. Ref. will be added to the importance for SUDS to mitigate against reduced permeability/ infiltration rates from the development and protect properties from flood risk near Harlowbury Brook and Pincey Brook.

c.xii - will be widened to include the provision of a minimum 8 metre buffer zone clear from any built development placed from the top of the bank of main rivers. This allows access to the channel for maintenance and improvement works, along with acting as a natural buffer during periods of heavy rainfall or flooding. These zones function as natural floodplains. This is in line with policy PL11 (clause 3) of the Harlow Local Development Plan and policy DM17 (clause A) of the Epping Forest Local Plan.

Regarding PAH and the flood zone: It was not the intention to show that built development would be located within the Flood Zone. The diagram was showing a potential PAH site which would be inclusive of natural and amenity spaces located within the Flood Zone. The way that PAH is illustrated on the drawings is to be reviewed to show a less definitive site boundary and remove any illustrative built form. Detailed preapplication discussions have not yet commenced on any built development at this location however flood risk assessment considerations will form a key element of technical work. In addition, the principle of locating medical facilities close to nature is very much supported (this will be clarified in the text) and to respond to this issue the Council will also consider altering the diagram to include the flood zone illustrated north of the hospital as also being part of the 'proposed green network' in the diagram key.

6. Sustainability and Build Quality

Section 6: Sustainability and Build Quality

Infrastructure Capacity

Policy HS3 in the Harlow Local Development Plan states that satisfactory water supply and wastewater network infrastructure must be in place for the Harlow and Gilson Garden Town (HGGT) vision. We feel this needs to be added into Part e (Topics to Consider when Preparing the Masterplan). Policy SP4 in the Epping Forest local plan also states that the HGGT must have 'satisfactory infrastructure including water (and) wastewater' (paragraph

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I.xi.). Future masterplans must therefore demonstrate that such infrastructure will be adequate. Furthermore, they must demonstrate that relevant third parties (e.g., Thames Water for sewage treatment) have the relevant capacity to cope with the increased demands represented by HGGT. We would therefore recommend that the SPD states that a water cycle study be completed. This will highlight any issues with capacity that the HGGT may face. Additionally, a water cycle study would identify opportunities for increasing water efficiency and/or water quality. This could enable the project to satisfy other Epping Forest and Harlow local plan policies (some of which are

detailed below). For more information on water cycle studies, please visit this site: water cycle studies.

Water Efficiency

The HGGT is being built in an area of high-water stress. The National Framework for Water Resources (Environment Agency, 2020) indicates the scale of the water resources challenge we face in the South East, where an additional 1765 megalitres per day is required by 2050 to:

- Supply the growing population.
- Make our supplies more resilient to drought.
- address the impact of climate change.

Improvements to water efficiency represents 22% of total water demand reductions by 2035 planned by Water Resources South East. At least 56% of Affinity Water users are using more than 150 litres per head per day, with 22% using in excess of 300 litres per head per day. These quantities are both in excess of the building regulations standards for new buildings.

Policy PL11 in the Harlow Local Development Plan (page 129) states that water use should be 'no more than 110 litres per person per day'. This is almost 50 litres lower than the current average in Harlow (Harlow Local Development Plan, page 131). The Epping Forest local plan also requires that new homes meet the 110 litres per person per day efficiency standard (Policy DM19, page 111). Policy SP2 in the Epping Forest Local Plan further states that any development proposals must positively respond to sustainable water management (paragraph xiv, page 33). The need and requirement for HGGT buildings to use water efficiently is clear.

We would therefore expect to see explicit strategies for achieving this water use standard, or a more efficient value, in the HGGT masterplan. Strategies could include commitments for all new dwellings to have efficient water fittings and the installation of water butts, or installation of building- and/or neighbourhood-level SuDS schemes which increase the retention and/or recycling of rainwater. We would add that a project on the scale of HGGT represents a great opportunity for each new home to be built with greywater recycling systems, as such systems can be difficult to retrofit at an individual dwelling level. We would expect this to be integrated into Section 7 and potentially other Sections too, as appropriate.

Water Quality

The Water Framework Directive sets a legal obligation to prevent the deterioration of waterbodies, including their biological quality elements and supporting elements. Under regulation 33 of the WFD, both Epping Forest and Harlow local authorities must have regard to the Thames River Basin Management Plan, and must consider the status and objectives of WFD waterbodies.

The HGGT development falls within the Pincey Brook and Stort and Navigation, Harlow to Lee waterbodies, which are currently classified as Moderate Ecological Status or Potential as appropriate. The HGGT masterplan should demonstrate how it will avoid deterioration of biological quality elements and supporting elements, and not prevent the waterbody from meeting its objectives. This would also satisfy Epping Forest Local Plan Policy DM17 (paragraph F, page 108) which states that: "development on or adjacent to a watercourse must not result in the deterioration of the water quality of that watercourse".

We are particularly concerned that the increase of impermeable cover (e.g., paths, roads, driveways, bridges, etc.) will increase surface water runoff. This runoff can transport pollutants into watercourses. A demonstration of this can be seen in the next waterbody downstream from Pincey Brook, the Stort and Navigation, B Stortford to

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Harlow, where urbanisation contributes to a poor phosphate classification. This is also relevant for the Stort and Navigation, Harlow to Lee waterbody. We would expect to see the HGGT masterplan identify/suggest a number of interventions to mitigate surface water runoff, including but not limited to the deployment of SuDS mechanisms such as natural filtration, permeable pathing, etc.

Sustainable Drainage

Epping Forest's Local plan has a specific policy (DM16) which states a preferred SuDS hierarchy of:

- Storage of rainwater for recycled use.
- Dse of infiltration.
- attenuation of rainwater in ponds/open water.
- attenuation of rainwater in tanks/sealed features.

We would therefore expect the HGGT development to adopt this hierarchy. This hierarchy serves both water efficiency (e.g., attenuation and reuse) and water quality (infiltration) objectives. Any SuDS initiatives should refer to guidance in and be in line with the Essex SuDS guide.

Considerations during Construction

Risks of water body deterioration are likely to be increased during construction. For example, without appropriate mitigation, increased earthworks will increase the sediments and pollutants mobilised in surface runoff. We would therefore expect HGGT masterplans to acknowledge that chosen contractors must demonstrate how they will mitigate their environmental impacts during construction.

We would also draw attention to the Upper Lee abstraction licensing strategy, which states that no further licences will be granted for consumptive water abstraction in the HGGT area. If the construction process anticipates the need to abstract water - for instance, for dewatering purposes - we suggest that relevant parties pay particular attention to what abstractions require a licence.

Council Response

SPD will be amended to emphasises satisfactory water supply and wastewater network infrastructure needing to be in place as per the Harlow and Epping LPs.

Water cycle studies or similar were carried out to inform the Harlow and Epping Local Plans.

.....

Ch6 will be amended to include ref. to the need for strategies for water use, e.g. commitments for all new dwellings to have efficient water fittings and the installation of water butts/other greywater recycling systems. It is considered that water quality deterioration, construction considerations and SuDS hierarchy is already covered sufficiently in the Harlow and Epping LPs - the SPD should avoid repetition.

See other comments to this rep regarding uses of SuDS.

7. Sustainable Movement

Section 7: Sustainable Movement

The 'Potential pedestrian/cycle links' and 'Sustainable Transport Corridors' within Fig 7.1 appear to cross over Harlowbury Brook. This is predominantly open channel through the red line boundary, so any road or path proposal that crosses this main river will need to investigate its impacts. For example, modifications may represent a potential deterioration of the WFD waterbody and affiliated channels. River or channel crossings also increase the incidence of surface runoff entering watercourses. Increased runoff and water quality implications should be assessed and mitigated. A Flood Risk Activity Permit will also need to be sought. Any proposed crossings will also need to meet all of our design criteria for bridges/crossings (e.g., sufficient freeboard above design flood level, abutments set back from bank, crossings made permeable and open to allow floodwater through etc.). We are strongly against culverting rivers in any shape or form, so this will need to be avoided.

We also note in Fig 7.1 that a 'Sustainable Transport Corridor' has been proposed running parallel to Harlowbury Brook. This looks to make use of the existing road. Any increase in hard standing should be avoided wherever possible, with permeable surfaces and SuDS incorporated. This is to ensure that additional run off from the

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increase in impermeable surfaces does not overwhelm the nearby main river.

Council Response

Ch7 will be amended to include ref. to the need to ensure that any crossings over waterways on the site would need to consider water quality implications and meet the relevant EA design criteria.

Ch7 will be amended to include ref. to use of SuDS to mitigate against impacts of surface run-off from any new roads or crossings.

8. Sustainable Transport Corridors

Council Response

9. All-Vehicle Access

Council Response

10. Educational Provision

Section 10: Education Provision

We welcome the inclusion of rainwater re-use within future school designs within Part f. iii. Also noted is the inclusion of SuDS (Part f. iv). We welcome the use of SuDS, as they will help to alleviate any increase in run-off from any hard standing used for the construction of schools. Most if not all surfaces should be at least permeable to some extent, with areas such as fields and open green spaces placed closest to any main rivers, and buildings and structures placed furthest away, outside of any flood zones or river corridors. Opportunities for proactive engagement regarding the proposed schools

in terms of flood risk and main rivers should be sought with ourselves to further promote the importance of protecting our natural corridors and being resilient to flooding.

Educational facilities should be built to a water efficiency rating equivalent to BREEAM

'excellent' in categories WAT 01-04. Epping Forest Local Plan Policy DM16 also states expected run-off rates for major developments. The expectation is that such developments will achieve greenfield run-off rates. Educational provision will have to be in line with this policy. The policy also states that wherever SuDS are implemented, a Surface Water Management Plan must also be produced (paragraph D.ii). We would therefore expect to see the production of Surface Water Management Plans.

Council Response

Ch10 will be amended to include the need for further dialogue with the EA in relation to schools and flooding risk.

The Harlow LP does not specify specific run-off rates and the schools are most likely to be provided within the Harlow portion of the site.

Ref. to Surface Water Management Plans in the Harlow and Epping LPs is considered sufficient.

11. Local Centres

Section 11: Local Centres

In Fig 11.2 we note that a local centre is proposed in very close proximity to the Harlowbury Brook. As stated previously, the sequential approach should be used when deciding the location and layout of any built development within the red line

boundary. Buildings (other than water compatible or essential infrastructure) should be situated outside of Flood Zones 2 and 3 wherever possible and should not encroach into the buffer zones of main rivers.

Noting our previous comments regarding the impacts of surface run-off, HGGT masterplans should demonstrate how impacts on Harlowbury Brook from local centres will be mitigated. We would expect to see significant implementation for SuDS and would encourage the use of larger scale multi-beneficial interventions (i.e., settlement ponds and reedbeds), buffer zones that utilise natural filtration, and/or initiatives like permeable

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paving. All of this will be required to prevent poor quality water draining into the Harlowbury Brook, which in turn would impact the Stort and Navigation, Harlow to Lee. This would ensure that the legal requirement to have regard to WFD is honoured.

Council Response

The masterplanning stage will consider the exact locations of buildings, etc. and will take into account issues such as flood risk.

Ch11 will be amended to make ref., for local centres near any watercourses, to larger scale multi-beneficial interventions (i.e., settlement ponds and reedbeds), buffer zones that utilise natural filtration, and/or initiatives like permeable paving. All of this will be required to prevent poor quality water draining into the Harlowbury Brook, which in turn would impact the Stort and Navigation, Harlow to Lee. This would ensure that the legal requirement to have regard to WFD is honoured.

12. Combined Principles

Section 12: Combined Principles

Please include the Harlowbury Brook in Fig 12.1. Development proposed in close proximity to the Harlowbury Brook (including the hospital, as shown within Fig 12.2) must apply the sequential approach and use national and local policy to guide development in accordance with Flood Zones. NFM opportunities should be sought to retain water upstream to slow the flow of water and decrease flood risk to Harlow.

Council Response

Fig. 12.1 will be amended accordingly.

Development will be expected, by default, to comply with local and national policy regarding FZs. See other comments to rep regarding NFMs.

Other Comments	
Council Response	
•	
Are there any attachments?	No

Respondent Name Zoe May

General Comments

We are pleased to submit an evidence base to determine the updated social infrastructure requirements arising from planned growth in the Harlow & Gilston Garden Town Community (East of Harlow) and contribute to delivering sustainable housing communities within this area over the period to 2033 and beyond.

The representations aim to:

- •Beinforce policy recognition for securing developer funded 'Ambulance Service Infrastructure & Facilities' (Ambulance Facilities) in association with planned growth at East of Harlow;
- Indentify budgetary parameters for EEAST's developer funded social infrastructure requirements arising in response to the planned growth within the Harlow & Gilston Garden Town Community (HGGTC) East of Harlow to 2033 & beyond;
- •Define the Ambulance facilities provision & related developer funding required to achieve sustainable housing communities within the HGGTC (East of Harlow);

Provide a basis for the developer funding of Emergency Services (Ambulance Facilities) to inform the next update of the Harlow & Gilston Garden Town Infrastructure Delivery Plan (IDP) published in April 2019, at Annex 3;

EEAST – Social Infrastructure Provider & Emergency Service

EEAST is an essential social infrastructure provider (and emergency service) who confirm that there will be an increased requirement for ambulance facilities necessitated by the planned housing and population growth arising within the HGGTC (East of Harlow) over the 10+ year Supplementary Planning Document (SPD) period to 2023 and beyond.

Information outlining EEAST's key operational facts and service provision is included at Annex 1 (see original rep).

The National Planning Policy Framework requires the planning system to provide for sustainable development through local authority plan making and development management processes, which should aim to achieve healthy, inclusive and safe places.

In promoting healthy lifestyles the planning system should provide the social facilities and services the community needs. It should take into account and support the delivery of local strategies to improve health and social wellbeing for all sections of the community, and ensure an integrated approach to considering the location of housing and community facilities and services.

As an essential social infrastructure provider EEAST has an important role to play in contributing to the achievement of sustainable new places (and along with its health and blue light partners) creating the conditions for healthy, safe and cohesive communities.

Population Increase & Demographic Profile

Population increase, along with deprivation, age and the increasing number of people living for longer with more complex long-term conditions, all impact on the level of ambulance service demand, in respect of both emergency and non-emergency patient transport services.

The age profile is also a key factor, as people at both ends of the age spectrum consume a disproportionately large quantity of healthcare services and resource. Those aged over 75 years are most likely to have multiple long-term conditions and complex care needs.

Analysis of EEAST activity from 2019/20 indicates residents aged 65 years and over account for over 1/3 (35%) of Category 1 ambulance activity and 52% of all activity. Those aged 2-18 years account for 15% of Category 1 activity and 8% of all activity.

EEAST's operational standards/ thresholds and response times are included for information at Annex 2 (see original rep).

Respondent Name Zoe May

EEAST therefore requires developer funding to mitigate the impacts arising on its service capacity - from the population increase associated with planned housing growth in the HGGTC (East of Harlow).

Planned Housing & Population Growth - Ambulance Facilities Funding Requirement & Budget In light of the housing growth provided for in the HGGTC (East of Harlow) area within the Harlow Local Development Plan (2020) and Epping Forest DC Local Plan (2023), budgetary parameters are provided to identify the likely cost of developer funded ambulance service infrastructure & facilities provision.

Developer funding would be required to mitigate the impact of planned growth on EEAST's operational capacity, efficiency and resources (i.e. estate, vehicle fleet & staff assets) over the period 2033 and beyond.

The planned housing growth would impact on EEAST's operations within the local area, which are operating at capacity.

Development at the East of Harlow strategic housing growth location, would therefore lead to an increased draw on ambulance service capacity and resources across the area.

Based on EEAST's activity rates and experience from other local authority areas within the East of England, a developer funded 'standard charge' of £340 per dwelling is considered necessary to fund the increased operational capacity EEAST is likely to require through additional ambulance service provision.

