

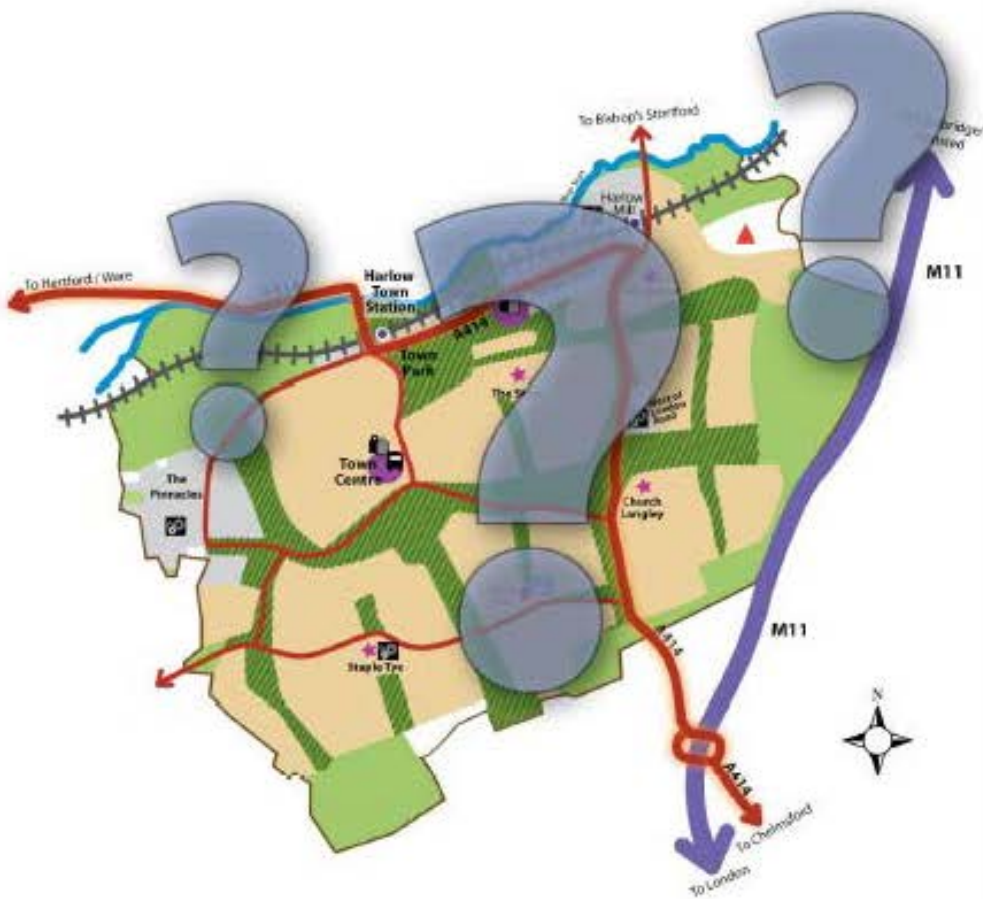


Harlow Local Development Plan

Emerging Strategy and Further Options

Consultation Summary Report

December 2014



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1. Background

- 1.1. Harlow Council is currently preparing a new Harlow Local Development Plan (HLDP). Once adopted, the HLDP will cover the period of 2011 to 2031 and will replace the existing Adopted Replacement Harlow Local Plan (which covered the period of 2006 to 2011).
- 1.2. The HLDP will set out the planning framework for Harlow up to the year 2031. It will include:
 - strategies and policies which will guide the growth and development of the town to meet the needs of residents and businesses
 - detailed policies setting out how proposals for development will be assessed
 - a schedule of infrastructure requirements and a supporting strategy for infrastructure implementation
 - an explanation of how the plan will be monitored and how actions will be implemented if necessary
- 1.3. The HLDP will consist of three main parts:
 - Strategic Policies
 - Development Management Policies
 - Policies Map
- 1.4. There are also a number of supporting documents to the HLDP:
 - Local Development Scheme
 - Evidence Base (comprising a range of technical documents)
 - Annual Monitoring Reports
 - Supplementary Planning Documents
 - Sustainability Appraisals
 - Statement of Community Involvement
 - Area Action Plans (if required)
- 1.5. A number of these documents have been completed and in some cases are regularly revised and updated. The various methods of consultations used during the preparation of the HLDP can be found in the Statement of Community Involvement: Review. This describes how the Council consults with the community in the preparation of Local Planning and other related documents.
- 1.6. The first stage in the preparation of the HLDP was the Issues and Options consultation undertaken at the end of 2010. This set out options for growth in Harlow based on development requirements in the East of England Plan. Since then, the Government has made a number of major changes to the planning system culminating in the abolition of the East of England Plan. This means the Council is now responsible for identifying the level of growth needed in Harlow, as well as location of new development in the town, subject to Government guidance set out in the National Planning Policy Framework and National Planning Practice Guidance.

2. Emerging Strategy and Further Options Consultation

- 2.1. Public consultation is an important part of the Harlow Local Development Plan and the Council is committed to involving the community in the preparation of all local planning policy documents, in accordance with national legislative requirements and the Council's Statement of Community Involvement¹ (SCI). As such, care is taken to ensure all key stakeholders are engaged in the consultation process during the preparation of the HLDP, including residents, businesses, statutory bodies, local groups and hard-to-reach groups.
- 2.2. The Emerging Strategy and Further Options consultation was the second stage in the preparation of Harlow's Local Development Plan (HLDP), aiming to answer a number of key questions including:
- How much development is needed to meet the town's needs?
 - What approach would best deliver the Council's corporate objectives?
 - What form of development would reflect the unique character of the town?
 - What are the main constraints and limitations to delivering development that need to be considered?

Consultation Materials

2.3. The table below details the consultation materials and their availability:

| Material | Availability |
|----------------------------|--|
| Main consultation document | <ul style="list-style-type: none"> • Hard copies available for viewing at the Civic Centre, Harlow Central Library, Old Harlow Library and exhibitions • Hard copies available for obtaining by residents and local groups (upon request); • Hard copies available for purchase by commercial bodies (upon request); • Downloadable from the Council website |
| Summary leaflet | <ul style="list-style-type: none"> • Obtainable from Civic Centre, Harlow Central Library, Old Harlow Library and exhibitions • Downloadable from the Council website |
| Printed questionnaire* | <ul style="list-style-type: none"> • Obtainable from Civic Centre, Harlow Central Library, Old Harlow Library and exhibitions • Downloadable from the Council website |
| Online questionnaire* | <ul style="list-style-type: none"> • Accessible on the consultation portal via the Council's website |
| Sustainability Appraisal | <ul style="list-style-type: none"> • Available for viewing at the Civic Centre, Harlow |

¹ At the time of the Emerging Strategy and Further Options consultation, the extant SCI was adopted in 2007. A review of the SCI has since been finalised and adopted following a period of public consultation, meaning the SCI: Review is now the adopted SCI for Harlow. The revised SCI reflects changes in national legislation and consultation best practices since 2007.

| | |
|--|---|
| | Central Library, Old Harlow Library and exhibitions • Downloadable from the Council website |
| CD** | • Obtainable from exhibitions and on request from the Council |
| Evidence Base documents, including the Green Wedge Review, Strategic Housing Land Availability Assessment, Strategic Housing Market Assessment and Spatial Options Study | • Hard copies available for viewing at the Civic Centre (upon request) • Downloadable from the Council website |

* The paper questionnaire and online questionnaire asked the same questions.

** The CD also contained the Statement of Community Involvement: Draft Review, which was being consulted on in parallel with the Emerging Strategy and Further Options consultation document.

- 2.4. The consultation document set out information on:
- the background behind the consultation
 - the issues and challenges facing Harlow
 - why new development is needed
 - five alternative examples suggesting how and where development could be accommodated in and around Harlow
- 2.5. The summary leaflet provided an overview of the five development examples set out in the main document.
- 2.6. The Sustainability Appraisal, which was carried out by independent consultants, assessed the social, environmental and economic effects of the development examples and forms an integral part of the preparation of the HLDP. Further Sustainability Appraisals will be carried out as the HLDP is prepared, ensuring that sustainability considerations inform the development of policies and proposals.

Please refer to Appendix 4 for more information on the Sustainability Appraisal.

Getting involved

- 2.7. The Emerging Strategy and Further Options consultation took place between **Monday 14 April and Friday 30 May 2014**. This length of period allowed for Bank Holidays and exceeded the Council's normal commitment (set out in the adopted SCI) to consult for a 6-week period at this stage.
- 2.8. Respondents were encouraged to read the consultation document and to complete a questionnaire on the consultation portal via the Council's website. Alternatively, paper questionnaires could be completed and returned to the Council. Representations could also be emailed or posted without filling in the questionnaire.
- 2.9. The questionnaire contained 'closed' questions (i.e. 'yes / no', 'please tick all that apply' and 'please rank'). The questions primarily related to the five development examples presented, with other questions relating to the level of development

proposed, the importance of certain principles in locating future development and the possibility of a 'blend' of development examples. Respondents were able to provide additional comments for each question by completing the comments box at the end of the questionnaire.

2.10. When responding to the consultation, respondents had to provide their contact details, as anonymous responses could not be accepted. This ensured that the process was fair and transparent. Respondents were also given the opportunity to 'opt out' of being added to the Harlow Local Development Plan database which is used to notify interested parties of updates relating to preparation of the HLDP.

2.11. Respondents could also speak to Council Officers in person or by telephone, but only written representations could be considered.

Notification Methodology

2.12. All consultees on Harlow Council's LDP database, who had not opted out of being kept informed, were notified about the consultation either by email or letter depending on their preference.

2.13. The notification emails/letters:

- provided information about the consultation;
- stated where documents could be viewed in public places and online;
- explained how responses to the consultation could be made and when they should be made by;
- reminded the recipient that they were being contacted as they were on our consultation database; and
- stated that if the recipient no longer wished to be on the database, they could request removal (specific consultees and local hard-to-reach groups could request that their details be changed to a more appropriate contact in their organisation).

2.14. A Consultation CD was also sent to specific consultees and local hard-to-reach groups who had a preferred communication method of 'post'.

2.15. A total of 1,468 letters (150 of which included a CD) and 913 emails were sent to consultees.

Please refer to Appendices 6 and 7 for a list of consultees and respondents to the consultation.

Public Exhibitions

2.16. Three staffed public exhibitions were held across Harlow during the consultation period as follows:

- St John's Arts & Recreation Centre, Old Harlow, Tuesday 13 May – 3pm to 9pm
- Latton Bush Centre, Wednesday 14 May – 3pm to 9pm
- Harvey Centre, Wednesday 21 May – 10am to 5pm

- 2.17. Two unstaffed exhibitions were also on display at public places in Harlow:
- Civic Centre, Monday 14 April to Friday 30 May
 - Harlow Central Library, Thursday 22 May to Friday 30 May
- 2.18. At the exhibitions, people could view displays of the five development examples contained in the consultation document. Visitors to the exhibitions could also pick up a copy of the summary leaflet, a consultation CD and a paper questionnaire. At the staffed exhibitions, members of the Council's Forward Planning Team were present to answer questions from members of the public and provide more information.
- 2.19. A total of approximately 170 people attended the staffed exhibitions, with additional people viewing the unstaffed exhibitions. Approximately 350 leaflets and 250 paper questionnaires were collected by visitors to the exhibitions. Details of the exhibition venues, dates and times were published on the Council's website. The exhibitions were also advertised via a press release in the *Harlow Star*.

Please refer to Appendices 12, 13 and 14 for more information on the exhibitions.

- 2.20. A presentation was given to fifteen members of the Harlow Youth Council followed by a discussion on the strategies and growth options. This helped ensure the consultation reached the younger people of Harlow, as young people are often one of the hardest groups to reach during consultations.

Please refer to Appendix 5 for more information on the presentation.

Further Press and Publicity

- 2.21. Following a Special Cabinet meeting to agree the content of the consultation, a press release was published in the 30 January 2014 edition of the *Harlow Star* to advertise the consultation in the Spring. The release was also published in the Spring 2014 edition of the *Harlow Times*.

Please refer to Appendices 9 and 10 for more information on the press releases.

- 2.22. A further press release was published in the 10 April 2014 edition of the *Harlow Star* to advertise the start of the consultation and explain how responses could be made. The press release was also published on the Council website and was reproduced on various news websites including the *Your Harlow* website. A tweet announcing the start of the consultation was sent through the Council's Twitter account and a news banner was placed on the Council's website homepage to advertise the consultation. A poster was also displayed in the window of the reception of the Civic Centre.

Please refer to Appendices 11, 15 and 16 for more information on this publicity.

3. Analysis of overall response

3.1. There were a total of 117 responses to the consultation, broken down as shown below. The majority of responses were in the form of questionnaires completed online or representations submitted by email. Many of the submitted questionnaires included additional comments.

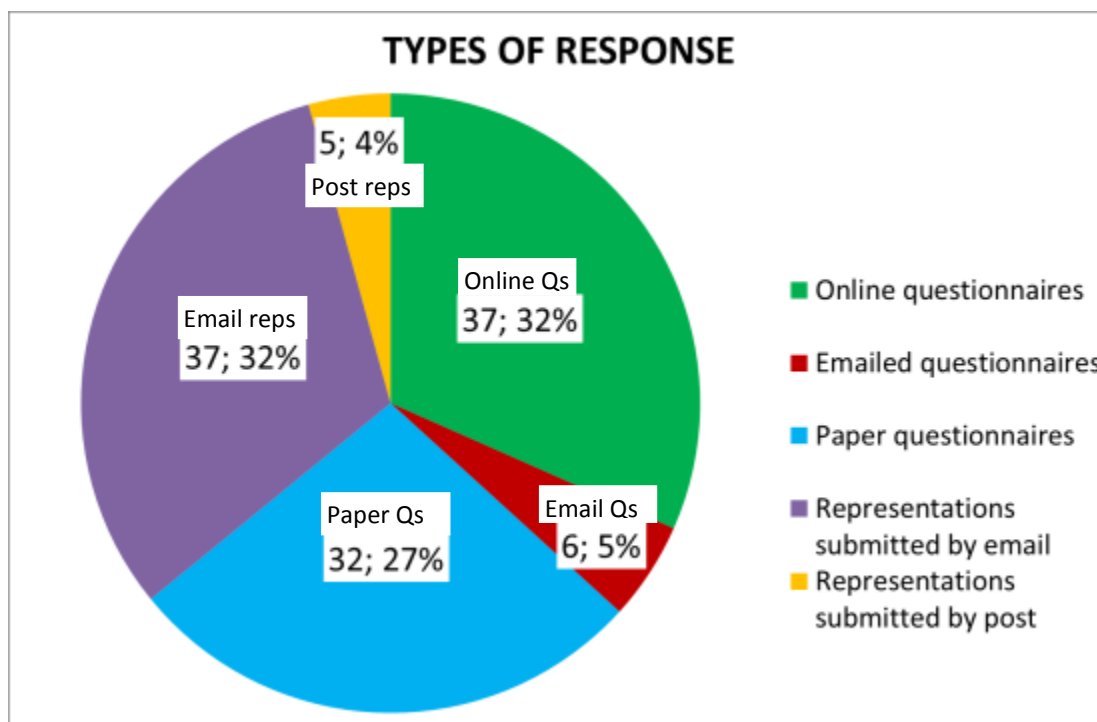


Fig. 3.1

3.2. A total of 101 people/organisations responded to the consultation, either by completing a questionnaire and/or submitting a representation. The number of responses is greater than the number of respondents because some respondents submitted a questionnaire and also a separate representation.

3.3. The respondents have been split into four sub-groups for analysis purposes, as shown below.

| Sub-Group | Type of Respondents |
|--|---|
| 1: Harlow Residents and Resident/Community Groups | <ul style="list-style-type: none"> • Harlow Residents • Harlow Resident/Community Groups/Associations |
| 2: Specific Consultees and Local Groups, Businesses & Organisations | <ul style="list-style-type: none"> • Adjacent Local Authorities, Parish Councils and County Councils • Government Agencies and Departments • Infrastructure and Utility Providers • Local Businesses • Local Groups and Organisations (including faith groups, disability groups, environmental) |

| | |
|--|--|
| | groups and ethnic minority groups) <ul style="list-style-type: none"> • Partner Agencies • Other Groups/Organisations |
| 3: Adjoining Parishes Residents and Other Residents | <ul style="list-style-type: none"> • Residents from East Hertfordshire DC area • Residents from Epping Forest DC area • Other Residents |
| 4: Local Developers, normally via Planning Consultants/Agents | <ul style="list-style-type: none"> • Local Developers (responses normally submitted via Planning Consultants/Agents) |

3.4. The chart below displays the number of respondents to the consultation, split by sub-group. Most of the responses received were from Sub-Group 1.

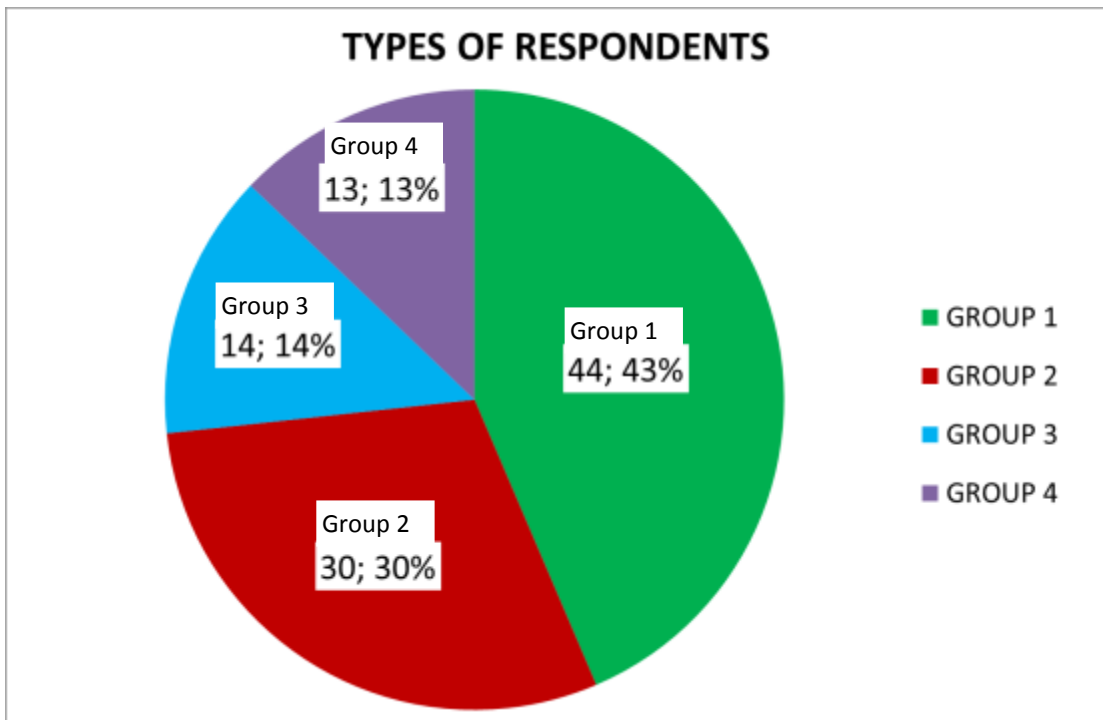


Fig. 3.2

Please refer to Appendix 7 for more information on the respondents.

4. Analysis of consultation responses

- 4.1. The questionnaire consisted of closed questions, but respondents had the opportunity to provide additional comments about individual questions and/or general issues relating to the consultation. Alternatively, respondents could submit representations without filling in a questionnaire. A number of representations were received which contained supporting technical documents, plans and maps; such representations were generally received from planning consultants/agents (on behalf of local developers) and specific consultees.
- 4.2. For analysis purposes, the responses to the consultation have been split by the questions in the questionnaire. For each question the following analysis is provided:
- explanation of the question
 - charts to display the responses²
 - commentary of the main issues arising from submitted comments relating to that question
 - comments relating to that question (the sub-group of the person/organisation who submitted each comment is also stated)
- 4.3. Comments relating to specific questions are reported in Appendix 1; comments which are not question-specific are reported in Appendix 2; and all comments (question-specific or otherwise) made by specific consultees, such as adjoining authorities, are reported in Appendix 3.
- 4.4. Responses to the consultation – including comments submitted via the questionnaire, standalone representations and any supporting documents – can be viewed, searched and downloaded from the Local Development Plan consultation portal via the Council website at <http://www.harlow.gov.uk/local-plan> The author (and organisation, where applicable) of each response is also provided.

STOP Harlow North petition

- 4.5. A petition was sent to East Herts Council by the STOP Harlow North campaign group in response to the consultation on the East Herts District Plan consultation which was undertaken earlier in 2014. The same petition was sent to Harlow Council as a representation to the Emerging Strategy and Further Options consultation. However, the petition did not directly answer the questions in the consultation questionnaire as the petition was tailored for the East Herts Council consultation.
- 4.6. A total of 1,846 people – mostly residents of East Hertfordshire – signed the petition and stated their agreement with STOP Harlow North's statements that development to the north of Harlow (in the Gilston area) would be unsustainable and not financially viable due to a lack of supporting infrastructure, and that the creation of Gilston Great Park is a preferred alternative.

² Five charts are provided for each question: one for all respondents and four for each of the sub-groups. The charts detail the number of responses received for each answer and the associated percentage. Note that some of the sub-groups had lower response levels than the others and care should therefore be taken in any statistical analysis for these sub-groups.

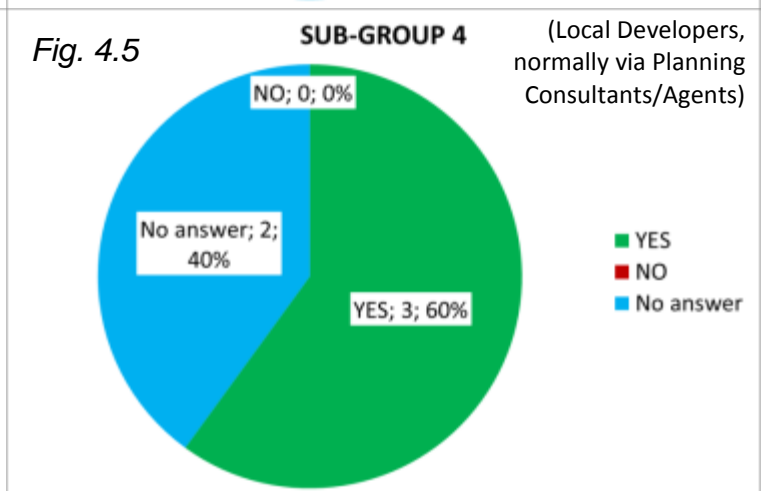
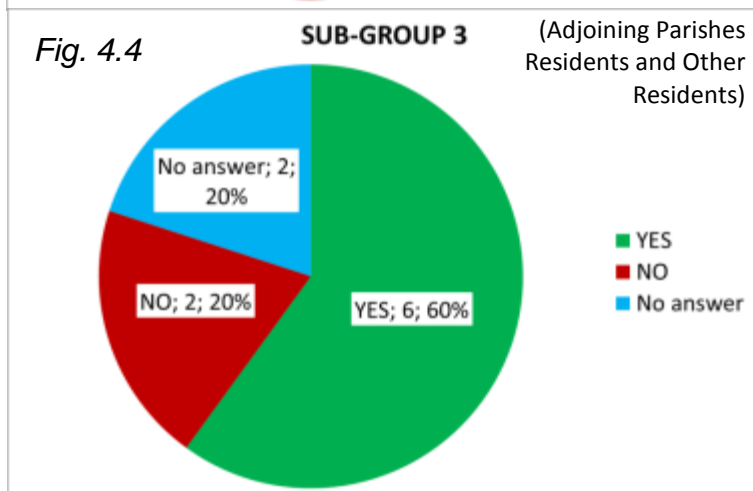
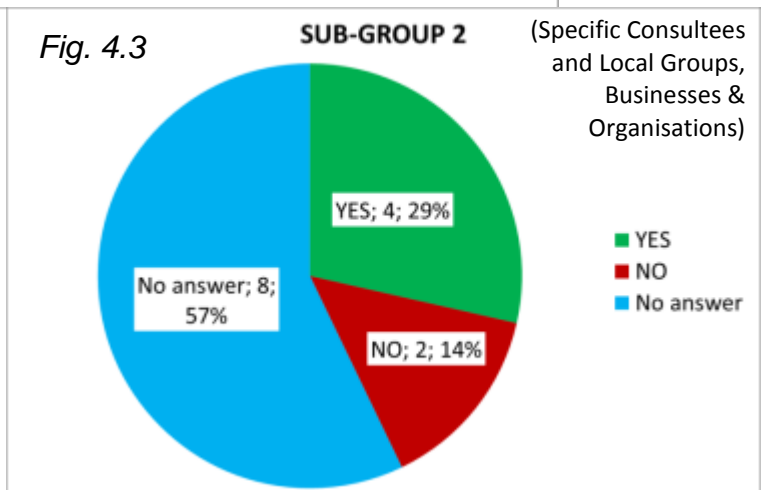
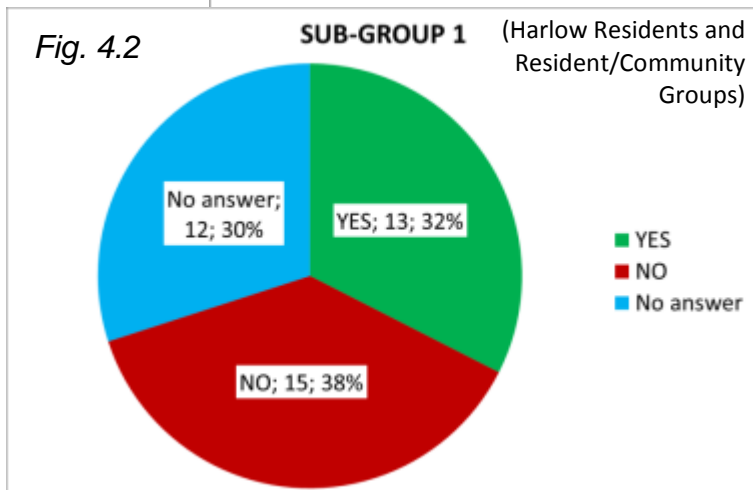
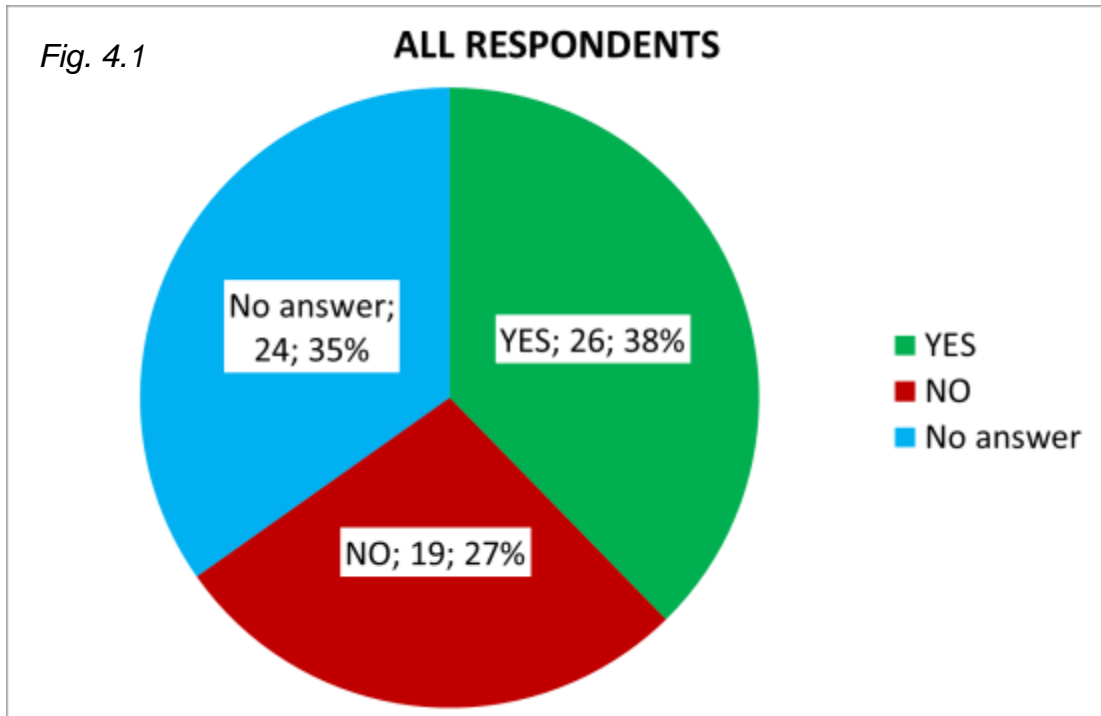
- 4.7. The development examples which include development to the north of Harlow also include development elsewhere. It cannot therefore be assumed that signatories of the petition would be opposed to all such examples.
- 4.8. Some of the comments made by the signatories relate to cross-boundary issues. Therefore, in order to ensure fairness is maintained and that responses to the Harlow Council consultation are not misinterpreted, the responses from the petition have been considered separately in Appendix 2.

Question 1

With [national government policy and the Council's objectives] in mind do you think that the level of development proposed for Harlow between 2011 and 2031 would deliver the Council's objectives as set out on page 20?

- 4.9. The National Planning Policy Framework, which is national Government planning policy, requires the Council to boost significantly the supply of housing to meet the needs of the community. This means 'no growth' is not an option for the Local Development Plan.
- 4.10. Additionally, the Council has a number of core priorities which it is aiming to achieve during the lifetime of the emerging Harlow Local Development Plan, including providing more and better housing, delivering a growing, sustainable and regenerated Harlow, and stimulating a thriving economy.
- 4.11. This question sought views on whether the level of development set out in the consultation document (i.e. 12,000 to 15,000 new dwellings and 8,000 to 12,000 new jobs between 2011 and 2031) would deliver the Council's objectives.
- 4.12. The majority of respondents who answered the question stated that the level of development **would** deliver the Council's objectives (38% answered 'yes', 27% 'no' and 35% did not answer). This response was broadly reflected across the sub-groups, except for sub-group 1 where the majority answer was 'no'.
- 4.13. Figures 4.1 to Fig. 4.5 visually represent the breakdown of responses to the question.

QUESTION 1: Graphical Representation of Responses



4.14. A number of comments were submitted about this question and the proposed growth levels in general. A more detailed breakdown of the comments is provided in Appendix 1. The main issues raised were:

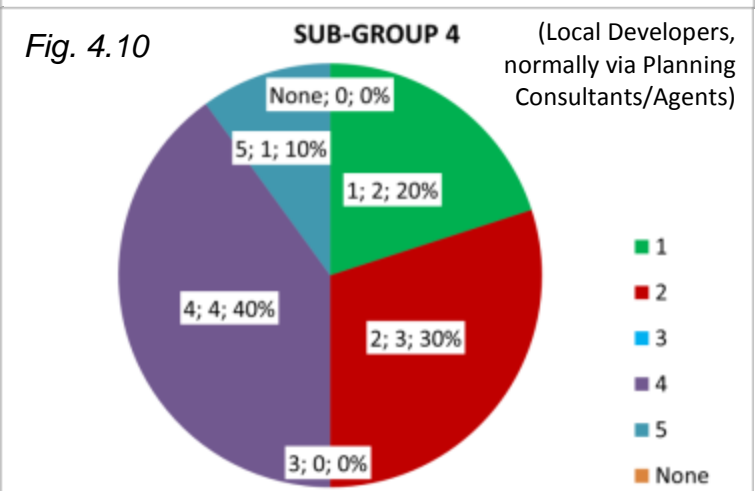
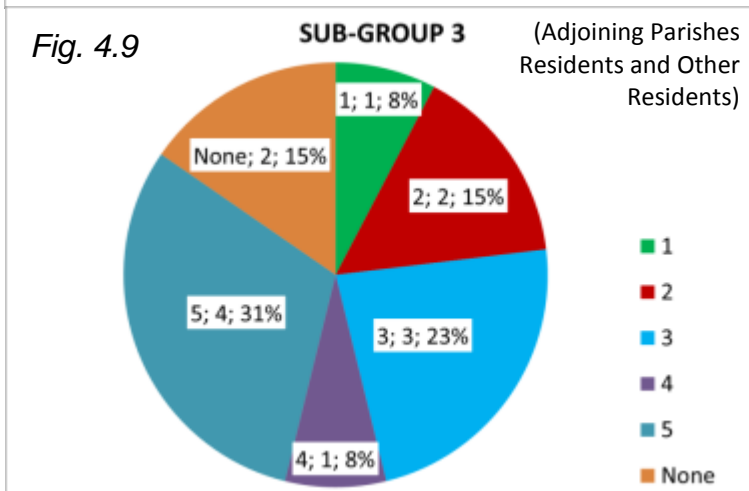
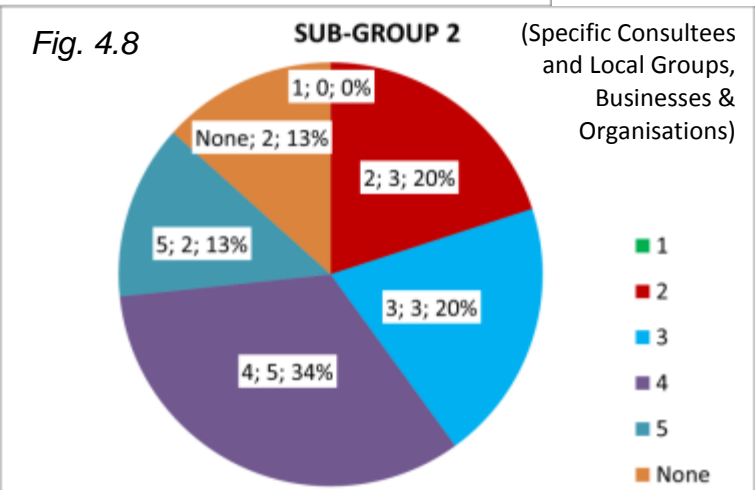
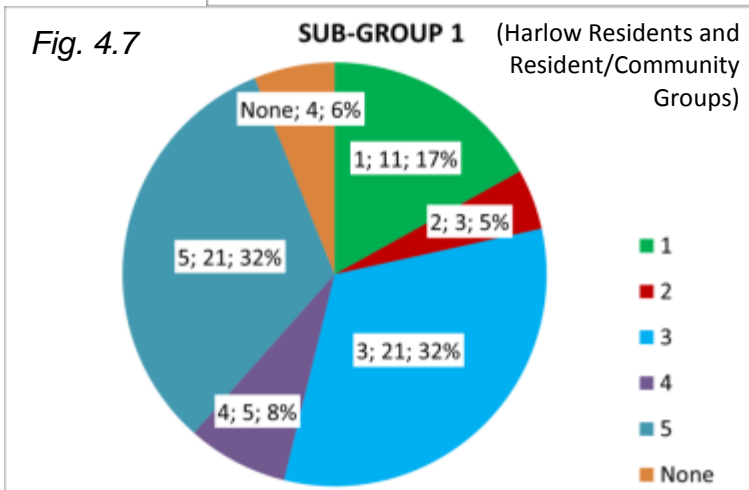
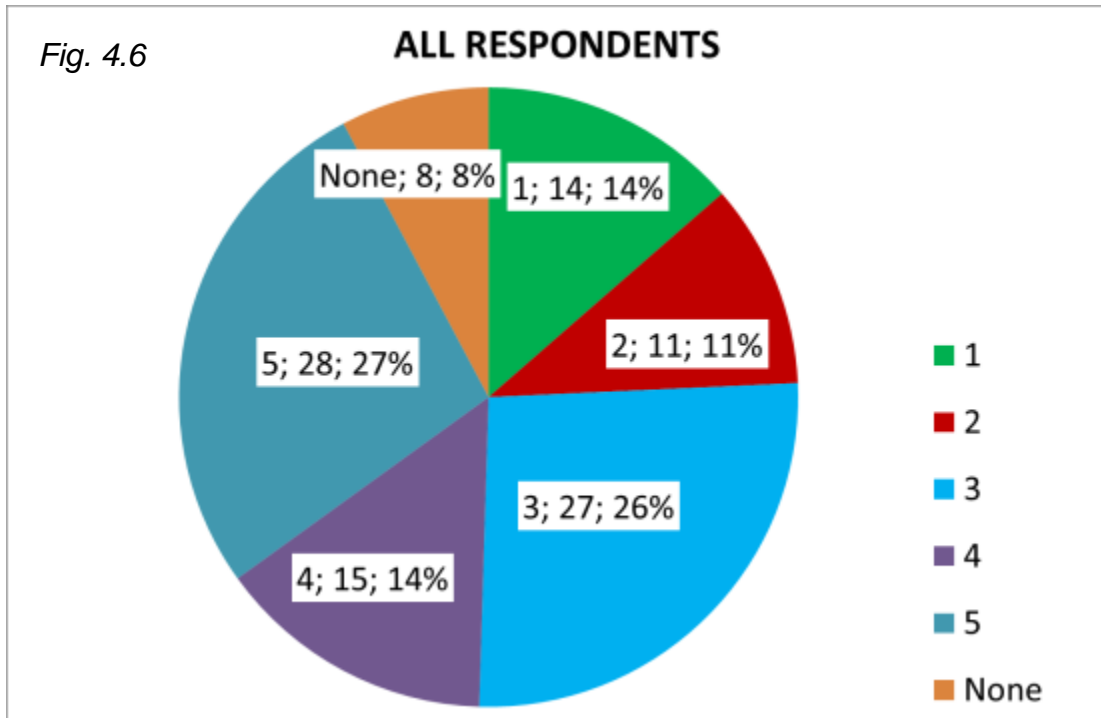
- proposed growth levels are excessive and unsustainable;
- 'do nothing' is not an option;
- shortfall from the current plan needs to be considered;
- need for a Green Belt Review;
- a higher target is needed for housing and jobs;
- number of houses needed in the Harlow Joint Working Area needs to be identified through the duty to co-operate;
- new housing, particularly affordable housing, is fundamental for a sustainable future and will deliver regeneration;
- other authorities have not allowed for Harlow's housing shortfall;
- other factors need to be considered in the calculation of housing requirements;
- proposed increase in Harlow is disproportionate compared to other areas;
- lack of infrastructure affecting the economic and social viability of new developments;
- impact of neighbouring councils;
- housing needs of workers;
- amount of social housing proposed;
- potential extent of regeneration needs to be considered;
- SHLAA overstates the potential availability and capacity of land; and
- need to change the mix of dwelling types and tenures needs addressing

Question 2

Which example(s) do you feel come closest to delivering the Council's stated vision and core priorities for the Local Plan?

- 4.15. Alongside the core priorities for the Local Development Plan, a vision for how the emerging planning strategy reflects the corporate policies of the Council was provided in the consultation document. The vision sets out a number of changes that the town should have secured during the lifetime of the emerging Local Development Plan, including sufficient housing to meet local needs, a significant increase in the provision of affordable homes, new development to revitalise key areas, a reduction in the amount of vacant and underused land, and the provision of excellent education facilities.
- 4.16. This question asked respondents to choose which of the five development examples contained in the consultation document come closest to delivering the Council's vision and core priorities. Respondents could choose one or more example, or a 'none of the above' option.
- 4.17. Examples **3 and 5** were the two most popular choices, with a combined total of over 50%. Only 8% of responses stated that none of the options would deliver the Council's vision and core priorities. These responses were broadly reflected across the individual sub-groups.
- 4.18. Figures 4.6 to 4.10 visually represent the breakdown of responses to this question.

QUESTION 2: Graphical Representation of Responses



4.19. A number of comments were submitted about this question and the development examples in general. A more detailed breakdown of the comments is provided in Appendix 1. The main issues raised were:

- support for examples 3 & 5, as growth to the north of Harlow fulfils a number of essentials not available in the south-west of Harlow, including sufficient transport infrastructure;
- concerns over potential of increased commuting;
- provision of rented affordable housing not clear;
- concerns over viability of Examples 1, 2 & 4 due to infrastructure issues;
- Examples 1, 2 and 4 are most appropriate as they would deliver growth, regeneration and investment benefits, and provide potential for landscape and ecological enhancement;
- Example 3 was preferred for its growth in the north of Harlow which is considered the most sustainable option;
- development to the east of Harlow (e.g. examples 2, 4 and 5) could facilitate a new M11 junction, extend the network of green wedges and maximise use of public transport;
- examples 3 and 5 have negligible regeneration potential;
- examples 2 and 4 are too focussed on prioritising the landscape to deliver sufficient regeneration;
- lack of protection of the town's distinctive character and heritage in the examples;
- relevance of the examples as they do not encompass all the objectives;
- lack of economic revitalisation and supported development & change in the examples;
- importance of choosing sites that can be delivered in the short-term to meet the key objectives; and
- reasoning behind the inclusion of land in certain examples and not others

Question 3

Please rank, in order of priority (1=most important, 4=least important) how important the following principles are to you in locating future development across Harlow:

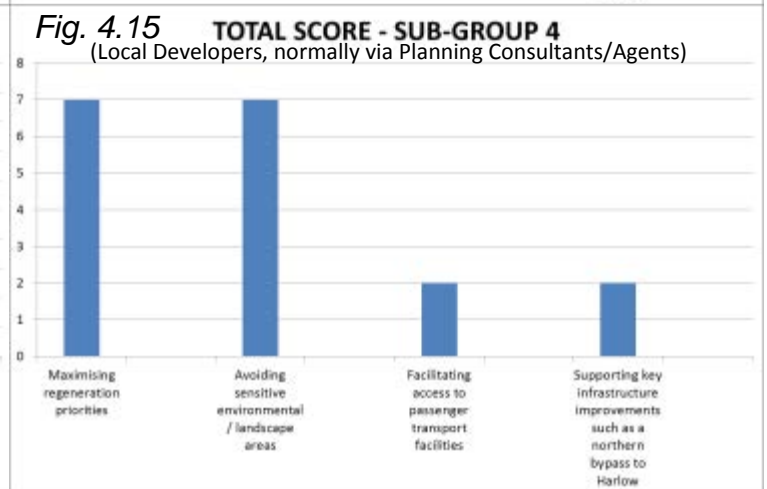
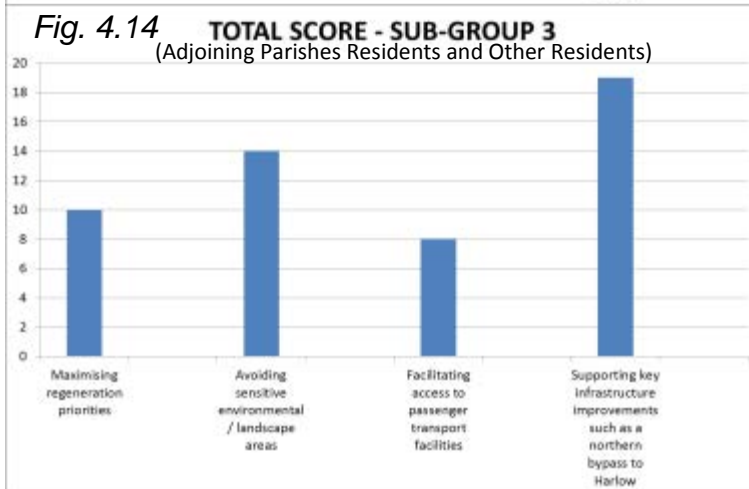
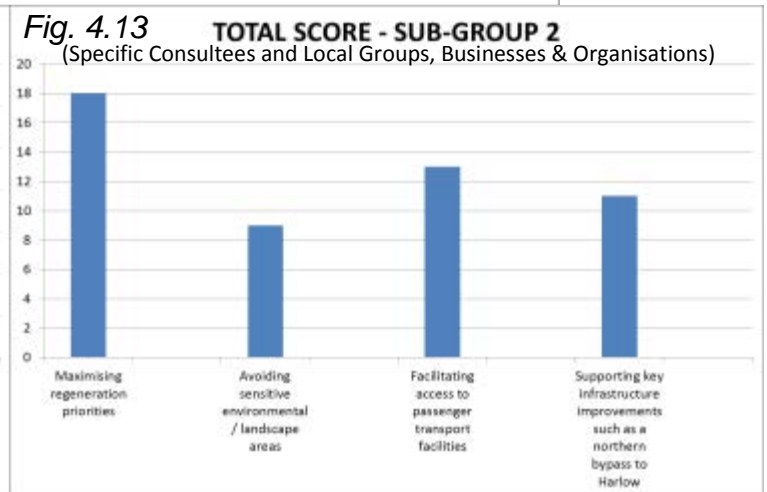
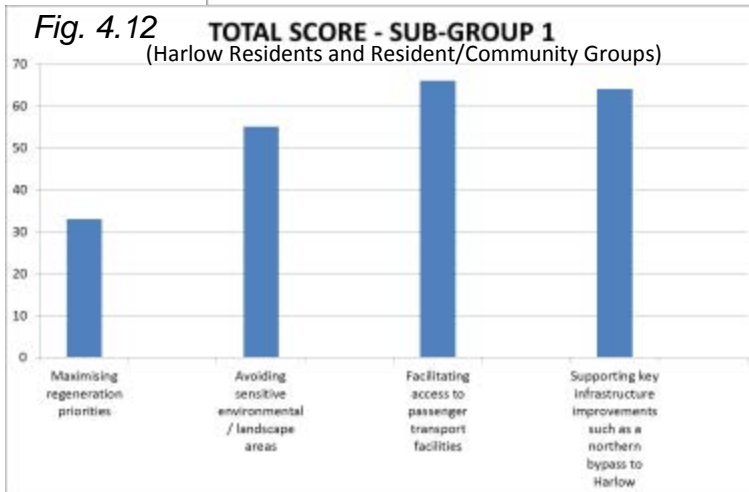
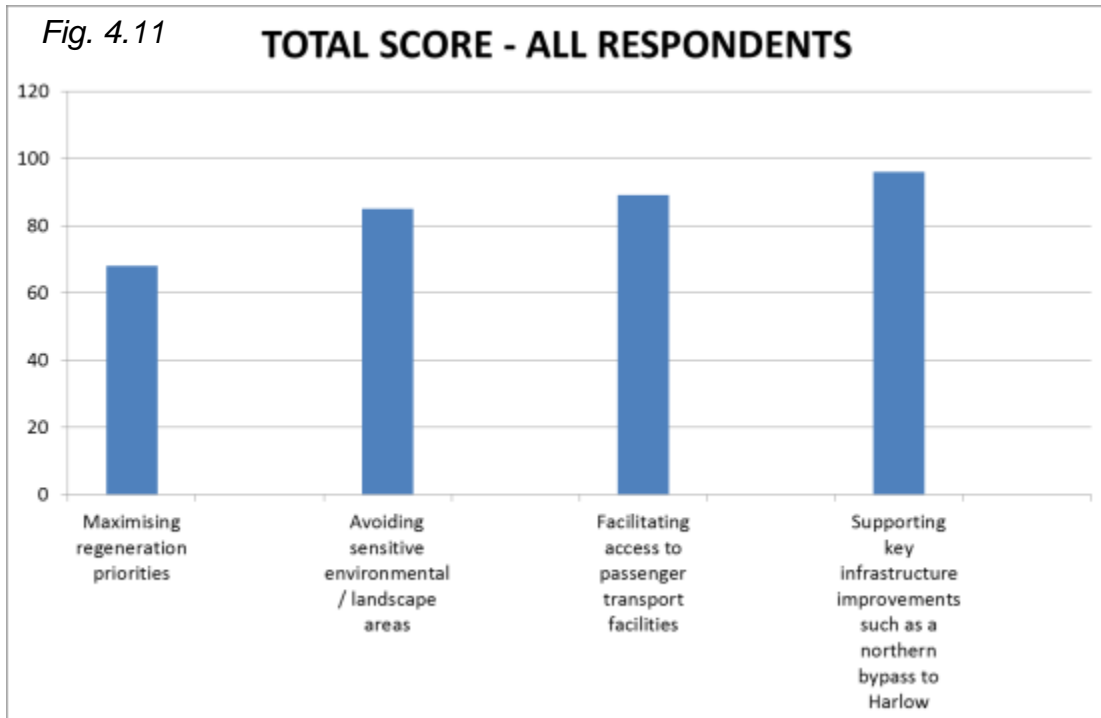
- *Maximising regeneration priorities*
- *Avoiding sensitive environmental/landscape areas*
- *Facilitating access to passenger transport facilities*
- *Supporting key infrastructure improvements, e.g. a northern bypass to Harlow*

4.20. This question sought views on the four principles (above) in deciding where to locate future development across Harlow. Respondents were asked to rank the principles depending on how important they think they are. The results were then analysed.

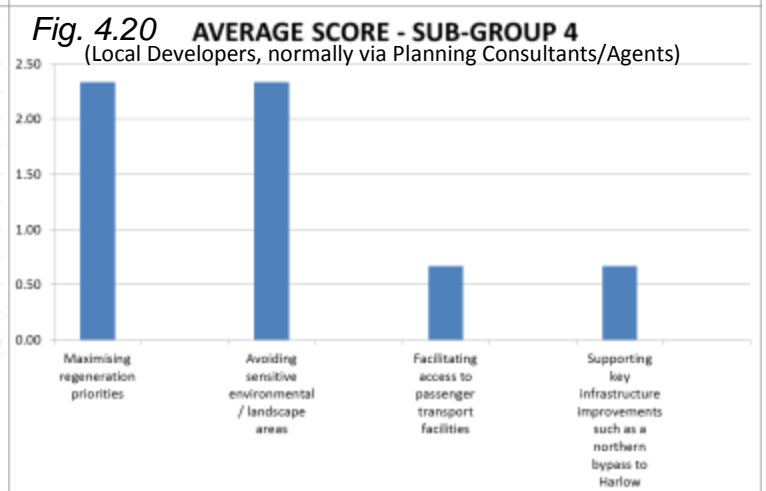
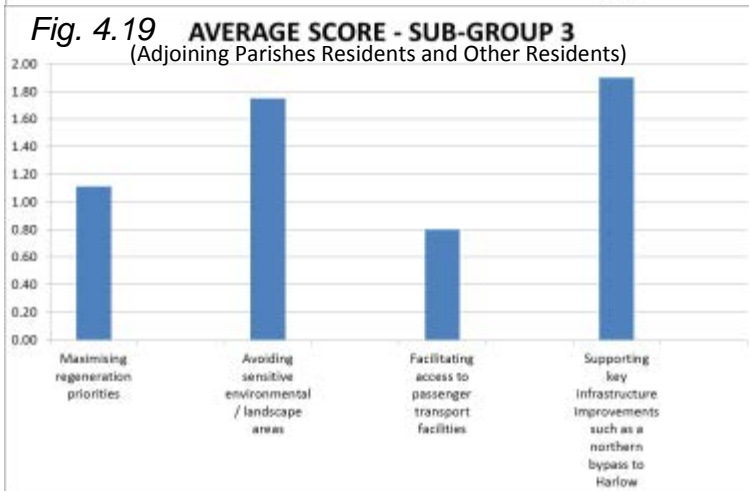
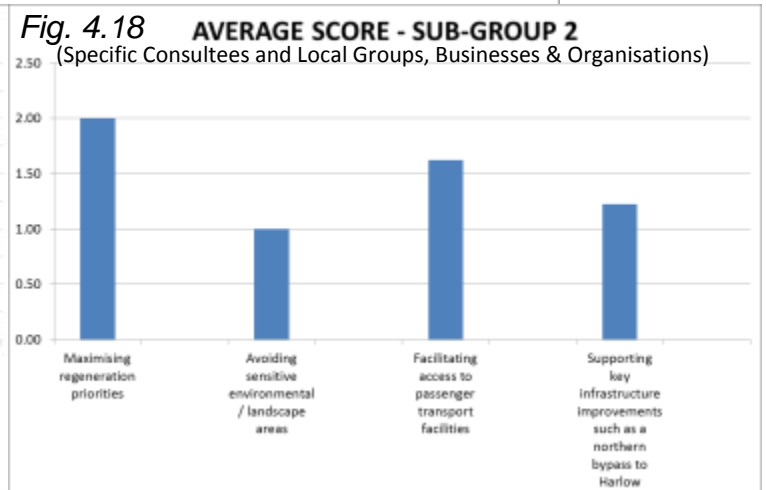
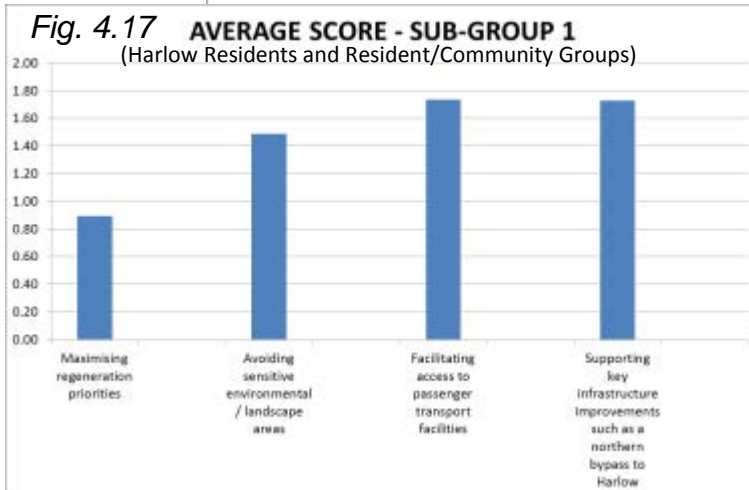
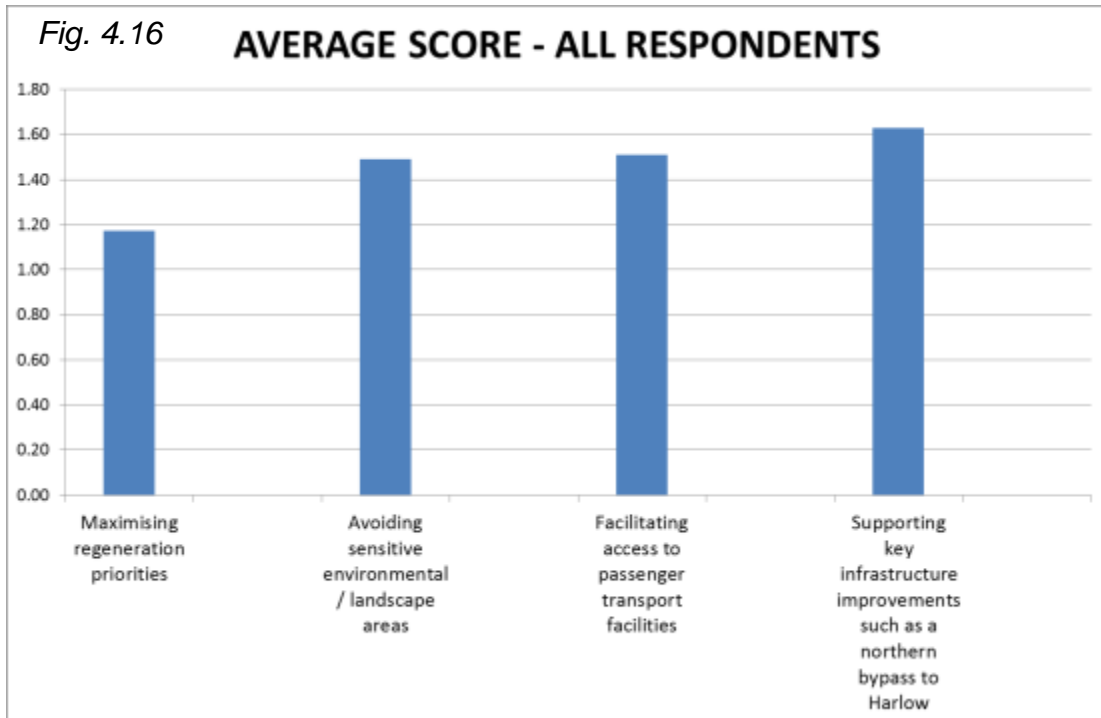
4.21. The factor which received the highest analysis score (and is therefore the most important factor) was **supporting key infrastructure improvements** such as a northern bypass to Harlow. The most important factor varied by individual sub-group.