EEAST acknowledges that the planned housing sites within the HGGTC (East of Harlow) area may be the subject of viability testing, and would be content to be flexible in its approach to the level of funding to be secured for ambulance service infrastructure & facilities, on a site-by-site basis as necessary.

Each future planning application would therefore be assessed on its merits to determine the likely funding required, which if applicable, would be secured via agreement with the developer(s) through a planning obligation and/ or via any future Community Infrastructure Levy (CIL) charging process, as appropriate.

The range of infrastructure and facilities (comprising estate, vehicle fleet & staff assets) required to mitigate and manage the impacts arising from the Local Plan growth strategies for the East of Harlow area, deliver inclusive, safe, healthy and sustainable new communities, and enable EEAST to maintain nationally mandated contractual response times and treatment outcomes, is defined and outlined below:

- Dpgrading/refurbishment of existing premises, or redevelopment/relocation of existing ambulance stations to a more suitable location to meet the increased local demand arising from housing developments;
- Provision of additional medical, pharmacy & IT equipment/digital software to manage the increased number of incidents arising from the new population;
- An increase in the number & type of ambulances;
- The recruitment, training, equipping & tasking of Community First Responders (CFR)b ased within the locality of development sites.

The requirement for on/ off site infrastructure and related facilities provision and working in partnership with infrastructure providers, is recognised by Policies HGT1, HS3 and IN6 of the Harlow Local Development Plan, and Policies SP1, SP3, SP4 and D1 of the Epping Forest Local Plan.

The need for 'Ambulance Service Infrastructure & Facilities' can also inform the next update of the Harlow & Gilston Garden Town Infrastructure Delivery Plan. Guideline text for the IDP is included within Annex 3 for this purpose. (see original rep)

In light of the HGGTC (East of Harlow) housing growth figures, the following housing, population growth and ambulance facilities budget estimates arise;

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EoH Document Comments

Respondent Name Zoe May

Organisation East of England Ambulance Service NHS Trust

Table 1 – Forecast Housing & Population Growth in the Harlow & Gilston Garden Town (East of Harlow) Area & EEAST Budgetary Parameters for Developer Funding

Planned Housing Growth within the HGGTC (East of Harlow) - Harlow & Epping Forest Administrative Areas = 3,350 Average Household Size - ONS2011CensusPopulation Growth Level) *1 = 2.4 (8,040)

Ambulance\(\text{gerviceInfrastructure} \) \(\text{Pacilities Budget (£) *2 = 1,139,000} \)

Notes

- *1 No of dwellings x average household sizes (2.4) within Epping Forest & Harlow Districts
- *2 Developer funded mitigation budget arising from 3,350 dwellings/ 8,040 population growth

Adopting this approach along with an average household size within the Epping Forest and Harlow District Areas of 2.4 (ONS 2011 Census) EEAST requires developer funding for additional ambulance facilities - to mitigate and manage the increased operational activity arising from the future housing growth comprising 3,350 homes (8,040 population).

Development at each housing growth location within the HGGT (East of Harlow) area would lead to an increased draw on ambulance service capacity and resources across the local area.

It is therefore requested that EEAST's requirement for developer funded ambulance facilities is reflected in the East of Harlow Masterplan SPD and in a future update of the HGGT IDP.

Infrastructure Delivery Plan Recognition

This information provides the basis for a Schedule of Ambulance Facilities (and a related budget) for inclusion in an update to the Harlow & Gilston Garden Town Infrastructure Delivery Plan (IDP) which future site-specific viability work can have regard to.

We trust this submission is of assistance in reinforcing the policy basis and determining the scope and level of social infrastructure provision (incorporating ambulance facilities as a component emergency service) required to support planned growth in the HGGT Community (East of Harlow) – to be reflected in the Masterplanning Guidance SPD, and look forward to liaising with you further in due course.

Council Response

SPD will be amended regarding impact of planned growth on the emergency services.				
L. Introduction				
Council Response				
2. Context				
Council Response				
3. Stewardship				
Council Response				
I. East of Harlow Character Considerations				
Council Response				

5. Landscape and Green Infrastructure

Council Response

East of England Ambulance Service NHS Trust

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EoH Document Comments

Respondent Name Hannah Young

Organisation Iceni o.b.o. Woolbro Morris Ltd

General Comments

We are writing on behalf of our client, Woolbro Morris Ltd ('Woolbro'), in relation to the consultation on the East of Harlow Masterplan. Woolbro has control of land within the allocation, in the northern corner close to Shearing, situated within Epping Forest District Council's (EFDC) administrative boundary.

This representation follows a helpful meeting with officers across EPDC, Harlow Council, Essex County Council and the Harlow and Gilston Garden Town which took place on Friday 13 October. Woolbro sought the meeting to understand the approach being taken by the Partnership Councils in the preparation of this document and wider delivery of the allocation; as far as we are aware, no approach had been made to engage with all landowners in the preparation of the Masterplan document.

At the meeting, it was established that the Masterplan is a preliminary document that has been prepared to aid a holistic development solution that can address the multiple land ownerships and deliver a cohesive development. Woolbro supports the Partnerships Councils' aspirations for a high quality strategic scale development in this location and is keen to play a leading role in engaging with landowners over the coming months to build a consensus and hopefully work with the Council to better understand the development potential and constraints.

a. Our Understanding of the East of Harlow Masterplan Document

It is understood that this document has been prepared by participating Councils to advance the delivery of East of Harlow and the wider Harlow and Gilston Garden Towns. At this time, there is no current master developer promoting this allocation. It is hoped that this document will aid the identification of a lead developer/s to promote and deliver this new community. Woolbro supports this overall objective.

Officers confirmed at the meeting on 13 October that the purpose of this document is to establish a range of overarching principles to inform subsequent, more detailed masterplanning of the allocation. This consultation document is intended to be adopted as a Supplementary Planning Document by all partner authorities, which once adopted, will be a material consideration in the determination of applications within the allocation boundary. On this basis, it is essential the document does not go beyond the scope of the evidence which supports it. On this note, officers confirmed that no detailed technical evidence has been prepared to underpin this Masterplan Guidance. It is anticipated that this will be done at more detailed design stage by the lead developer.

Following this consultation, officers have confirmed that it will seek to engage more with the landowners to draw up a delivery strategy for this allocation. Woolbro is very keen to engage moving forward. It would welcome playing a lead role in the formulation, design and delivery of the allocation, working collaboratively with the other landowners.

As Woolbro confirmed at the meeting, it is extremely keen to enter into discussions with the other landowners within the allocation to seek to unlock development in this location. We would be very grateful if you could please faciliate the appropriate discussions, and keep Woolbro included on any landowner circulation list.

We would also like to actively engage on subsequent masterplan discussions in relation to the growth area.

We trust the above is clear, but if you have any questions, please do not hesitate to contact either myself or my colleague James Waterhouse.

Council Response

Background noted.

1. Introduction

We consider, within the introductory chapter, some text is inserted which makes clear that these principles

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Respondent Name Hannah Young

Organisation Iceni o.b.o. Woolbro Morris Ltd

are a firm directional steer for development, but these will be applied flexibly where required subject to the necessary evidence being bought forward. A number of the key diagrams are market "potential" which we support, but some text to draw this out for absolute clarify would be beneficial.

Council Response

It is considered that the existing text in the introductory chapter accurately reflects the aims of the SPD.

2. Context

Council Response

3. Stewardship

Council Response

4. East of Harlow Character Considerations

Council Response

5. Landscape and Green Infrastructure

In the consultation document, the land to the north of the proposed new Princess Alexandra Hospital is shown as BNG/SANG land. This includes the land under Woolbro's control. The partnership Councils have confirmed that this land has been categorised for this use in the absence of any technically informed ecological strategy and there is uncertainty at this time as to whether an on-site SANG is needed. The Masterplan is identifying green infrastructure without understanding its importance/necessity or the identified land's availability, potential or deliverability.

Officers have since acknowledged the potential risks with this approach and are suggesting an amendment of the land identification to "Green Buffer".

We understand that the approach being taken in respect of the land stems from the Policy requirement in the Epping Forest Local Plan (Policy SP4) which requires any detailed masterplan for East of Harlow to consider a build line which prevents coalescence with Sheering.

Whilst we appreciate the acknowledgment of officers that the original description was not effective, it remains our view that this description is unnecessary and unsound. This guidance has not been informed by a technical evidence base and it is extremely important that the document does not provide, or be considered to provide, a fixed blueprint. It should allow for flexibility for a masterplan to come forward which responds appropriately to the evidence base on which it is formed; and be able to respond appropriately to market conditions. It is critical that the role of this document is understood.

The policy requirement for a built line to be determined so to not coalesce with Sheering does not automatically translate into a Green Buffer- the landscaping strategy for an allocation of this site is complex and needs to be proper, full and evidenced consideration.

In our view, the land should just be left unmarked on the site, with simply perhaps some text stating "ensure separation from Sheering" on the Plan. Anything further than this results in the document setting principles that are too prescriptive and go beyond the policy principle set out in the statutory development plan but with little or no evidence to support this approach at the current time. This could prohibit comprehensive masterplanning in the future and not result in the most effective or sustainable solution being delivered.

It also ignores the existing land uses within the northern part of the allocation. For example, there is an existing employment premises in this area currently occupied by Oak Leaf Oil Limited. This is a built-up employment site,

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Respondent Name Hannah Young

Organisation Iceni o.b.o. Woolbro Morris Ltd

the land is previously developed, it does not function as a green buffer and in line with the Epping Forest Local Plan, retention and expansion of this employment site would be supported in line with Policy E1. A scheme could come forward which does not prejudice the policy objectives for East of Harlow, and it is essential for proper plan making that uninformed masterplan principles are not identified unnecessarily.

It is important this SPD is prepared and adopted in a manner that aids delivery of the allocation, providing effective policy guidance which can be applied in a flexible manner to faciliate future more detailed masterplanning, and planning applications to come forward in the future. Accordingly, we would consider the approach set out above is more effective.

Council Response

Are there any attachments?

No

It is considered that the identification of a green buffer in the land in the north of the site, as opposed to a BNG/SANG which is currently indicated, provides sufficient flexibility for the exact nature of the land and allows the possible use of the land for other compatible uses, while adhering with the requirements of the Epping Local Plan.
6. Sustainability and Build Quality
Council Response
7. Sustainable Movement
Council Response
8. Sustainable Transport Corridors
Council Response
9. All-Vehicle Access
Council Response
10. Educational Provision
Council Response
11. Local Centres
Council Response
12. Combined Principles
Council Response
Other Comments
Council Response

Organisation

General Comments

4) Nos 5,19,20,21,23-24-25-26,36,40,44,46,48,50,55,57,58,68,69,70,(= 21maps of the same area) Printers error.

Some of our congregation have found it very difficult to distinguish the colour scheme that has been chosen to represent the individual items on the map. Thus making it very difficult, for some, to identify with the context colouring...

Style of Housing as well as height should be considered.

There is a lot of crime on Newhall (as evident on the neighbourhood app) In My opinion block design is being suggested to fit as many houses into the given space as possible, not for the well being of the people who will reside there. People do not want to live in cramped areas overlooked by their neighbours- and it is not in keeping with the current area. The high density building in New Hall also means that the buildings are tall near the community hubs and this is not in keeping with the existing village.

Gilden Park is a much better layout than Newhall for comparison for the East Harlow building and has a enhanced community feel where people do walk to places around the estate including Harlow Old Town There are numerous parks, where families congregate, Children play in the parks watched over by their parents from their houses and on talking to people who have moved into Gilden Park they find it a very good community to be a part of. Car parking is generally within central parking areas within blocks of housing, assessed through an arch or road rather than along the main roads around the estate. Traffic and park cars are seen, but the design of the place has meant that this has been kept to a minimum. This is very much in contrast to Newhall, the block design on New Hall means that there are a lot of problems with parking there as well as parking on the streets, making it less safe for people crossing the road.

Sir Frederick Gibbard designed Harlow so that housing developments could not be seen because they were built mainly in the lower areas of the countryside, so when approaching Harlow the Town could generally not be seen. Housing is now be proposed on the high points which makes it far more visible and intrusive.

Five traveller pitches.

There is no reference to where these pitches might be. Harlow has had a lot of issues with travellers in the past, so this needs to be very carefully considered

Gibbard

The original Master plan was prepared by Gibbard in 1947 Very shortly thereafter he rose to the rank of Consultant Architect Planner. The Master plan provided clear frameworks for the towns future and outlined plans. Original Numbers 60,000 up to 80,000 persons

Council Response

The maps in the final SPD will be amended to maximise clarity. The masterplan will provide more detailed maps. Style of housing as well as height will be considered in the context of the existing area.

Housing density will be considered at the masterplan stage as will Secure By Design principles to ensure overlooking of spaces/homes etc. Densities will vary across the site, taking into account existing nearby facilities, communities and the landscape.

New housing will be guided by the HGGT Design Guide, the Harlow Design Guide and Addendum, and other guidance, to ensure new development is safe, appropriately overlooked but with good privacy for residents, and is in-keeping with existing surrounding communities.

The 'cue taken from Newhall' does not mean that all aspects of Newhall will be replicated.

The exact location for any traveller pitches will be determined at the masterplan stage.

The SPD requires the masterplan to sensitively consider existing communities. In particular it states that the effects on existing settlements, such as the historic settlement of Churchgate Street, must be considered and any adverse impacts mitigated against, particularly regarding density and building heights.

While Sir Frederick Gibberd originally designed the New Town to be built within the landscape, he recognised

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EoH Document Comments

Respondent Name Paul Richardson

Organisation

that the town would continue to grow in the future (see the plaque to his work in the Water Gardens with associated quote) but note that the heights and landscape must be factored into a masterplan.

The East of Harlow site was allocated for housing and associated ancillary uses in the Harlow and Epping Local Plans, which went through rigorous rounds of consultation, public examination and inspection by government. The south-east of the UK has some of the highest house prices in the country due to high demand and lack of supply. Issues such as people living longer than previous generations, higher rates of divorce in older people (resulting in a divorced couple requiring two homes instead of one), and birth rates historically being higher than death rates, has increased demand. The need for housing - including much needed affordable housing - is detailed further in the evidence base supporting the Harlow and Epping Local Plans.

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Council Response

2. Context

Council Response

- 3. Stewardship
- 1) Who will be elected to the proposed committee (TCPA) as pointed out on page 12 No 3.1& 3.2
- 2) I consider this to be important due to comments made on page 12

New facilities will not be sustainable without well organised management structures, supported by consistent revenue streams. Community assets must be actively managed and properly looked after in perpetuity. Putting local people at the heart of the process can help to generate increased local support, eg Community Land Trusts.

Council Response

More information about stewardship can be found in the draft HGGT Stewardship Charter which was consulted on recently. It will be considered in further detail at the masterplanning and planning application stages.

4. East of Harlow Character Considerations

In one sentence Moor Hall Rd and Hobbs Cross Rd are referred to as Main Roads and in another they are existing country lanes. They are not main roads they are winding country roads that give access to Churchgate Street.

Newhall is totally out of keeping with Churchgate Street, which is why a buffer zone is needed between them. But this density of housing is also out of keeping with the existing village. The density of housing on Gilden Park is more suitable as a comparison, but not the style of the flats/ apartments on the edge of the roundabout with Gilden Way

Council Response

Status of Hobbs Cross and Moor Hall Roads will be clarified in final version of SPD.

Housing density will be considered at the masterplan stage. Densities will vary across the site, taking into account existing nearby facilities, communities and the landscape. A buffer between Newhall and this development is a possibility and this will be referenced in the SPD.

5. Landscape and Green Infrastructure

Existing site photos 1-8 P22

- 1) Who will take ownership of roads etc when works are complete, Council, Farmers???
- 2) Seven of the eight photos are within boundary lines yet No8 is not,(please explain)
- 3}Photos No's 1-8 should be spring or summer photos, thus showing full growth, this will allow viewer to understand what's going to be lost.