4.22. Figures 4.11 to 4.20 visually represent the breakdown of responses to the question.

QUESTION 3: Graphical Representation of Responses (1)



QUESTION 3: Graphical Representation of Responses (2)



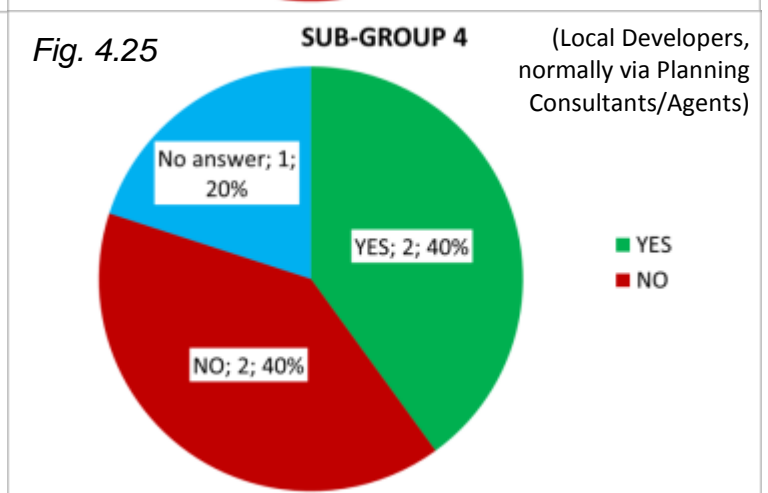
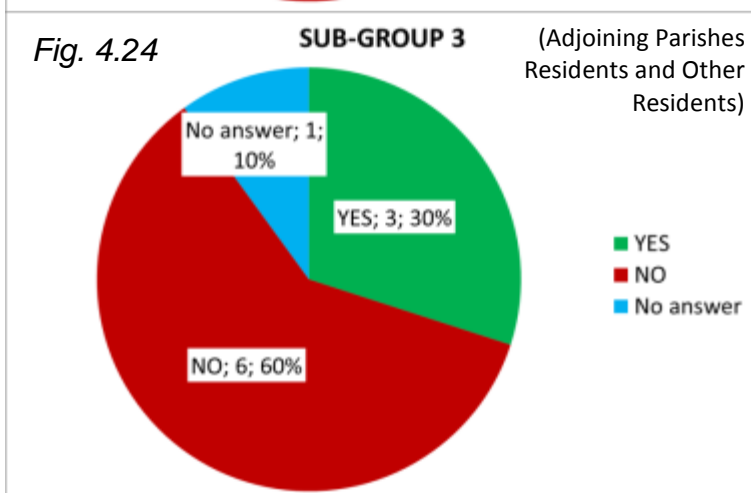
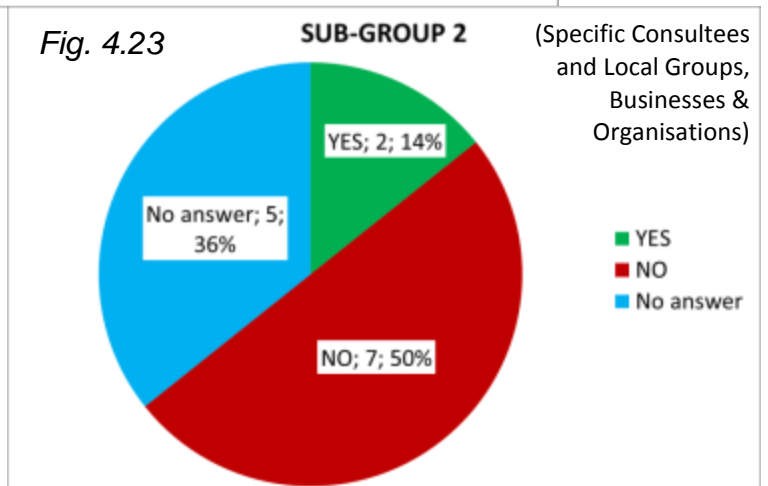
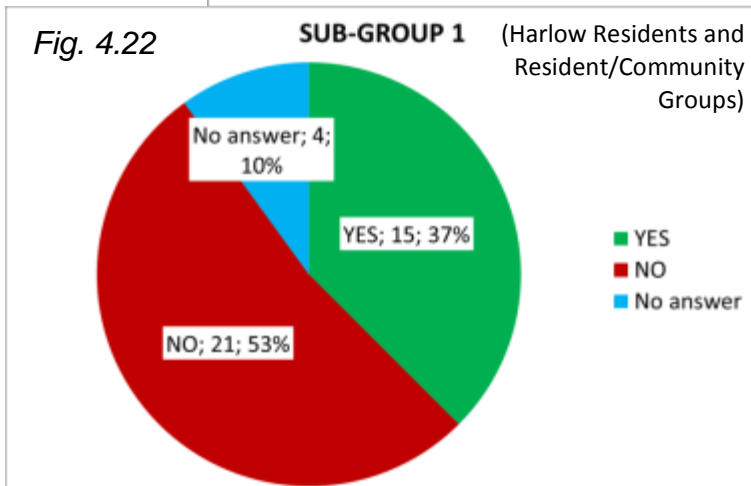
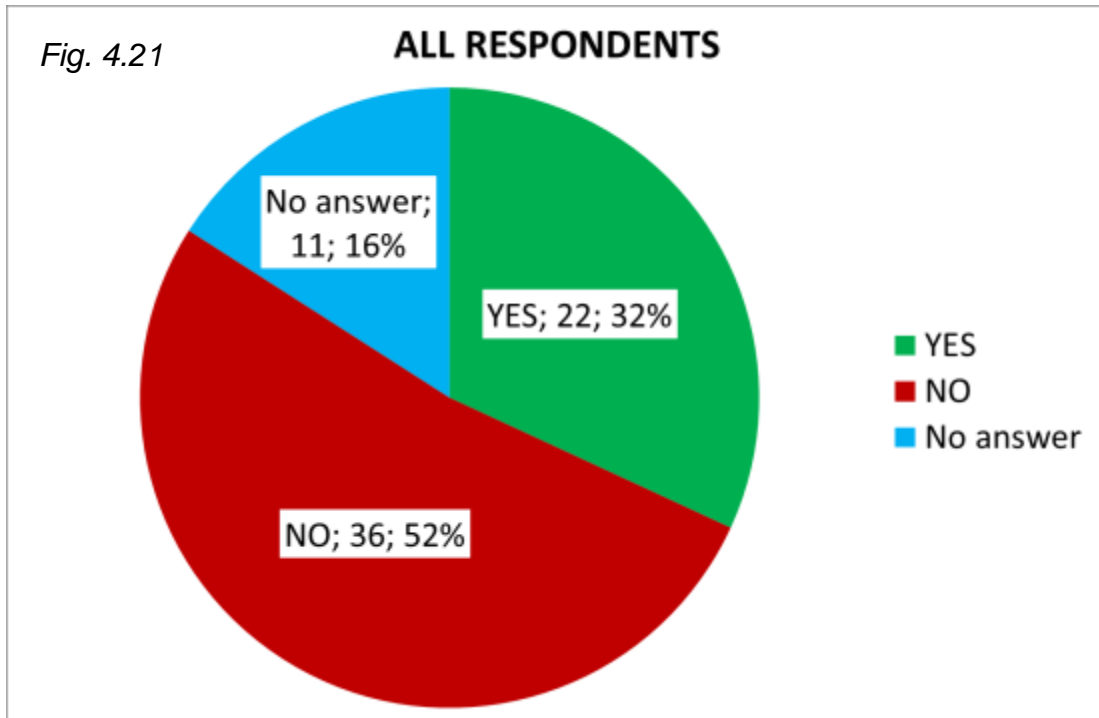
- 4.23. A number of comments were submitted relating to this question. A more detailed breakdown of the comments is provided in Appendix 1. The main issues raised were:
- regeneration should be the key principle to meet the core priorities;
 - enhancement of public transport and infrastructure are part of achieving successful regeneration;
 - regeneration is beneficial in assisting with solving deep rooted social and economic deprivation; and
 - it is wrong to rank the principles because they are interdependent and the five examples do not address all the objectives and priorities.

Question 4

Do you think the locations included in the Focused on Priority Regeneration Areas Example 1 are likely to deliver the Council's regeneration objectives?

- 4.24. This question related to Example 1 and whether the locations included in it would be likely to deliver the regeneration objectives set out in the consultation document.
- 4.25. Example 1 – Focused on Priority Regeneration Areas – focuses the majority of development in Priority Regeneration Areas to the south and west of Harlow, with the possibility of growth to the north. The example includes the renaissance of the town centre, improvement of neighbourhood centres and hatches, and the reuse of the town's brownfield sites, employment land and some greenfield sites for housing and mixed uses.
- 4.26. The majority of respondents who answered this question stated that the example **would not** meet the regeneration objectives (52% answered 'no', 32% 'yes' and 16% did not answer). This response is broadly reflected in the individual sub-groups.
- 4.27. Figures 4.21 to 4.25 visually represent the breakdown of responses to this question.

QUESTION 4: Graphical Representation of Responses



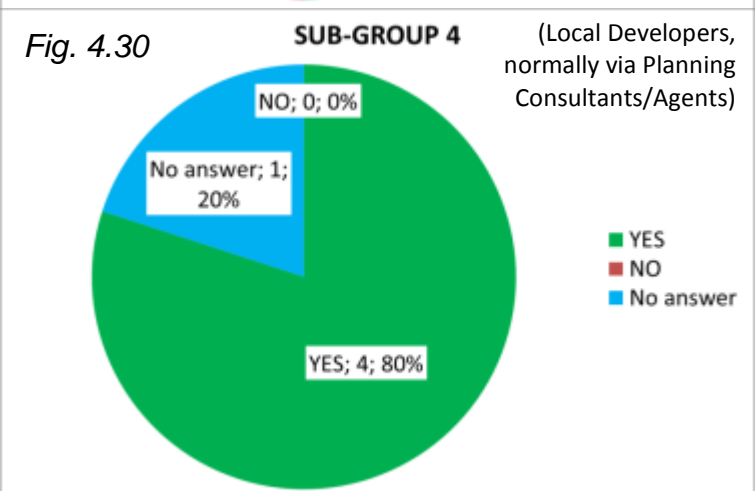
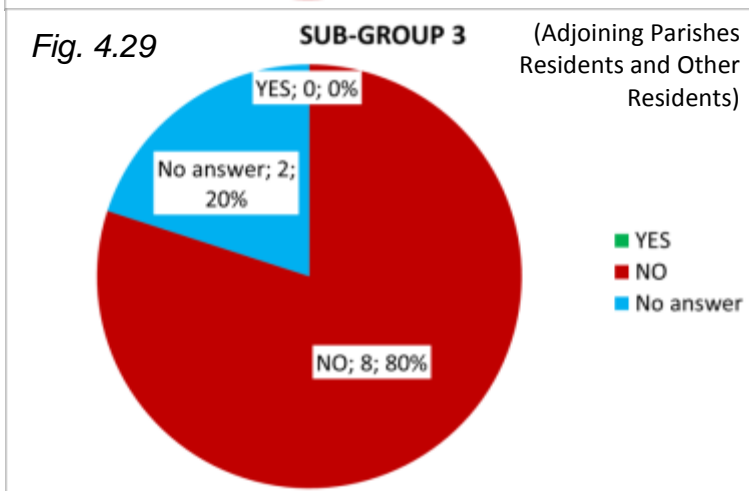
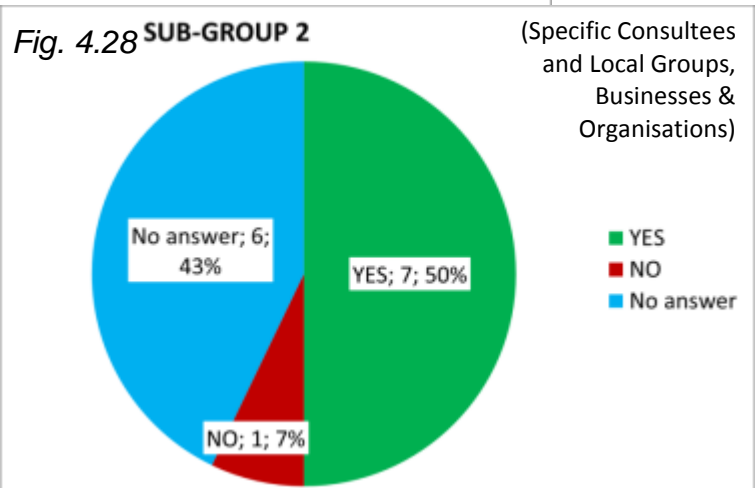
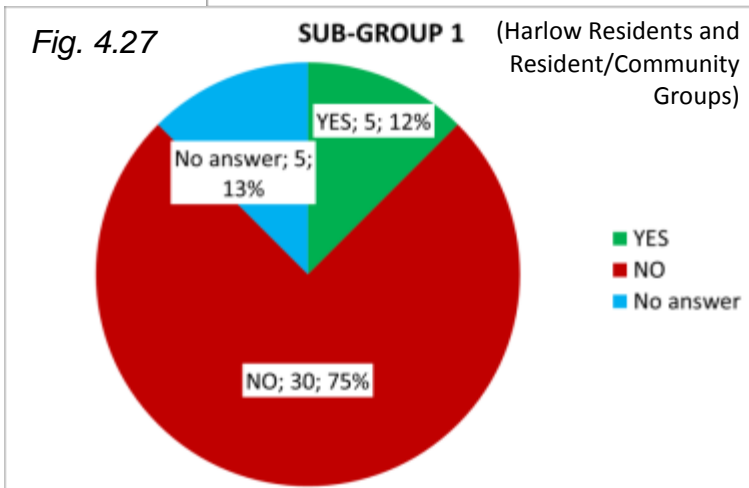
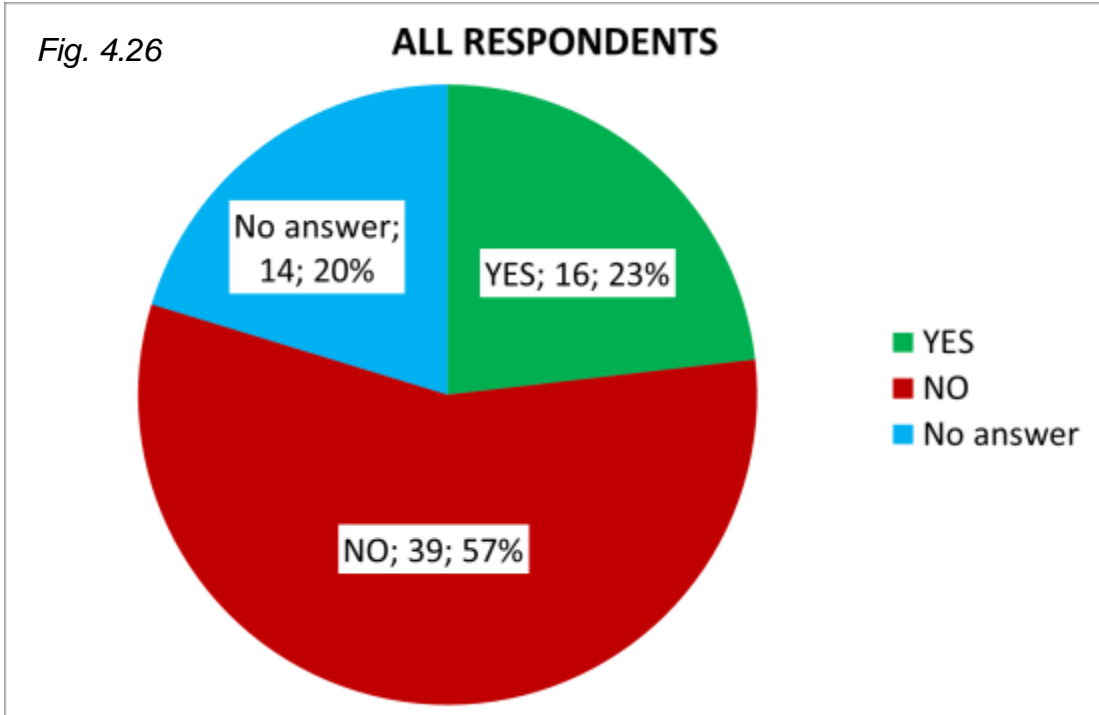
- 4.28. A number of comments were submitted about this question. A more detailed breakdown of the comments is provided in Appendix 1. The main issues raised were:
- loss of Green Belt land to the south of Harlow;
 - increased transport congestion and pollution in the south/south-west of Harlow and associated need for road improvements;
 - effect on the rurality of the area to the south-west;
 - West Sumners would deliver a range of regeneration benefits with development to the east offering some regeneration benefits;
 - land at South Harlow should be allocated for residential and employment development to achieve revitalisation of the town as it is strategically located in relation to the highway network and provides a close link between growth and regeneration;
 - new development must be actively and effectively physically linked to Harlow;
 - regeneration is a matter of investment in the town centre and sustainable neighbourhoods; and
 - the link between growth and regeneration is not guaranteed.

Question 5

Do you think the locations included in the Environmental/Landscape Led Example 2 are likely to reduce environmental/landscape impacts?

- 4.29. This question related to Example 2 and whether the locations included in it would be likely to reduce environmental/landscape impacts.
- 4.30. Example 2 – Environmental/Landscape Led – involves the creation of new neighbourhoods considered to have less impact on the environment and landscape (i.e. to the east and north-east of the town centre), with the possibility of further growth to the south-west of Harlow. This would shift the town’s urban area to the east and minimal change would be experienced in the town centre due to the retention of many features and principles.
- 4.31. The majority of respondents to this question stated Example 2 **would not** be likely to reduce environmental/landscape impacts (57% answered ‘no’, 23% ‘yes’ and 20% did not answer). This was reflected through the individual sub-groups, with the exception of sub-groups 2 and 4 where the majority answer was ‘yes’.
- 4.32. Figures 4.26 to 4.30 visually represent the breakdown of responses to the question.

QUESTION 5: Graphical Representation of Responses



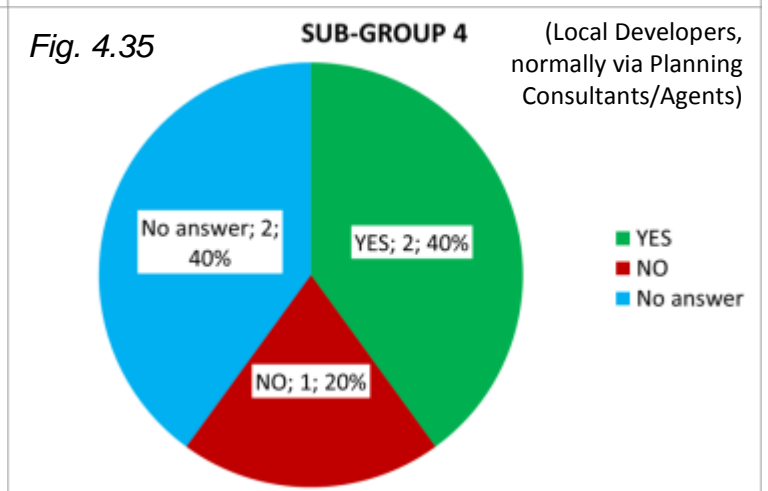
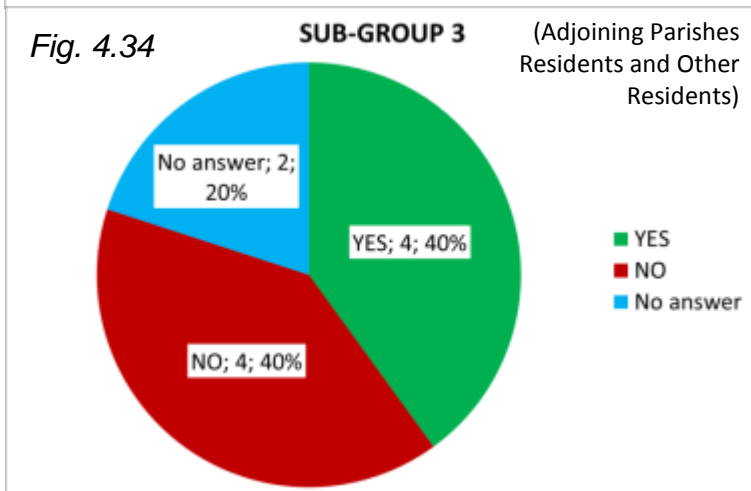
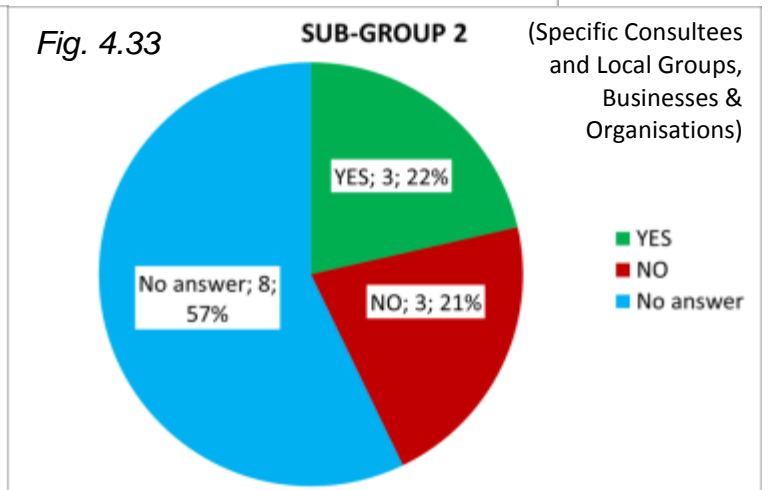
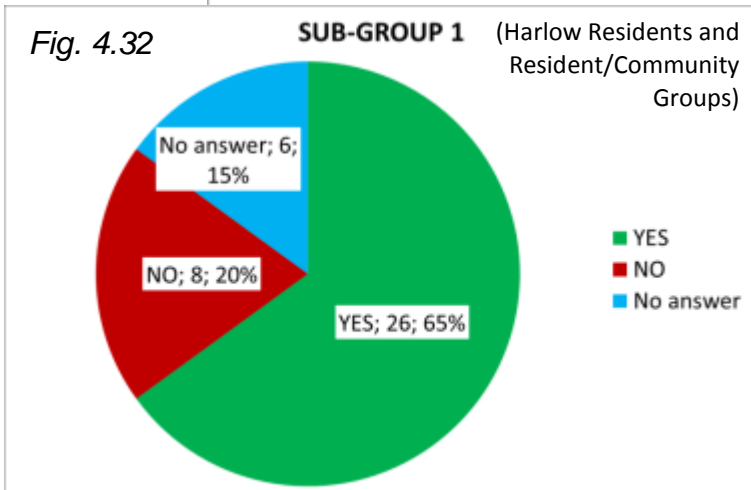
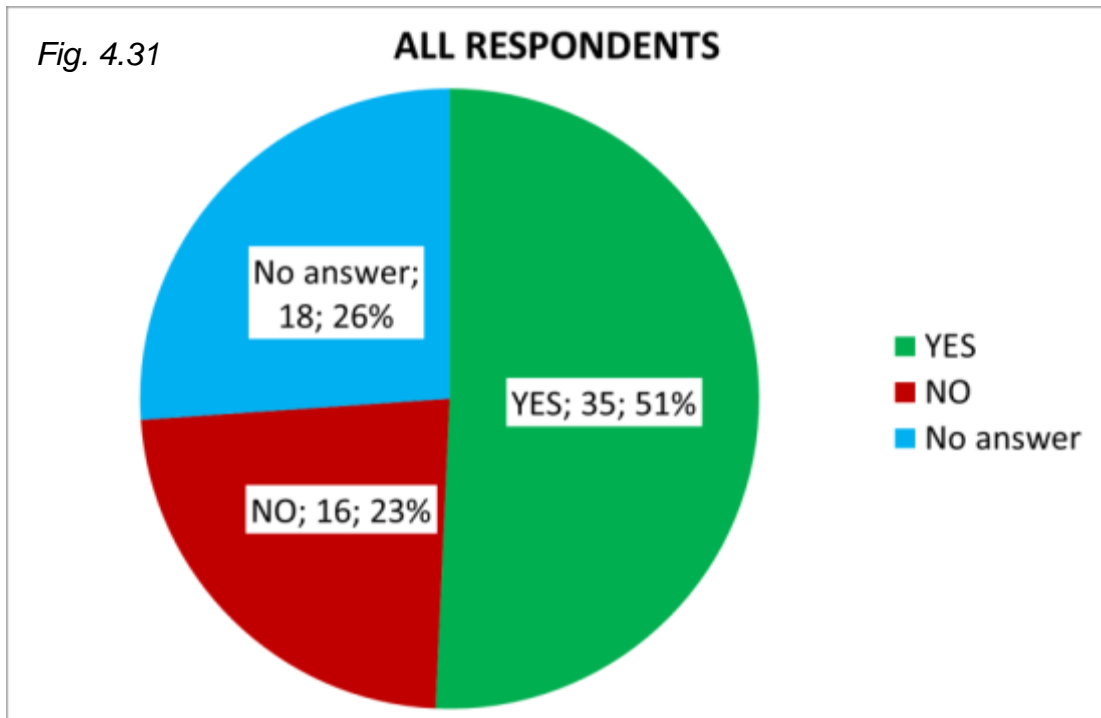
- 4.33. A number of comments were submitted about this question. A more detailed breakdown of the comments is provided in Appendix 1. The main issues raised were:
- example will intensify problems in the south of Harlow and destroy Green Belt land;
 - West Sumners proposals would intensify transport congestion and pollution, necessitating road and other infrastructure improvements;
 - concerns over the inclusion of playing field to the south of Gilden Way which is a well-used community open space;
 - West Sumners site has little ecological impact so should be identified as a preferred location;
 - the locations in this example are likely to minimise environmental/landscape impacts;
 - this example could aid the regeneration of both Pinnacles (employment) and Katherines (residential) with substantial landscape enhancements; and
 - South Harlow benefits from natural visual containment and development at Latton Priory is the option that will minimise environmental and landscape impacts

Question 6

Do you think the locations included in the Passenger Transport-Led Example 3 are likely to deliver passenger transport objectives?

- 4.34. This question sought views as to whether Example 3 would be likely to deliver the passenger transport objectives set out in the consultation document.
- 4.35. Example 3 – Passenger Transport-Led – includes new neighbourhoods in an around areas where opportunities for passenger transport uptake are higher. Most new development would be in northern and eastern parts of Harlow and the town centre – areas which have better access to transport nodes. As such, there would be little change in south Harlow where access to passenger transport is poorest. There is also the possibility of development to the north which would draw more movement into the town centre.
- 4.36. The majority of respondents to this question stated that this example **would** be likely to deliver passenger transport objectives (51% answered ‘yes’, 23% ‘no’ and 26% did not answer). This was broadly reflected across the individual sub-groups.
- 4.37. Figures 4.31 to 4.35 visually represent the breakdown of responses to the question.

QUESTION 6: Graphical Representation of Responses



4.38. A number of comments were submitted about this question. A more detailed breakdown of the comments is provided in Appendix 1. The main issues identified were:

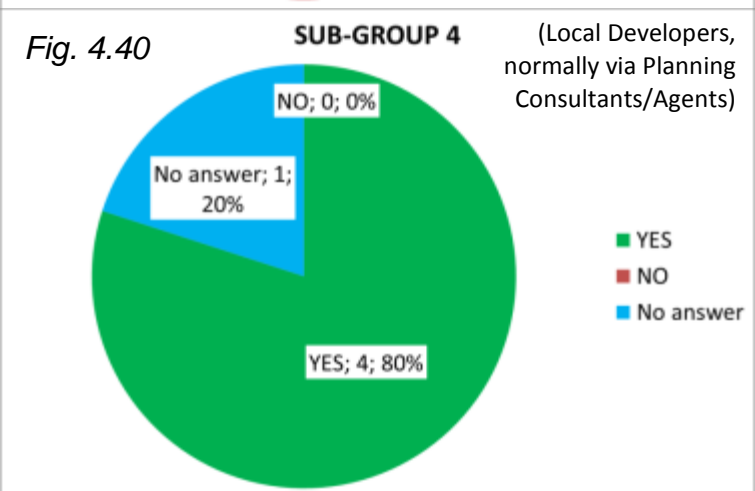
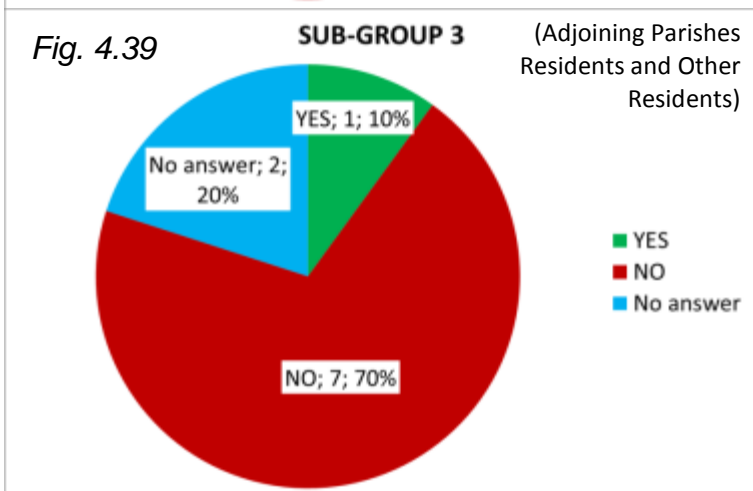
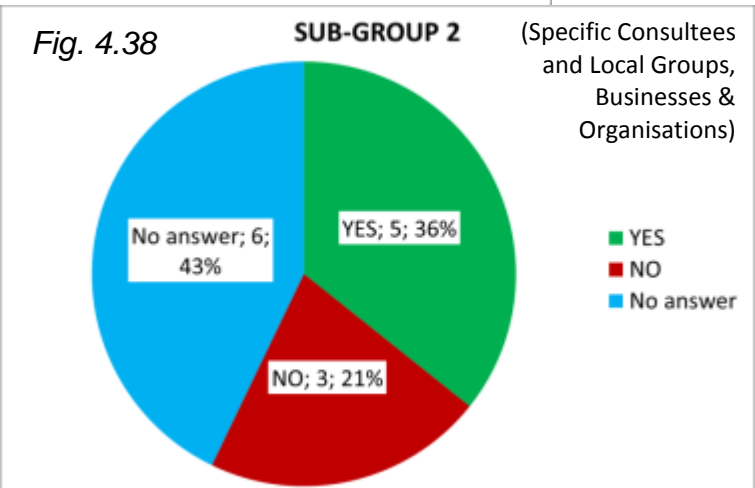
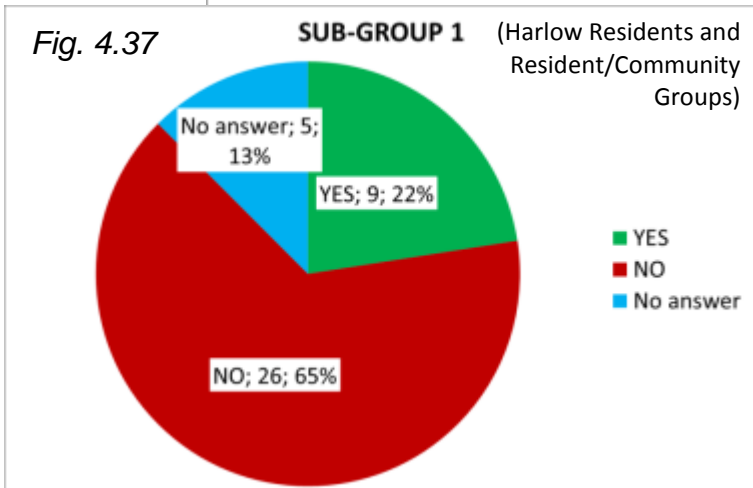
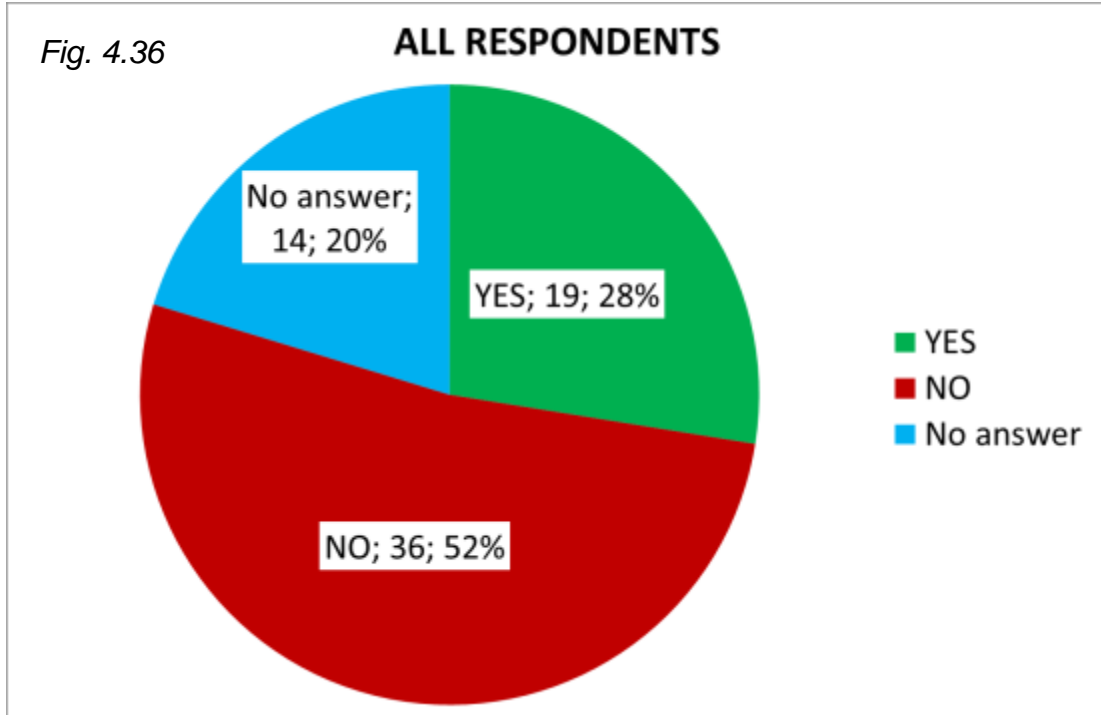
- this example is sensible if infrastructure is provided prior to building houses;
- new bus lanes should not be implemented;
- example limits development to Harlow North which is unrealistic as issues would not be addressed in the short-term;
- high quality linkages between new developments and transport nodes would be needed;
- northern part of East Harlow is geographically closer to a railway station than parts of North Harlow and therefore East Harlow has more public transport uptake potential;
- it should not be assumed that proximity and accessibility are correlated;
- the example has little or no regard to buses;
- growth to the north, which this example focuses on, is considered most sustainable; and
- there is an over-reliance on land within East Herts

Question 7

Do you think the locations included in the Regeneration and Landscape-Led Example 4 are likely to balance regeneration and landscape objectives?

- 4.39. This question sought views on whether Example 4 would be likely to balance the regeneration and landscape objectives which are set out in the consultation document.
- 4.40. Example 4 – Regeneration and Landscape-Led – includes new neighbourhoods in areas considered to have lesser environmental/landscape impacts and areas which would meet regeneration objectives. Regeneration of the town centre is central to this example, with development in and around hatches and neighbourhood centres to assist regeneration. Substantial investment and change would be directed to the east and southwest of Harlow, with the possibility of growth to the west.
- 4.41. The majority of respondents to this question stated that this option **would not** be likely to balance regeneration and landscape objectives (52% answered ‘no’, 28% ‘yes’ and 20% did not answer). This response was reflected in sub-groups 1 and 3; however for sub-groups 2 and 4 the majority answer was ‘yes’.
- 4.42. Figures 4.36 to 4.40 visually represent the breakdown of responses to this question.

QUESTION 7: Graphical Representation of Responses



- 4.43. A number of comments were submitted about this question. A more detailed breakdown of the comments is provided in Appendix 1. The main issues raised were:
- West Sumners proposals would intensify transport congestion and pollution in the south and west of Harlow, necessitating road and other infrastructure improvements;
 - example would lead to the destruction of Green Belt land in the south of Harlow;
 - example could assist the regeneration of Pinnacles (employment) and Katherines (residential) with substantial landscape enhancements;
 - concerns over whether land to the south of Gilden Way is considered to be a less sensitive environmental area;
 - West Sumners site can provide a balance of regeneration and landscape objectives;
 - example does not propose development on key landscape sensitivities;
 - more detailed understanding of landscape issues on a site-scale basis required;
 - omission of South Harlow is curious because it is considered less sensitive than land to the west and south-west in terms of Green Belt constraints; and
 - South Harlow better located to deliver regeneration benefits due to proximity to Priority Estates

Question 8

Do you think the locations included in the Northern Bypass-Led Example 5 are more likely to support a new northern bypass to Harlow?

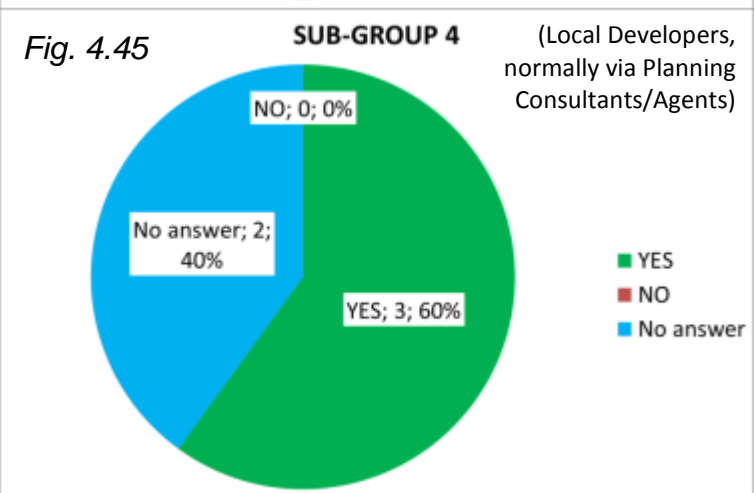
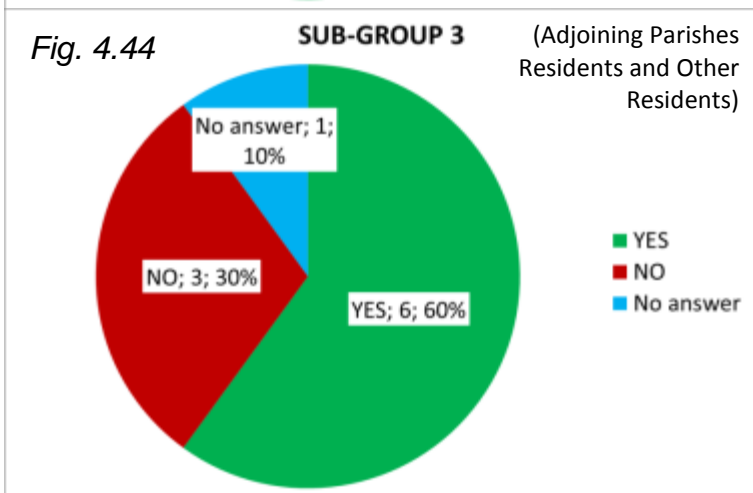
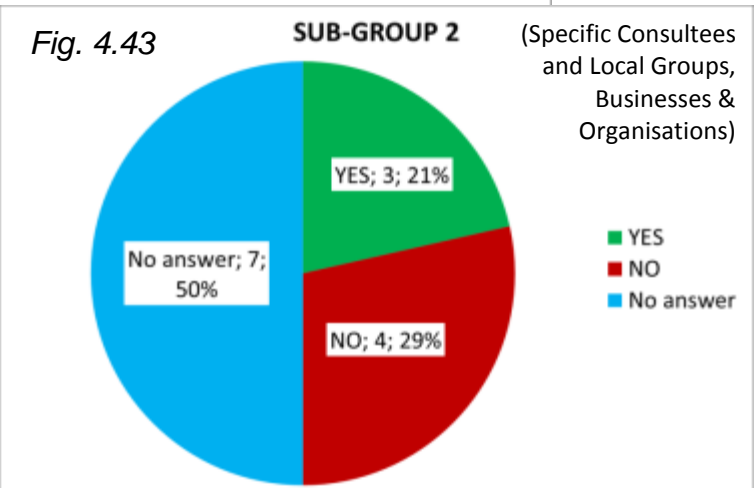
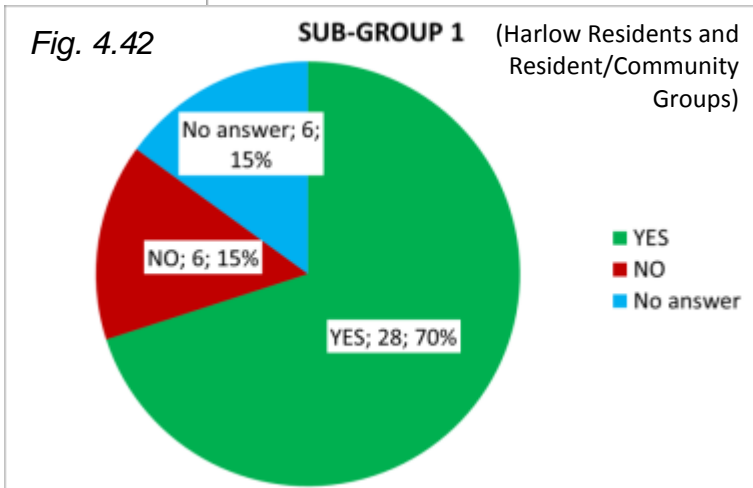
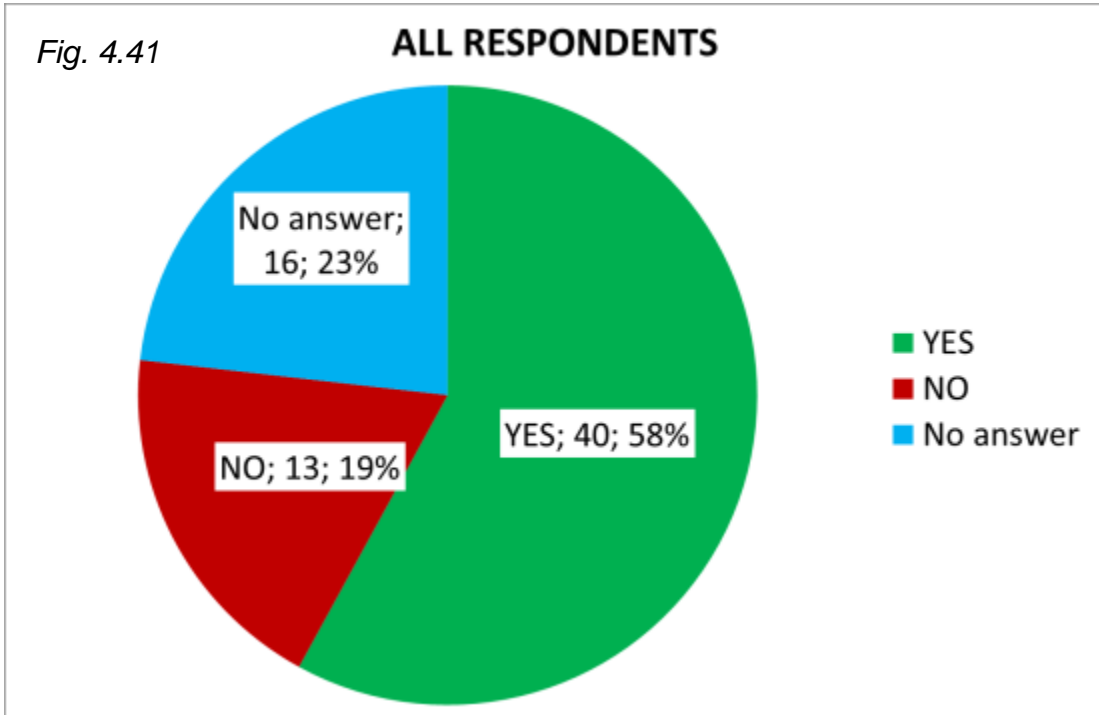
4.44. This question sought views regarding whether Example 5 would be likely to support a new northern bypass to Harlow.

4.45. Example 5 – Northern Bypass-Led – includes development in accordance with the Passenger Transport Led example, with additional development to the north of Harlow to aid the case for a new northern bypass linking a new M11 Junction 7a to new development. Most of the development in this example is to the north of Harlow, with new neighbours in the east and some development in and around the town centre.

4.46. The majority of respondents to this question stated that the example **would** be more likely to support a new northern bypass to Harlow (58% answered ‘yes’, 19% ‘no’ and 23% did not answer). This response is broadly reflected in the individual sub-groups, with the exception of sub-group 2 where the majority answer was ‘no’.

4.47. Figures 4.41 to 4.45 visually represent the breakdown of responses to this question.

QUESTION 8: Graphical Representation of Responses



- 4.48. A number of comments were submitted regarding this question. A more detailed breakdown of the comments is provided in Appendix 1. The main issues raised were:
- example is sensible if infrastructure is provided before houses are built;
 - example could be at a cost to Gibberd's plan thereby losing the town's heritage;
 - growth in the east of Harlow would facilitate a new M11 Junction 7a and link road to Gildea Way corridor;
 - the technical and financial feasibility and viability of a northern bypass is questionable;
 - previous evidence has suggested a direct link to development at Harlow North could risk such development competing with Harlow;
 - a northern bypass should be funded by a Greater Harlow CIL; and
 - example is focused on single transport measure and does not assess how sites and options could improve transport accessibility in a wider sense

Question 9

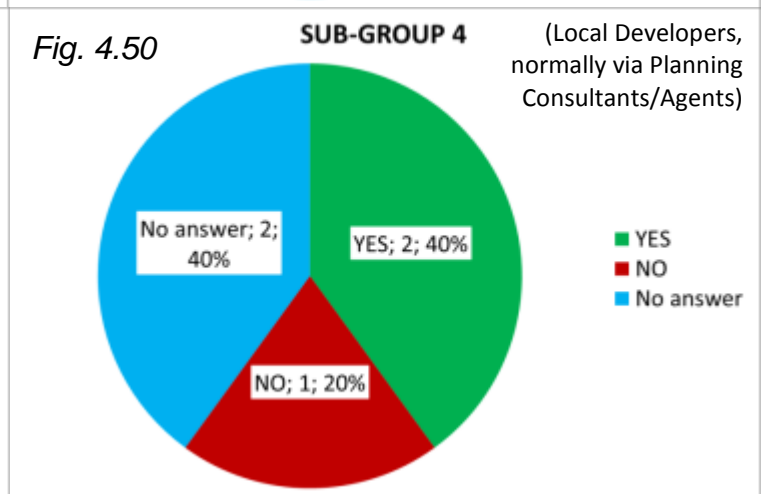
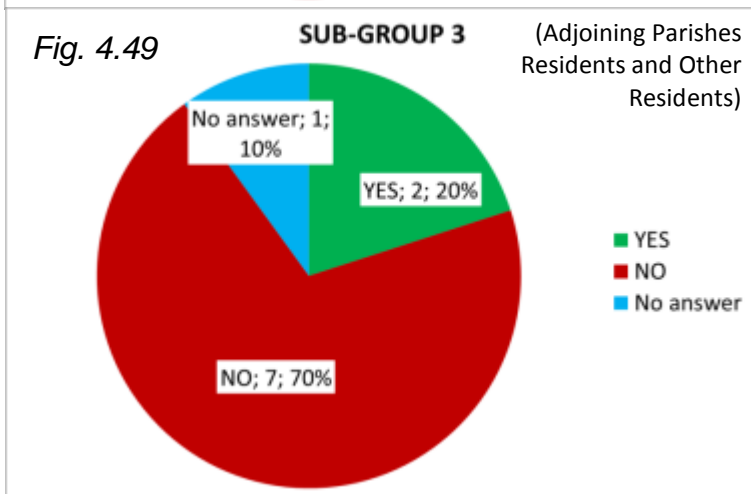
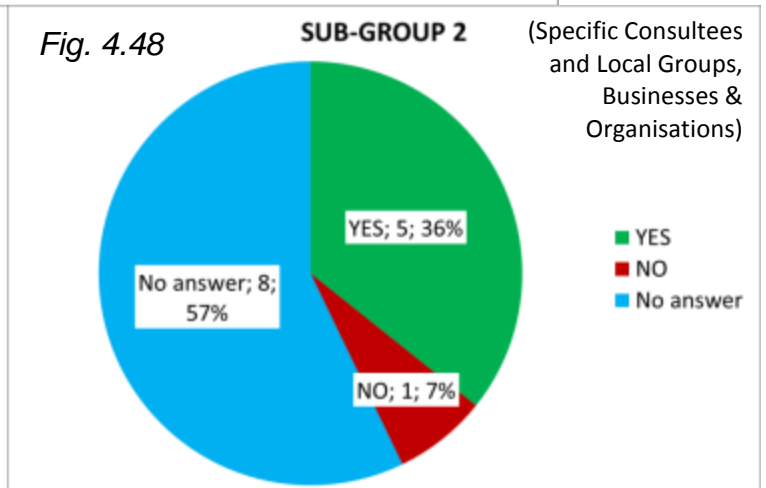
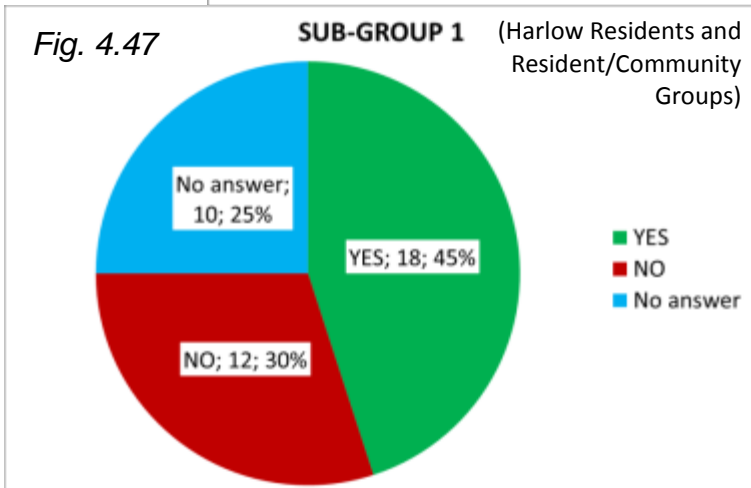
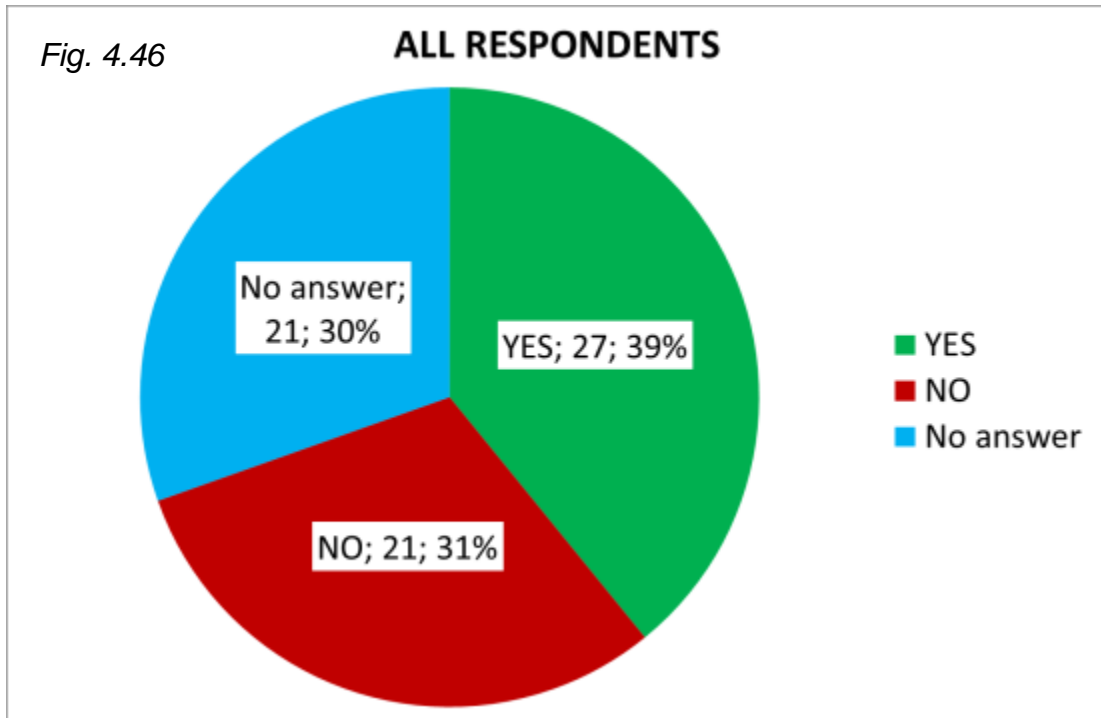
Do you think a “blend” of development examples is more appropriate for Harlow?

4.49. This question sought the views of people on whether a blend of the development examples would be more appropriate for the future growth of Harlow. Such a blend could include smaller amounts of development which are dispersed in and around the town, rather than focussing large amounts of development in particular areas.

4.50. The majority of respondents to this question **agreed** that a blend of development examples would be more appropriate (39% answered ‘yes’, 31% ‘no’ and 30% did not answer). This response was broadly reflected in the individual sub-groups, with the exception of sub-group 3 where the majority answer was ‘no’.

4.51. Figures 4.46 to 4.50 visually represent the breakdown of responses to this question.

QUESTION 9: Graphical Representation of Responses



4.52. A number of comments were submitted regarding this question. A more detailed breakdown of the comments is provided in Table 4.9. The main issues raised were as follows:

- blend would be good as Gibberd favoured mixed development;
- a blend is vital for sustainability reasons;
- this is too vague and it would depend on the blend;
- a sustainable approach would be high levels of growth on sites which deliver regeneration, minimise environmental impacts and have good public transport connections, including West Sumners site;
- preferred options are dependent on the outcomes of duty to co-operate agreements with adjoining authorities; and
- a blend of examples is best if all objectives and priorities are encompassed

5. Summary and Next Steps

- 5.1. The consultation set out a housing figure for Harlow together with a number of examples for where development could be provided within the district. These examples will be subject to further assessment taking into account the consultation responses and ensuring the most appropriate outcome for Harlow can be delivered. This will enable the Council to confirm the level of development which Harlow needs and whether some may need to be accommodated in adjoining districts.
- 5.2. The majority of respondents consider the suggested overall level of development would deliver the Council's corporate objectives. Some respondents suggested that further adjustments to the housing requirement figures may be needed, subject to the outcomes of cross-boundary co-operation (the duty to co-operate). In addition an update on development viability will be needed to establish the percentage of affordable housing that can be delivered, and the identification of housing requirements for specific groups such as elderly people and students.
- 5.3. The development examples which received the most support, including support from Harlow residents, were Example 3 (Passenger transport-led) and Example 5 (Northern Bypass-led), which both focus the majority of development to the north and east of Harlow. In respect of development principles, respondents overall considered 'supporting key infrastructure improvements' to be the most important, followed by 'facilitating access to passenger transport facilities'.
- 5.4. Before the Council finalises the Preferred Option the population forecasts provided in the latest Phases of the Greater Essex Demographics Forecasts, future DCLG population/household projections, as well as the results of the revised Strategic Housing Market Assessment will need to be taken into consideration. The level of development proposed will be further refined based on information on infrastructure capacity or mitigation, as well as assessment of the likelihood of the housing sites being completed within the plan period by demonstrating deliverability.
- 5.5. The main issue raised by respondents related to infrastructure capacity and whether the local infrastructure would be able to cope with the proposed levels of development. Comments regarding infrastructure capacity mostly focussed on transport infrastructure (such as roads and public transport provision), sewerage, health facilities and school facilities.
- 5.6. The Council is currently undertaking further work to assess the amount of housing and employment capacity that can be accommodated before a new Junction 7a on the M11 is provided. An Infrastructure Delivery Plan will also be prepared to identify future infrastructure requirements and set out the costs of providing these. Some of this work will depend on the infrastructure requirements of adjoining districts, the implications of which are expected to be resolved through the outcomes of the duty to co-operate discussions. It is considered, however, that delivering the proposed levels of development will necessitate significant improvements to existing facilities and services.

- 5.7. A number of respondents to the consultation questioned whether the Council and adjoining Councils have satisfied the requirements of the duty to co-operate. The Council recognises that the duty to co-operate is a key legal requirement which is essential in order for the Harlow Local Development Plan to be found sound. This requires the Council to engage proactively and regularly with adjoining districts on cross-boundary issues such as transport provision. The Council is seeking to address the duty to co-operate through a programme of engagement with adjoining districts.
- 5.8. Following completion of the work outlined above, the next stage of the Harlow Local Development Plan will be the preparation of the Preferred Options document. This document will set out the preferred level of development for Harlow over the plan period of 2011 to 2031, the preferred strategic development locations, the allocated sites within Harlow, and details of the infrastructure requirements arising from the Infrastructure Delivery Plan together with the supporting policy framework.

Appendix 1: Question-specific comments received

All question-specific comments received are reported in this appendix.

Note that all comments (question-specific or otherwise) made by specific consultees, such as adjoining authorities, are reported in Appendix 3.

The table below, reproduced from Chapter 3, explains how the respondents were categorised into Sub-Groups.

| Sub-Group | Type of Respondents |
|--|---|
| 1: Harlow Residents and Resident/Community Groups | <ul style="list-style-type: none"> • Harlow Residents • Harlow Resident/Community Groups/Associations |
| 2: Specific Consultees and Local Groups, Businesses & Organisations | <ul style="list-style-type: none"> • Adjacent Local Authorities, Parish Councils and County Councils • Government Agencies and Departments • Infrastructure and Utility Providers • Local Businesses • Local Groups and Organisations (including faith groups, disability groups, environmental groups and ethnic minority groups) • Partner Agencies • Other Groups/Organisations |
| 3: Adjoining Parishes Residents and Other Residents | <ul style="list-style-type: none"> • Residents from East Hertfordshire DC area • Residents from Epping Forest DC area • Other Residents |
| 4: Local Developers, normally via Planning Consultants/Agents | <ul style="list-style-type: none"> • Local Developers (responses normally submitted via Planning Consultants/Agents) |

Question 1

COMMENTS REGARDING QUESTION 1 AND THE PROPOSED LEVELS OF DEVELOPMENT

| Comment | Sub-Group |
|--|-----------|
| <ul style="list-style-type: none"> • Proposed infrastructure would not meet level of development proposed | 1 |
| <ul style="list-style-type: none"> • Careful look needed at infrastructure needs due to growing population and increase in housing. Developers who do not provide infrastructure will severely compromise the social and economic viability of the town | 1 |
| <ul style="list-style-type: none"> • What is the impact of neighbouring councils? Regional plan required | 1 |
| <ul style="list-style-type: none"> • If the Enterprise Zone creates more jobs, those workers will choose to live in or near Harlow | 1 |
| <ul style="list-style-type: none"> • 8,000 houses more appropriate according to evidence base | 1 |
| <ul style="list-style-type: none"> • Should not be assumed that social housing outweighs other factors such as environmental, transport, infrastructure factors. Additional 4,000 housing to get more social housing not supported by data | 1 |

| | |
|---|---|
| • Preferred option is option B (NLP study) | 1 |
| • Growth levels proposed are excessive and unsustainable – current infrastructure cannot cope and experience shows infrastructure will not be provided in a timely manner | 1 |
| • Maximum growth plans are unworkable – minimum growth option should be adopted | 1 |
| • Number of issues are mostly capable of mitigation if attention is paid to population stagnation | 1 |
| • Other places should take share of new housing as Harlow has already had a big increase and proposed increase is disproportionate | 1 |
| • Suspicions of locals that Epping is dumping its housing need onto a neighbouring town. Locals have hostility to having their lives, communities and environment compromised by a neighbouring town | 1 |
| • The Council needs to review its ideas on demographic forecasts. Population did not grow more than 1.5% in 40 years due to bulge in age groups from when building started | 1 |
| • The difference in numbers of housing proposed is a significant impact, with a range of approx. 18% to 49% - the plan needs a more precise number to ensure services can be delivered | 1 |
| • Accept that to do nothing in respect of growth is not an option | 2 |
| • Creation of new dwellings is fundamental to achieving the sustainable future development of Harlow | 2 |
| • Level of growth of the order described in Scenario C – Jobs Led – is of the order that would be acceptable, and would meet 95% of the affordable housing requirement | 2 |
| • Dwelling numbers are in excess of the 7,485 stated in the Greater Essex Demographic Study. Harlow’s claim seems ‘grandiose’ | 3 |
| • Harlow, within its boundary, can build 8,900 homes, why not make that number the maximum amount of properties to be built. It exceeds the 7,485 recommended in the Greater Essex Demographic Study? | 3 |
| • Unclear as to the number of houses required and how they were calculated. | 3 |
| • Referring to NLP study: <ul style="list-style-type: none"> ○ Options A and B fail to meet corporate objectives ○ Option E is too ambitious; Options C and D would discharge duty to co-operate ○ Option D most appropriate as it meets objectives | 4 |
| • It is important to acknowledge that the wider “housing market area” is based on the Harlow Joint Working Area (i.e. including the districts of Epping Forest and East Herts). Therefore, to be fully NPPF compliant, the next iteration of the Plan should have regard to the market and affordable housing needs for the housing market area as a whole. In particular, the Greater Essex Demographic Forecasts (Phase 4) (2013) identify that there is a need for 38,680 homes in the Harlow Joint Working Area between 2011 and 2031 (under the SNPP 2010 scenario). East Herts District Council (EHDC) has recently finished consulting on its own District Plan Preferred Options, including the provision for at least 15,000 new homes between 2011 and 2031. If Harlow District Council (HDC) decides to proceed with a housing requirement of 12,000-15,000 new homes, this will leave a residual figure of some 8,680-11,680 new homes for Epping Forest District | 4 |

| | |
|---|---|
| Council (EFDC) to accommodate. EFDC has not yet prepared a Preferred Option consultation and it is not clear if this is a scale of growth it is contemplating or can realistically accommodate. | |
| <ul style="list-style-type: none"> Clearly there is a need for joint working between the three local authorities, including under the Duty to Cooperate, to ensure that the cumulative 2011 to 2031 housing requirement for all three districts meets the overall housing needs of the housing market area. | 4 |
| <ul style="list-style-type: none"> Recommends that HDC adopts a housing requirement of at least 15,000 new homes between 2011 and 2031. Not only will this increase the likelihood of all three districts being able to meet the cumulative housing need in the Harlow Joint Working Area, it will also ensure that all of Harlow's regeneration outcomes are feasible. | 4 |
| <ul style="list-style-type: none"> There can be no doubt that any significant level of new growth in or around Harlow, beyond the committed schemes at New Hall Farm and north of Gildea Way, will necessitate the need for a review of the Green Belt | 4 |
| <ul style="list-style-type: none"> It is clear that the evidence base and current consultation documents for both the emerging Harlow and East Herts Plans fail to respond to the concerns raised by the Panel about growth at Harlow North in 2006. East Herts' approach to the Gilston Area as set out in their draft District Plan and evidence base already demonstrates that development to the North of Harlow is not being planned with Harlow's core priorities in mind. | 4 |
| <ul style="list-style-type: none"> Whilst considering the overall assumptions about the quantum of development required to achieve regeneration are sound it is not considered that development around Harlow will automatically achieve regeneration unless the form of this development and the linkages to and from it are specifically tailored so that this development is part of Harlow rather than separate from it. | 4 |
| <ul style="list-style-type: none"> In terms of the overall quantum of development this should be at the upper end of the range consulted on, ie 15,000 houses. It is clear from the Harlow Futures Study that far greater benefits accrue to the regeneration of the town, which is at the heart of Harlow's vision and objectives for the Local Plan, if higher levels of development can be achieved. | 4 |
| <ul style="list-style-type: none"> Irrespective of the capacity of Harlow to accommodate new housing growth, on the basis the NPPF requirement to viably plan to meet objectively assessed needs for both market and affordable housing - Scenario A, Scenario B and Scenario C should all be discounted from further consideration as their minimum housing targets all fall short of the minimum 12,000 dwellings required to meet both market and affordable housing needs viably during the plan period. | 4 |
| <ul style="list-style-type: none"> It is therefore crucial that the Plan provides for 15,000 dwellings and 12,000 jobs to meet its objectives and ensure consistency with its evidence base. No other conclusion would be sound if the plan is to meet the "positively prepared", "justified" and "effective" tests set out in paragraph 182 of the NPPF | 4 |
| <ul style="list-style-type: none"> 12,000 dwellings unlikely to subsidise affordable housing accommodation required | 4 |
| <ul style="list-style-type: none"> 12,000 dwellings would lead to a shortfall of affordable homes required in Harlow | 4 |
| <ul style="list-style-type: none"> Agree that Harlow should be meeting the requirements of the NPPF by meeting objectively assessed needs for housing, and providing an increased number of affordable homes and jobs across the District, which in turn will help to deliver regeneration objectives | 4 |
| <ul style="list-style-type: none"> East Herts and Uttlesford have recently consulted on their emerging plans and | 4 |