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Respondent Name Paul Richardson

Organisation

On 10/10/23 at St Marys Church, a meeting was held to discuss the forthcoming building works (East of Harlow, HGGT). At this meeting I brought up the subject of Medi-evil soakaways. Knowing full well that if this is not taken seriously that flooding is sure to take place; especially in Churchgate Street as it did so in May of 2023. The answer that I received from the committee that sat at the front of the Church was that of a garbled response with an attitude that told me to wait for the next bus to Harlow central and get on it. It wasn't until a councillor took up the mantle that the committee took the question seriously, and gave a reply that was somewhat better than the first reply.

I am pleased that mature trees and hedgerows should be retained. It would be good if these could be enhanced and used as a screen to cut down on any additional noise, and to visually screen the new building. Could this be achieved? In advance of the building to allow them to develop before significant building begins.

Green Wedges were an important part of Harlow when it was first developed.

The land to the North of Harlow east is being designated as a buffer between this development and Sheering; How about a buffer between Churchgate street and Harlow East?

There also needs to be a buffer established between Newhall and Churchgate Street.

I note that on page 69, that the field opp what was Hubbard hall and is now the Amazing Place, which separates New Hall from Churchgate Street which was originally designated for housing, but the planning for that has now time lapsed.

With all this development now encroaching on the countryside around Old Harlow, could that now be designated a green finger to link the green wedge running East /West THROUGH Harlow East development.

Also there needs to be a green finger separating a new development from Churchgate Street School playing fields, which will be fenced off and therefore not accessible to locals, so while this may create a green buffer zone it will not be somewhere where locals can exercise of walk their dogs. Green fingers and wedges are also needed for existing residence, not only the huge number of people who will move into the area.

Churchgate Street has recently experienced significant flooding; opposite the junction of the private road leading from the Amazing place formally Hubbard Hall, with Hobs Cross road. All of this additional building and concreting over the fields will increase the likely hood of a reoccurrence of the folding problem.

I could not see where Zone 2/3 were on the maps provided. Will anything be put in place to ensure that the new building will not increase the risk of flooding to existing residence and what will be put in place to help prevent this happening?

If ponds or lakes are developed to allow for flood relief, could they be areas that the locals can enjoy with seats etc. The pond flood defences for Gilden park have all been fenced of so that locals cannot sit to enjoy the areas, where has New Hall has a lovely pond area but with no seats.

Who has covered the loss of medi-evil-soakaways

Soak ways can be an ideal drainage solution to deal with rainfall that doesn't naturally drain from your property. It is no more than a pit in the ground into which flows rainwater drainage. Less often, soak ways are also used to dispose of effluent from septic tanks, sometimes known as "leaching fields".

Placed at the ends or sides of fields etc, it has taken many years to establish rainwater runs that work, Photo can be seen p22 No4. If the rainwater is not directed from the property in a safe manor areas are likely to flood.

Council Response

More information about stewardship can be found in the draft HGGT Stewardship Charter which was consulted on recently. It will be considered in further detail at the masterplanning and planning application stages.

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EoH Document Comments

Respondent Name Paul Richardson

Organisation

Photo 8 is included to add additional context.

The photos are designed to provide an indication of the area.

SuDS, including new ponds and swales, are likely to help with any future flooding. Churchgate Street area flooding in 2023 was as a result of a very intense and short period of rain that impacted on the local brook within a known flood zone area (as per EA maps). This is with EA to decide whether further work/what work is required.

Landscaping and planting to assist with visual and noise screening will likely be planted early on to allow them to be more mature when the houses are occupied. However, this detail will be laid out in the masterplan or accompanying landscape scheme with the planning application.

The exact location of green space around existing areas and in new areas will be established in the masterplan, but the SPD ensures that existing places will be suitably protected. The SPD requires the masterplan to be landscape-led, ensuring that open spaces and Green infrastructure are provided, while respecting and preserving the original landscape as much as possible. This also includes a mandatory net increase in biodiversity and the delivery of a new Green Wedge through the development for new and existing residents to enjoy.. It is possible that a buffer between Newhall and the development may be provided in the land referenced.

Details of landscaping around the schools - the exact locations of which are yet to be determined - will be established at the masterplanning and planning application stages. It is also possible that school playing fields may be accessible to the public outside school hours - this is mentioned in the SPD.

There is a new Green Wedge running east-west throughout the site which connects to the rest of Harlow's Green Wedge network.

Details regarding ponds or lakes will be set out in the masterplan including details on how green and blue infrastructure should be enjoyed by residents as well as acting as natural habitats.

6. Sustainability and Build Quality

Council Response

7. Sustainable Movement

The village has a high proportion of retired people, and the two schools mean that a lot of children how make their way through the area. I realise that the objective is to walk /cycle/or use public transport. However, realistically people are going to take their children to school on their way to work and will jump into their car, thus vastly adding to the total amount of cars using the area. Also, who will be running the transport? Will it be a reliable and regular time table that people will be able to rely on if not (if it is anything like the bus service around Harlow, the busses will be reduced due to non profitability, then it will be cut permanently.

For people to use public transport instead of cars, there needs to be a comprehensive bus service to all areas of the town this is NOT PRESENT IN HARLOW at the moment.

As cyclist who have a car, but use the bikes as our go to mode of transport, I like the idea of the development of additional cycle routes linking key areas of the town.

Council Response

The HGGT Transport Strategy, STC and associated modal shift/change are key strands of the HGGT vision to address potential increased vehicular movements arising from new development. The STC will provide fast, direct, safe walking, cycling and bus routes for residents across the town. For the eastern part of the STC it will provide sustainable travel opportunities for residents at East of Harlow, Newhall odal change is about allowing short car journeys to be completed using sustainable transport instead, thereby reducing the number of cars on the road overall. The allocation of the site has been informed by transport assessment evidence as part of the Local Planand further detailed transport assessments will be carried out by the developer. The HGGT IDP identifies what schemes and proposals are required from the development including those related to improving the highway network to accommodate growth.

8. Sustainable Transport Corridors

Respondent Name Paul Richardson

Organisation

lorrys

Council Response

The STC route as a whole is for the purpose of carrying buses, walking and cycling, however sections of the route may and are likely to be shared with other internal movements within the development.

9. All-Vehicle Access

P4There are three proposed access routes to the site, one from the new junction 7a roundabout, one from Mayfield Farm and one from Gildon way, cutting through the Newhall site.

The proposed vehicular access routes will need to cut across Hobs Cross Road and Moor Hall Road. This will increase the amount of traffic into Churchgate Street significantly. Presently, it has a village feel, with a tight fit community. The roads already become very congested especially at school drop off and school pick up time.

Access roads should be built before house building commences, so that heavy lorries do not use Hobbs Cross Road or Churchgate Street or Moor Hall Road.

Will there be a no right turn and bollards along Gilden way like the junction to and from Mulberry Green?

Quite a few motorists ignored the "no right turn" in and out of Mulberry Green- Permanent bollards had to be installed to prevent this; a bridge over the road will be the only way to prevent this from happening again on such a narrow road.

The primary street crossing Hubbard's Hall Drive (Private road/ track/ public footpath, as a priority route: There should be no vehicle access to the private road/ track/ public footpath from this new access road. It is totally unsafe leading onto Churchgate Street and Hobbs Cross Road. It also runs adjacent to the playing fields of the two existing schools, so would add to the pollution for the children in their playgrounds. Equal consideration should be given to those already living in the area

Hubbard Hall Drive Junction should be controlled as no turning towards Churchgate Street with supporting junction design and traffic calming measures on Hubbards Hall Drive near Junction: The junction of this private road with Churchgate Street is on a very dangerous bend, there should be no turning in or out of therewith Churchgate School and St Nicholas School to the right of the junction as you come out of it. Also additional residences are to be developed at the old Churchgate Manor Hotel, which will increase the traffic entering the road at this point.

There is parking all along the road for when children enter and are picked up from school. Children cross the road to go into Elmbridge and Windmill Fields, this road cannot take additional traffic from new development. At School start and finishing times it is totally congested and is already an accident waiting to happen. Hobbs Cross road leading out of Harlow is a bendy road and not suitable as a rat -run to the Junction 7 roundabout and this would be likely to increase.

With the proposed primary School being built next to the Amazing place there is a high possibility that the private road would gain additional road use from parents with children in the new school, adding to the existing chaos on Churchgate street/Hobbs Cross Road It would also be an additional route for people living in Newhall to get to junction 7 on the MII

Council Response

It is unlikely that a bridge will able to be provided due to the significant cost and engineering of such a project. Regarding restrictions, Essex County Council will be able to implement a number of solutions such as cameras and physical barriers to enforce restrictions such as no-right turns.

Any routes from the new development into Churchgate Street would be for walking and cycling only, enabling access to facilities, services and green spaces in the East of Harlow Garden Community to the benefit of existing residents in this area, enabling access to facilities, services and green spaces in the East of Harlow Garden

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Respondent Name Paul Richardson

Organisation

Community to the benefit of existing residents in this area, enabling access to facilities, services and green spaces in the East of Harlow Garden Community to the benefit of existing residents in this area. The SPD will be amended to clarify this.

10. Educational Provision

School Questions

Are Pupil Numbers increasing- Decreasing- static. This will indicate level of pupil Numbers plus car ratios.

Churchgate Street Primary school council run

St Nicholas Private secondary school

New School Primary No Name

School grounds (including the schools themselves) appear and disappear at the whim of the architect (School locations Options 1- 2 - 3- 4.

Are Heads in agreement with the shearing of resources and facilities including school grounds? Agreement in place Agreement not in place

Drawings show land being moved to please architect. Are the school governors at St Nicks fully aware of the proposed school refurbishment and proposed land grab about to take place in there grounds.

HGGT School Locations Option 1, 2, 3, 4.

•The main road which is now outside the Churchgate Street School plus St Nicks is twice daily congested with inconsiderate parkers and will only take one small accident which will cause a major hold up to any emergency vehicle trying to get through to any of the School areas.

It may be considered that the roads here are major roads but be warned; these roads are treated and are considered country roads not trunk roads.

Why should they be near to existing neighbourhoods? A green finger needs to give opportunities for existing residence to continue to have access to green areas and a buffer to this high density housing that is proposed.

Council Response

The exact locations of the schools have yet to be established and are indicative in the SPD. Essex County Council will be providing further evidence and justification for the best location. The SPD will therefore be amended to remove the school options and state that locations are to be decided.

The exact location of green space around existing areas and in new areas will be established in the masterplan, but the SPD ensures that existing places will be suitably protected. The SPD requires the masterplan to be landscape-led, ensuring that open spaces and Green infrastructure are provided, while respecting and preserving the original landscape as much as possible. This also includes a mandatory net increase in biodiversity and the delivery of a new Green Wedge through the development for new and existing residents to enjoy.. It is possible that a buffer between Newhall and the development may be provided in the land referenced.

Details of landscaping around the schools - the exact locations of which are yet to be determined - will be established at the masterplanning and planning application stages. It is also possible that school playing fields may be accessible to the public outside school hours - this is mentioned in the SPD.

There is a new Green Wedge running east-west throughout the site which connects to the rest of Harlow's Green Wedge network.

11. Local Centres

For an area of this size, the neighbourhood areas will need to involve Doctors Dentists supermarket and community halls, cafe as a minimum whilst school facilities can be used for community use. Community groups need areas where they can meet for self help groups, keep fit toddler groups faith groups. At the moment Doctors and Dentists etc cannot cope with their existing patient load. Parks and playgrounds will also be needed apart from school playing areas and facilities.

The centres appear to be very close to the existing village of Churchgate Street. This will mean that the higher

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Respondent Name Paul Richardson

Organisation

density levels of housing will encroach hugely on the village. This usually means blocks of flats that have flat roofs and will not be in keeping with the area. Please can consideration be Given to the area where these houses will be built, so that the needs of existing residents are also thought through.

There is no mention of preschool provision; Doctors Dentists, Play areas, community rooms for the use of faith activities, keep fit toddler and support groups.

Council Response

The site will be supported by the right infrastructure in the right location including health, education, sustainable transport, access and highway improvements and all utility provision having considered any pressures in the local area. This is set out in the HGGT Infrastructure Delivery Plan. Infrastructure will have to be provided in a phased approach based on the construction/occupation of dwellings. However, it is not appropriate for the SPD to provide detail on phasing of housing and phasing of infrastructure provision - this will come at the masterplan stage in detailed discussion with infrastructure providers.

The SPD requires the masterplan to sensitively consider existing communities, including for issues such as building heights. In particular it states that the effects on existing settlements, such as the historic settlement of Churchgate Street, must be considered and any adverse impacts mitigated against, particularly regarding density and building heights.

The SPD will be amended to include reference to preschool provision; doctors; dentist; play areas; community rooms for use for faith activities; keep fit; toddler groups; support groups etc.

12. Combined Principles			
Council Response			
Other Comments			
Council Response			
•			
Are there any attachments?	No		

Appendix 6: Submitted Survey Responses and Council Responses

Do you think the preferred route for the Sustainable Transport Corridor will encourage residents to use it? I don't know

Council Response

Do you agree with the guidance principles for delivering schools on the site?

Page 2 of 194 Re	p ID 1		EoH Masterplanning Guidance SPD Survey
Respondent Name Andrew	พ Bray	Organisation	
Council Response			
What services and facilities Community facilities, Education		provide?	
Council Response			
Comments for What service	ces and facilities should	d a local centre provide	??
Council Response			
Other Comments			
Council Response			
•			
Are there any attachments?	No		
	_		

Do you agree with the key routes and green spaces that the masterplan guidance proposes connections to? 1 **Council Response** What would encourage future residents to cycle more at East of Harlow? home/work/stations/on-street **Council Response** The masterplan guidance shows potential key sustainable links to the site do you agree with these? Yes, but there are others to consider **Council Response** Yes **Council Response** Do you think the preferred route for the Sustainable Transport Corridor will encourage residents to use it? Yes **Council Response** Do you agree with the guidance principles for delivering schools on the site? 1

Page 4 of 194	Rep ID 2	EoH Masterplanning Guidance SPD Survey
Respondent Name Jam	nes Fitten	Organisation
Council Response		
	lities should a local centre afes and restaurants, Educ	e provide? Cation provision, Shared green space
Comments for What se	ervices and facilities should	d a local centre provide?
Council Response		
Other Comments		
Council Response		
•		
Are there any attachment	ts? No	

EoH Masterplanning Guidance SPD Survey

Page 5 of 194

Page 6 of 194 Respondent Name	Rep ID Sander Kave		Organisation	EoH Masterplanning Guidance SPD Survey
•			al centre provide? tail, Community facilities	
Council Response				
Comments for Wh	at services ar	nd faciliti	es should a local centre provid	de?
Council Response				
Other Comments				
Council Response				
•				
Are there any attach	ments?	No		

EoH Masterplanning Guidance SPD Survey

Page 7 of 194

Page 8 of 194	Rep ID 4	Ec	oH Masterplanning Guidance SPD Survey
Respondent Name	Alice Burton	Organisation	
	acilities should a local centre taurants, Community facilitie	•	EV charging points, A transport hub
	t services and facilities shoul	d a local centre provide?	
Council Response			
Other Comments			
Council Response			
•			
Are there any attachm	ents? No		

Page 10 of 194	Rep ID 5		EoH Masterplanning Guidance SPD Survey
Respondent Name Jo	oel Charles	Organisation	
What services and fa Community facilities	icilities should a loca	al centre provide?	
Council Response			
Comments for What	services and facilities	es should a local centre prov	vide?
I oppose the East of I	Harlow housing plan	and believe it should be aba	andoned.
Plans, which went the The south-east of the supply. Issues such a (resulting in a divorce than death rates, has detailed further in the	rough rigorous rounge UK has some of the speople living longe ed couple requiring sincreased demands evidence base supen Community will he	ids of consultation, public execution of consultation, public executions and the consultation of the consu	cillary uses in the Harlow and Epping Local xamination and inspection by government. e country due to high demand and lack of s, higher rates of divorce in older people and birth rates historically being higher uding much needed affordable housing - is ping Local Plans. The Harlow portion of the es for Harlow residents as well as a range of
Other Comments			
Council Response			
•			
Are there any attachme			

Do you agree with the guidance principles for delivering schools on the site?