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| appear to have made no allowance to accommodate any of Harlow's housing shortfall | |
| <ul style="list-style-type: none"> EPOA report provides a valuable starting point for objectively assessed needs but will not necessarily provide the full picture because it is wholly demographic in its methods. Other factors that need to be considered include the previous backlog of delivery, the need to improve affordability more generally, the scale of market dwellings to support the delivery of specific affordable housing products, the scale of supply necessary to support economic growth objectives, and the needs of specialist groups such as retirement housing and student accommodation | 4 |
| <ul style="list-style-type: none"> Evidence of the effects of deteriorating affordability will be revealed in the data on overcrowding, concealed and homeless households and the extent of any affordability problem in Harlow | 4 |
| <ul style="list-style-type: none"> Generally support proposed housing range of 12,000 – 15,000 dwellings but suggest that the top end of this range would be required and present the most prudent course of action in light of the scale of the needs of Harlow plus the unmet need in London (at least 7,000 dwellings per year) as well as the actions of other authorities who are not willing to meet their own needs for housing | 4 |
| <ul style="list-style-type: none"> Generally supportive of the 12,000 – 15,000 dwelling range but consider that the Council should be aiming at the top end of this range | 4 |
| <ul style="list-style-type: none"> Harlow has already demonstrated that they do not have a 5 year housing land supply and for this reason additional sites are required in and around Harlow | 4 |
| <ul style="list-style-type: none"> Harlow identifies its housing need as between 12,000 to 15,000 new dwellings. The plan also refers to Harlow's objectively assessed needs as being in the region of 12,000 dwellings as highlighted in the SHMA. Consider this to be outdated and the Council should undertake a NPPF compliant SHMA to consider the present day's economic and social factors in determining housing need | 4 |
| <ul style="list-style-type: none"> Have some sympathy with adopting the range of housing as this will enable the Council to provide some flexibility if demand increases further | 4 |
| <ul style="list-style-type: none"> It is appropriate to have some flexibility in the level of growth at this stage to enable information on viability and infrastructure to be factored in | 4 |
| <ul style="list-style-type: none"> Supply of 15,000 dwellings would also best support the provision of 4,500 affordable dwellings that are needed | 4 |
| <ul style="list-style-type: none"> The local Plan should meet the full objectively assessed needs for market and affordable housing. Based on information from the LPA, this means that the housing requirement in the HLDP should be at least 20,000 dwellings during the plan period | 4 |
| <ul style="list-style-type: none"> The objectives will not be achieved if the spatial strategy is framed in a manner which does not support, as a minimum, the level of growth described | 4 |
| <ul style="list-style-type: none"> The plan fails to identify whether a 20% buffer has been applied to the 12,000 to 15,000 housing target, and should do if the plan is to be found sound | 4 |
| <ul style="list-style-type: none"> The Plan needs to clarify whether the shortfall in housing numbers from the previous Local Plan has been accounted for | 4 |
| <ul style="list-style-type: none"> The provision of at least 15,000 dwellings and 12,000 jobs will deliver the Council's objectives | 4 |
| <ul style="list-style-type: none"> The SHMA fails to take into account of the wider housing shortfall that is predicted in London. It has already been acknowledged by the Mayor that he expects the wider south east to take on an element of this housing shortage. The Harlow Local Plan should detail whether this has been considered | 4 |

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| <ul style="list-style-type: none"> • The SHMA needs to be updated and take account of previous under delivery and its impact on household projections | 4 |
| <ul style="list-style-type: none"> • Argue that 30% affordable housing cannot be demonstrated as reasonable unless supported by further robust viability work | 4 |
| <ul style="list-style-type: none"> • General support for Development Scenarios D and E, on the basis of their housing delivery targets exceeding objectively assessed needs and delivering regeneration benefits to Harlow and the wider sub-region | 4 |
| <ul style="list-style-type: none"> • In order to viably meet objectively assessed needs for both market and affordable housing, as well as the wider regeneration objectives of HC, in general support of Development Scenarios D and E. However need to give further consideration to the implications for historic housing shortfall against previous targets within the administrative area | 4 |
| <ul style="list-style-type: none"> • Welcomes the recognition in the ESFO that Harlow District Council (“HDC”) needs to plan for substantial housing and economic growth over the plan period to achieve its market and affordable housing needs, and regeneration requirements | 4 |
| <ul style="list-style-type: none"> • The evidence base work confirms that a minimum of 12,000 homes (or 13,000 homes as states at para 5.48 of the HFPS) are required to satisfy objectively assessed needs. However, as set out in the table at paragraph 4.21 of the ESFO this quantum of development (ie Scenario C) does not deliver a number of key regeneration objectives for Harlow. Therefore, it is inappropriate and inconsistent with HDC’s own evidence base and the NPPF, to plan for a level of growth where the lower range would fail to achieve a key objective | 4 |
| <ul style="list-style-type: none"> • In light of the above, as a minimum HDC should be planning for 15,000+ homes over the plan period (Scenario D) as this scenario, according to the HFPS, has the prospect of assisting to deliver all objectives | 4 |
| <ul style="list-style-type: none"> • Believe that HDC should plan to accommodate the full scale of growth identified in the ESFO and its evidence base, which will enable Harlow to achieve its full regeneration objectives, importantly including all of the key objectives and infrastructure requirements set out on Page 25 of the ESFO | 4 |
| <ul style="list-style-type: none"> • The growth figures have no regard to the extent of regeneration that maybe be delivered and the need to change fundamentally the mix of dwelling types and tenures within the town | 4 |
| <ul style="list-style-type: none"> • It is assumed in the ESFO that, having completed the Strategic Land Availability Assessment, Harlow has enough land to accommodate approximately 8,900 dwellings. However, consider that this over-states the potential availability and capacity of land | 4 |
| <ul style="list-style-type: none"> • In many instances of the view that the role, function and nature of the proposed development at GPE has not been fully reflected. | 4 |
| <ul style="list-style-type: none"> • The assessment process in the ESFO and its associated evidence base (in particular the Harlow Spatial Options Study) has not fully considered the benefits of a more concentrated approach having regard unique opportunity of the GPE site | 4 |
| <ul style="list-style-type: none"> • That provision of 15,000 dwellings and 12,000 jobs, as set out in Option D of the development scenarios, is vital to achieve the Council’s vision, objectives and priorities in accordance with the Plan’s evidence base | 4 |
| <ul style="list-style-type: none"> • Consider it vital that the plan makes provision for at least 15,000 dwellings between 2011 and 2031 as there is a very clear justification for this level of | 4 |

development in the Council's evidence base. This justification, provided by the "Harlow Future Prospects" Study (NLP August 2013) provides compelling evidence for Option D of the defined development scenarios (i.e. 15,000 dwellings and 12,000 new jobs) as necessary to meet the Council's vision and objectives

Question 2

COMMENTS REGARDING QUESTION 2 AND THE DEVELOPMENT EXAMPLES

| Comment | Sub-Group |
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| <ul style="list-style-type: none"> Examples 1, 2, 4 not viable without substantial infrastructure improvements, specifically roads and passenger transport as rural B-road does not have capacity to carry additional motor vehicles | 1 |
| <ul style="list-style-type: none"> Preferred examples are 3 and 5 as they will be supported by appropriate infrastructure, specifically transport | 1 |
| <ul style="list-style-type: none"> Harlow North one of best options | 1 |
| <ul style="list-style-type: none"> Harlow North proposals fulfil a number of essentials not available to south-west of Harlow. The proposals are infrastructure heavy, with plans to include schools, medical facilities etc at the time of building houses, improve road crossings across the Stort, move the greenbelt, replace current farmland with more environmentally valuable woodland and press for a northern junction of the M11 | 1 |
| <ul style="list-style-type: none"> South-west Harlow has very poor public transport, with an infrequent, ill-advertised and unreliable bus service, meaning people use cars to travel to Epping tube station and increase congestion | 1 |
| <ul style="list-style-type: none"> Own research (based on government data) shows that proposals for West Sumners are neither socially nor environmentally sustainable | 1 |
| <ul style="list-style-type: none"> Assumption of 12,000 dwellings (increased from 7,500 to 8,000 to allow for social housing) reduces relevance of the examples | 1 |
| <ul style="list-style-type: none"> Another town centred on station would increase commuting | 1 |
| <ul style="list-style-type: none"> Rented affordable housing urgently needed for Harlow residents | 1 |
| <ul style="list-style-type: none"> In favour of Examples 2 & 4 | 2 |
| <ul style="list-style-type: none"> Consider that there are many other opportunities for housing in more sustainable settings within the development boundary | 2 |
| <ul style="list-style-type: none"> Do not support any of the five Examples. All areas of the town should accept some development. EFDC in its Issues & Options consultation made the point that the 'local road network capacity' is a constraint to development. The same document includes the 'local sewage treatment works' as a constraint | 3 |
| <ul style="list-style-type: none"> Example 1 is best example only if integrated with access at several points to a more expensive than currently proposed M11/A414 link | 3 |
| <ul style="list-style-type: none"> Example 1 is most appropriate example as it delivers growth and investment and potentially benefits areas with less regeneration benefits | 4 |

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| <ul style="list-style-type: none"> • Commend Examples 1,2 and 4 they secure – <ul style="list-style-type: none"> ○ Housing from land available with 97 Ha land available for development and open space. ○ By connectivity with Katherines and Pinnacles for regeneration, by investment and patronage of existing infrastructure. ○ Green space provision with ecological and landscape enhancement ○ Improve connectivity with existing public transport routes. | 4 |
| <ul style="list-style-type: none"> • Supports Examples 2, 4 and 5 as they appear to identify East Harlow in its entirety for development. In doing so, these Examples come closest to delivering HDC's vision | 4 |
| <ul style="list-style-type: none"> • Examples 3 and 5 have negligible regeneration potential | 4 |
| <ul style="list-style-type: none"> • In particular East Harlow can assist the vision by: delivering sufficient new homes to help meet local needs; help to make the enterprise zones a success, by facilitating a new M11 junction and link road to improve access to them; retain and extend the network of green wedges in Harlow; maximise the use of public transport, including bus priority measures; and, facilitate new educational facilities towards the east of the town. East Harlow can also deliver directly or support the delivery of the Core Priorities. | 4 |
| <ul style="list-style-type: none"> • Acknowledge the transport requirements of development here and indicate that expansion to the east could facilitate the implementation of J7a on the M11 by utilising some of the land. | 4 |
| <ul style="list-style-type: none"> • Transportation analysis shows some existing headroom at J7 which will allow some development to be provided in the area. | 4 |
| <ul style="list-style-type: none"> • Any significant Harlow development is likely to impact on the existing M11 junction (7) and East Harlow is no different to any other in that respect. However, it is becoming clear that the cost / benefit of improving Junction 7 is increasingly unattractive. The latest estimates from ECC indicate that the cost of meaningful improvements at Junction 7 (including a new flyover) could be approximately twice as expensive as creating a new Junction 7A | 4 |
| <ul style="list-style-type: none"> • Of the 5 examples presented, two prioritise landscape quality over other objectives. Example 2 is wholly environmental/landscape led, whilst example 4 is stated to be 'regeneration and landscape led'. Whilst this indicates regeneration is still a priority, this example effectively prioritises landscape over regeneration given it moves away from the distribution of development outlined in example 1 which is focused wholly on regeneration | 4 |
| <ul style="list-style-type: none"> • On this basis suggest that those scenarios which prioritise the landscape around Harlow (scenarios 2 and 4) will not those which are most likely to achieve Harlow's stated Vision and Core Priorities which are overwhelmingly focused on renewal and regeneration. | 4 |
| <ul style="list-style-type: none"> • Consider that Option 3 – Passenger Transport Led, might be the most favourable option in terms of distributing growth within the Harlow area to deliver the core priorities within the consultation document, as focussing the largest concentration of development growth towards the north of Harlow (the Gilston Area) is considered the most sustainable option for residentially-led, mixed use development. | 4 |
| <ul style="list-style-type: none"> • Consider that the five examples are not a relevant, appropriate or justified approach to the distribution of development and selection of sites as they do not encompass all of the plan's objectives. | 4 |
| <ul style="list-style-type: none"> • Favoured spatial strategy is to focus development and identify sites that will | 4 |

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| provide the best possible contribution to all the key objectives set out on page 20 of the consultation document, including delivery of Junction 7A and interim improvements to Junction 7 of the M11. Crucially, that strategy should include sites that can be delivered in the short term. This is the only sound approach as the objectives are interdependent. | |
| <ul style="list-style-type: none"> Consider that Objective 4 “Economic Revitalisation” and Objective 10 “Supported Development and Change” (ensuring adequate infrastructure and service provision) are not properly addressed in the chosen examples. Suggest the inclusion of two further Examples as follows: “Economic growth and revitalisation led and “Transport Infrastructure and improved accessibility led” | 4 |
| <ul style="list-style-type: none"> If, as confirmed by own analysis, land south of Harlow has an important role in the Council’s focus on regeneration areas (Example 1) and minimizes impact on the environment and landscape (Example 2), logic dictates that this land must be included in Example 4 that combines these two considerations. Consider the omission of land south of Harlow from Example 4 to be inconsistent with the evidence presented in Examples 1 and 2. Example 4 is therefore unsound as it stands because the exclusion of land south of Harlow is not justified by the evidence (as required by paragraph 182 of the NPPF). | 4 |
| <ul style="list-style-type: none"> Support for Growth Strategy Examples 1, 2 or 4 and include illustrative broad outline of location, access, and green infrastructure | 4 |
| <ul style="list-style-type: none"> If Harlow will have regained by 2031 its reputation as a place of aspiration, the spatial strategy should be based on scenario D described in the Future Prospects Study and the distribution of growth as suggested in example 1 of the Emerging Strategy | 4 |
| <ul style="list-style-type: none"> The development options presented are in isolation from those presented by Epping Forest | 4 |
| <ul style="list-style-type: none"> Chapters 6 to 10 focus on a narrow sample of development “Examples” that neglect key Council objectives, notably the need to show how options serve economic growth and revitalisation and can deliver essential transport infrastructure. This is not a sound approach to the Plan | 4 |
| <ul style="list-style-type: none"> The distribution of development and choice of sites must be based on all the objectives and principles set out on page 20 of the document and not a limited number of themes | 4 |
| <ul style="list-style-type: none"> Harlow’s Core Priorities do, at objective 6, make mention of protecting the town’s ‘distinctive character and heritage’, however this is in the context of ‘established quality streets and spaces’, rather than directly referring to preserving the landscape quality of the areas surrounding Harlow. However, in contrast five out of the 10 priorities listed refer to regeneration and renewal, with the remaining four referring to meeting housing needs, adapting to and mitigating the impacts of climate change and two objectives focused on delivering infrastructure. Similarly, the vision at page 18 does not include preserving the landscape quality of the surrounding countryside. | 4 |
| <ul style="list-style-type: none"> Example 3 best but good links to public transport are required and it assumes the public would use them | 4 |

Question 3

COMMENTS REGARDING QUESTION 3

| Comment | Sub-Group |
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| <ul style="list-style-type: none"> • New development areas must not detract from unique urban form of the town | 4 |
| <ul style="list-style-type: none"> • New development should enhance existing public transport | 4 |
| <ul style="list-style-type: none"> • Public transport and infrastructure improvements are needed to ensure sustainability of developments | 4 |
| <ul style="list-style-type: none"> • Facilitating access to passenger transport facilities and supporting key infrastructure improvements are part of achieving successful regeneration, and as such a strict prioritisation is not possible. | 4 |
| <ul style="list-style-type: none"> • All principles are significantly assisted; Regeneration (employment); landscape enhancements; CIL to support a northern bypass | 4 |
| <ul style="list-style-type: none"> • Support the Core Priorities for Harlow, which are overwhelmingly focused on achieving regeneration and renewal, and as such suggest that maximising regeneration priorities should be the key principle | 4 |
| <ul style="list-style-type: none"> • Development of West Sumners in accordance with Gibberd's expansion plans and would give critical mass to support regeneration | 4 |
| <ul style="list-style-type: none"> • Option 3 – Passenger Transport Led most closely aligns with HC's regeneration objectives as it focuses growth to the north which is considered to be the most sustainable location for delivering strategic growth to meet local and regional needs | 4 |
| <ul style="list-style-type: none"> • Believe it is wrong to rank these principles as they are interdependent and cannot be prioritized in this way. Have already expressed our concern that the five Examples set out in Question 2 do not address all of the Council's objectives and priorities. | 4 |
| <ul style="list-style-type: none"> • Locating development where it maximises regeneration targets important issues of deep seated social and economic deprivation | 4 |

Question 4

COMMENTS REGARDING QUESTION 4

| Comment | Sub-Group |
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| <ul style="list-style-type: none"> • South Harlow should be last choice as it is in Green Belt | 1 |
| <ul style="list-style-type: none"> • This example will intensify problems in the south of Harlow and destroy Green Belt land | 1 |
| <ul style="list-style-type: none"> • West Sumners proposals would intensify transport congestion & pollution in south & west of Harlow | 1 |
| <ul style="list-style-type: none"> • New roads and road improvements required – West Sumners development could put extra 2,000 cars on the roads in a rural area. Is this sustainable in terms of road use, pollution and congestion? | 1 |
| <ul style="list-style-type: none"> • Large amounts of infrastructure required for this example, particularly to the road network | 1 |
| <ul style="list-style-type: none"> • West Sumners is able to deliver the most direct range of regeneration benefits, including renewal of hatch, school and community facilities which would form the heart of a new neighbourhood, improving viability and bringing disposable income to area | 4 |

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| <ul style="list-style-type: none"> If planned as part of a comprehensive urban extension serves to establish the regeneration of both Pinnacles (employment) and Katherines (residential and neighbourhood hub) and offer substantial landscape enhancements. The difference between the examples invites a critical comparison between substantial extra growth to the north and south of Harlow, compared to growth to the north east. | 4 |
| <ul style="list-style-type: none"> Consider development to the east would deliver some regeneration benefits which would justify the inclusion of land to the east within the “regeneration” options. | 4 |
| <ul style="list-style-type: none"> Believe that in Harlow regeneration is more a matter of investment, particularly in the town centre, as well as changing the image and profile of the town. Regeneration is less about pure proximity and more about the ability to deliver quality sustainable neighbourhood, with strong links and investment commitments. | 4 |
| <ul style="list-style-type: none"> Whilst example 1 offers the potential to achieve regeneration objectives, do not consider the link between quantum of growth and delivery of regeneration is guaranteed. | 4 |
| <ul style="list-style-type: none"> Form of development at a site scale needs to ensure that the development is actively and effectively physically linked to Harlow in order to harness the regenerative benefits of growth | 4 |
| <ul style="list-style-type: none"> Fully support a distribution of development and allocation of sites that includes land at South Harlow (at Latton Priory) for residential and employment development to achieve the key objectives of revitalizing the town, encouraging investment, creating additional jobs and regenerating areas of greatest need. | 4 |
| <ul style="list-style-type: none"> Land to the south of Harlow, known as Latton Priory, is capable of accommodating circa 2,250 dwellings and 15 hectares of high quality employment, strategically located in relation to the highway network. Of all the sites put forward for development around Harlow, Latton Priory provides the closest relationship between growth and regeneration. | 4 |
| <ul style="list-style-type: none"> Example 1 – EHDC do not appear to have included this in the their local Plan | 4 |

Question 5

COMMENTS REGARDING QUESTION 5

| Comment | Sub-Group |
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| <ul style="list-style-type: none"> South Harlow should be last choice as it is in Green Belt | 1 |
| <ul style="list-style-type: none"> This example will intensify problems in the south of Harlow and destroy Green Belt land | 1 |
| <ul style="list-style-type: none"> All developments on periphery of Harlow will cause loss of greenbelt | 1 |
| <ul style="list-style-type: none"> West Sumners proposals would intensify transport congestion & pollution in south & west of Harlow | 1 |
| <ul style="list-style-type: none"> New roads and road improvements required – West Sumners development could put extra 2,000 cars on the roads in a rural area. Is this sustainable in terms of road use, pollution and congestion? | 1 |
| <ul style="list-style-type: none"> Large amounts of infrastructure required for this example, particularly to the road network | 1 |

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| <ul style="list-style-type: none"> • Object to Example 2 and specifically inclusion of playing field to the south of Gildea Way Site ref 22 <ul style="list-style-type: none"> ○ many people want this site removed ○ site performs role of Green Wedge between communities and will be more important when Gildea Way development goes ahead ○ it is an established, well-used community open space with informal and formal amenity, habitats and woodland, bringing considerable environmental and landscape benefits ○ including this as a less sensitive environmental area will be challenged ○ this site as a development location flies in the face of the vision the Council has to retain and reinforce the green wedge network | 1 |
| <ul style="list-style-type: none"> • Agree with the proposed development to the north east of Harlow in the environmental/landscape led example, the plan should allocate some further adjoining land | 2 |
| <ul style="list-style-type: none"> • West Summers site has limited ecological value, no major archaeological constraints, little risk of flooding and limited landscape impact. It should be identified as a preferred location | 4 |
| <ul style="list-style-type: none"> • Agree that the locations identified in Example 2 are likely to minimise environmental and landscape impacts. In particular, Example 2 appears to identify the whole of East Harlow for growth. The Panel that examined the East of England Plan (EEP) in 2005/06 concluded that East Harlow is “generally accepted to be the least constrained direction for growth”. This conclusion was based on a raft of technical work covering ecology, landscape character, the historic environment, noise and air quality. This technical work included the Harlow Area Landscape & Environmental Study and the Masterplanning which inter alia accepted that a large scale urban extension on land to the east of Harlow would have the least environmental impact of the options available. | 4 |
| <ul style="list-style-type: none"> • If planned as part of a comprehensive urban extension serves to establish the regeneration of both Pinnacles (employment) and Katherines (residential and neighbourhood hub) and offer substantial landscape enhancements. The difference between the examples invites a critical comparison between substantial extra growth to the north and south of Harlow, compared to growth to the north east. | 4 |
| <ul style="list-style-type: none"> • The landscape appraisal work forming the evidence base for the Harlow local plan preparation is comprehensive at a district scale but it does not provide the necessary level of detail to understand the impacts of proposals for development around the town on a site by site basis. Appraisal work undertaken by site promoters on the basis of agreed methodologies will provide a more detailed and nuanced understanding of the landscape impacts for each direction of growth. Many of the proposals being brought forward occupy only small parts of individual Landscape Character Areas and as such generalised conclusions about the impact of development based on whole Character Areas are not justified | 4 |
| <ul style="list-style-type: none"> • Option 3 – Passenger Transport Led most closely aligns with HC’s regeneration objectives as it focuses growth to the north which is considered to be the most sustainable location for delivering strategic growth to meet local and regional needs | 4 |
| <ul style="list-style-type: none"> • Support the inclusion of South Harlow within the environmental / landscape led example as being a site which benefits from natural visual containment as a result of the topography of the land and mature tree belts. The fact that | 4 |

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| development at Latton Priory is the option that will minimize environmental and landscape impacts is fully demonstrated by the landscape and visual study “A Vision for a Green Infrastructure Future” by our landscape consultants FPCR (2013). | |
| <ul style="list-style-type: none"> • Example 2 – A larger allocation to the west of Harlow could be provide the infrastructure needed to regenerate adjoining areas but also help mitigate any transport impacts | 4 |

Question 6

COMMENTS REGARDING QUESTION 6

| Comment | Sub-Group |
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| <ul style="list-style-type: none"> • Sensible if infrastructure (schools, medical facilities, water supply, public transport) is provided before building houses | 1 |
| <ul style="list-style-type: none"> • Sensible solution with appropriate infrastructure (particularly road network enhancements) | 1 |
| <ul style="list-style-type: none"> • Not if it means new bus lanes or keeping existing. Transport led implies people employed from outside the town. Congestion could be reduced by remodelling key building entrances | 2 |
| <ul style="list-style-type: none"> • Agree with the proposed development to the north east of Harlow in the passenger transport led example, the plan should allocate some further adjoining land | 2 |
| <ul style="list-style-type: none"> • Example 3 limits development to Harlow North which is unrealistic as current economic, regeneration and housing issues would not be addressed in the short-term. | 4 |
| <ul style="list-style-type: none"> • In order for development to the north of Harlow to benefit from its proximity to the stations and the Town Centre transport hub there must be high quality linkages between the development and these destinations. | 4 |
| <ul style="list-style-type: none"> • Northern part of East Harlow (i.e. north of Moor Hall Road) is actually geographically closer to a railway station (Harlow Mill) than parts of North Harlow, the general approach set out in Example 3 is considered to be unsound | 4 |
| <ul style="list-style-type: none"> • Example 3 is predicated on locating development close to the rail stations and the town centre transport hubs. Consider this approach is sound in principle, however caution against assumption that proximity and accessibility are automatically correlated. | 4 |
| <ul style="list-style-type: none"> • Existing public transport can be enhanced in locations such as West Sumners | 4 |
| <ul style="list-style-type: none"> • Despite referring to “passenger transport”, this option appears to focus predominantly on rail transport and has little or no regard to buses and in particular existing and planned future bus priority corridors | 4 |
| <ul style="list-style-type: none"> • East Harlow has at least as much potential, if not more, to encourage public transport uptake than other growth locations in or around Harlow. | 4 |
| <ul style="list-style-type: none"> • Detailed consideration needs to be given to the form and boundaries of development at a site scale to ensure that high quality linkages are achievable in order that the benefits of that proximity can be harnessed. | 4 |
| <ul style="list-style-type: none"> • Option 3 – Passenger Transport Led most closely aligns with HC’s regeneration objectives as it focuses growth to the north which is considered to be the most | 4 |

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| sustainable location for delivering strategic growth to meet local and regional needs | |
| <ul style="list-style-type: none"> Do not consider this example is appropriate as there is an over-reliance on land within East Herts District which would be unlikely to come forward in the plan period. East Herts is currently consulting on its Local Plan in which they consider it likely that only 3,000 new homes can be delivered in this location before 2031. | 4 |
| <ul style="list-style-type: none"> Example 3 – EHDC has not sought to include this proposed growth. Growth is also heavily reliant on the delivery of a new junction on the M11 | 4 |
| <ul style="list-style-type: none"> An acknowledgement that an Option 3 – Passenger Transport Led, distribution of development could be an appropriate option for further consideration by HC and neighbouring Authorities | 4 |

Question 7

COMMENTS REGARDING QUESTION 7

| Comment | Sub-Group |
|---|-----------|
| <ul style="list-style-type: none"> West Sumners proposals would intensify transport congestion & pollution in south & west of Harlow | 1 |
| <ul style="list-style-type: none"> New roads and road improvements required – West Sumners development could put extra 2,000 cars on the roads in a rural area. Is this sustainable in terms of road use, pollution and congestion? | 1 |
| <ul style="list-style-type: none"> Large amounts of infrastructure required, particularly to the road network | 1 |
| <ul style="list-style-type: none"> This will intensify problems in the south of Harlow and destroy Green Belt land | 1 |
| <ul style="list-style-type: none"> If planned as part of a comprehensive urban extension serves to establish the regeneration of both Pinnacles (employment) and Katherines (residential and neighbourhood hub) and offer substantial landscape enhancements. The difference between the examples invites a critical comparison between substantial extra growth to the north and south of Harlow, compared to growth to the north east. | 1 |
| <ul style="list-style-type: none"> How can loss of playing field (area 22) be said to be less sensitive environmental area? | 1 |
| <ul style="list-style-type: none"> Agree with the proposed development to the north east of Harlow in the regeneration and landscape led example, the plan should allocate some further adjoining land | 2 |
| <ul style="list-style-type: none"> West Sumners site is able to provide a balance of regeneration and landscape objectives as it conforms with the Gibberd Masterplan, provides new facilities and locates development where the natural topography limits landscape impact | 4 |
| <ul style="list-style-type: none"> Support Example 4 as an approach to accommodating growth principally because it identifies East Harlow in its entirety and to a lesser extent because it does not propose development on the two key landscape sensitivities around Harlow, namely the ridge of high ground to the south and the River Stort valley and its floodplain to the north. | 4 |
| <ul style="list-style-type: none"> Given the Harlow Futures Study has established the principle that higher levels of growth can deliver better regeneration, a more detailed understanding of landscape issues on a site by site basis is required. This detailed evaluation will establish that it is possible to select a strategy which optimises the achievement | 4 |

| | |
|---|---|
| of regeneration and renewal objectives through the delivery of high levels of growth within landscape constraints. | |
| <ul style="list-style-type: none"> The omission of South Harlow is curious since it was included within Example 1 “Focussed on Priority Regeneration Areas”, and Example 2 “Environmental / Landscape Led”. Logically, South Harlow must be included in Example 4 that combines these two themes. Under the landscape led option, paragraph 7.1 states that development is required in South-West Harlow if 15,000 homes are needed but is not clear why this location is favoured over South Harlow under this scenario. Land to the south is considered to be less sensitive than the land to the west and south-west in terms of the Green Belt conflict considerations. Furthermore, with regards to regenerative benefits, South Harlow is considered to be better located to deliver these benefits due to its proximity to the Priority Estates of Aylets Field, The Briars, Copshall Close, Barley Croft and Lower Meadow. | 4 |
| <ul style="list-style-type: none"> Example 4 – Support this approach as it relies solely on EFDC rather than other uncooperative LPAs | 4 |

Question 8

COMMENTS REGARDING QUESTION 8

| Comment | Sub-Group |
|---|-----------|
| <ul style="list-style-type: none"> Sensible if infrastructure (schools, medical facilities, water supply, public transport) is provided before building houses | 1 |
| <ul style="list-style-type: none"> Sensible solution with appropriate infrastructure (particularly road network enhancements) | 1 |
| <ul style="list-style-type: none"> At a cost to Gibber’s masterplan - do not want to lose heritage | 1 |
| <ul style="list-style-type: none"> Another New Town is a better solution | 1 |
| <ul style="list-style-type: none"> Agree with the proposed development to the north east of Harlow in the northern by pass led example, the plan should allocate some further adjoining land | 2 |
| <ul style="list-style-type: none"> Support Example 5 in so far that it identifies the whole of East Harlow for strategic growth and would facilitate a new M11 Junction 7A and link road to the Gildea Way corridor. All of ECC’s preliminary new Junction 7A and link road options have been designed in such a way to be capable of linking into a possible new northern bypass, if that were to come forward at some point in the future. | 4 |
| <ul style="list-style-type: none"> It is questionable whether a new northern bypass is likely to be delivered during the plan period. The cost of a bypass may be prohibitively high (representatives of ECC and HCC have suggested figures of £200m-£400m) and there is much uncertainty over land acquisition. Furthermore, it is unclear whether there is sufficient planning and political support for the scheme amongst the three district councils and two county councils, who each administer some of the land or act as the local highway authority. | 4 |
| <ul style="list-style-type: none"> The technical and financial feasibility of the northern by-pass requires significant further work. Cost of the bypass could reduce the availability of funds to achieve regeneration and renewal objectives. Question whether, particularly in the context of East Herts stated intention to bring forward development in the Gilston area to serve their own development needs, a northern bypass is conducive to | 4 |

| | |
|---|---|
| development situated to the north of Harlow meeting Harlow's Core Priorities and Vision | |
| <ul style="list-style-type: none"> The 2006 East of England Panel Report specifically highlighted (para 5.91) that a direct link from the M11 to development at Harlow North would increase the risks of this development having little relationship to Harlow and competing with rather than supporting the regeneration of the town. | 4 |
| <ul style="list-style-type: none"> A northern bypass should not override other objectives but if it is seen as essential, it should be funded by a Greater Harlow CIL | 4 |
| <ul style="list-style-type: none"> Northern Bypass example is focused on a specific single transport measure rather than the wider issue of improved transport infrastructure and accessibility. It does not therefore allow a rounded assessment of how various development sites and options could improve transport accessibility in its wider sense. The Northern Bypass led example is also likely to skew the results of the evaluation in favour of sites that might address this single transport solution. The inclusion of this example is not therefore, in our view, a sound approach to decisions on where development should be located. | 4 |
| <ul style="list-style-type: none"> Example 5 – Heavily reliant on infrastructure delivery including J7a and a northern bypass. There are several constraints in terms of deliverability and the location of the link road is particularly constrained. It appears that this is not a robust or deliverable option as it relies on the cooperation of EHDC | 4 |

Question 9

COMMENTS REGARDING QUESTION 9

| Comment | Sub-Group |
|---|-----------|
| <ul style="list-style-type: none"> Blend would be good as Gibberd concentrated on mixed development | 1 |
| <ul style="list-style-type: none"> Too vague – depends on blend, but a blend is vital for social, demographic and economic reasons. | 1 |
| <ul style="list-style-type: none"> It would depend on the blend | 1 |
| <ul style="list-style-type: none"> A sustainable approach would be 15,000 new homes and 12,000 new jobs, sites which deliver regeneration and minimise environmental impacts and good public transport connections; including West Sumners site for up to 1,200 homes | 4 |
| <ul style="list-style-type: none"> The preferred strategy for Harlow is heavily dependent on the outcome of joint working with East Herts and Epping Forest under the Duty to Cooperate. Detailed consideration is required to properly understand how growth which is proposed adjacent to Harlow to meet East Herts' and Epping's housing needs will be planned to ensure that it meets Harlow's vision and core priorities as set out in chapter 3 of the consultation document | 4 |
| <ul style="list-style-type: none"> Consider a blend of development examples could be a better approach if that blend encompasses all the objectives and priorities set out on Page 20 of the consultation document. However, our favoured spatial strategy, as detailed in our response to Question 2, is to focus development and identify sites that will provide the best possible contribution to all the key objectives set out on page 20 of the consultation document, including delivery of Junction 7A and interim improvements to Junction 7 of the M11. | 4 |

Appendix 2: Other comments received (split by topic)

All other comments received – which did not directly relate to any of the questions – are reported in this appendix. The comments are split by topics as follows:

- AREAS AND SITES
 - North Harlow
 - South/West Harlow
 - East Harlow
 - Other Areas/Sites
- OPEN SPACES
 - Green Wedges
 - Green Belt
 - Other Open Space
- EMPLOYMENT
- INFRASTRUCTURE (GENERAL)
- INFRASTRUCTURE (TRANSPORT)
 - M11
 - Northern bypass
 - Other transport
- REGENERATION
- TOWN CENTRE
- OTHER ISSUES
- CONSULTATION PROCESS

Note that all comments (question-specific or otherwise) made by specific consultees, such as adjoining authorities, are reported in Appendix 3.

The table below, reproduced from Chapter 3, explains how the respondents were categorised into Sub-Groups.

| Sub-Group | Type of Respondents |
|--|---|
| 1: Harlow Residents and Resident/Community Groups | <ul style="list-style-type: none"> • Harlow Residents • Harlow Resident/Community Groups/Associations |
| 2: Specific Consultees and Local Groups, Businesses & Organisations | <ul style="list-style-type: none"> • Adjacent Local Authorities, Parish Councils and County Councils • Government Agencies and Departments • Infrastructure and Utility Providers • Local Businesses • Local Groups and Organisations (including faith groups, disability groups, environmental groups and ethnic minority groups) • Partner Agencies • Other Groups/Organisations |
| 3: Adjoining Parishes Residents and Other Residents | <ul style="list-style-type: none"> • Residents from East Hertfordshire DC area • Residents from Epping Forest DC area • Other Residents |
| 4: Local Developers, normally via Planning Consultants/Agents | <ul style="list-style-type: none"> • Local Developers (responses normally submitted via Planning Consultants/Agents) |

Areas and Sites

North Harlow

Table A1.1

| Comment | Sub-Group |
|--|-----------|
| <ul style="list-style-type: none"> • Harlow North comes closest to demonstrating some infrastructure provision | 1 |
| <ul style="list-style-type: none"> • Best option is to create additional new towns - Harlow North only option that comes closest to this approach | 1 |
| <ul style="list-style-type: none"> • Developing the Gildea Way area further would kill the community, victimise existing residents and take away all that they hold dear | 2 |
| <ul style="list-style-type: none"> • Infrastructure in Katherines and Gilston area not strong enough to sustain amount of building proposed | 2 |
| <ul style="list-style-type: none"> • Do not think Harlow North is an option | 2 |
| <ul style="list-style-type: none"> • Any development for 15,000 extra homes needs to be concentrated to the NORTH of Harlow and integrated with a A414/M11 link far better than junction 7a. | 3 |
| <ul style="list-style-type: none"> • Development in Harlow North would cause enormous problems with infrastructure, relating to roads, schools, hospitals and public transport which are already overstretched | 3 |
| <ul style="list-style-type: none"> • Development to the north of Harlow would be the better option. | 3 |
| <ul style="list-style-type: none"> • Harlow seems keen to use land north of Harlow without considering the destruction of communities and the loss of open spaces which are used for recreational purposes including bird-watching, cycling and walking and which are promoted through the Stort Valley Corridor project, and the loss of wildlife habitats of various species including barn owls and rare birds | 3 |
| <ul style="list-style-type: none"> • Object to designation of Gilston area for development – this would be an extravagant, undemocratic and unsustainable use of land, changing the area into a huge suburban mass which won't be part of Harlow due to the River Stort being in-between | 3 |
| <ul style="list-style-type: none"> • Permission to extend Newhall and develop Gildea Way area, with existing and proposed transport links near railway stations and the Enterprise Zone, suggest that development to the north and east of Harlow are more practical options | 3 |
| <ul style="list-style-type: none"> • Eastwick roundabout on the A414. Gridlocked most days (before the Harlow North properties have even been approved), Roydon suffers from East Herts residents 'rat running' to gain quicker access to their workplace. Where will the Harlow North traffic go? | 3 |
| <ul style="list-style-type: none"> • Alternative to Harlow North is to use brownfield site of North Weald airfield | 3 |
| <ul style="list-style-type: none"> • Key opportunities to secure development at Gilston in such a form that benefits the regeneration of Harlow are already being missed | 4 |
| <ul style="list-style-type: none"> • High quality physical linkages can be delivered between development in the Gilston Area and Harlow - such linkages could determine whether development in the Gilston Area supports the town or turns its back on it | 4 |
| <ul style="list-style-type: none"> • Currently, draft policies for the development proposed in the Gilston Area to meet East Herts' housing needs does not take into account Harlow's regeneration priorities as they fail to provide an opportunity for that development to achieve | 4 |

high quality linkages into Harlow which are considered would be a pre-requisite to ensuring that development at Gllston supports rather than undermines the regeneration of Harlow.

South/West Harlow

Table A1.2

| Comment | Sub-Group |
|--|------------------|
| <ul style="list-style-type: none"> Worst options are Latton Priory, Katherines West and Sumners West – these would increase congestion on Southern Way and in Bush Fair, plus any traffic reaching the M11 from these would have to travel through Harlow and they are furthest from main public transport hubs | 1 |
| <ul style="list-style-type: none"> Development of West Sumners would enlarge Harlow’s footprint | 1 |
| <ul style="list-style-type: none"> Is West Sumners socially and economically sustainable? Will it exacerbate congestion on Southern Way and add to rush hour chaos? | 1 |
| <ul style="list-style-type: none"> It does seem beyond comprehension that any new residents of Sumners would not be classed as Harlow residents but they would be swelling demand for Harlow services and infrastructure | 1 |
| <ul style="list-style-type: none"> Preference against West Sumners and in favour of further housing and infrastructure to the north and east of Harlow | 1 |
| <ul style="list-style-type: none"> Sumners community is against West Sumners development and in favour of development on brownfield sites and to the north of Harlow to supply the required housing and minimise disruption to the community, economy and environment | 1 |
| <ul style="list-style-type: none"> Worst options are Latton Priory, Katherines West and Sumners West – these would increase congestion on Southern Way and in Bush Fair, plus any traffic reaching the M11 from these would have to travel through Harlow and they are furthest from main public transport hubs | 1 |
| <ul style="list-style-type: none"> Crest Nicholson regeneration plans for Sumners Hatch – is it sustainable? Will it provide concurrent infrastructure improvements? Is it environmentally sound? Will it add to traffic congestion on Southern Way? Is it worth the loss of Green Belt and the additional infrastructure burden? More attractive shops will only be provided in the long-term. Some developers make promises of planning gain finance for regeneration, but regeneration of a specific hatch in return for carte blanche on house building is very short sighted | 1 |
| <ul style="list-style-type: none"> Council-led regeneration of Sumners Hatch could consider housing needs of the elderly, school and medical facilities, disruption on Southern Way and environmental concerns. Why not bring in ‘not for profit’ developers who could look at the site? | 1 |
| <ul style="list-style-type: none"> Sumners West is regarded as the prime area for expansion, as set out by Gibberd | 2 |
| <ul style="list-style-type: none"> A small development at Sumners may be acceptable, dependent on the numbers | 3 |
| <ul style="list-style-type: none"> Development at Katherines would be unacceptable. Both Sumners and Katherines are too far from the Town Centre and therefore would not support the facilities there. The area to the west of Katherines is an allocated glasshouse area | 3 |
| <ul style="list-style-type: none"> Developments to the southwest would have many disadvantages – developments would be distanced from the town centre, commuting from this area would cause traffic congestion, local sewerage network is a restraint, there is a danger of | 3 |

| | |
|--|---|
| coalescence with Harlow and Roydon, developments could encroach on historic landscapes and the Green Belt, and land west of Katherines is a glasshouse area | |
| <ul style="list-style-type: none"> Object to growth in Katherines and west of Sumners, due to poor transport links, overcrowded roads, distance to facilities. | 3 |
| <ul style="list-style-type: none"> Sumners, is proposed for development, in Epping Forest DC area, what decisions regarding domestic waste, bus routes and, schools etc have been confirmed. Roydon village is used for parking for the station by Sumners residents | 3 |
| <ul style="list-style-type: none"> Expansion to the west of Harlow is consistent with that proposed in the 1974 Masterplan which recognised the lower landscape value of this land | 4 |
| <ul style="list-style-type: none"> Extension to west of Harlow between Water Lane, Epping Road, Old House lane, Flex Meadow and Kathrines can provide up to 1,100 homes and employment land particularly contributing to the achievement of the objectives underpinning Example 1 | 4 |
| <ul style="list-style-type: none"> Consider that Latton Priory must form part of the Plan's spatial strategy because it has been demonstrated that it will make a direct and immediate contribution to the key objectives 1 – 5 and 10.4 | 4 |
| <ul style="list-style-type: none"> Land south of Harlow at Latton Priory is best placed to deliver all the Council's objectives and has a vital role in delivering an early phase of housing, economic growth and regeneration alongside short term and longer term improvements to the strategic road network. | 4 |

East Harlow

Table A1.3

| Comment | Sub-Group |
|--|------------------|
| <ul style="list-style-type: none"> A Harlow East option should be considered, with development to the east of the M11 with a new junction, a new branch line from the railway and new bus station which would allow businesses to be within easy reach of current Harlow residents | 1 |
| <ul style="list-style-type: none"> East Harlow should be considered the catalyst for growth in and around Harlow. Through facilitating the delivery of a new M11 Junction 7A and link road to the Gilden Way corridor, East Harlow can kick start the regeneration of Harlow by easing congestion in the town, by improving the connectivity of the town's employment areas and the Enterprise Zone and by unlocking long term potential for strategic growth elsewhere in and around in the town (beyond a Phase 1 at East Harlow). | 4 |
| <ul style="list-style-type: none"> Of crucial importance is to secure an allocation that will enable a viable development to come forward at East Harlow. | 4 |
| <ul style="list-style-type: none"> It is vital not to frustrate or delay growth at East Harlow by insisting that a further site specific DPD or AAP is prepared, once the emerging Plan has been adopted. To the contrary, in order to allow East Harlow and the new M11 junction to unlock the long term potential for strategic growth in and around in the town, the emerging Plan should seek to identify site specific allocations (not broad locations) for growth at East Harlow. This could allow a planning application to be worked up in parallel with the emerging Local Plan process and allow a greater number of completions to be delivered on-site within the next five years. | 4 |
| <ul style="list-style-type: none"> Would not object to a blend of the development examples, providing that East | 4 |

| | |
|--|---|
| Harlow features in its entirety in whatever Preferred Option HDC decides to pursue. | |
| <ul style="list-style-type: none"> CIL may enable contributions to be collected from a wider pool of development sites, but it also may preclude funding from other sources (e.g. HCA loans) and would prevent delivering infrastructure directly on-site. Therefore, it may be preferable to zero rate certain strategic sites (including East Harlow) under any CIL schedule and pool contributions for the new M11 junction through s106 instead or itemise elements of the new Junction 7a and its associated package of improvements and carefully consider those elements best delivered by CIL and those by development. | 4 |

Other Areas/Sites

Table A1.4

| Comment | Sub-Group |
|--|------------------|
| <ul style="list-style-type: none"> Land west of 93 – 100 Jocelyns – concern that playing field is included: it is only open space in neighbourhood, provides natural break between housing, is used by children and provides a safe environment. Loss of such a site would be against Gibberd’s vision of bringing countryside into the town | 1 |
| <ul style="list-style-type: none"> New development in Comonside Road will be the first development with retail space directly by roadside in residential area if ground floor units are for retail. Thought needs to be given over whether this is to be duplicated elsewhere thereby eroding the town’s unique character | 1 |
| <ul style="list-style-type: none"> Concerned by Crest Nicolson plans for Sumners Hatch – to allow development which would place huge burden on area’s limited infrastructure in return for some regeneration is foolhardy, plus infrastructure only considered at later phase | 1 |
| <ul style="list-style-type: none"> Old Harlow set to suffer from soulless, under-supported housing estates and traffic | 1 |
| <ul style="list-style-type: none"> Dashes Playing Field to be used for joint community and educational use | 2 |
| <ul style="list-style-type: none"> Look more closely at existing opportunities, even if sites are identified for other uses. Example of one such opportunity at Junction Parkway/Roydon Rd. | 2 |
| <ul style="list-style-type: none"> Making use of sites such as Junction Parkway/Roydon Road would assist the council greatly in addressing their required development needs | 2 |
| <ul style="list-style-type: none"> Terminus House car park retained for public and college use | 2 |
| <ul style="list-style-type: none"> The College has contributed to the regeneration of Harlow through relinquishing significant parts of its campus for the development of University College. This restricts future options for the college to develop its estate. Proposed therefore: Vacant garage blocks adjacent to College used for College Parking to allow expansion | 2 |
| <ul style="list-style-type: none"> The council should be putting more emphasis on sites such as the land at Junction Parkway/Roydon Road | 2 |
| <ul style="list-style-type: none"> Support inclusion of Ram Gorse playing field as a housing development site | 4 |

Open Spaces

Green Wedges

Table A1.5

| Comment | Sub-Group |
|--|------------------|
| <ul style="list-style-type: none"> • Must keep green wedges | 1 |
| <ul style="list-style-type: none"> • No more incursion into Green Wedges as a number of them have been eroded already | 1 |
| <ul style="list-style-type: none"> • Existing Green Wedges are inviolate. Green Wedges should be incorporated in expansion areas in the same proportions as now | 2 |
| <ul style="list-style-type: none"> • Green Wedges should not be built on as they are the lungs of the town | 2 |
| <ul style="list-style-type: none"> • Agree that the 'principle' of Green Wedges should be retained | 4 |
| <ul style="list-style-type: none"> • Do not agree that the viability of the land as farmland should need to be demonstrated, if the proposed use is compatible with Green Wedge (i.e. sports and recreation), as this restrictive policy could lead to the Green Wedge unable to provide the "multifunctional opportunities for residents and wildlife" set out in Vision 7 of the Vision for Harlow, and could mean that the vitality of the Green Wedge is eroded through over-restrictive policy constraints | 4 |

Green Belt

Table A1.6

| Comment | Sub-Group |
|---|------------------|
| <ul style="list-style-type: none"> • Object to use of Green Belt land for development and creeping development which encircles the town and threatens quality of life | 1 |
| <ul style="list-style-type: none"> • Allowing sites to absorb residential development will reduce the council's need to allow development in the Green Belt and also to require other authorities to accommodate their housing needs. | 2 |
| <ul style="list-style-type: none"> • More sustainable to develop a site within the established urban area and provide local facilities for residents as opposed to relying on greenfield sites located within the green belt | 2 |
| <ul style="list-style-type: none"> • Harlow's 'grandiose' growth claim sadly includes the inclusion/use of the Green Belt | 3 |
| <ul style="list-style-type: none"> • Creeping coalescence between Roydon and Harlow must be avoided. Two Planning Inspectors' Reports relating to land at East End have supported this. EFDC have been clear from the outset that all green belt land must be maintained as so | 3 |
| <ul style="list-style-type: none"> • Cooperation should include a comprehensive review of the Green Belt in Epping Forest District to ensure the needs of both districts are met | 4 |
| <ul style="list-style-type: none"> • Green Belt boundaries must be capable of enduring beyond the plan so the Council should aim for the upper (15,000 dwelling) growth level | 4 |
| <ul style="list-style-type: none"> • Harlow will need to work with adjoining authorities on a joint Green Belt review | 4 |
| <ul style="list-style-type: none"> • Scenario C - Jobs led might involve loss of Green Belt which is concerning | 4 |

Other Open Space

Table A1.7

| Comment | Sub-Group |
|--|------------------|
| <ul style="list-style-type: none"> • Erosion of Old Harlow & Churchgate St green spaces and rainwater soakaways | 1 |

| | |
|--|---|
| exacerbates flooding | |
| <ul style="list-style-type: none"> • First class farmland should not be developed – instead use land that is unproductive | 1 |
| <ul style="list-style-type: none"> • Harlow’s green verges are suffering from ‘cutting edge design’ where new developments are being built virtually next to the roadside | 1 |
| <ul style="list-style-type: none"> • Substantial development on flood plains has resulted in flooding. Further development will exacerbate flooding | 1 |
| <ul style="list-style-type: none"> • SUDS have been proved to be a nonsense by experience of New Hall & Church Langley SUDS which has flooded Old Harlow & Churchgate St | 1 |
| <ul style="list-style-type: none"> • Harlow has a distinct character with buildings away from the road giving it a green and open feel | 1 |
| <ul style="list-style-type: none"> • Building on playing fields is fundamentally wrong as it removes children’s rights to have a safe area for meeting, sports, exploring and playing | 2 |
| <ul style="list-style-type: none"> • Natural environment must be enhanced not destroyed | 2 |
| <ul style="list-style-type: none"> • Brownfield sites need to be considered and developed – and not greenfield sites, especially due to development planned at Gilden Way | 2 |
| <ul style="list-style-type: none"> • New housing areas should come from old brownfield sites | 2 |
| <ul style="list-style-type: none"> • Plans should recognise need to build on many of its own open spaces and brownfield sites whilst retaining green areas | 3 |
| <ul style="list-style-type: none"> • Trust diminishes as green space is identified for development | 3 |
| <ul style="list-style-type: none"> • Appropriate amounts of recreation and sporting space must be provided for both current and future residents | 4 |

Employment

Table A1.8

| Comment | Sub-Group |
|---|-----------|
| <ul style="list-style-type: none"> • No business plan is provided and there is no discussion of the financial cost and benefits of the proposals, including the levels of increased employment | 1 |
| <ul style="list-style-type: none"> • Employers are attracted to those places with good transport links | 1 |
| <ul style="list-style-type: none"> • Question whether more housing is needed. More jobs locally is what is really needed | 1 |
| <ul style="list-style-type: none"> • Many original residents have left because the jobs solutions have become dire | 1 |
| <ul style="list-style-type: none"> • NPPF effectively advises against local authorities retaining old employment sites if there is little prospect of them being brought forward for development | 2 |
| <ul style="list-style-type: none"> • Appear to be more of a need for housing land than employment land over the plan period | 2 |
| <ul style="list-style-type: none"> • Poor accessibility is a major inhibiting factor for the existing major employment sites and successful businesses have indicated their intention to move from Harlow rather than expand within the town | 2 |
| <ul style="list-style-type: none"> • Leaflet suggests at least 3,000 houses will home jobless people or commuters | 3 |

Infrastructure (General)

Table A1.9

| Comment | Sub-Group |
|--|-----------|
| • Better to offer solutions that prioritise infrastructure | 1 |
| • Infrastructure is important | 1 |
| • Why would a doughnutting approach be valid when the road structure does not cope and medical facilities are at capacity? | |
| • It is not housing that will prevent decline – it is correct investment in infrastructure which will allow additional housing | 1 |
| • Lack of infrastructure could result in Harlow becoming an ‘overspill’ for other towns | 1 |
| • Little mention of infrastructure, e.g. schooling, road upgrades, sewerage, drainage, water supply pressure, hospital | 1 |
| • Much more information needed on schools, health care, drainage/sewerage | 1 |
| • No evidence of water supply, sewerage or hospital infrastructure – existing facilities will struggle to cope with developments in other authorities pushing against Harlow’s boundaries | 1 |
| • Already difficult to get appointment at GP surgery | 2 |
| • How will other services such as schools, social care and policing cope? | 2 |
| • Utmost care must be taken in the provision of additional infrastructure and services | 2 |
| • Will hospital be able to cope? | 2 |
| • Should first protect and enhance existing infrastructure before building new. Advise district-wide policy for this purpose to reflect NPPF to deliver the social, recreational and cultural facilities and services that the community needs, planning policies and decisions should plan for the use of shared space and guard against unnecessary loss of valued facilities. | 2 |
| • Infrastructure not strong enough to sustain amount of building proposed | 2 |
| • Should set out strategic priorities in the Plan including provision of health, security, community and cultural infrastructure and other local facilities. | 2 |
| • Concerned about the ability of infrastructure to cope. | 3 |
| • Costs of new infrastructure would presumably have to be borne by the developer rather than the taxpayer? | 3 |
| • Primary concern for the next few years is the quality of secondary education our children can receive from the town | 3 |
| • Provide infrastructure such as roads, schools, medical facilities, water supply, and sewage before building new properties | 3 |
| • An infrastructure delivery plan should be published in the early stages of the consultation process. It should specify when and how the work will be delivered and how it will be funded | 4 |
| • The Council needs to clarify whether it intends to implement infrastructure improvements in parallel to development or prior to development | 4 |
| • Emphasize the importance of the Council’s Objective 10 which is to support development and change through the provision of adequate infrastructure. | 4 |

Infrastructure (Transport)

M11

Table A1.10

| Comment | Sub-Group |
|--|-----------|
| • Junction 7a would be a disaster as it would increase Harlow congestion | 1 |
| • M11 Junction 7A is needed, but only to provide a northern bypass to the town, no link to Gilden Way. Northern bypass is vital if north Harlow developed | 2 |
| • Not happy with proposed Junction 7A proposals to lead traffic through Old Harlow | 2 |
| • Do not support Junction 7a proposal as it will not reduce existing traffic and congestion. Take road link nearer to Pishiobury & Sawbridgeworth and remove need to go through Harlow to get to M11 | 3 |
| • M11 junction 7a proposal not part of this consultation | 3 |

Northern bypass

Table A1.11

| Comment | Sub-Group |
|--|-----------|
| • It makes no sense to link M11 to Harlow via Gilden Way now that major development north of Harlow is a possibility | 1 |
| • Northern bypass essential | 1 |
| • Northern bypass only possible solution to avoid congestion | 1 |
| • Support plans for a northern bypass to connect to M11 – ECC and HCC should deliver joint infrastructure programme to solve congestion on the border | 1 |
| • Without a northern bypass, the proposals will choke Harlow with traffic congestion and have a highly detrimental effect, particularly on Old Harlow | 1 |
| • Little consideration for infrastructure and transport in some examples – issue with link road going through Old Harlow/Edinburgh Way is increased congestion. Lack of improved road network would make Harlow a less attractive place for businesses (inc. those in the scientific sector), retailers and shoppers, and increase pollution | 1 |
| • Proposals will generate unsustainable traffic congestion and improvements will not provide relief, instead replicating major problems around the hamburger roundabout | 1 |
| • There will be lots of new residents and traffic with new development but Harlow has virtually no dual carriageways. | 1 |
| • Tinkering with transport system as now will not work, building new houses exacerbates traffic and parking congestion | 1 |
| • While bus lanes sit empty most of the time, traffic queues beside them | 1 |
| • Harlow's congested road network and diminishing public transport network is inhibiting the travel of students | 2 |
| • Roads are under strain and major enhancement may not be the solution. Consideration should be given to alternative modes of travel. Through traffic should have an alternative route than now | 2 |
| • Town currently gridlocked during rush hour | 2 |
| • Bus service in Harlow is of the lowest standard which only serves to keep residents in their cars. Growth will come with more congestion if this is not addressed | 3 |
| • Concentrate on developing a high quality, frequent and reliable bus system the | 3 |

| | |
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| town can meet its aspirations without increasing the strain on the local road network | |
| <ul style="list-style-type: none"> Document seems to focus primarily on improvements to the Highway network without thought to providing a higher quality bus service | 3 |