No

Council Response

Page 12 of 194	Rep ID	6		EoH Masterplanning Guidance SPD Survey
Respondent Name	Lorraine D	oull	Organisation	
Council Response				
What services and	facilities sl	nould a loc	al centre provide?	
Community facilities	es, Other, E	ducation p	rovision, Shared green spa	ice
Council Response				
Comments for Wh	at services	and faciliti	es should a local centre p	rovide?
For the love of Goo	d don't mak	e it like Ne	whall	
Council Response				
The design of the camended to clarify	=	nt will be s	ensitive to existing develo	pments and not just Newhall - SPD will be
Other Comments				
Council Response				
•				
Are there any attach	ments?	No		

Council Response

Do you think the preferred route for the Sustainable Transport Corridor will encourage residents to use it? No

Council Response

Do you agree with the guidance principles for delivering schools on the site?

Page 14 of 194	Rep ID 7	EoH Masterplanning Guidance SPD Survey
Respondent Name	Tom Stevens	Organisation
Council Response		
What comices and	facilities should a local con-	tro municipal
What services and facilities should a local centre provide?		
Community facilities, Retail, Cafes and restaurants, Small scale workspace, Shared green space, EV charging points, Education provision		
Council Response		
Comments for What services and facilities should a local centre provide?		
Council Response		
Other Comments		
Council Response		
•		
Are there any attach	ments? No	

Respondent Name Lesley Davison	Organisation
Council Response	
What services and facilities should a local centre Other, Community facilities, Retail, Cafes and rest green space, EV charging points Council Response	provide? caurants, Education provision, Small scale workspace, Shared
Comments for What services and facilities should Council Response	d a local centre provide?
Other Comments	
Council Response	
•	
Are there any attachments? No	

Page 16 of 194 Rep ID 8

Page 17 of 194

Page 18 of 194	Rep ID 9		EoH Masterplanning Guidance SPD Survey
Respondent Name	Paula Robinson	Organisation	
	facilities should a local or es, Cafes and restaurants	•	sport hub, Shared green space
Council Response			
Comments for Wha	at services and facilities	should a local centre provide	e?
Council Response			
Other Comments			
Council Response			
•			
Are there any attachr	ments? No		

4

I don't know

Council Response

Respondent Name Mike Osborne	Organisation
Council Response	
What services and facilities should a local centre Community facilities, Cafes and restaurants, Smal green space Council Response	provide? I scale workspace, Education provision, A transport hub, Shared
Comments for What services and facilities should	d a local centre provide?
Council Response	
Other Comments	
Council Response	
•	
Are there any attachments? No	

Page 20 of 194

General Comments Council Response What is your interest in the East of Harlow masterplan guidance area? I'm a local resident **Council Response** Do you support the vision for the East of Harlow masterplan guidance? 3 **Council Response** What is the most important vision theme for the masterplan guidance? Hospital (innovative, sustainable) **Council Response** What design and construction principles do you think the East of Harlow masterplan guidance should consider? Well designed community buildings, Well laid out green spaces, Net-zero design and construction **Council Response** Do you agree with the key routes and green spaces that the masterplan guidance proposes connections to? 3 **Council Response** What would encourage future residents to cycle more at East of Harlow? Secure storage/ parking at home/work/stations/on-street, Access to showers/changing at work, Off-road and segregated cycle paths **Council Response** The masterplan guidance shows potential key sustainable links to the site do you agree with these? Yes, but there are others to consider **Council Response** Do you agree with the requirements for the Sustainable Transport Corridor as set out in the guidance document? Yes **Council Response** Do you think the preferred route for the Sustainable Transport Corridor will encourage residents to use it? Yes **Council Response**

Page 22 of 194	Rep ID 11	EoH Masterplanning Guidance SPD Survey
Respondent Name	Steven Gale	Organisation
Council Response		
	•	ntre provide? ilities, Education provision, A transport hub, EV charging points,
Comments for Wh	at services and facilities sh	nould a local centre provide?
Council Response		
Other Comments		
Council Response		
•		
Are there any attach	ments? No	

Council Response

Do you think the preferred route for the Sustainable Transport Corridor will encourage residents to use it? Yes

Council Response

Page 24 of 194	Rep ID	12	EoH Masterplanning Guidance SPD Survey
Respondent Name	Karen Woo	olhouse	Organisation
Council Response			
What services and Community facilities charging points, Of Council Response	es, Cafes and		e provide? ail, Education provision, A transport hub, Shared green space, EV
Comments for Wh	at services a	and facilities shoul	ld a local centre provide?
Other Comments			
Council Response			
Are there any attach	ments?	No	

The masterplan guidance shows potential key sustainable links to the site do you agree with these?

Do you agree with the requirements for the Sustainable Transport Corridor as set out in the guidance document?

Yes

Council Response

Do you think the preferred route for the Sustainable Transport Corridor will encourage residents to use it?

No

Council Response

Page 26 of 194	Repl	D 13		EoH Masterplanning Guidance SPD Survey
Respondent Name	Taylor Fo	rster-Cornes	Organisation	
Council Response				
What services and Retail, Cafes and re points, Shared gree Council Response	estaurants	, Community f	acilities, Small scale work	space, Education provision, EV charging
Comments for Wha	at service	s and facilities	should a local centre pro	ovide?
Council Response				
Other Comments				
Council Response				
•				
Are there any attachi	ments?	No		

Do you agree with the requirements for the Sustainable Transport Corridor as set out in the guidance document?

Council Response

Do you think the preferred route for the Sustainable Transport Corridor will encourage residents to use it? Yes

Council Response

Page 28 of 194	Rep ID 14		EoH Masterplanning Guidance SPD Survey
Respondent Name	Stayko Minchev	Organisation	
Council Response			
	facilities should a local ce	-	
Comments for Wh	at services and facilities sh	nould a local centre prov	ride?
Council Response			
Other Comments			
Council Response			
•			
Are there any attach	ments? No		

Page 29 of 194

EoH Masterplanning Guidance SPD Survey
he site?
pace, Education provision, A transport hub,
ride?
s near bus and train stations and close by ibberd plan to minimise pollution to the w development and housing near j7a will gnores the new mass transport light tram route is based on PAH being in Harlow
improvement required to the hospital. cal to deliver improved public transport ransport Corridor through the East of Harlow re presence is still likely to be located close open spaces and Green infrastructure are much as possible.

Other Comments

Council Response

Are there any attachments?

No

Do you agree with the guidance principles for delivering schools on the site?

Council Response

What services and facilities should a local centre provide? Community facilities, Retail, Cafes and restaurants, Small scale workspace, Education provision, A transport hub, Shared green space, EV charging points Council Response Comments for What services and facilities should a local centre provide? A lot of the area around Churchgate street is oldest in the town and should not be left isolated or overwhelmed by the development Council Response The partner authorities agree that the area at Churchgate Street is some of the olders parts of Harlow and are unique in character and history and the SPD requires that existing settlements be protected and that any development must be sensitive to this when arranging and locating development and open spaces. Other Comments	Page 32 of 194	Rep ID 16	EoH Masterplanning Guidance SPD Survey
Comments for What services and facilities should a local centre provide? A lot of the area around Churchgate street is oldest in the town and should not be left isolated or overwhelmed by the development Council Response The partner authorities agree that the area at Churchgate Street is some of the olders parts of Harlow and are unique in character and history and the SPD requires that existing settlements be protected and that any development must be sensitive to this when arranging and locating development and open spaces. Other Comments	Respondent Name I		Organisation
Community facilities, Retail, Cafes and restaurants, Small scale workspace, Education provision, A transport hub, Shared green space, EV charging points Council Response Comments for What services and facilities should a local centre provide? A lot of the area around Churchgate street is oldest in the town and should not be left isolated or overwhelmed by the development Council Response The partner authorities agree that the area at Churchgate Street is some of the olders parts of Harlow and are unique in character and history and the SPD requires that existing settlements be protected and that any development must be sensitive to this when arranging and locating development and open spaces. Other Comments	Council Response		
Shared green space, EV charging points Council Response Comments for What services and facilities should a local centre provide? A lot of the area around Churchgate street is oldest in the town and should not be left isolated or overwhelmed by the development Council Response The partner authorities agree that the area at Churchgate Street is some of the olders parts of Harlow and are unique in character and history and the SPD requires that existing settlements be protected and that any			•
Comments for What services and facilities should a local centre provide? A lot of the area around Churchgate street is oldest in the town and should not be left isolated or overwhelmed by the development Council Response The partner authorities agree that the area at Churchgate Street is some of the olders parts of Harlow and are unique in character and history and the SPD requires that existing settlements be protected and that any development must be sensitive to this when arranging and locating development and open spaces. Other Comments	•		staurants, Small scale workspace, Education provision, A transport hub,
Comments for What services and facilities should a local centre provide? A lot of the area around Churchgate street is oldest in the town and should not be left isolated or overwhelmed by the development Council Response The partner authorities agree that the area at Churchgate Street is some of the olders parts of Harlow and are unique in character and history and the SPD requires that existing settlements be protected and that any development must be sensitive to this when arranging and locating development and open spaces. Other Comments	-		
Council Response The partner authorities agree that the area at Churchgate Street is some of the olders parts of Harlow and are unique in character and history and the SPD requires that existing settlements be protected and that any development must be sensitive to this when arranging and locating development and open spaces. Other Comments			
The partner authorities agree that the area at Churchgate Street is some of the olders parts of Harlow and are unique in character and history and the SPD requires that existing settlements be protected and that any development must be sensitive to this when arranging and locating development and open spaces. Other Comments		nd Churchgate stree	t is oldest in the town and should not be left isolated or overwhelmed
unique in character and history and the SPD requires that existing settlements be protected and that any development must be sensitive to this when arranging and locating development and open spaces. Other Comments	Council Response		
	unique in character a	nd history and the S	PD requires that existing settlements be protected and that any
Council Response .	Other Comments		
•	Council Response		
	•		
Are there any attachments? No	Are there any attachmen	nts? No	

Page 34 of 194	Rep ID	17	EoH Masterplanning Guidance SPD Survey
Respondent Name pa	ul porter		Organisation
What services and fac	cilities sho	uld a	local centre provide?
Other			
Council Response			
			cilities should a local centre provide? T POLUTION FROM THE HOSPITAL
Council Response This will be considere clarify this.	d at the n	nastei	rplanning and/or planning application stage. The SPD will be amended to
Other Comments			
Council Response			
•			
Are there any attachmen	nts?	No	

Do you think the preferred route for the Sustainable Transport Corridor will encourage residents to use it? I don't know

Council Response

Page 38 of 194 Rep ID 19	EoH Masterplanning Guidance SPD Survey
Respondent Name Lorraine Perry	Organisation
Council Response	
What services and facilities should a local centre	e provide?
Community facilities, Retail, Cafes and restauran	ts, Small scale workspace, A transport hub, Shared green space
Council Response	
Comments for What services and facilities shoul	d a local centre provide?
Council Response	
Other Comments	
Council Response	
Council Response	
•	
Are there any attachments? No	

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Page 40 of 194 Respondent Name	Rep ID 20 Carol McKenzie	Organisation	EoH Masterplanning Guidance SPD Survey
	facilities should a local ceres, Retail, Cafes and restaur	•	e, Education provision, Shared green
Council Response			
Comments for Wha	at services and facilities sh	ould a local centre provide	9?
Council Response			
Other Comments			
Council Response			
•			
Are there any attachr	ments? No		

Page 42 of 194	Rep ID 21		EoH Masterplanning Guidance SPD Survey
Respondent Name	Laura Dodwell	Organisation	
What services and	facilities should a local	centre provide?	
Shared green space	e		
Council Response			
Comments for Wh	at services and facilities	s should a local centre prov	ide?
The historic building	ngs and the Churchgate	st village	
Council Response			
development.	·		these areas when designing the
Other Comments			
Council Response			
•			
Are there any attach	ments? No		

Page 43 of 194	Rep ID 22		EoH Masterplanning Guidance SPD Survey
Respondent Name	Ionathan Smith	Organisation	
General Comments			
Council Response			
What is your interest	st in the East of Harlow mas	terplan guidance area?	
Council Response			
	vision for the East of Harlov		
Council Response			
What is the most im Hospital (innovative Council Response	nportant vision theme for the, sustainable)	e masterplan guidance?	
			v masterplan guidance should consider?
Council Response			
Do you agree with t	he key routes and green spa	aces that the masterplan	guidance proposes connections to?
Council Response			
	rage future residents to cycle		
Council Response			
The masterplan guid	dance shows potential key s	sustainable links to the si	ite do you agree with these?
Council Response			
Do you agree with t	he requirements for the Sus	stainable Transport Corri	dor as set out in the guidance document?
Council Response			
Do you think the pro	eferred route for the Sustair	nable Transport Corridor	will encourage residents to use it?
Council Response			
Do you agree with t	he guidance principles for d	elivering schools on the	site?
Council Response			

Page 44 of 194	Rep ID	22		EoH Masterplanning Guidance SPD Survey
Respondent Name	ame Jonathan Smith		Organisation	
What services and Education provision		uld a local centre	e provide?	
Council Response				
Comments for Wha	at services an	nd facilities shoul	d a local centre provide	?
Council Response				
Other Comments				
Council Response				
•				
Are there any attachi	ments?	No		

Page 45 of 194	Rep ID 23		EoH Masterplanning Guidance SPD Survey
Respondent Name	Roz Ruben	Organisation	
General Comments			
Council Response			
		masterplan guidance are	a?
Council Response			
		arlow masterplan guidan	ce?
Council Response			
		or the masterplan guidan	
Council Response			
What design and co	nstruction principles do	you think the East of Ha	rlow masterplan guidance should consider? esigned community buildings, Ease of walking
Council Response			
Do you agree with to	he key routes and greer	n spaces that the masterp	plan guidance proposes connections to?
Council Response			
	age future residents to speeds, less traffic, more	cycle more at East of Har e considerate driving)	·low?
Council Response			
			ne site do you agree with these?
Council Response			
Do you agree with the look of	he requirements for the	e Sustainable Transport C	forridor as set out in the guidance document?
Council Response			
Do you think the pre	eferred route for the Su	stainable Transport Corri	dor will encourage residents to use it?
Council Response			
Do you agree with to	he guidance principles f	for delivering schools on t	the site?
Council Response			

Page 46 of 194	Rep ID	23	EoH Masterplanning Guidance SPD Survey
Respondent Name	Roz Ruben		Organisation
What services and	facilities sh	ould a	local centre provide?
Community facilitie Other	es, Retail, Ca	fes an	nd restaurants, Small scale workspace, Education provision, A transport hub,
Council Response			
Comments for Wha	at services a	nd fac	cilities should a local centre provide?
Council Response			
Other Comments			
Council Response			
•			
Are there any attach	ments?	No	

Page 48 of 194 Respondent Name	Rep ID 24 Les Wraight	Organisation	EoH Masterplanning Guidance SPD Survey
Community facilitie	facilities should a local centr s, A transport hub	e provide?	
Council Response			
Comments for Wha	t services and facilities shou	ld a local centre provide	e?
Council Response			
Other Comments			
Council Response			
•			
Are there any attachn	nents? No		

Organisation

What services and facilities should a local centre provide?

I don't have a preference

Council Response

Comments for What services and facilities should a local centre provide?

this development is completely ruining every little bit of character and quaintness CGS and Old Harlow have. I already cannot get out of my drive on a daily basis due to the influx in traffic and the unbelievably complicated and wrongly singled roundabout. CGS cannot take this extra influx, it already flooded early this yeah due to insane amounts of concrete everywhere. Stop ruining the charm or surrounding villages just to make money. Its ruining hectors of wildlife and green spaces that are needed!!

Council Response

The HGGT Transport Strategy, STC and associated modal shift/change are key strands of the HGGT vision to address potential increased vehicular movements arising from new development. The STC will provide fast, direct, safe walking, cycling and bus routes for residents across the town. For the eastern part of the STC it will provide sustainable travel opportunities for residents at East of Harlow, Newhall and First Avenue in particular. Modal change is about allowing short car journeys to be completed using sustainable transport instead, thereby reducing the number of cars on the road overall. The allocation of the site has been informed by transport assessment evidence as part of the Local Plan and further detailed transport assessments will be carried out by the developer. The HGGT IDP identifies what schemes and proposals are required from the development including those related to improving the highway network to accommodate growth. including those related to the highway network to accommodate growth.

SuDS, including new ponds and swales, are likely to help with any future flooding. Churchgate Street area flooding this year is as a result of a very intense and short period of rain that impacted on the local brook within a known flood zone area (as per EA maps). This is with EA to decide whether further work/what work is required. The assessments for flooding considered future events. As part of the masterplan and eventual planning application, further flood risks will be required to be considered.

The SPD requires the masterplan to be landscape-led, ensuring that open spaces and Green infrastructure are provided, while respecting and preserving the original landscape as much as possible. This also includes a mandatory net increase in biodiversity.

The SPD requires the masterplan to consider existing communities, including ensuring that prominent views would not be spoilt.

The East of Harlow site was allocated for housing and associated ancillary uses in the Harlow and Epping Local Plans, which went through rigorous rounds of consultation, public examination and inspection by government. The south-east of the UK has some of the highest house prices in the country due to high demand and lack of supply. Issues such as people living longer than previous generations, higher rates of divorce in older people (resulting in a divorced couple requiring two homes instead of one), and birth rates historically being higher than death rates, has increased demand. The need for housing - including much needed affordable housing - is detailed further in the evidence base supporting the Harlow and Epping Local Plans. The Harlow portion of the East of Harlow Garden Community will help deliver affordable homes for Harlow residents as well as a range of other benefits and opportunities. Lack of affordable.

Other Comments		 	 		 	 		 	 	 	
Council Response											
•		 									
Are there any attachments?	No					 					

Page 52 of 194	Rep ID 26	EoH Masterplanning Guidance SPD Survey
Respondent Name	Emma Gabriel	Organisation
Community facilities space, EV charging	facilities should a local centers, Retail, Cafes and restaura points, Other, A transport h	nts, Small scale workspace, Education provision, Shared green
Council Response		
Comments for Wha	at services and facilities sho	uld a local centre provide?
Council Response		
Other Comments		
Council Response		
•		
Are there any attachr	ments? No	

Page 54 of 194 Rep ID 27 Respondent Name Kim Bate	EoH Masterplanning Guidance SPD S Organisation	urvey
What services and facilities should a local centre. Shared green space, Cafes and restaurants	re provide?	
Council Response		
Comments for What services and facilities shou	uld a local centre provide?	
Council Response		
Other Comments		
Council Response		
Are there any attachments? No		

Organisation

What services and facilities should a local centre provide?

I don't have a preference

Council Response

Comments for What services and facilities should a local centre provide?

This should not even be considered, I agree with the hospital but that's it. There is no need for housing to crowd around a historic village. Newhall has been enough. Build on west Harlow where there is no history no villages! This is going to spoil Harlow green space and cause more congestion, crime and pollution

Council Response

The HGGT Transport Strategy, STC and associated modal shift/change are key strands of the HGGT vision to address potential increased vehicular movements arising from new development. The STC will provide fast, direct, safe walking, cycling and bus routes for residents across the town. For the eastern part of the STC it will provide sustainable travel opportunities for residents at East of Harlow, Newhall and First Avenue in particular. Modal change is about allowing short car journeys to be completed using sustainable transport instead, thereby reducing the number of cars on the road overall. The allocation of the site has been informed by transport assessment evidence as part of the Local Plan and further detailed transport assessments will be carried out by the developer. The HGGT IDP identifies what schemes and proposals are required from the development including those related to improving the highway network to accommodate growth. including those related to the highway network to accommodate growth.

The SPD requires the masterplan to be landscape-led, ensuring that open spaces and Green infrastructure are provided, while respecting and preserving the original landscape as much as possible. This also includes a mandatory net increase in biodiversity.

The SPD requires the masterplan to sensitively consider existing communities, including ensuring that prominent views would not be spoilt. In particular it states that the effects on existing settlements, such as the historic settlement of Churchgate Street, must be considered and any adverse impacts mitigated against, particularly regarding density and building heights. The addition of references to the need for design codes throughout the document means that specific design details can be carefully considered and agreed by the Councils, in consultation with stakeholders and the community, ensuring that the impact on areas such as Churchgate Street are minimised.

The East of Harlow site was allocated for housing and associated ancillary uses in the Harlow and Epping Local Plans, which went through rigorous rounds of consultation, public examination and inspection by government. The south-east of the UK has some of the highest house prices in the country due to high demand and lack of supply. Issues such as people living longer than previous generations, higher rates of divorce in older people (resulting in a divorced couple requiring two homes instead of one), and birth rates historically being higher than death rates, has increased demand. The need for housing - including much needed affordable housing - is detailed further in the evidence base supporting the Harlow and Epping Local Plans. The Harlow portion of the East of Harlow Garden Community will help deliver affordable homes for Harlow residents as well as a range of other benefits and opportunities. Lack of affordable.

In order to meet housing requirements in the future, the area to the west of Harlow (i.e. Water Lane) is also being developed as a new Garden Community.

Other Comments	
Council Response	
•	
Are there any attachments?	No

Page 57 of 194	Rep ID 29		EoH Masterplanning Guidance SPD Survey
Respondent Name	Shruti Choudhry	Organisation	
General Comment	S		
Council Response			
	est in the East of Harlow r		ea?
Council Response			
	e vision for the East of Ha		nce?
Council Response			
What is the most i Water (nature, eco	mportant vision theme foology, landscape)	or the masterplan guida	nce?
Council Response			
What design and c		you think the East of Ha	arlow masterplan guidance should consider?
Do you agree with	the key routes and green	spaces that the master	plan guidance proposes connections to?
Council Response			
	urage future residents to o	-	rlow? s traffic, more considerate driving)
The masterplan gu	idance shows potential k	ey sustainable links to t	he site do you agree with these?
Council Response			
Do you agree with Yes	the requirements for the	Sustainable Transport (Corridor as set out in the guidance document?
Council Response			
Do you think the p	referred route for the Sus	stainable Transport Corr	idor will encourage residents to use it?
Council Response			
6	the guidance principles fo	or delivering schools on	the site?
Council Response			

Page 58 of 194	Rep ID 29	EoH Masterplanning Guidance SPD Surve
Respondent Name	Shruti Choudhry	Organisation
	facilities should a local ce s, Retail, Education provis	entre provide? sion, A transport hub, EV charging points, Shared green space
Comments for Wha	t services and facilities sl	hould a local centre provide?
Other Comments		
Council Response		
•		
Are there any attachm	nents? No	

Page 60 of 194	Rep ID 30		EoH Masterplanning Guidance SPD Survey
Respondent Name Su	e Newland	Organisation	
What services and faci Other			
Council Response			
Comments for What se		should a local centre prov	ide?
Should not be built!			
Council Response			
			camination and inspection by government.
supply. Issues such as (resulting in a divorced than death rates, has i detailed further in the East of Harlow Garden other benefits and opp	people living longer d couple requiring tw increased demand. T evidence base supp n Community will hel	than previous generations vo homes instead of one), The need for housing - incl orting the Harlow and Epp Ip deliver affordable home	e country due to high demand and lack of s, higher rates of divorce in older people and birth rates historically being higher uding much needed affordable housing - is ping Local Plans. The Harlow portion of the es for Harlow residents as well as a range of
supply. Issues such as (resulting in a divorced than death rates, has i detailed further in the East of Harlow Garden other benefits and opposition	people living longer d couple requiring tw increased demand. T evidence base supp n Community will hel	than previous generations vo homes instead of one), The need for housing - incl orting the Harlow and Epp Ip deliver affordable home	s, higher rates of divorce in older people and birth rates historically being higher uding much needed affordable housing - is ping Local Plans. The Harlow portion of the
supply. Issues such as (resulting in a divorced than death rates, has i detailed further in the East of Harlow Garden other benefits and opposition	people living longer d couple requiring tw increased demand. T evidence base supp a Community will hel portunities. Lack of a	than previous generations vo homes instead of one), The need for housing - incl orting the Harlow and Epp Ip deliver affordable home affordable.	s, higher rates of divorce in older people and birth rates historically being higher uding much needed affordable housing - is bing Local Plans. The Harlow portion of the es for Harlow residents as well as a range of
supply. Issues such as (resulting in a divorced than death rates, has i detailed further in the East of Harlow Garden other benefits and opposition	people living longer d couple requiring two increased demand. T evidence base supply a Community will hell portunities. Lack of a	than previous generations vo homes instead of one), The need for housing - incl orting the Harlow and Epp Ip deliver affordable home affordable.	s, higher rates of divorce in older people and birth rates historically being higher uding much needed affordable housing - is bing Local Plans. The Harlow portion of the

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Page 62 of 194 Rep ID 31		EoH Masterplanning Guidance SPD Survey
Respondent Name Chloe Ruffell	Organisation	
What services and facilities should a local cen	tre provide?	
Council Response		
Comments for What services and facilities sho	ould a local centre pro	ovide?
Council Response		
Other Comments		
Council Response		
•		
Are there any attachments? No		

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Page 64 of 194	Rep ID 32		EoH Masterplanning Guidance SPD Survey
Respondent Name	Dean Merchant	Organisation	
	facilities should a local c , Shared green space	entre provide?	
Council Response			
Comments for Wh	at services and facilities s	should a local centre prov	ide?
Council Response			
Other Comments			
Council Response			
•			
Are there any attach	ments? No		

Do you agree with the requirements for the Sustainable Transport Corridor as set out in the guidance document? Yes

Council Response

Do you think the preferred route for the Sustainable Transport Corridor will encourage residents to use it? Yes

Council Response

Page 66 of 194 Rep ID 33	EoH Masterplanning Guidance SPD Survey
Respondent Name Fionnuala Quinn	Organisation
Council Response	
What services and facilities should a local centre	e provide?
Community facilities, Retail, Cafes and restaurant	ts, Education provision, A transport hub, Shared green space
Council Response	
Comments for What services and facilities shoul	d a local centre provide?
Council Response	
Other Comments	
Council Response	
Are there any attachments? No	

Council Response

Page 68 of 194	Rep ID 34	EoH Masterplanning Guidance SPD Surv
Respondent Name J	lennifer Jones	Organisation
Council Response		
	acilities should a local acilities, Cafes and rest	centre provide? aurants, Shared green space
	t services and facilities	should a local centre provide? nsidered.
Council Response The masterplan will	need to be informed I	by appropriate flood assessments including drainage and mitigation
-		ne SPD will be amended to clarify this.
-		ne SPD will be amended to clarify this.
measures put in place		ne SPD will be amended to clarify this.
Other Comments		ne SPD will be amended to clarify this.
Other Comments	ce where necessary. T	ne SPD will be amended to clarify this.

Council Response

Page 70 of 194	Rep ID 35		EoH Masterplanning Guidance SPD Survey
Respondent Name Sa	Illy Brisco	Organisation	
	cilities should a local centro ed green space, Education	•	taurants
Comments for What s	services and facilities shou	ld a local centre provide	e?
Council Response			
Other Comments			
Council Response			
•			
Are there any attachmen	nts? No		

Page 72 of 194	Rep ID	36	EoH Masterplanning Guidance SPD Sur	⁄ey
Respondent Name	Helen Delan	iey	Organisation	
Council Response				
Council Response	es, Cafes and	restaurants, s	entre provide? Shared green space	
Comments for Wh	at services ar	nd facilities sl	hould a local centre provide?	
•	_	•	eas, it is not considering natural land where wildlife currently reside. a more man made structure	
	•		iversity net gain so that the habitat lost is delivered and increased l ure and wildlife to live in otherwise it will be considered	ıy
Other Comments				
Council Response				
Are there any attach	ments?	No		
The there arry account				
rice there any account				
The there any attach				
The there any actuals				
The there any actuals				

Page 73 of 194	Rep ID	37		EoH Masterplanning Guidance SPD Survey
Respondent Name I	Richard Ha	anrahan	Organisation	
General Comments				
Council Response				
			sterplan guidance area	a?
Council Response				
			ow masterplan guidanc	e?
Council Response				
What is the most in	nportant vi	sion theme for t	he masterplan guidano	ce?
Council Response				
	nstruction			low masterplan guidance should consider?
Council Response				
Do you agree with t	he key rou	tes and green sp	paces that the masterp	lan guidance proposes connections to?
Council Response				
			le more at East of Harl	ow?
Council Response				
The masterplan guid	dance show	vs potential key	sustainable links to the	e site do you agree with these?
Council Response				
Do you agree with t	he require	ments for the Su	ustainable Transport Co	orridor as set out in the guidance document?
Council Response				
Do you think the pro	eferred rou	ute for the Susta	inable Transport Corric	dor will encourage residents to use it?
Council Response				
			delivering schools on t	
Council Response				

Page 74 of 194	Rep ID	37		EoH Masterplanning Guidance SPD Survey
Respondent Name	Richard Ha	ınrahan	Organisation	
What services and I don't have a prefe		ould a local centr	e provide?	
Comments for Wh	at services a	nd facilities shou	ld a local centre provide	e?
Other Comments				
Council Response				
Are there any attach	ments?	No		

I don't know

Council Response

Do you think the preferred route for the Sustainable Transport Corridor will encourage residents to use it?