Other Transport

Table A1.12

| Comment | Sub-Group |
|--|-----------|
| <ul style="list-style-type: none"> Many original residents have left because transport solutions have become dire | 1 |
| <ul style="list-style-type: none"> More car parking for Staple Type shopping centre is required in light of recent and future developments in that area | 1 |
| <ul style="list-style-type: none"> Where will investment come from for new roads linking new developments? | 1 |
| <ul style="list-style-type: none"> Where will open spaces be allocated for park'n'ride if they have been built on? | 1 |
| <ul style="list-style-type: none"> Document glosses over infrastructure and transport | 3 |
| <ul style="list-style-type: none"> Concurs with ECC's view that a more northerly bypass of Harlow would "not address congestion within the town... or provide for the growth and regeneration of the town" (ECC option consultation) | 4 |
| <ul style="list-style-type: none"> ECC has concluded that, following completion of the Test 5 modelling, there are no transport show stoppers to 10,000 residential units along with employment for 2,500 people proceeding at GPE. Accordingly, HDC can have comfort that the conclusions reached by the authorities and in particular ECC, are robust and that transport considerations do not preclude development a GPE of up to 10,000 homes | 4 |
| <ul style="list-style-type: none"> The provision of Junction 7A is the single most important action necessary under Objective 10 and the key part of a strategy to improve access to the motorway and strategic road network. | 4 |

Regeneration

Table A1.13

| Comment | Sub-Group |
|--|-----------|
| <ul style="list-style-type: none"> Better to offer solutions that prioritise regeneration | 1 |
| <ul style="list-style-type: none"> None of the examples are ambitious enough to stimulate sufficient regeneration | 1 |
| <ul style="list-style-type: none"> Previous expansions have promised increased employment, improved town centre and quality of life, attraction of businesses and regeneration. However, recent expansion has had the reverse impact | 1 |
| <ul style="list-style-type: none"> Regeneration of existing residential areas to provide improved housing stock, and to increase density where possible, is to be encouraged. | 2 |
| <ul style="list-style-type: none"> Wholesale regeneration initiative required to deliver housing, business and jobs | 2 |
| <ul style="list-style-type: none"> Document glosses over regeneration | 3 |
| <ul style="list-style-type: none"> Regeneration should include redevelopment of existing housing and better quality development to attract the young and aspiring | 3 |
| <ul style="list-style-type: none"> Agrees with the conclusions of the Harlow Future Prospects Study and with paragraph Emerging Strategy that evidence shows that additional development will be required to deliver long term regeneration of Harlow | 4 |

| | |
|---|---|
| • Clear link between growth and regeneration | 4 |
| • The regeneration of the existing urban area is not simply achieved by facilitating development on nearby sites – it is perfectly possible for new development to leave deprived areas untouched even when it is very close by | 4 |

Town Centre

Table A1.14

| Comment | Sub-Group |
|--|-----------|
| • Town centre needs to be made more attractive as certain areas are a disgrace | 1 |
| • Need to focus on regenerating town centre to support the local economy and ensure Harlow is a sub-regional centre for leisure and entertainment | 1 |
| • Ensure town centre remains the centre by building around Harlow and not just to the east – this will also reduce traffic congestion by allowing more walking and cycling | 1 |
| • Concern with the impact of the potential closing of anchor stores in the town centre | 2 |
| • Town centre can be a great place again through investment in new stores | 2 |
| • The town centre and neighbourhood shopping and commercial centres must form an important part of the town's regeneration. Have great potential, as retail and commercial hubs, and could provide residential use without losing their individuality, but developed in a way that preserves their character | 2 |
| • Gradual erosion of the town centre offer and its physical environment has been identified, which has resulted in a declining role for employment and other opportunities for our students | 2 |

Other Issues

Table A1.15

| Comment | Sub-Group |
|---|-----------|
| • Affordable, social and small housing units are important in a growing town | 1 |
| • Has the Council explored all options of redeveloping brownfield sites? Smaller size starter homes could be focused on smaller brownfield sites | 1 |
| • Consider increasing housing density | 1 |
| • Have all empty properties been used? | 1 |
| • The south of England should not be carpeted with unaffordable executive homes – instead New Towns should be built with rented accommodation | 1 |
| • Officers should live in the town | 1 |
| • Residents had to work in the town before they were housed so traffic was manageable | 1 |
| • The role of Harlow could not be transformed into current day Cambridge as Harlow is not part of the key science area known as the “golden triangle” | 1 |
| • What happens if there is a change of government with different policies? | 1 |
| • New developments are not in keeping with surrounding areas and are more suited to inner city/town centre styling, and some areas have been over- | 1 |

| | |
|--|---|
| developed | |
| <ul style="list-style-type: none"> • New developments should have included in their costs a figure of compensation to be paid for loss of value for affected communities | 1 |
| <ul style="list-style-type: none"> • Preservation of communities and adherence to Gibberd masterplan are important | 1 |
| <ul style="list-style-type: none"> • Good quality architecture is to be aimed for | 1 |
| <ul style="list-style-type: none"> • Supports Harlow Council to realise the towns potential | 2 |
| <ul style="list-style-type: none"> • There is a growing need for extra sites to cover D1 (Community) Use - Especially D1-h class sites. This vital provision for the wellbeing, reduction in crime, and spirituality of the population is being eroded rapidly rather than expanded and if future planning is to be considered sound, considering population and housing expansion, this trend has to be reversed and extra space made available for the residents of Harlow and around to have the required quality of life. | 2 |
| <ul style="list-style-type: none"> • Any land developed to meet growth outside Harlow should be subject to compulsory boundary change | 2 |
| <ul style="list-style-type: none"> • Principles of the Gibberd Plan must form the basis for any expansion | 2 |
| <ul style="list-style-type: none"> • Development should be in-keeping with existing development | 2 |
| <ul style="list-style-type: none"> • Harlow has a great record for using old properties for other uses | 2 |
| <ul style="list-style-type: none"> • Consider that more development could be achieved within Harlow's established administrative and urban area | 2 |
| <ul style="list-style-type: none"> • Encourage Harlow Council to extend program of building council houses for rent | 2 |
| <ul style="list-style-type: none"> • Ensure that established facilities and services are retained and able to develop for the benefit of the community. This guidance is contained in the Sustainability Appraisal but not in the Emerging Strategy. | 2 |
| <ul style="list-style-type: none"> • Every urban area needs to have symmetry between its housing supply, employment opportunities and leisure facilities. Future planning applications for your social infrastructure will require criteria for their assessment and none are offered in this document. | 2 |
| <ul style="list-style-type: none"> • There is no guidance in the document as how the community will be able to take advantage of Harlow's excellent sporting, leisure and cultural facilities. There is no mention of this aspiration in the Objectives listed on page 20. | 2 |
| <ul style="list-style-type: none"> • NPPF states economic development can be supported by a communities', health, social and cultural well-being. Consequently provision of community infrastructure for tourism (cultural heritage) and town centre vitality (cultural facilities) etc., are vital for their contribution to residents' and visitors' life satisfaction. | 2 |
| <ul style="list-style-type: none"> • Locals feel the town has changed from the original ideas prepared by Gibberd. A few thousand houses are not going to change the town into what the Planners want. Harlow has little land of its own to use for development and is relying on neighbouring authorities to provide land for development, to the detriment of villages on the outskirts of Harlow | 3 |
| <ul style="list-style-type: none"> • Harlow Council should be prepared to take a robust approach with adjoining authorities on the Duty to Cooperate | 4 |
| <ul style="list-style-type: none"> • Harlow must work with Epping Forest District under the Duty to Cooperate as this is a statutory obligation and seek the allocation of development sites beyond the boundary of its administrative area | 4 |
| <ul style="list-style-type: none"> • Supportive of Part 2 of the Vision, which is supported by para. 47 of the NPPF | 4 |
| <ul style="list-style-type: none"> • Do not believe EHDC and HDC have, at present, discharged their duty to co-operate fully and effectively. The evidence base shows that there is a genuine | 4 |

and immediate need in East Hertfordshire that is best met north of Harlow.

Consultation Process

Table A1.16

| Comment | Sub-Group |
|---|-----------|
| • Consultation document difficult to follow and leaflet poorly presented | 1 |
| • Consultation needs to be subject to a local referendum | 1 |
| • Consultation period needs extending | 1 |
| • Councillors and officers should have held public meetings for the public to learn and question the proposals | 1 |
| • Fear being misrepresented or misinterpreted in answering the questions | 1 |
| • If the council asks the wrong questions it will get useless answers or silence | 1 |
| • Insufficient, overly complex and inaccessible information | 1 |
| • Results of previous consultation should have been included | 1 |
| • The consultation fails to meet best practices for consultations, burdening the public with a mass of incomprehension and jargon, making the consultation inaccessible to the majority of Harlow and giving the impression of a Council not wanting to consult | 1 |
| • The website for responding is complex and user-unfriendly | 1 |
| • Time consuming and challenging to provide feedback due to comprehensiveness of document and complexity/awkwardness of website | 1 |
| • Wider debate needed with Harlow's residents | 1 |
| • Document gives little information on the views of Epping and East Herts. Councils | 3 |

Petition submitted by STOP Harlow North

- 5.9. A petition was sent to East Herts Council by the STOP Harlow North campaign group in response to the consultation on the East Herts District Plan Preferred Options consultation.
- 5.10. A total of 1,846 people – mostly residents of East Hertfordshire – signed the petition and stated their agreement with STOP Harlow North's statements that development to the north of Harlow (in the Gilston area) would be unsustainable and not financially viable due to a lack of supporting infrastructure, and that the creation of Gilston Great Park is a preferred alternative.
- 5.11. A number of comments regarding cross-boundary issues were identified by comments in the petition. The main issues raised are as follows, split by topic area:

Environmental

- Exacerbation of flooding caused by development
- Light pollution arising from new development
- Green spaces in Harlow should be used for development
- Good agricultural land would be lost
- Brownfield land should be used for development and not greenfield land
- The countryside is used for recreational purposes including walking, as well as educational purposes, and needs to be preserved for wildlife habitats and future generations to enjoy
- The traditional, rural character of surrounding villages would be lost
- Urban sprawl needs to be prevented by keeping Green Belt land in place

Infrastructure

- General infrastructure would not cope
- There are not enough primary and secondary school places
- There would not be enough capacity at local hospitals and surgeries
- The electricity supplies would not cope and powercuts could increase
- Water supplies would not be sufficient and this area is already one of the driest in the country
- Issues regarding public transport provision, and road congestion and parking issues arising from the effects of development in this area
- Communications infrastructure would not cope
- Police and fire services would be placed under too much strain
- The drainage and sewerage systems are not sufficient to cope
- Current leisure facilities would be insufficient

Other issues

- Harlow should be regenerated instead of building in this area
- Harlow has suffered from past expansions / Harlow would not benefit from the proposed development
- These proposals would not alleviate affordable housing need
- Noise and pollution would increase
- There are not enough jobs for the levels of growth proposed

- There are already too many housing expansions taking place
- Such development would encourage commuting
- Crime rates would increase
- Empty properties should be used before building on greenfield land
- The proposed development would add to the overspill from London
- Land further north or west should be developed
- People should be moved elsewhere in the country such as the north / New Towns elsewhere should be built
- It is better to have smaller, dispersed settlements / expansions

Appendix 3: Summaries of Representations from Specific Consultees

All comments (question-specific or otherwise) made by specific consultees are reported in this appendix.

The comments are split by specific consultees (and where appropriate, split further into topic areas and/or questions):

- ESSEX COUNTY COUNCIL
 - Transport & Highways
 - Education
 - Historic & Natural Environment
 - Minerals & Waste
 - Other
- HERTFORDSHIRE COUNTY COUNCIL
 - Public transport
 - Roads
 - Ecology
 - Other
- EAST HERTFORDSHIRE DISTRICT COUNCIL
 - General
 - Questions 1 - 9
- EPPING FOREST DISTRICT COUNCIL
- EASTWICK & GILSTON PARISH COUNCIL
- HUNSDON PARISH COUNCIL AND EASTWICK & GILSTON PARISH COUNCIL (consultant report)
- HIGHWAYS AGENCY
 - General
 - M11 Junctions
 - Modelling, Mitigation & Impacts
- ENVIRONMENT AGENCY
- PRINCESS ALEXANDRA HOSPITAL NHS TRUST
- WEST ESSEX CCG & NHS ENGLAND
- NATURAL ENGLAND
- ENGLISH HERITAGE
 - General
 - Specific Areas/Sites
- THAMES WATER

Essex County Council

Transport & Highways

- The County Council recommends that Harlow Council considers the Essex EGS and priorities in the Essex Transport Strategy when preparing the emerging Plan spatial policies.

- Highways and Transportation – Ensure that the growth and development proposed by Harlow Council reflect the spatial options that have been used for the County Council Highways Modelling work. The County Council also welcomes further detail regarding the nature of sustainable transportation planned for new developments.
- The 5 growth scenarios set out in the Harlow Plan reflect some of the highways modelling test previously undertaken. However, there are variations in the scenarios set out in the Harlow Plan and those scenarios that have been tested it will be necessary to undertake additional detailed tests to reflect the revised locations and numbers. Essex County Council welcomes working with Harlow Council to undertake these additional tests and enable the County Council to provide a comprehensive response on the impacts of each example.
- The County Council questions the viability of growth at Harlow north below 5,000 as there maybe issues in respect of delivery of necessary highway infrastructure. With levels below this further transport modelling would be required to ensure that development issues associated with growth below 5,000 consider wider transportation issues.
- Development scenario example 5 incorporates 10,000 dwellings within north of the town, and Harlow Council refer to this option as ‘Northern Bypass Led’. The County Council considers that referring to the growth option as ‘Northern Bypass Led’ is misleading to the local community within Essex. The transport modelling to date has shown that traffic can be catered for it within the existing Harlow network providing the M11 J7a is delivered and accounts for other network upgrades. The estimated cost of the northern bypass is between £300 - £400m and is unlikely to be deliverable at the level of growth proposed; furthermore it would require the link to Gilden Way. The reference therefore is misleading and raises local community transportation expectations that are extremely unlikely at this stage.
- Harlow Council should seek to ensure that the Essex Transport Strategy West Essex priorities are appropriately referred to within the Local Plan.
- The NPPF also aims to ensure that strategic infrastructure needs are considered. It is therefore recommended that Harlow Council considers the role and impact relationship that London Stansted Airport may play from a transportation and economic perspective.
- ECC recommends that the Harlow Plan provides specific details on the type of sustainable transportation measures to be delivered

Education

- Education – Primary and Secondary – The County Council considers that each of the five development scenarios is likely to require the provision of additional primary and secondary school places. This may be achieved by a combination of the expansion of existing schools within the existing built up area, where site capacities permit, and the establishment of new schools where the scale of development would require the provision of significant numbers of additional places and there is little scope for the expansion of existing provision within reasonable travelling distance of the new developments.
- Harlow District Council’s officers have recently been provided with a detailed analysis of the education requirements, which would be needed to meet the social infrastructure requirements to ensure any new development is sustainable, for a

variety of growth scenarios. This identified those areas where growth might be accommodated by the expansion of existing schools and those areas where there is likely to be a requirement for the establishment of new schools. It is important to note that this information can be updated by the County Council when Harlow Council revises the options and agrees the preferred option through the local development plan process.

- The County Council wishes to be involved in any joint plan prepared with adjoining authorities.
- ECC has an expectation that, where there is an increase in demand for school places that is attributable to new housing development which cannot be met within existing permanent capacity, the additional provision should be funded via developer contributions (section 106 or CIL). ECC's approach towards mitigating the impact of development on schools and early years and childcare is set out in the "Education Contribution Guidelines Supplement to the "Essex County Council's Developers' Guide to Infrastructure Contributions".
- Early Years and Child Care - Within Harlow current evidence indicates that the following wards are either full or very close to full capacity (Bush fair, Mark Hall, Netteswell, Old Harlow and Toddbrook). Provision will also be required in Old Harlow.
- The following areas have some (limited capacity) - Church Langley, Sumners and Kingsmoor, Little Parndon and Hare Street, Harlow Common and Staple Tye.
- Changes to Government policy mean that there will be an increase in demand for such facilities which will need to be recognised, and met, in the emerging Local Plan.

Historic & Natural Environment

- Natural Environment – Ensure that reference is given to Essex Wildlife Trust's Living Landscapes and designated and other priority habitats are protected and enhanced where possible. Policy wording is also supplied in Appendix 1.
- Evidence from Living Landscapes suggests that development between Harlow Wood SSSI and Latton Common Local Wildlife Site (within the Parndon Woods Living Landscapes) could potentially create a barrier between these ancient woodlands, potentially resulting in habitat fragmentation, pollution and increased usage.
- Historic Environment – Ensure that consideration is given to the Historic Environment Record.
- The County Council considers that all of the proposed strategies and development areas identified in Chapters 6, 7, 8, 9 and 10 and Appendix 1 have potential to impact on the historic environment of Harlow District to a greater or lesser degree. There is no reference within the Harlow Plan to the Historic Environment as a constraint, despite the presence of a range of designated and undesignated assets within the District and the identification of the Historic Environment as a factor within the Sustainable Appraisal for Harlow

Minerals & Waste

- Minerals and Waste – The County Council recommends that Harlow aims to ensure that emerging policy is consistent with the County Council's Minerals and Waste

Plans. We welcome further discussions with Harlow to assist the Local Planning Authority in progressing to the next stage of plan preparation.

- ECC recommends that the Essex Minerals Local Plan and the Essex and Southend Waste Local Plan form a part of the overall Local Development Plan in Harlow. Both of the respective plans should be included within the figure accompanying paragraph 1.2. It is recommended that the Local Plan clearly acknowledges that in seeking to develop future spatial policies for Harlow consideration is given to the Minerals Local Plan and the Waste Local Plan.
- ECC recommend reference to 'sui generis' uses of an employment nature at these designated employment areas where this is considered suitable. This ensures there is sufficient provision of land for waste facilities necessary for waste arising within Harlow.
- It is important for Harlow Council to note that the NPPF requires Mineral Safeguarding Areas (MSAs) to be defined in Local Plans so that known locations of specific minerals are not needlessly sterilised by other forms of development, whilst not creating a presumption that the defined resources will ever be worked.
- It is also necessary to safeguard existing mineral workings and Preferred Sites to prevent the possibility of new incompatible neighbours being established and ultimately restricting extraction activities. Mineral Consultation Areas (MCAs) apply to the safeguarded site itself and extend for a distance of 250 metres outwards from the site boundary of each of these safeguarded sites.

Other

- Libraries – The proposed growth will require the provision of new library facilities.
- Climate Change – Welcomes that the consultation document includes a strategic objective referring to “adapting and mitigating the impacts of climate change”. However it is acknowledged that the remainder of the text set out within the consultation document makes no further to how Harlow plans to address the issues of climate change or promote sustainable development. It is recommended that consideration be given to how Harlow Council will seek to address climate change and sustainability.
- Locational Specific Comments – The County Council consider that there are some inconsistencies within the Harlow Plan that require further attention.
- ECC consider that Example 2 'Environmental/ landscape -led' fails to meet objective 7 (page 20) entitled 'Revitalised Green Spaces' as it makes no reference to how Harlow Council will deliver a revitalised network of multifunctional green spaces that are fully integrated into the built environment, meeting the needs of the community and providing ecological opportunities. The County Council welcomes working with Harlow in seeking to ensure that future growth and development minimises impact on the environment and landscape. Furthermore the County Council also welcomes appropriate green belt assessment and review as an integral component of the plan preparation process.
- The County Council also considers that Example 2 is not consistent with strategic objective 8 (page 20 of the Harlow Plan) entitled 'Adapt to and mitigate the impacts of climate change'. ECC support the statement set out in Issues and Challenges section within page 19 of the Harlow Plan whereby it indicates that further studies are required on the impacts of climate change. ECC's views in section 2 highlight that further information is required regarding how Harlow plans to address the

issues of climate change or promote sustainable development, including more details on renewables and low carbon energy, design and use of natural resources.

- Strategic Environmental Assessment – The County Council has supplied general views regarding the Sustainability Report that accompanies the Harlow Plan.
- The County Council notes that the SA Report ranks each alternative against sustainability criteria, overall the order of most favourable sites (assuming all sustainability criteria are weighted equally) is 1a, 3a, 1b, 3b, 2a, 4a, 4b, 2b and finally 5. It is also noted that all the alternatives appraised have positives and negatives against the sustainability criteria, therefore mitigation for negatives will need to be considered for the spatial option selected.

Hertfordshire County Council

Public transport

- In terms of sustainable transport issues the core strategy appears to be somewhat deficient. Even Example 3, which purports to be 'Passenger transport-led', appears to have been devised without taking into account some key factors. Little consideration seems to have been given to the strategic rail network. Developments to the north and north east of Harlow would involve an element of commuting to Harlow Town Station to reach employment in central London. The funded improvements to rolling stock and longer trains on the West Anglia routes would help with current capacity problems into London but are not sufficient to cope with the additional growth as a result of Stansted Airport and other trip attractors in the region. By contrast, the opening of Crossrail 1 will provide additional capacity on the Central Line from Epping Station.
- In terms of access to Harlow Town Station, and indeed to Harlow town centre, transport links from the north are hampered by the station's proximity to the A414. At Epping, there is an opportunity to improve access to the station by way of the currently disused trackbed to Ongar. If sustainable transport connections are not of sufficient quality, the impact on the road network would be greater.
- In particular confirmation should be sought that both station and rail infrastructure is positioned to be able to cope with likely demands placed upon it in respect to the preferred development sites.
- In relation to bus services HCC would seek to ensure that development is situated in locations where there are already existing services or where new quality, frequent, reliable services could be provided long term commercially and would therefore not be reliant on funding to operate and serve communities.

Roads

- The results of transport modelling to date have shown that for the level of infrastructure improvements tested the traffic impacts of a development of 10,000 homes in East Herts combined with 9,229 homes in Harlow could not be fully mitigated. Significant delay and highway stress also occurs in the wider area at a number of locations on the A1184 through Sawbridgeworth, and there would be further pressure on the A414 (particularly at Amwell junction and on the section between Eastwick and Burnt Mill) and on the A10.

- The proposed northern bypass appears aspirational and the limited testing to date in the HSGTM did not indicate that the scheme would alleviate congestion without substantial additional infrastructure within Harlow and the wider area as there is a relatively low proportion of through traffic within the town.
- Modelling work undertaken to date has indicated that potential capacity issues would exist on the Hertfordshire road network with a lower level of development (than that proposed in the emerging strategy) in and around Harlow. The proposals for 12,000 to 15,000 homes in the emerging strategy are therefore likely to require major investment in new highway infrastructure, if development went ahead, particularly if development was focussed on the north side of Harlow.
- It is important that the transport modelling takes account of the combined impacts from the proposals in Harlow as well as neighbouring authorities, and the HSGTM tests do include the cumulative impact of development. Further transport work is required to identify if there is an infrastructure solution for the Hertfordshire road network that can be delivered to mitigate the impact of the Harlow development allocations, along with developments in East Herts, including the 5,000 to 10,000 dwellings identified in the Gilston area.
- The East Herts Draft District Plan proposes a strategic scale development of between 5,000 and 10,000 new homes in the Gilston Area (north of Harlow), which will compound the impacts on the County's road network in this area, if there are additional allocations northeast of Harlow and in East Herts.

Ecology

- Vision 7. Improved access to the countryside laudable but will place increased pressure on the countryside. Particularly area of Hertfordshire separated by the Stort Valley.
- Example 1. Will significant environmental impact in Hertfordshire. Including; local wildlife sites, and possibly Hunsdon Meads SSSI.
- Example 2. No direct ecological impact in Hertfordshire.
- Example 3. Possibly twice the potential impacts on general open land area in Hertfordshire as Example 1. Possible direct impact on numerous other Wildlife Sites further north, and indirect impacts on others.
- Example 4. No direct ecological impact in Hertfordshire.
- Example 5. Will have the greatest negative ecological impact in Hertfordshire. This will cross the Stort Valley, fragment the landscape ecologically and visually, increase noise, light pollution and reduce what 'tranquillity' exists north of the river. Will affect Wildlife Sites and possibly also Hunsdon Mead SSSI.
- Q3. 'Avoiding sensitive environmental / landscape areas' is very important if the quality of the countryside around the town is recognised as providing an important asset to the town and its communities. Development to the north will provide yet another pinch point along the R.Stort corridor, and must be mitigated if development to the north of Harlow is pursued. Create a significant development within what is currently largely open countryside, for which good design would only limit the damage this will cause to this environment. However this is inevitable to an extent where greenfield development is required.
- Q5. Option would reduce major environmental / landscape impacts within Hertfordshire.

- Q7. Environmental impacts will be reduced within Hertfordshire under Example 4, so it is reasonable to assume that landscape objectives will be achieved.
- Any significant development around Harlow will exacerbate recreational pressure on the surrounding countryside, whether in Essex or Hertfordshire. May require increased provision for those services that help manage countryside features on behalf of a wider public, including the Lea Valley Country Park, ranger services and Wildlife Trusts.
- Important to recognise that the Stort Valley provides a direct linear corridor link to the Lee Valley between Herts and Essex and in this sense provides a continuum of resource which is of at least regional importance (international for some wildlife) and a major environmental feature between both counties. This applies to a lesser extent to east, south and west aspects of Harlow.
- Where traditional countryside management through farming still takes place, such enterprises should be supported to maintain the role they play in contributing to the countryside
- Local farming can help deliver some of the outcomes desired by the Local Plan aims, in particular Vision No.7.
- Many of these views are reflected within the Environmental Appraisal of the draft plan in terms of impacts of the various options and associated issues. Particularly paras 6.5.11 and 6.5.12
- Allotments and associated habitats provide open greenspace and can be of significant ecological interest locally.

Other

- The accompanying sustainability appraisal does not include options for accommodating growth of Harlow which have been considered or proposed in the recent past – for example, North Weald and east of the M11. You will no doubt wish to reflect upon this as you move forward with your plan as I am sure you will the dated nature of a sizable proportion of the evidence base.
- Requirements of Infrastructure Planning – At the pre submission consultation stage HCC require outline mitigation measures to be identified including broad cost estimates, indicative delivery timescales and an identification of funding sources with the expectation that this high level feasibility review will be refined moving towards submission of the Strategy.
- The County Council remains concerned about the effects Harlow has on the transportation infrastructure within Hertfordshire around the town - including the West Anglia Main Line (WAML), A414 and A1184.
- The HSGTM tests included an allowance for 9,229 homes within the Harlow, boundary which differs from the number of dwellings identified from the SHLAA (8,900). No allowance has been made for additional development outside the Harlow boundary other than that which meets adjoining districts needs. Therefore the number of dwellings tested is less than the number identified in the emerging strategy, and therefore this is likely to underestimate the scale of impacts.
- None of the options described in the emerging strategy appear to give sufficient consideration to transport infrastructure.
- It is recommended that Harlow Council liaise closely with Hertfordshire County Council, Essex County Council and East Herts to develop the evidence base. Should Harlow wish to include 12,000 to 15,000 homes within their plan the

outstanding mitigation issues, both highway and public transport, must be addressed.

- Landscape – There is overall concern for the lack of reference to landscape (and the supporting evidence base) within the emerging strategies vision and core priorities, despite leading to the presentation of examples 2 and 4 that promote a landscape led approach to development.
- It is strongly recommended that the area to the north of Harlow is subject to more detailed site based assessment, including landscape and visual impact assessments, to better understand the ability of the landscape to accommodate any change.
- Archaeology – Further consideration is needed on the potential for archaeology that may be present on land to the north of Harlow.
- Provided an overview of the services and facilities likely to be required if Example 5 (Northern Bypass Led) was to be provided. This consists of 10,000 dwellings to the north of Harlow.
- Provision would be required for new Primary and Secondary Schools, Early Years, Nursery Education and Childcare, Nurseries, Pre-Schools, Libraries, youth services and adult care services
- No additional fire and rescue services would be required.

East Hertfordshire District Council

General

- East Herts Council has taken a bold step in identifying the Gilston Area as a Broad Location for further testing, despite its long-standing opposition to the proposal. If it is ultimately demonstrated that there is no reasonable prospect of delivery in one or more of the Broad Locations, including the Gilston Area (north of Harlow), then East Herts Council will need to consider the implications for meeting the District's long-term housing needs.
- Regardless of whether any differences of opinion remain following consideration of the responses the Local Planning Authorities will need to continue to work together to obtain the necessary evidence inputs from the infrastructure and service providers, in particular from Essex County Council and Hertfordshire County Council.
- These inputs will then need to be subject to a process of viability and feasibility testing, which will be the central task of a Delivery Study for the District Plan during 2014. In order to achieve confidence in the outcomes of the study, maximum transparency will be maintained.
- East Herts Council is doing everything it can to progress the Plan as quickly as possible, as far as is consistent with maintaining a robust and transparent process.
- This will take strong and responsible leadership from the elected Members of both Councils, in order to understand and explain to the public the requirements of top-down national policy and ensure that, as far as possible local aspirations can be fully taken into account within this context.