I don't know

Council Response

Page 76 of 194	Rep ID 38	EoH Masterplanning Guidance SPD Survey
Respondent Name	Vishnu Selvaraju	Organisation
Council Response		
		ntre provide? space, Education provision, Cafes and restaurants, A transport hub,
	at services and facilities sh	nould a local centre provide?
Council Response		
Other Comments		
Council Response		
•		
Are there any attachi	ments? No	

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Page 78 of 194 Rep ID 39		EoH Masterplanning Guidance SPD Survey
Respondent Name Allen Mevo	Organisation	
What services and facilities should a local of Community facilities, Retail, Shared green s	•	
Council Response		
Comments for What services and facilities	should a local centre prov	ride?
Council Response		
Other Comments		
Council Response		
•		
Are there any attachments? No		

Page 80 of 194	Rep ID 40		EoH Masterplanning Guidance SPD Survey
Respondent Name C		Organisation	
	acilities should a local	centre provide?	green space, Other, Community facilities,
Retail	s, Education provision	, A transport hab, sharea g	green space, other, community racinities,
Council Response			
Comments for What	services and facilities	should a local centre prov	
Do not develop the a	area at all		
Council Response			
Plans, which went the The south-east of the supply. Issues such a (resulting in a divorce than death rates, had detailed further in the East of Harlow Garden other benefits and o	nrough rigorous round e UK has some of the as people living longer ed couple requiring tw s increased demand. I he evidence base supp en Community will he pportunities. Lack of a	s of consultation, public exhighest house prices in the than previous generations vo homes instead of one), The need for housing - includering the Harlow and Epple deliver affordable homes affordable.	cillary uses in the Harlow and Epping Local xamination and inspection by government. e country due to high demand and lack of s, higher rates of divorce in older people and birth rates historically being higher uding much needed affordable housing - is ping Local Plans. The Harlow portion of the es for Harlow residents as well as a range of
Other Comments			
Council Response			
•			
Are there any attachmo			

Do you think the preferred route for the Sustainable Transport Corridor will encourage residents to use it? No

Council Response

Page 82 of 194	Rep ID 41		EoH Masterplanning Guidance SPD Survey
Respondent Name	Matt Bradley	Organisation	
Council Response			
	facilities should a local onts, EV charging points, S	centre provide? Shared green space, Commu	unity facilities
		should a local centre providual buld kept as well as existing	
provided, while res	specting and preserving rease in biodiversity.	the original landscape as m	pen spaces and Green infrastructure are nuch as possible. This also includes a
Other Comments			
Council Response			
•			
Are there any attachr			

Respondent Name Maria Lyons Organisation
General Comments
Council Response
What is your interest in the East of Harlow masterplan guidance area? I'm a local resident Council Response
Do you support the vision for the East of Harlow masterplan guidance? 1 Council Bearence
Council Response
What is the most important vision theme for the masterplan guidance? Health (wellbeing, physical, active) Council Response
What design and construction principles do you think the East of Harlow masterplan guidance should consider? Well laid out green spaces, Characterful placemaking, Well designed community buildings Council Response
Do you agree with the key routes and green spaces that the masterplan guidance proposes connections to? 1
Council Response
What would encourage future residents to cycle more at East of Harlow? Safer roads (slower speeds, less traffic, more considerate driving), Off-road and segregated cycle paths, Safe cycle lanes, Promotion of local cycling routes, Secure storage/ parking at home/work/stations/on-street Council Response
The masterplan guidance shows potential key sustainable links to the site do you agree with these? Yes, but there are others to consider Council Response
Do you agree with the requirements for the Sustainable Transport Corridor as set out in the guidance document? Yes Council Response
Do you think the preferred route for the Sustainable Transport Corridor will encourage residents to use it? No Council Response

Page 84 of 194 Rep ID 42	EoH Masterplanning Guidance SPD Survey
Respondent Name Maria Lyons	Organisation
Council Response	
What services and facilities should a local ce	ntre provide?
Community facilities, Retail, Cafes and restau	rants, A transport hub, Shared green space
Council Response	
Comments for What services and facilities sh	ould a local centre provide?
Council Response	
Other Comments	
Council Response	
•	
Are there any attachments? No	

Respondent Name Jeff Coles

Organisation

Do you agree with the guidance principles for delivering schools on the site?

5

Council Response

What services and facilities should a local centre provide?

Community facilities, Retail, Cafes and restaurants, Education provision, A transport hub, Shared green space, EV charging points

Council Response

Comments for What services and facilities should a local centre provide?

Any major building project like this, must include and take into consideration, the following: the inclusion of appropriate infrastructure of all road/vehicle, pedestrian access. It must include all sufficient utility services that must be in addition to existing services. All appropriate steps must be taken to protect, the current countryside, landscape, historical / protected buildings, current wild life habitat. All major steps must be taken to reduce as much as possible the impact of the increased vehicle traffic caused by the increase in residential / service structures like shops, schools community centres etc. Finally sufficient / adequate public/ residents services must be provided eg: NHS Doctors, Dentists, sufficient for the developments residents. These facilities should not attract residents from further afield, causing iincreased vehicle congestion.

Council Response

The site will be supported by the right infrastructure in the right location including health, education, sustainable transport, access and highway improvements and all utility provision having considered any pressures in the local area... This is set out in the HGGT Infrastructure Delivery Plan. Infrastructure will have to be provided in a phased approach based on the construction/occupation of dwellings. However, it is not appropriate for the SPD to provide detail on phasing of housing and phasing of infrastructure provision - this will come at the masterplan stage in detailed discussion with infrastructure providers.

The SPD requires the masterplan to be landscape-led, ensuring that open spaces and Green infrastructure are provided, while respecting and preserving the original landscape as much as possible. This also includes a mandatory net increase in biodiversity.

The SPD requires the masteprlan to consider existing communities, including ensuring that prominent views would not be spoilt.

The SPD will be amended to include specific reference to various community infrastructure.

Other Comments
Council Response
•
Are there any attachments? No

Do you think the preferred route for the Sustainable Transport Corridor will encourage residents to use it? No

Council Response

Page 88 of 194	Rep ID 44		EoH Masterplanning Guidance SPD Survey
Respondent Name	Mark Davis	Organisation	
Council Response			
What services and	facilities should a local cent	re provide?	
Community facilities	es, Cafes and restaurants		
Council Response			
Comments for Wha	at services and facilities sho	uld a local centre provide	e?
Council Response			
Other Comments			
Council Response			
Council Response			
•			
Are there any attachr	ments? No		

Do you think the preferred route for the Sustainable Transport Corridor will encourage residents to use it?

No

Council Response

Page 90 of 194	Rep ID 45	EoH Masterplanning Guidance SPD Surve
Respondent Name	Shirley Potter	Organisation
Council Response		
What services and	facilities should a local	centre provide?
Shared green space	e, A transport hub, Educ	ation provision, Cafes and restaurants, Retail
Council Response		
Comments for Wh	at services and facilities	should a local centre provide?
•	trees need to be preserv have stood for hundred	ed many established trees have been cut down for residential s of years.
provided, while res	specting and preserving rease in biodiversity.	dscape-led, ensuring that open spaces and Green infrastructure are the original landscape as much as possible. This also includes a
Other Comments		
Council Response		
•		
Are there any attach	ments? No	

Page 92 of 194 Rep ID Respondent Name Tina Amor		Organisation	EoH Masterplanning Guidance SPD Survey
What services and facilities sh Community facilities, Shared g Council Response		provide?	
Comments for What services Council Response	and facilities should	l a local centre provide	?
Other Comments			
Council Response Are there any attachments?	No		
Are there any attachments:	NO		

Page 94 of 194	Rep ID 47		EoH Masterplanning Guidance SPD Survey
Respondent Name Joe	e Manton	Organisation	
	ilities should a local centre and restaurants, Retail, Co	-	red green space
Comments for What some The gibberd garden	ervices and facilities should	l a local centre provide	?
Council Response This is a separate site	which will be unaffected by	the East of Harlow de	evelopment.
Other Comments			
Council Response			
Are there any attachmen	nts? No		

Respondent Name Colum Leahy Organisation
General Comments
Council Response
What is your interest in the East of Harlow masterplan guidance area? I'm a local resident
Council Response
Do you support the vision for the East of Harlow masterplan guidance? 1
Council Response
What is the most important vision theme for the masterplan guidance? Health (wellbeing, physical, active)
Council Response
What design and construction principles do you think the East of Harlow masterplan guidance should consider?
Council Response
Do you agree with the key routes and green spaces that the masterplan guidance proposes connections to?
Council Response
What would encourage future residents to cycle more at East of Harlow? Off-road and segregated cycle paths, Safe cycle lanes, Promotion of local cycling routes, Secure storage/ parking at home/work/stations/on-street, Well maintained road surfaces for cycling, Better signposting of safer cycle routes
Council Response
The masterplan guidance shows potential key sustainable links to the site do you agree with these? No
Council Response
Do you agree with the requirements for the Sustainable Transport Corridor as set out in the guidance document? Yes
Council Response
Do you think the preferred route for the Sustainable Transport Corridor will encourage residents to use it? I don't know
Council Response
Do you agree with the guidance principles for delivering schools on the site?
Council Response

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Rep ID 48

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EoH Masterplanning Guidance SPD Survey

Respondent Name Colum Leahy

Organisation

What services and facilities should a local centre provide?

Community facilities, Cafes and restaurants, Shared green space, EV charging points, Education provision, A transport hub

Council Response

Comments for What services and facilities should a local centre provide?

I don't think you should be developing in this area at all. The Harlow area is already getting thousands of new homes, with very little improvement to facilities and infrastructure

Council Response

The East of Harlow site was allocated for housing and associated ancillary uses in the Harlow and Epping Local Plans, which went through rigorous rounds of consultation, public examination and inspection by government. The south-east of the UK has some of the highest house prices in the country due to high demand and lack of supply. Issues such as people living longer than previous generations, higher rates of divorce in older people (resulting in a divorced couple requiring two homes instead of one), and birth rates historically being higher than death rates, has increased demand. The need for housing - including much needed affordable housing - is detailed further in the evidence base supporting the Harlow and Epping Local Plans. The Harlow portion of the East of Harlow Garden Community will help deliver affordable homes for Harlow residents as well as a range of other benefits and opportunities. Lack of affordable.

The site will be supported by the right infrastructure in the right location including health, education, sustainable transport, access and highway improvements and all utility provision having considered any pressures in the local area... This is set out in the HGGT Infrastructure Delivery Plan. Infrastructure will have to be provided in a phased approach based on the construction/occupation of dwellings. However, it is not appropriate for the SPD to provide detail on phasing of housing and phasing of infrastructure provision - this will come at the masterplan stage in detailed discussion with infrastructure providers.

Other Comments	
Council Response	
•	
Are there any attachments? No	

Page 98 of 194 Rep ID 49 Respondent Name Kelly Owen	EoH Masterplanning Guidance SPD Survey Organisation
What services and facilities should a local centre I don't have a preference Council Response	provide?
Comments for What services and facilities should Council Response	d a local centre provide?
Other Comments	
Council Response	
Are there any attachments? No	

Page 100 of 194 Respondent Name	Rep ID Claire Wats		Organisation	EoH Masterplanning Guidance SPD Survey
What services and I don't have a prefe		ould a local centre	provide?	
Comments for Wh	at services a	nd facilities should	l a local centre provide	?
Other Comments				
Council Response . Are there any attache	ments?	No		

Page 102 of 194 Rep ID 51 Respondent Name Zoe Turvill	EoH Masterplanning Guidance SPD Survey Organisation
What services and facilities should a local centre Retail, Cafes and restaurants, Education provision	
Council Response	
Comments for What services and facilities should	l a local centre provide?
Council Response	
Other Comments	
Council Response	
Are there any attachments? No	

Page 104 of 194 R	ep ID 52		EoH Masterplanning Guidance SPD Survey	
Respondent Name Leann	Arkell	Organisation		
What services and faciliti	es should a local centre	provide?		
Community facilities, Edu	cation provision, Shared	I green space		
Council Response				
Comments for What serv	ices and facilities should	d a local centre provide	e?	
Council Response				
Other Comments				
Council Response				
•				
Are there any attachments?	No			

Council Response

Do you think the preferred route for the Sustainable Transport Corridor will encourage residents to use it?

No

Council Response

Page 106 of 194	Rep ID 53	EoH Masterplanning Guidance SPD Survey
Respondent Name	Clare Venables	Organisation
Council Response		
What services and	facilities should a local	
Community facilities	es, Other	
Council Response		
		should a local centre provide?
The view of the chi	urch in old Harlow and cl	hurchgate street
views would not b settlement of Chur regarding density a document means t	e spoilt. In particular it s rchgate Street, must be d and building heights. The that specific design deta	ively consider existing communities, including ensuring that prominent states that the effects on existing settlements, such as the historic considered and any adverse impacts mitigated against, particularly e addition of references to the need for design codes throughout the ils can be carefully considered and agreed by the Councils, in mmunity, ensuring that the impact on areas such as Churchgate Street
Other Comments		
Council Response		
•		
Are there any attach	ments? No	

Page 108 of 194 Rep ID 54		EoH Masterplanning Guidance SPD Survey			
Respondent Name Chloe Humphreys	Organisation				
Comments for What services and facilities should a local centre provide?					
Council Response					
Other Comments					
Council Response					
•					
Are there any attachments? No					

Page 110 of 194	Rep ID	55		EoH Masterplanning Guidance SPD Survey
Respondent Name	Amanda Ba	aker	Organisation	
Council Response				
Comments for What	at services a	and facilities shou	ld a local centre provid	e?
Council Response				
Other Comments				
Council Response				
•				
Are there any attachi	ments?	No		

Page 112 of 194 R	ep ID 56		EoH Masterplanning Guidance SPD Survey
Respondent Name James	Marshall	Organisation	
What services and faciliti Other	es should a local centre	provide?	
Council Response			
Comments for What serv	ices and facilities should	d a local centre provide	e?
Council Response			
Other Comments			
Council Response			
•			
Are there any attachments?	No		

No

Council Response

Do you think the preferred route for the Sustainable Transport Corridor will encourage residents to use it?

No

Council Response

Page 114 of 194 Re	ep ID 57		EoH Masterplanning Guidance SPD Survey
Respondent Name Micha	el Smith	Organisation	
Council Response			
What services and facilities	es should a local o	centre provide?	
Other			
Council Response			
Comments for What servi	ices and facilities	should a local centre pro	ovide?
The idea is nonsense			
Council Response			
supply. Issues such as peo (resulting in a divorced co than death rates, has incr detailed further in the evi East of Harlow Garden Co other benefits and opport	ople living longer to ouple requiring tw reased demand. T idence base suppo ommunity will hel	than previous generation vo homes instead of one he need for housing - ind orting the Harlow and Ep p deliver affordable hom	ne country due to high demand and lack of ns, higher rates of divorce in older people), and birth rates historically being higher cluding much needed affordable housing - is oping Local Plans. The Harlow portion of the nes for Harlow residents as well as a range of
Other Comments			
Council Response			
•			
Are there any attachments?	No		

Page 116 of 194	Rep ID	58	EoH Masterplanning Guidance S	SPD Survey
Respondent Name	Agniva Ban	erjee	Organisation	
			ocal centre provide? restaurants, Small scale workspace, EV charging points	
Council Response				
Comments for What services and facilities should a local centre provide?				
Council Response				
Other Comments				
Council Response				
•				
Are there any attachr	ments?	No		

Respondent Name Stephen Davies Organisation
General Comments
Council Response
What is your interest in the East of Harlow masterplan guidance area? I'm a local resident
Council Response
Do you support the vision for the East of Harlow masterplan guidance? 4
Council Response
What is the most important vision theme for the masterplan guidance? Water (nature, ecology, landscape)
Council Response
What design and construction principles do you think the East of Harlow masterplan guidance should consider? Net-zero design and construction, Well laid out green spaces, Well designed community buildings, Ease of walking and cycling
Council Response
Do you agree with the key routes and green spaces that the masterplan guidance proposes connections to?
Council Response
What would encourage future residents to cycle more at East of Harlow? Off-road and segregated cycle paths, Promotion of local cycling routes, Access to showers/changing at work, Well maintained road surfaces for cycling, Better signposting of safer cycle routes
Council Response
The masterplan guidance shows potential key sustainable links to the site do you agree with these? Yes, but there are others to consider
Council Response
Do you agree with the requirements for the Sustainable Transport Corridor as set out in the guidance document? Yes
Council Response
Do you think the preferred route for the Sustainable Transport Corridor will encourage residents to use it? I don't know
Council Response
Do you agree with the guidance principles for delivering schools on the site?

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Page 118 of 194	Rep ID	59		EoH Masterplanning Guidance SPD Survey
Respondent Name	Stephen Day	<i>r</i> ies	Organisation	
Council Response				
What services and Retail, Cafes and re charging points, Co Council Response	estaurants, Sn	nall scale workspa		n, A transport hub, Shared green space, EV
Comments for Wh	at services an	nd facilities should	d a local centre provide	??
Council Response				
Other Comments				
Council Response				
•				
Are there any attach	ments?	No		

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Page 120 of 194	Rep ID 60		EoH Masterplanning Guidance SPD Survey
Respondent Name	Gurinder Cheema	Organisation	
What services and I don't have a prefe	facilities should a local ce erence	ntre provide?	
Council Response			
Comments for Wh	at services and facilities sh	ould a local centre pro	vide?
Council Response			
Other Comments			
Council Response			
•			
Are there any attach	ments? No		

Do you agree with the guidance principles for delivering schools on the site?

No

Page 122 of 194 Rep ID 61	EoH Masterplanning Guidance SPD Survey
Respondent Name Leigh Leal	Organisation
Council Response	
What services and facilities should a	local centre provide?
Shared green space, Community facil Other	ities, Cafes and restaurants, Small scale workspace, Education provision,
Council Response	
Comments for What services and fac	ilities should a local centre provide?
	miles should a local schile provide.
Council Response	
Other Comments	
other comments	
Council Response	
•	
Are there any attachments? No	

Respondent Name Tommy Smith

Organisation

What services and facilities should a local centre provide?

I don't have a preference

Council Response

Comments for What services and facilities should a local centre provide?

While the guidance covers important landscape and heritage considerations, there are some additional unique features worth highlighting to help shape a context-sensitive masterplan. Specifically, the intricate network of historic lanes, hedgerows and meadows that crisscross the site provide an important sense of place. These ancient field boundaries and rural tracks should be protected and incorporated into the masterplan to preserve local character. There are also several mature oak trees along the northern boundary that form a distinctive feature and should be retained to maintain local distinctiveness. The western edge has an open, rural aspect with expansive views across the Stort Valley. The masterplan should be designed to retain these open vistas which are an integral part of the landscape setting. Overall, the masterplan must be designed sensitively to protect and enhance the intrinsic rural qualities, mature trees, historic lanes, and distinctive views that are unique to this place. Supplementing the guidance with additional on-site analysis will help achieve an organic design rooted in the local vernacular

Council Response

The SPD requires the masterplan to be landscape-led, ensuring that open spaces and Green infrastructure are provided, while respecting and preserving the original landscape as much as possible. This includes the historic lanes and rural tracks. Further on-site analysis will be carried out at the masterplanning and planning application stages.

The SPD requires the masterplan to sensitively consider existing communities, including ensuring that prominent views would not be spoilt. In particular it states that the effects on existing settlements, such as the historic settlement of Churchgate Street, must be considered and any adverse impacts mitigated against, particularly regarding density and building heights. The addition of references to the need for design codes throughout the document means that specific design details can be carefully considered and agreed by the Councils, in consultation with stakeholders and the community, ensuring that the impact on areas such as Churchgate Street

are minimiseu.
Other Comments
Council Response
•
Are there any attachments? No

Page 126 of 194 Rep	p ID 63		EoH Masterplanning Guidance SPD Survey
Respondent Name Charlot	tte Gregory		
What services and facilitie I don't have a preference Council Response			
Comments for What service	ces and facilities sho	uld a local centre prov	ide?
Do not agree with area to ι	use all farm land. Esp	ecially north of Moorh	nall Road adjacent to Mayfield Farm
Harlow and Epping Local P	Plans, which allocated	d this site, that the los	s accepted at the examinations for the soft soft soft soft solutions of the UK has some of the highest
house prices in the country previous generations, high instead of one), and birth i housing - including much n Harlow and Epping Local P affordable homes for Harlo	ner rates of divorce in rates historically bein needed affordable ho Plans. The Harlow po ow residents as well	n older people (resulting higher than death rousing - is detailed furtion of the East of Haas a range of other be	ssues such as people living longer than ng in a divorced couple requiring two homes rates, has increased demand. The need for ther in the evidence base supporting the rlow Garden Community will help deliver enefits and opportunities. Lack of affordable.
house prices in the country previous generations, high instead of one), and birth i housing - including much n Harlow and Epping Local P affordable homes for Harlo	ner rates of divorce in rates historically bein needed affordable ho Plans. The Harlow po ow residents as well	n older people (resulting higher than death rousing - is detailed furtion of the East of Haas a range of other be	ng in a divorced couple requiring two homes rates, has increased demand. The need for ther in the evidence base supporting the rlow Garden Community will help deliver
house prices in the country previous generations, high instead of one), and birth housing - including much n Harlow and Epping Local P affordable homes for Harlo	ner rates of divorce in rates historically bein needed affordable ho Plans. The Harlow po ow residents as well	n older people (resulting higher than death rousing - is detailed furtion of the East of Haas a range of other be	ng in a divorced couple requiring two homes rates, has increased demand. The need for ther in the evidence base supporting the rlow Garden Community will help deliver enefits and opportunities. Lack of affordable.
house prices in the country previous generations, high instead of one), and birth in housing - including much in Harlow and Epping Local P affordable homes for Harlo	ner rates of divorce in rates historically bein needed affordable ho Plans. The Harlow po ow residents as well	n older people (resulting higher than death rousing - is detailed furtion of the East of Haas a range of other be	ng in a divorced couple requiring two homes rates, has increased demand. The need for ther in the evidence base supporting the rlow Garden Community will help deliver enefits and opportunities. Lack of affordable.

Respondent Name Janet and Ken Whitehead Organisation
General Comments
Council Response
What is your interest in the East of Harlow masterplan guidance area? I'm a local resident
Council Response
Do you support the vision for the East of Harlow masterplan guidance? 1
Council Response
What is the most important vision theme for the masterplan guidance? Connection (social and mobility)
Council Response
What design and construction principles do you think the East of Harlow masterplan guidance should consider? Well laid out green spaces, Ease of walking and cycling
Council Response
Do you agree with the key routes and green spaces that the masterplan guidance proposes connections to? 1
Council Response
What would encourage future residents to cycle more at East of Harlow?
Council Response
The masterplan guidance shows potential key sustainable links to the site do you agree with these? Yes, but there are others to consider
Council Response
Do you agree with the requirements for the Sustainable Transport Corridor as set out in the guidance document? Yes
Council Response
Do you think the preferred route for the Sustainable Transport Corridor will encourage residents to use it? Yes
Council Response
Do you agree with the guidance principles for delivering schools on the site? 1
Council Response

Page 127 of 194

Page 128 of 194	Rep I	D 64			EoH Masterplanning Guidance SPD Survey
Respondent Name	Janet an	d Ken White	nead	Organisation	
What services and	facilities	should a loca	l centro	e provide?	
I don't have a prefe	erence				
Council Response					
Comments for Wha	at service	s and faciliti	s shou	ld a local centre p	provide?
					vise the new residents will be blocking Sheering uld make Sheering into "Greater Harlow".
sustainable transported in the local be provided in a place appropriate for the come at the master The SPD indicates in the sustainable transported in the	ort, acces cal area hased appe SPD to perplan stagethat the r	s and highwa . This is set of proach based provide detailed ge in detailed nasterplan w	ny improut in the on the long phase on phase on phase of the long	rovements and all the HGGT Infrastru construction/occ asing of housing a ssion with infrastruire a substantial l	location including health, education, utility provision having considered any cture Delivery Plan. Infrastructure will have to cupation of dwellings. However, it is not and phasing of infrastructure provision - this will cucture providers. Couffer between the northern part of the site ang retains its identity.
Other Comments					
Council Response					
•					
Are there any attachi	ments?	No			

Page 130 of 194	Rep ID 65		EoH Masterplanning Guidance SPD Survey
Respondent Name	Elsie Baker	Organisatio	n
		d a local centre provide? tion provision, Shared greer	ı space
		facilities should a local cent between the "plan area" and	-
		rplan will require a substant ce is prevented and that She	ial buffer between the northern part of the site ering retains its identity.
Other Comments			
Council Response			
•			
Are there any attachi	ments? No)	

Do you think the preferred route for the Sustainable Transport Corridor will encourage residents to use it? Yes

Council Response

Page 132 of 194 Rep ID 66	EoH Masterplanning Guidance SPD Survey
Respondent Name Lesley Paine	Organisation
Council Response	
What services and facilities should a local centre	provide?
Community facilities, EV charging points, Shared	green space
Council Response	
Comments for What services and facilities should	d a local centre provide?
Council Response	
Other Comments	
Council Response	
- Council Response	
•	
Are there any attachments? No	

Do you think the preferred route for the Sustainable Transport Corridor will encourage residents to use it?

Yes

Council Response

Page 134 of 194 Rep ID 67	EoH Masterplanning Guidance SPD Survey
Respondent Name Sam Terrell	Organisation
Council Response	
What services and facilities should a local centre	provide?
Retail, Cafes and restaurants, Community facilities EV charging points	s, Small scale workspace, A transport hub, Shared green space,
Council Response	
Comments for What services and facilities should	d a local centre provide?
Council Response	
Other Comments	
Council Response	
•	
Are there any attachments? No	

Page 136 of 194 Respondent Name I		s	Organisation	EoH Masterplanning Guidance SPD Survey
What services and for Community facilities Council Response	acilities sho	ould a local centre	provide?	
Comments for What The problem is the t transport hub canno through sheering an wasn't even thought bikes and cycle arou doing it the fact is th	t services a ransport ho of for the sho d lower sho t of as a rat nd these and ne majority	nd facilities should ub by putting these neering area just ca eering which they of run by the planne reas then you are of of people will not	d a local centre provide things like schools are annot take the amound on now because of blins of Juntion 7a. If you deluded. If people were even use it and once a	nd hospitals all sound lovely but the t of traffic using the road traffic will come nkered planning and sheering lower road a seriously believe that residents will all get re going to cycle they would already be again be a complete waste of money which e minority and not the majority
address potential in direct, safe walking, provide sustainable Modal change is ab reducing the numbe assessment evidenc	creased ve , cycling an travel opp out allowin er of cars on e as part o HGGT IDP i ted to impi	hicular movement d bus routes for re ortunities for resic ng short car journe n the road overall. f the Local Plan an dentifies what sch roving the highway	es arising from new desidents across the town dents at East of Harlow eys to be completed use. The allocation of the difference and proposals a	are key strands of the HGGT vision to evelopment. The STC will provide fast, wn. For the eastern part of the STC it will w, Newhall and First Avenue in particular. sing sustainable transport instead, thereby site has been informed by transport nsport assessments will be carried out by are required from the development odate growth. including those related to
Other Comments				

Are there any attachments?

No

Page 137 of 194

Page 138 of 194	Rep ID	69		EoH Masterplanning Guidance SPD Survey
Respondent Name	T Powell		Organisation	
What services and	facilities sh	ould a local centre	provide?	
Council Response				
Comments for Wha	at services a	and facilities should	d a local centre provide	?
Council Response				
Other Comments				
Council Response				
•				
Are there any attachr	ments?	No		

Respondent Name Rosemary Kelsell Organisation
General Comments
Council Response
What is your interest in the East of Harlow masterplan guidance area? I'm a local resident
Council Response
Do you support the vision for the East of Harlow masterplan guidance? 1
Council Response
What is the most important vision theme for the masterplan guidance? Hospital (innovative, sustainable)
Council Response
What design and construction principles do you think the East of Harlow masterplan guidance should consider? Net-zero design and construction, Characterful placemaking, Well laid out green spaces, Well designed community buildings, Ease of walking and cycling
Council Response
Do you agree with the key routes and green spaces that the masterplan guidance proposes connections to?
Council Response
What would encourage future residents to cycle more at East of Harlow? Safer roads (slower speeds, less traffic, more considerate driving), Off-road and segregated cycle paths, Safe cycle lanes, Promotion of local cycling routes, Secure storage/ parking at home/work/stations/on-street, Access to showers/changing at work, Well maintained road surfaces for cycling, Better signposting of safer cycle routes, Training to help me ride a bike or increase my confidence, Cycle maintenance courses, Better cycle hire facilities Council Response
The masterplan guidance shows potential key sustainable links to the site do you agree with these? No, some links should not be considered
Council Response
Do you agree with the requirements for the Sustainable Transport Corridor as set out in the guidance document? No
Council Response
Do you think the preferred route for the Sustainable Transport Corridor will encourage residents to use it? No
Council Response

Page 139 of 194 Rep ID **70**

Page 140 of 194 Rep ID	70	EoH Masterplanning Guidance SPD Survey
Respondent Name Rosemary Ke	elsell Organisation	
Do you agree with the guidance 6	principles for delivering schools or	n the site?
Council Response		
What services and facilities should don't have a preference		
Council Response		
Comments for What services an	d facilities should a local centre pro	ovide?
Council Response		
Other Comments		
Council Response		
•		
Are there any attachments?	No	

Page 142 of 194	Rep ID	71		EoH Masterplanning Guidance SPD Survey
Respondent Name	Vicky Early		Organisation	
What services and Community facilities Small scale worksp Council Response	es, Retail, Ca		•	Shared green space, EV charging points,
Comments for Who	at services a	nd facilities should	d a local centre provide	e?
Other Comments				
Council Response				
•				
Are there any attach	ments?	No		

Page 144 of 194 Respondent Name	Rep ID 72 Joe Ephgrave	Organisation	EoH Masterplanning Guidance SPD Survey
Community facilities	I facilities should a local cent es, Retail, Cafes and restaura , Shared green space	•	pace, Education provision, A transport hub,
Comments for Wh	at services and facilities sho	uld a local centre prov	ride?
Other Comments			
Council Response Are there any attach	ments? Yes		
and any account			

Do you think the preferred route for the Sustainable Transport Corridor will encourage residents to use it? No

Council Response

Page 146 of 194	Rep ID 73	EoH Masterplanning Guidance SPD Survey Phase 2		
Respondent Name	Gemma Palmer	Organisation		
Council Response				
	facilities should a local centers, Cafes and restaurants, Ec	tre provide? ducation provision, Shared green space, EV charging points		
Comments for What services and facilities should a local centre provide?				
Council Response				
Other Comments				
Council Response				
•				
Are there any attachr	ments? No			

Page 148 of 194	Rep	ID 74		EoH Masterplanning Guidance SPD Survey
Respondent Name	Sammy			
What services and	facilities		a local centre provide?	
Small scale worksp	ace, Com	munity	facilities	
Council Response				
Comments for Wh	at service	es and f	acilities should a local centre p	provide?
Green open spaces	are esse	ntial wh	nen considering the volume of	homes being built within limited space
Council Response				
	specting	and pre	serving the original landscape	hat open spaces and Green infrastructure are as much as possible. This also includes a
Other Comments				
Council Response				
•				
Are there any attach	ments?	No		

Do you think the preferred route for the Sustainable Transport Corridor will encourage residents to use it? No

Council Response

Page 150 of 194 Rep ID 75	EoH Masterplanning Guidance SPD Survey		
Respondent Name Charlotte Riley	Organisation		
Council Response			
What services and facilities should a local centre	provide?		
Community facilities, Education provision, Shared	green space		
Council Response			
Comments for What services and facilities should a local centre provide?			
Council Response			
Other Comments			
Council Response			
•			
Are there any attachments? No			

Do you think the preferred route for the Sustainable Transport Corridor will encourage residents to use it?

Respondent Name Amanda Wyburn	Organisation		
Council Response			
What services and facilities should a local centre process and facilities, Retail, Cafes and restaurants Council Response	provide? , Education provision, A transport hub, EV charging points		
Comments for What services and facilities should a local centre provide?			
Council Response			
Other Comments			
Council Response			
And the one provests above onto 2.			
Are there any attachments? No			

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Rep ID 77

Page 153 of 194

Page 154 of 194	Rep ID 77		EoH Masterplanning Guidance SPD Survey
Respondent Name	Harmeet Matharu	Organisation	
I don't have a prefe	facilities should a local centerence	tre provide?	
Council Response			
Comments for Wha	at services and facilities sho	ould a local centre prov	ide?
Council Response			
Other Comments			
Council Response			
•			
Are there any attachr	ments? No		

Page 156 of 194 Respondent Name Be	Rep ID 78 ev Faulkner	Organisation	EoH Masterplanning Guidance SPD Survey	
What services and facilities should a local centre provide? Community facilities, Cafes and restaurants, A transport hub, EV charging points, Shared green space				
Council Response				
Comments for What services and facilities should a local centre provide?				
Council Response				
Other Comments				
Council Response				
Are there any attachmer	nts? No			
Are there any attachmen	ito:			

Page 158 of 194	Rep ID 79	EoH Masterplanning Guidance SPD Surve	У
Respondent Name	Paul Moret	Organisation	
Council Response			
Other Comments			
Council Response			
•			
Are there any attachr	ments? No		_

Respondent Name Kirk Collins Organisation **General Comments Council Response** What is your interest in the East of Harlow masterplan guidance area? I'm a local resident **Council Response** Do you support the vision for the East of Harlow masterplan guidance? 3 **Council Response** What is the most important vision theme for the masterplan guidance? Water (nature, ecology, landscape) **Council Response** What design and construction principles do you think the East of Harlow masterplan guidance should consider? Well laid out green spaces **Council Response** Do you agree with the key routes and green spaces that the masterplan guidance proposes connections to? 3 **Council Response** What would encourage future residents to cycle more at East of Harlow? Off-road and segregated cycle paths, Promotion of local cycling routes, Secure storage/ parking at home/work/stations/on-street **Council Response** The masterplan guidance shows potential key sustainable links to the site do you agree with these? Yes, but there are others to consider **Council Response** Do you agree with the requirements for the Sustainable Transport Corridor as set out in the guidance document? No **Council Response** Do you think the preferred route for the Sustainable Transport Corridor will encourage residents to use it? No **Council Response**

Do you agree with the guidance principles for delivering schools on the site?

Page 160 of 194	Rep ID 80	EoH Masterplanning Guidance SPD Survey
Respondent Name K	irk Collins	Organisation
Council Response		
NA/hat comings and fo	اموما و اماروهام مونخانه	andre medical
	cilities should a local	
	space, cales and resta	aurants, Community facilities
Council Response		
		s should a local centre provide?
masterplan to under upgrading existing fa provision of new em Town identifies the v	stand any impacts on icilities. However, it h ergency service statio wider provision of 'blu	mergency services are engaged during the preparation of the their services, including the potential financial contributions to as not been identified that this development would necessitate the ons in the vicinity. The Infrastructure Delivery Plan for the Garden are light' services which the authorities are committed to identify notion of existing sites if necessary.
Other Comments		
Council Response		
•		
Are there any attachme	ents? No	
7		

Page 162 of 194	Rep ID 81	EoH Masterplanning Guidance SPD Survey
Respondent Name C		Organisation
What services and fa		
Community facilities	, Cafes and restaura	nts, Shared green space
Council Response		
		es should a local centre provide?
New emergency serv	rices stations to mee	t the demands of the growing community within the old harlow area.
Council Response		
masterplan to under upgrading existing fa provision of new em Town identifies the provision for including	stand any impacts of acilities. However, it ergency service state wider provision of 'l ng the potential exp	emergency services are engaged during the preparation of the on their services, including the potential financial contributions to has not been identified that this development would necessitate the ions in the vicinity. The Infrastructure Delivery Plan for the Garden plue light' services which the authorities are committed to identify ansion of existing sites if necessary.
Other Comments		
Council Response		
•		
Are there any attachmo		

Page 163 of 194	Rep ID 82	EoH Masterplanning Guidance SPD Survey
Respondent Name	James Broughton	Organisation
General Comments	S	
Council Response		
	est in the East of Harlow ma	
Council Response		
	e vision for the East of Harlo	w masterplan guidance?
Council Response		
What is the most in Connection (social	mportant vision theme for the and mobility)	he masterplan guidance?
Council Response		
What design and council Response	onstruction principles do you spaces, Ease of walking and	u think the East of Harlow masterplan guidance should consider? cycling, Well designed community buildings
		aces that the masterplan guidance proposes connections to?
Council Response		
	urage future residents to cycl r speeds, less traffic, more co	
Council Response		
The masterplan gu	idance shows potential key	sustainable links to the site do you agree with these?
Council Response		
Do you agree with No	the requirements for the Su	stainable Transport Corridor as set out in the guidance document?
Council Response		
Do you think the p	referred route for the Sustai	nable Transport Corridor will encourage residents to use it?
Council Response		
Do you agree with	the guidance principles for o	delivering schools on the site?
Council Response		

Page 164 of 194	Rep ID	82		EoH Masterplanning Guidance SPD Survey
Respondent Name	James Brou	ıghton	Organisation	
What services and	facilities sh	ould a lo	cal centre provide?	
Community facilities	es, Retail, Ca	fes and i	restaurants, Education provision	
Council Response				
Comments for Wh	at services a	nd facili	ties should a local centre provide	?
Council Response				
Other Comments				
Council Response				
•				
Are there any attach	ments?	No		

Page 165 of 194	Rep ID	83		EoH Masterplanning Guidance SPD Survey
Respondent Name	Robbie huto	chin	Organisation	
General Comments				
Council Response				
			asterplan guidance area	a?
Council Response				
			ow masterplan guidanc	e?
Council Response				
			the masterplan guidanc	ce?
Council Response				
What design and co Well laid out green : Council Response	enstruction p spaces, Net-	orinciples do yo zero design and	ou think the East of Har d construction	low masterplan guidance should consider?
				lan guidance proposes connections to?
Council Response				
What would encour	age future r	esidents to cyc	cle more at East of Harl on of local cycling routes	
Council Response				
				e site do you agree with these?
Council Response				
				orridor as set out in the guidance document?
Council Response				
				dor will encourage residents to use it?
Council Response				
			delivering schools on t	he site?
Council Response				
What services and f				

Cafes and restaurants, A transport hub, Shared green space

Page 166 of 194	Rep ID 83		EoH Masterplanning Guidance SPD Survey
Respondent Name I	Robbie hutchin	Organisation	
Council Response			
Comments for Wha	t services and facilities	should a local centre prov	ride?
Council Response			
Other Comments			
Council Response			
•			
Are there any attachm	ients? No		

Page 168 of 194	Rep ID	84		EoH Masterplanning Guidance SPD Survey
Respondent Name	David Bell		Organisation	
What services and f A transport hub	acilities sh	ould a local centre p	provide?	
Council Response				
Comments for Wha	t services a	and facilities should	a local centre provide	?
Council Response				
Other Comments				
Council Response				
•				
Are there any attachm	nents?	No		

Page 169 of 194	Rep ID 85		EoH Masterplanning Guidance SPD Survey
Respondent Name	Matthew Hibbitt	Organisation	
General Comment	S		
Council Response			
What is your interc	est in the East of Harlow m	nasterplan guidance ar	ea?
Council Response			
	e vision for the East of Har		nce?
Council Response			
What is the most i	mportant vision theme for and mobility)	r the masterplan guida	nce?
Council Response			
What design and c	construction principles do y	you think the East of H	arlow masterplan guidance should consider? iid out green spaces, Well designed community
Council Response			
Do you agree with	the key routes and green	spaces that the maste	rplan guidance proposes connections to?
Council Response			
Safer roads (slower lanes, Promotion of	•	considerate driving), O re storage/ parking at I	off-road and segregated cycle paths, Safe cycle home/work/stations/on-street, Well
The masterplan gu	•	ey sustainable links to	the site do you agree with these?
Council Response			
Do you agree with	the requirements for the	Sustainable Transport	Corridor as set out in the guidance document?
Council Response			
Do you think the p	preferred route for the Sust	tainable Transport Cor	ridor will encourage residents to use it?
Council Response			

Page 170 of 194	Rep ID 85		EoH Masterplanning Guidance SPD Survey
Respondent Name	Matthew Hibbitt	Organisation	
Do you agree with 2	the guidance principles	for delivering schools on t	he site?
Council Response			
	facilities should a local on, Shared green space, EV	entre provide? / charging points, Commu	nity facilities
Council Response			
Comments for Wha	at services and facilities	should a local centre prov	ide?
Council Response			
Other Comments			
Council Response			
•			
Are there any attachi	ments? No		

Page 172 of 194 Rep Respondent Name Terry No	D 86 orth	Organisation	EoH Masterplanning Guidance SPD Survey
What services and facilities Community facilities, Retail, Shared green space, EV char Council Response	Cafes and restaurant	•	e, Education provision, A transport hub,
Comments for What service Council Response	s and facilities should	d a local centre provide	?
Other Comments			
Council Response			
Are there any attachments?	No		

Page 174 of 194 Rep ID 87		EoH Masterplanning Guidance SPD Survey
Respondent Name Svetlana Buzdugan	Organisation	
What services and facilities should a local cent Retail, Education provision, A transport hub, Sh Council Response	•	
Comments for What services and facilities sho Council Response	uld a local centre prov	ride?
Other Comments		
Council Response		
•		
Are there any attachments? No		

Council Response

Page 176 of 194	Rep ID	88		EoH Masterplanning Guidance SPD Survey
Respondent Name	Lesley Perry	/	Organisation	
Council Response				
What services and Community facilities			•	on, A transport hub, Shared green space, EV
charging points, Ot			•	
Council Response				
			hould a local centre prov	ride?
Sculpture - public a	art - in keepii	ng with the Sc	culpture Town ethos.	
Council Response				
requires new art ir	n developme	nts such as th	iese.	velopment Plan policy on public art, which
Other Comments		••••••		
Council Response				
•				
Are there any attach	ments?	No		

Yes

Council Response

Respondent Name Trudie Baker	Organisation
Council Response	
What services and facilities should a local centre Community facilities, Cafes and restaurants, Small Shared green space Council Response	provide? Il scale workspace, Education provision, A transport hub, Retail,
Comments for What services and facilities should	d a local centre provide?
Council Response	
Other Comments	
Council Response	
•	
Are there any attachments? No	

EoH Masterplanning Guidance SPD Survey

Rep ID 89

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Page 180 of 194 Rep ID 90

EoH Masterplanning Guidance SPD Survey

Respondent Name Shenagh Waddoup

Organisation

Council Response

What services and facilities should a local centre provide?

Community facilities, Cafes and restaurants, Education provision, Shared green space, EV charging points, A transport hub

Council Response

Comments for What services and facilities should a local centre provide?

I live in Elmbridge CM170JU and my back garden will be coterminous with the playing fields of the proposed new secondary school if the plans go ahead as proposed. Whilst I do not object in principle with the building of schools in the fields behind our neighbourhood, I am concerned about noise reduction and the importance of creating a 'green wedge' between the rear of the school playing fields and the existing pathway which I am assuming will be maintained. I would urge the planners to plant trees and bushes along that pathway to maintain the ambiance of this neighbourhood and keep the noise pollution to a minimum. Furthermore I am concerned to make a point about the style of any new buildings in the area adjacent to Churchgate St. it cannot be stressed too highly that this is a very old and settled community with traditional family housing and architecture. PLEASE PLEASE can the design model of ALL new buildings take account of these factors and ensure that all new buildings are sympathetic to the historic and beautiful architecture and house design already in situ and ensure that all new builds reflect this in their design so that they blend in with the neighbourhood. I have been informed that the proposal is to build houses along the architectural framework of New Hall. This is appalling quite frankly as New Hall is a hideous development and even residents in that community acknowledge that the buildings there are ugly and will not age well. Please give this your consideration.

Council Response

The exact locations of the schools have yet to be established and are indicative in the SPD. Essex County Council will be providing further evidence and justification for the best location. The SPD will therefore be amended to remove the school options and state that locations are to be decided. The SPD refers to the importance of taking design cues from development within the vicinty including Churchgate but also Newhall and will also need to consider the sustainability and energy efficiency of buildings (which will impact design), the mix of homes that are required and density of homes in particular locations around the site. This will be considered in far greater detail through the masterplan process.

Other Comments

Council Response

Are there any attachments?

No

Page 182 of 194	Rep ID	91		EoH Masterplanning Guidance SPD Survey
Respondent Name	Suwit Rung	ruang	Organisation	
			ocal centre provide? e, Cafes and restaurants, Retail, E	ducation provision
Comments for What services and facilities should a local centre provide? Council Response				
Other Comments				
Council Response				
Are there any attach	ments?	No		

The masterplan guidance shows potential key sustainable links to the site do you agree with these?

Yes, but there are others to consider

Council Response

Do you agree with the requirements for the Sustainable Transport Corridor as set out in the guidance document?

I don't know

Council Response

Do you think the preferred route for the Sustainable Transport Corridor will encourage residents to use it?

No

Council Response

Do you agree with the guidance principles for delivering schools on the site?

Page 184 of 194	Rep ID 92	EoH Masterplanning Guida	nce SPD Survey
Respondent Name	Sarah Swift	Organisation	
Council Response			
What consider and	facilities should a les	al agustus musicida?	
	facilities should a loc	•	مامدند مراددها
Other, Community	racilities, Cares and re	estaurants, Small scale workspace, Shared green space, EV c	narging points
Council Response			
		es should a local centre provide?	
The character of Ch	nurchgate Street need	s to be considered.	
Council Response			
The SPD will make	clear that surroundir	ng neighbourhoods and building design including overall ch	aracter must
be taken into acco	unt.		
Other Comments			
Council Response			
Are there any attach	ments? No		

Do you think the preferred route for the Sustainable Transport Corridor will encourage residents to use it?

No

Council Response

Page 186 of 194	Rep ID 93	EoH Masterplanning Guidance SPD Survey
Respondent Name Jac	ob Price	Organisation
Council Response		
What services and faci	lities should a local centre	provide?
Community facilities, C charging points	afes and restaurants, Smal	Il scale workspace, Shared green space, Education provision, EV
Council Response		
Comments for What se	ervices and facilities should	d a local centre provide?
Council Response		
Other Comments		
Council Response		
Are there any attachmen	ts? No	
·	,	

Page 188 of 194 Respondent Name G I	Rep ID 94	Organisation	EoH Masterplanning Guidance SPD Survey
		Organisation	
What services and fac Other	cilities should a local centre	e provide?	
Council Response			
Comments for What s	services and facilities shoul	d a local centre provide	e?
Council Response			
Other Comments			
Council Response			
Are there any attachmen	nts? No		

Page 190 of 194	Rep ID	95		EoH Masterplanning Guidance SPD Survey
Respondent Name	Gaurav S		Organisation	
What services and Retail, Education p			•	
Council Response				
			es should a local centre provid	le?
Living right next to	busiest mot	corway, how	w is it healthy for next gen?	
-	riate buffe	rs and scre	ening and any other mitigation	the potential impact from the M11 and on measures to protect future residents, in
Other Comments				
Council Response				
Are there any attachr	ments?	No		

Respondent Name lieann legon Organisation General Comments Council Response What is your interest in the East of Harlow masterplan guidance area? I'm a local resident Council Response Do you support the vision for the East of Harlow masterplan guidance? 2 Council Response What is the most important vision theme for the masterplan guidance? Health (wellbeing, physical, active) Council Response What design and construction principles do you think the East of Harlow masterplan guidance should consider? Well laid out green spaces, Net-zero design and construction, Well designed community buildings, Ease of walking and cycling, Characterful placemaking
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Council Response
Do you agree with the key routes and green spaces that the masterplan guidance proposes connections to?
Council Response
What would encourage future residents to cycle more at East of Harlow? Safer roads (slower speeds, less traffic, more considerate driving), Off-road and segregated cycle paths, Well maintained road surfaces for cycling, Better signposting of safer cycle routes, Safe cycle lanes, Promotion of local cycling routes Council Response
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The masterplan guidance shows potential key sustainable links to the site do you agree with these? Yes, but there are others to consider
Council Response
Do you agree with the requirements for the Sustainable Transport Corridor as set out in the guidance document? Yes
Council Response
Do you think the preferred route for the Sustainable Transport Corridor will encourage residents to use it? No
Council Response

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Respondent Name	lieann leg	gon	Organisation	
Do you agree with 4	the guida	nce pri	nciples for delivering schools on th	e site?
Council Response				
What services and	facilities	hould	a local centre provide?	
Community facilities	es, Cafes a	nd rest	aurants, Education provision, A trar	nsport hub, Shared green space, Retail
Council Response				
Comments for Wha	at services	and fa	icilities should a local centre provid	de?
Council Response				
Other Comments				
Council Response				
Are there any attachr	ments?	No		

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Respondent Name			Organisation	
Other Comments				
Council Response				
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Are there any attachment	ts?	No		
Are there any attachment	ts?	No		