Question 1

- It is agreed that “no growth” is not an option, given the requirements in the NPPF Paragraph 47 and elsewhere, and the strict way in which the Planning Inspectorate has been interpreting this at the Examination in Public of Local Plans.
- Option A provides for only 4,000 dwellings, significantly below the level of objectively assessed housing needs according to the Office for National Statistics (ONS) figures. This option would not be acceptable to a planning inspector at Examination in Public.
- Option B uses Office for National Statistics based demographic projections prepared by Edge Analytics, amounting to 7,500 homes and 3,000 jobs. This is the starting point for establishing objectively assessed needs and is commonly required by the Planning Inspectorate.
- Option C, Harlow Council has adopted a different methodology based on the SHMA figure of 3,600 affordable housing need for Harlow and using an assumption of 30% affordable housing provision to reach a housing requirement of 12,000 and 8,000 jobs. However, as acknowledged in Paragraph 4.8 of the Emerging Strategy, affordable housing rates could be as low as 10% of the total. At 10% the housing requirement would have to be 36,000, an absurdly high figure which illustrates the limitations of this methodology. Figures extrapolated in this way are not objectively assessed.
- Option D is based on the critical mass and regeneration aspirations of the Council set out in the Harlow Future Prospects Study: Linking Regeneration and Growth Study. It proposes 15,000 homes and 12,000 new jobs, but the methodology contained within the study is based on aspiration rather than objective assessment. Given the distance of the Gilston Area/north of Harlow from the M11 it is not clear that this area could host significant numbers of new jobs, even if funding for a new northern bypass connecting to the motorway were to be secured. Given low levels of job creation in Harlow, and the mixed success of the Enterprise Zone to date, East Herts Council questions the achievability of this option.
- Option E proposes 20,000 homes and claims to be able to “transform the role of Harlow into current day Cambridge”. Harlow Council recognises that this is not achievable.
- East Herts Council proposes that Harlow Council should pursue Option B as its objectively assessed housing need, rather than adopting an approach based on a questionable methodology and unrealistic aspirations set out in C and D. As acknowledged in the Emerging Strategy, up to 8,900 homes, or the entirety of Harlow Councils need, could be accommodated within Harlow District.
- An effective plan for growth of the levels set out in the Harlow Emerging Strategy will depend upon whether Epping Forest and/or East Herts Districts can realistically accommodate some of Harlow’s unmet need within their administrative areas, whilst also meeting their own housing needs within each separate housing market area.
- All three Councils need to take account not only of Harlow’s needs, but also of the practicalities of delivery and the wider strategy for the adjoining Districts, before it is possible to understand whether it is realistic to achieve the starting point suggested by the ONS projections. Only then will it be possible to consider whether higher levels of aspirational need can be sustainably accommodated and delivered through an effective plan.

Question 2

- Each option is based on achieving 15,000 new dwellings, however, based on ONS figures a lower figure of 7,500 new homes should also be considered

Question 3

- All of these principles are important, and indeed all of them need to be considered together in order to demonstrate that there is a sound plan. East Herts Council questions whether the approach based on general principles has moved forward the process of strategy and site selection beyond that set out in the Harlow Options Appraisal (2010). It is essential that both Councils work together to look at the practicalities of delivery. Principles such as these, whilst laudable, do not directly address the challenges.

Question 4

- No. Whilst it may be the case that some development within the urban area could provide additional housing as part of specific regeneration schemes, there is no explanation provided in Section 6 as to how Greenfield development could contribute to such objectives.

Question 5

- Yes. East Herts Council agrees with the statement in paragraph 7.1 that “east of the town is considered to have relatively less landscape significance (when assessed against other areas).” However, Example 2 does not mention the Stort Valley floodplain, which is the main environmental constraint around the town. This has implications in terms of bridging the floodplain, which in turn poses challenges for the viability of development to the north. This does not appear to have been considered within the consultation documents.

Question 6

- No. Large scale development to the north is likely to result in large amounts of commuting to London from Harlow Town and Harlow Mill Station. It may be that the scale of development could support additional internal bus services, although it is unclear whether this provision would be better than that resulting from development in other directions around the town.

Question 7

- No. The basis for this question is unclear. As per East Herts Councils response to question 4, there is no evidence to suggest that specific directions will help to achieve regeneration: the argument in Harlow Councils Future Prospects Study (2013) relates to critical mass overall, not specific locations.

Question 8

- No. Assessment of this will be a part of the East Herts Delivery Study during 2014, in which Harlow Council is invited to participate. Given the distance from the M11

and the cost of bridging the River Stort and the railway line, the costs of a north bypass would be considerable. Essex County Council has recently stated that estimates of a £100 million in earlier studies is a significant underestimate, and has stated that work currently being undertaken is likely to suggest a cost as high as £300 million-£400 million.

- It is very unlikely that even higher levels of growth north of Harlow could contribute anything more than a very small proportion of the necessary funding without significantly reducing funding for affordable housing, sustainability features and local transport measures.
- Developer contributions would normally be phased and even these relatively modest contributions would not be received until late in the plan period, after construction of a considerable number of dwellings. It is therefore likely that traffic congestion in and around Harlow would worsen before the completion of any northern bypass.
- In addition, interpretation of transport modelling results to date by specialists at Hertfordshire County Council suggests that a northern bypass would not itself adequately mitigate the transport impacts arising from large-scale development to the north.
- Example 5 suggests 20,000 dwellings for the area, implying higher levels of growth in East Hertfordshire north of Harlow, which would reduce the cost per dwelling for the bypass. Given a realistic phasing of development, much of this money would not be available to pay for a northern bypass until after 2031, and would therefore not play a significant role in mitigating transport impacts arising from the development.
- It may be that there are no feasible transport measures which can make any development acceptable in planning terms. This will need to be subject to rigorous feasibility testing involving the infrastructure providers over the coming months and years.

Question 9

- The basis for this question is unclear because it pays no regard to the practicalities of delivery. The question operates at a conceptual level. Harlow Council and East Herts Council need to work together closely over the coming year to focus on the practicalities of delivery rather than on theoretical approaches.

Epping Forest District Council

- We have found the Strategic Housing Market Assessment/ Duty to Co-operate Group, of which Harlow Council is a member, to be a particularly useful forum for Officers to engage on technical matters that relate to the determination of objectively assessed housing needs (OAHN). The remit – and title -- of this group is evolving into a forum for wider cross-boundary discussions and constructive actions that will hopefully lead to outcomes that can be politically supported by the authorities involved.
- As expressed by officers at a number of recent joint meetings, EFDC does not consider that it has a clear understanding of how the OAHN figure, housing capacity or jobs provision have been arrived at by Harlow Council, or the interrelationship

between them. We have recently discussed with you updating the SHMA on a joint basis to take account of latest national population data and determine what it means for Harlow, Epping Forest District and the respective housing market areas. We consider this to be an important stage in helping determine the OAHN for Epping Forest District and suggest that it will be just as important for Harlow. It is therefore difficult to make an informed response to this consultation until further information is available through the SHMA, and further engagement has taken place between Harlow and EFDC officers, as well as other relevant authorities. We therefore do not feel able to express a view on the most appropriate strategy as set out in your consultation.

- We note that there are a number of potential strategic development sites identified within Epping Forest District's (Green Belt) boundary in the consultation document, many of which have some history as potential development sites dating from the days of the East of England Plan. Before we can consider accommodating any need arising from Harlow, we need to understand the evidence, as highlighted above. Furthermore, at this early stage in developing our own Local Plan we anticipate that there may be problems in meeting our own development needs within the district. EFDC has not yet prepared a draft strategy for the location of future development within the district, and we wish to be clear that Harlow Council's identification of sites within Epping Forest District was not discussed with EFDC prior to your Cabinet's approval of the approach set out in the consultation document. EFDC considers this to be premature and does not support this approach.

Eastwick & Gilston Parish Council

- Oppose designation of land north of Harlow for housing development
- Substantial infrastructure deficit (limited capacity of road and rail network, hospital services and sewage treatment)
- Loss of Green Belt land
- Where is evidence that building here will regenerate Harlow?
- Are there not real options to build sufficient housing within Harlow?
- Are the affordable housing percentages achievable?
- Support Harlow's regeneration but simply building more houses in another county won't solve regeneration issues
- Securing local employment opportunities, encouraging quality retail outlets and stopping the loss of major companies will do far more than a separate dormitory town whose residents will go elsewhere for work and services

Hunsdon Parish Council and Eastwick & Gilston Parish Council

A consultant prepared a report which relates specifically to the East Herts District Plan Preferred Options consultation, and in particular the potential for development in the Gilston area to the north of Harlow. The report was endorsed by Hunsdon Parish Council and Eastwick & Gilston Parish Council (and the STOP Harlow North campaign group) and was submitted in response to the Harlow Local Development Plan Emerging Strategy consultation.

Whilst most of the issues relate to East Herts, the consultant has identified a number of potentially cross-boundary issues, summarised below:

- Development would be unsustainable and could not be delivered, and would fail tests of soundness, increase levels of pollution and degrade air quality
- East Herts and Harlow councils, through meetings under the duty to co-operate, recognise that such development could not come forward without the supporting infrastructure, especially transport provision
- Studies show that there is considerable stress on the local road network, particularly with the A414 through Harlow. Further work needs to be done to ascertain whether traffic impacts of development in this area could be mitigated
- The issue of the increased strain that the development would put on local public transport provision – which is already deficient – needs to be addressed
- Herts strategy highlighted that major public funding would not be available for water supply and drainage improvements
- Green Belt in this area is of special significance and applies particularly to Harlow in preserving the town's landscape structure. The Green Belt boundaries in this area are well-established and robust and should not be altered
- Landscape of great significance in terms of the setting of Harlow and developing it would breach important landscape threshold
- Previous studies have shown that land to the north of Harlow is more environmentally sensitive than land to the west, south or east
- Exacerbation of flooding and loss of agricultural land and wildlife habitats. No amount of green infrastructure would compensate
- Area under Stansted flight path - safety and noise concern
- Health facilities are under stress and new surgery would be required
- Currently no commitment from authorities to provide new schools
- Possibility of adverse effects on opportunities to provide social and community facilities in other local areas
- Plans would encourage out-commuting and rely on Harlow for employment
- Development to north of Harlow will compete with the town and hamper its regeneration
- Potential coalescence of villages around Harlow and other settlements to the north
- Alternative options for growth need to be considered and worked on

Highways Agency

General

- It is important that suitable sustainable transport solutions are available within any development that comes forward in and round these areas to ensure the impact of additional traffic on the network is reduced where possible.
- I note that 3,900 jobs are expected to be created in Harlow between 2012 and 2031. This does not match the predicted number of additional homes and therefore may result in greater levels of out commuting from Harlow than already occurs.
- The LP proposes a number of large development sites located relatively close to the strategic road network and therefore trips generated by these developments could have an impact of nearby junctions.

- The evidence base should ideally include an evaluation of the cumulative and individual impacts of the district plan (and adjacent districts') proposals on the road links and junctions, with an assessment of the ability of the affected highway to accommodate the forecast traffic flows in terms of capacity and safety.
- Re the infrastructure provision plan – it is important that any funding shortfalls are identified early.
- There needs to be improvements in walking and cycling to and from developments and to encourage use of public transport. Encouraging sustainable transport is key to ensuring traffic generation on the surrounding network is minimised.
- I consider that the highways modelling assessment work done to date (primarily through the HSGTM) and TRANSYT model does not yet fully demonstrate the operation of the strategic road network following the implementation of all district plan development.
- Unless improvement schemes to the strategic road network are already committed it should not be assumed that the Agency will be able to fund any improvements to the strategic road network. It is likely therefore that developers will be a major source of funding through s106 or CIL.

M11 Junctions

- A large amount of development to the north of the town is reliant upon a new junction to the M11 J7a. The primary junctions of concern are M11 J7 (developments to the south in particular). Trips generated from developments in other locations to the north east and east may also have an impact at this junction but there is potential for dispersal by the time they reach the strategic road network and therefore the impact is less significant.
- J7a is currently not in any programme of works and its delivery and timing is somewhat uncertain, therefore it will be important to demonstrate that some development can be allowed to proceed with appropriate mitigation before the junction is delivered.
- From a review of the modelling it is evident that the proposed development aspirations have the clear potential to result in a material impact to the strategic road network – the impact varies with the various scenarios. It is clear that elements of the strategic road network will be operating near or in excess of capacity for any of the scenarios. The main areas of concern are:
- M11 J7: development will have an impact and that J7a will be required. However, no test has been undertaken to examine the cumulative impact of growth at Harlow north combined with growth at south of Bishops Stortford or North of Ware. These assessments are required to understand the full impact of development on the junction.
- The impacts on the strategic road network of two further options, a partial or full northern link road connecting the A414 at Eastwick Roundabout with the A118 or M11 J7a respectively, are also unclear.
- M11 J7a: there is an assumption in all the evidence presented so far that J7a is to be provided as mentioned. However this needs to go through a number of design and legal procedures which have the potential to delay its delivery. No measures have yet been put forward to allow growth to come forward before the implementation of J7a.

- M11 J8: Further testing here will need to include development proposed around Harlow.

Modelling, Mitigation & Impacts

- Detailed assessments identifying the mitigation measures that could be required have not yet been undertaken for all development, therefore it is unknown at this time if any 'major problems' exist that could result in adverse impacts to the strategic road network does not operate within capacity at the end of the plan period.
- A reasonable level of confidence needs to be established as early as possible that any mitigation measures can be delivered.
- Consideration will need to be given to the cumulative impact of all district plan development at each junction. Cross-collaboration should be undertaken with neighbouring authorities.
- Further modelling should be undertaken to identify the likely extent and location of the mitigation measures required,
- There is a risk that more detailed evidence could determine that the impacts are greater than what could be considered acceptable, and/or that infrastructure which can effectively manage the impacts is not deliverable. Additional detailed evidence should be undertaken and provided at the earliest opportunity so that the Agency can understand the impacts on the strategic road network and gain sufficient reassurance that impacts have been identified and appropriate and deliverable infrastructure measures can be brought forward.

Environment Agency

- Overall, we have no specific preferences for the strategy that is chosen for development in Harlow.
- Need to ensure that there is adequate infrastructure provision for new development and redevelopments, particularly for those areas of substantial growth.
- For individual site allocations, you will need to consider the constraints of each site.
- Flood Risk: areas of proposed growth largely avoid areas of fluvial flood risk (i.e. Flood Zones 2 and 3). Need to assess flood risk from all sources, using 2011 Strategic Flood Risk Assessment (SFRA) as a basis. Consider whether SFRA needs updating to reflect new or updated modelling or data, such as the 'Updated Flood Map for Surface Water' published earlier this year
- The Environment Agency has set out in their response guidance and advice in the National Planning Practice Guidance, with regards flood risk.
- The Rye Meads Water Cycle Study (WCS) is a key piece of evidence on infrastructure for the impact of the larger growth areas. This may need updating to assess the impact of the growth options as they stand.
- All new development and redevelopments should maximise the use of Sustainable Drainage Systems (SuDS). These could be important in regeneration areas where opportunities may exist to improve existing drainage systems.
- Promote the creation of new Green Infrastructure (GI) through new developments.

- Development areas should be assessed for opportunities to for environmental improvements, such as watercourse improvement, de-culverting and restoration of water courses.
- The Environment Agency have made comments on the specific sites identified in the Emerging Strategy.

Princess Alexandra Hospital NHS Trust

- Requested that the importance and role of the Hospital as a key community and economic facility is recognised in the emerging LDP for Harlow
- Support for the Trust's associated investment and development programme should also be referenced to, as well as the important contribution it will make to delivering sustainable development and economic regeneration
- Include a suitable planning policy basis to enable the Trust's development programme to be brought forward and delivered through the development management process where planning permission is needed
- Current Local Plan Policy CP4-Community should be carried forward into the emerging LDP
- Ensure that other vital infrastructure including transportation measures are provided in a phased way to meet the impacts of general housing and commercial development growth

West Essex CCG & NHS England (Agent: Lawson Planning Partnership)

- WECCG and NHSE commission all healthcare services, incorporating the provision of primary healthcare facilities within their administrative areas.
- The housing growth envisaged in the LDP will have a significant impact on the capacity of local healthcare services, requiring appropriate mitigation through developer provision of increased infrastructure and funding.
- Proposed growth in the LDP would, therefore, necessitate additional (developer funded) healthcare provision, which would principally be focussed on GP related medical services and supporting community health services.
- It is noteworthy that an increased draw down of NHS funding for the provision and maintenance of healthcare facilities and services over the Plan period would be experienced in Harlow independently of proposed growth. This is due to the ageing of the population and the associated increase in the proportion of patients with long term limiting conditions, by the increased disease burden and the increased incidence of obesity, smoking and alcohol consumption, which would all have a significant impact on the future health of the local population and healthcare capacity.
- WECCG and NHSE welcome the recognition that all growth options would require "careful phasing and implementation to ensure that development is delivered in a way that existing services can cope".
- The healthcare capacity position for these areas needs to be considered when determining the preferred approach for meeting Harlow District's housing needs.

- WECCG & NHSE have provided a detailed breakdown of healthcare needs (and contributions required) for each development scenario set out in the consultation document.

Natural England

- Increased populations in Harlow could cause increased use of Epping Forest and Lee Valley Regional Park – reference to these needs to be made in the Habitats Regulation Assessment
- Natural England wish to be engaged with the potential of a new M11 junction
- Concerns that a new junction could cause increased level of traffic and pollution through Epping Forest
- Natural England welcomes looking at previously developed brownfield land initially, to retain green wedges and respect the Gibberd Masterplan
- The ten core policies are broadly supported, specifically 6 (established quality streets and spaces), 7 (revitalised green spaces) and 8 (adapted to and mitigated the impacts of climate change)
- Development should be on suitable sites avoiding environmental impacts
- Communities should have access to an appropriate mix of green spaces, with at least 2 ha of accessible natural greenspace per 1,000 people (a more detailed breakdown is provided), possibly through use of existing Green Belt for recreation
- Sustainability Appraisal – Natural England broadly supports: the sustainability objectives, approach and methodology, use of relevant legislation in Section 6.3 and expansion of biodiversity and green infrastructure network. Under climate change section, link could be made to biodiversity, green infrastructure and SUDS

English Heritage

General

- English Heritage recognises the significance and distinctive character of Harlow as a Mark 1 new town which gives it historic significance and an opportunity to regenerate itself in a distinctive way
- Opportunity to draft policies that benefit the town's heritage assets and to consider site allocations that result in enhancements to the significance and setting of heritage assets
- Historic environment includes buildings with statutory protection, and the landscape and townscape components of the historic environment. The importance and extent of below ground archaeology is often unknown
- Comments on specific sites and potential development locations have been informed by desk-based analysis
- Reference to Harlow's history, distinctive character and heritage welcomed. Improve by reference to the town's designation as a Mark I New Town and the development of Gibberd's 1952 Masterplan, with reference to green wedges, and that future growth will have built on the New Town legacy
- Would like to see reference to the positive role of Harlow's built heritage in place-shaping. Need further characterisation, appraisal and assessment of the historic

environment and Harlow's heritage. Opportunity for enhancements to the built and natural environment by recognising and valuing Harlow's architectural and landscape inheritance and using it to inform distinctive new development.

- Protection and enhancement of heritage should complement policies including regeneration and revitalising centres
- Protection and enhancement of green wedges welcomed, subject to the outcomes of the Green Wedge Review which retain the green Wedges with some limited redefinition and enhancement. Revitalised green spaces should include reference to green wedges and the role they play in delivering multifunctional green space
- Development at certain sites could impact upon designated heritage assets and their settings. Assessment of development impacts will be necessary, including visual impact and impacts of noise, dust, movement and vibration. Consideration should be given in the future to opportunities to protect, conserve and enhance the setting of heritage assets. The sites in question include:

Specific Areas/Sites

- Site 7 - Scheduled Monuments: Harlowbury deserted medieval village and a Roman villa; Listed Buildings; Conservation Areas at Harlowbury, Old Harlow and Churchgate Street; Registered Park and Garden at The House
- East of Newhall, various sites - Listed Buildings including Hubbard Hall; Conservation Areas at Churchgate Street
- Harlow North - Scheduled Monuments including moated sites and World War II defences; Listed Buildings in Eastwick, Gilston, Hunsdon, Hunsdonbury and High Wych and in Gilston Park; Conservation Areas in Hunsdon, Widford and High Wych
- Harlow South - Scheduled Monuments: a moated site and Latton Priory; Listed Buildings including the Grade II* Latton Priory
- West Kathrines & West Sumners - Scheduled Monument: a cold war anti-aircraft gun site; Listed Buildings; Large Conservation Area at Nazeing & South Roydon
- North East Harlow - Listed Buildings; Registered Park and Garden at The House
- Development at Harlow North, Harlow South, West Katherines & West Sumners and North East Harlow will require co-operative working with neighbouring authorities and the release of Green Belt land
- Town Centre should remain the main focus for Harlow, but its importance in defining the character of Harlow, especially in the case of Market Place, should be a key factor in its reuse and enhancement
- Implications for historic environment and historic assets for each example should be considered in the 'Implications' text
- Northern Bypass is a major development that would impact upon a number of designated heritage assets and their settings. Thorough assessment of effects necessary
- At this stage, English Heritage does not wish to select a preferred approach to accommodate growth in Harlow. We recognise that the preferred approach is likely to include combinations of the proposals put forward in the Examples.
- Future iterations of the Plan should fully and properly consider impacts on the historic environment and heritage assets when selecting options to go forward in the plan and associated policy documents

- Sustainability appraisal work for future iterations of the plan and associated policy documents should be informed by a strengthened evidence base for the historic environment to provide the basis for place-shaping policies

Thames Water (Agent: Savills)

- Harlow is served by Rye Meads Sewage Treatment Works (STW) which also serves areas of Broxbourne, East Herts, Epping Forest, Harlow, North Herts, Stevenage and Welwyn Hatfield. Development can have effects on network and treatment upgrades required and neighbouring authorities should work closely with each other, and Thames Water, in the allocation and phasing of housing.
- There are options to expand the treatment facilities at Rye Meads STW within current operational boundaries but the degree of expansion required is currently unknown as a full understanding of development proposals for all authorities which drain to the STW would be required.
- As well as expansion of Rye Meads STW, options for localised wastewater treatment should be considered but this can only be considered where it is both sustainable and economic. As a result this option may be limited to the very large developments proposed. Should localised treatment options be preferred then these would not obviate the need to increase capacity at Rye Meads STW.
- Thames Water's preferred approach for growth is for a small number of large clearly defined sites to be delivered rather than a large number of smaller sites as this would simplify the delivery of any necessary infrastructure upgrades.
- As a general comment, the impact of brownfield sites on the local sewerage treatment works is likely to be less than the impact of greenfield sites. We would therefore support a policy that considers brownfield sites before greenfield sites.
- In relation to sewerage network requirements very small developments are likely to be able to be accommodated almost anywhere in the catchment. There comes a point when the scale of the development relative to the extent/cost of the sewer upgrades required becomes disproportionate. In this situation concentrating development sites within such an area reduces the unit cost of upgrade required. Focussing development sites to drain into the existing outfall corridor, east to west along the River Stort valley/Railway line, would enable economic solutions to be identified for the upgrades.
- To enable Thames Water to make a detailed assessment of the impact the proposed housing provision will have on local wastewater infrastructure we will require details of the Council's aspiration for each site. For example, an indication of the location, type and scale of development together with the anticipated timing of development.
- It is essential that developers demonstrate that adequate wastewater infrastructure capacity exists both on and off the site to serve the development and that it would not lead to problems for existing customers.
- Where there are infrastructure constraints, it is important not to under estimate the time required to deliver necessary infrastructure. For example: local network upgrades take around 18 months and Sewage Treatment Works upgrades can take 3-5 years. Implementing new technologies and the construction of a major treatment works extension or new treatment works could take up to ten years.

- Thames Water have a suggested policy which it would like to have included within the plan.

Appendix 4: Comments received relating to the Sustainability Appraisal

SUB-GROUP 2

- Ensure that established facilities and services are retained and able to develop for the benefit of the community. This guidance is contained in the Sustainability Appraisal but not in the Emerging Strategy.

SUB-GROUP 4

- The Sustainability Appraisal suggests that option 1b would result in significant negative effects in terms of biodiversity. However, the Hunsdon Mead SSSI, Harlow Wood SSSI and Mark Bushes Wood LoWS are distant from Harlow West

HERTFORDSHIRE COUNTY COUNCIL

- The accompanying sustainability appraisal does not include options for accommodating growth of Harlow which have been considered or proposed in the recent past – for example, North Weald and east of the M11. You will no doubt wish to reflect upon this as you move forward with your plan as I am sure you will the dated nature of a sizable proportion of the evidence base.

NATURAL ENGLAND

- Sustainability Appraisal – Natural England broadly supports: the sustainability objectives, approach and methodology, use of relevant legislation in Section 6.3 and expansion of biodiversity and green infrastructure network. Under climate change section, link could be made to biodiversity, green infrastructure and SUDS

ENGLISH HERITAGE

- Sustainability appraisal work for future iterations of the plan and associated policy documents should be informed by a strengthened evidence base for the historic environment to provide the basis for place-shaping policies

Appendix 5: Youth Council presentation & discussion

The following is a summary of the comments that were made by members of the Youth Council at a presentation and discussion event which took place with them.

Housing and Open Spaces

- Is there enough space to build this level of housing?
- Harlow is a cultural town with lots of open spaces that are used a lot (e.g. the Town Park and playing fields)
- Harlow is already struggling to keep its open spaces and not become too industrial
- Housing is needed, but people may not want to live in Harlow if too much green space is lost
- The open spaces in Harlow are the nicest parts of it
- Epping and East Herts should build their own housing, but that is doubtful as they would lose their Green Belt land
- Flats are often dressed up as apartments but flat blocks can negatively affect communities
- A mix of flats and houses are needed to house different people (e.g. flats are often used as starter homes)

Opportunities in Harlow

- Nice areas in Harlow are often spoilt by derelict housing which needs to be regenerated
- All towns and cities have ups and downs, but Harlow town centre is too 'grey' and parts of it are run down and dirty
- The hatches could be nicer – e.g. Elm Hatch's closed pub is a focal point for crime and the buildings are falling down
- There is a lot for young children to do in the town, but little for teenagers
- There are many sport opportunities but they're not what everyone wants to do
- There is a lot for people to do in Harlow but people often don't make use of facilities – e.g. skate park, cinema, etc.
- There is little vacant space in local libraries – particularly during revision periods
- Young people have ambitions to move away because of limited job opportunities in the town
- There is a lack of high quality sixth forms
- Parking is often a problem and it needs to be recognised that many houses now have two or three cars
- The cost of public transport is too high
- The whole of Harlow is pretty good
- The development at Park Lane (next to the Town Park) is a good way of integrating green space into new developments
- Church Langley is the nicest area, partly because of the newer housing
- New Hall is a good mix of housing and open space
- Church Langley and New Hall are nice in terms of cleanliness and green space but limited in terms of housing size

- Church Langley is full of similar looking housing and you can get lost in it
- Many community events take place in Church Langley
- There should be more money put into education so people will have better jobs and prospects, so they will be able to afford housing

Development Examples

- Land around Nazeing and Katherine's could be used to build on
- Existing properties should be refurbished and regenerated
- Examples 1 and 2 are spread out and preserve green spaces
- Example 4 provides housing and regenerates needy areas
- Example 5 is too focused on one area
- Example 5 is best because it focuses the development in one area

Appendix 6: List of consultees

- **SPECIFIC CONSULTTEES (51)**
 - British Gas
 - British Waterways
 - Broxbourne Council
 - BT Openreach
 - East Herts District Council
 - East of England Ambulance Service NHS Trust
 - Eastwick and Gilston Parish Council
 - English Heritage
 - Entec UK Ltd
 - Environment Agency
 - Epping Forest District Council
 - Essex County Council - Highways & Transportation
 - Essex County Council
 - Essex County Fire & Rescue Service
 - Freight Transport Association
 - Harlow Council - Contact Harlow
 - Hertfordshire County Council
 - Highways Agency
 - Historic Environment Branch
 - National Express East Anglia
 - National Grid
 - Natural England
 - Network Rail
 - North Weald Bassett Parish Council
 - Roydon Parish Council
 - Sport England
 - Thames Water (Savills)
 - UK Power Networks
 - West Essex Primary Care Trust
 - Affinity Water
 - Anglian Water
 - East of England Development Agency
 - Epping Upland Parish Council
 - Essex Police
 - GO East
 - Harlow Primary Care Trust
 - Homes and Communities Agency
 - Hunsdon Parish Council
 - Lee Valley Water PLC
 - Little Hadham Parish Council
 - Matching Parish Council
 - Mobile Operators Association

- Much Hadham Parish Council
- Nazeing Parish Council
- NHS England - Essex Area Team
- NHS West Essex
- Princess Alexandra Hospital NHS Trust
- Sawbridgeworth Town Council
- Sheering Parish Council
- Transco
- Widford Parish Council

- **LOCAL GROUPS AND ORGANISATIONS (144)**
 - Abbotsweld Primary School
 - All Ability Sports and Leisure
 - Army Cadets
 - Blue Birds Badminton Club
 - Brenda Taylor School of Dance and Performing Arts
 - Broadfields Primary School
 - Buddhist Group Harlow
 - Burnt Mill School
 - Canal Boat Project
 - Chelmsford DBF
 - Christ Embassy
 - Church Langley Church
 - Church Langley Primary School
 - Church of England
 - Church of England Church Commissioners
 - Church of the Assumption of our Lady
 - Churchgate C of E Primary School
 - Commission for Racial Equality
 - Commonsides Christian Fellowship
 - David Livingstone URC
 - Diocese of Chelmsford
 - East Potential - Harlow Foyer
 - Elim Church of Pentecost
 - Equal Opportunities Commission
 - Essex CC Harlow Centre
 - Essex Youth Service
 - Fawbert & Barnard's Primary School
 - Foyer
 - Freshwaters Christian Fellowship
 - Friends, Families and Travellers and Traveller Law Reform Project
 - Gateway Christian Fellowship
 - Glen Savage
 - Great Parndon Library
 - Gypsy Council
 - Gypsy Services Manager
 - Gypsy & Traveller Law Reform Coalition
 - Hare Street Community Primary School & Nursery

- Harefield Church
- Harlow & District Chinese Community Centre
- Harlow and District Access Group
- Harlow and Epping Social Club for the Blind
- Harlow Area Access Group
- Harlow Ballet School
- Harlow Baptist Church
- Harlow Black Culture Group
- Harlow Central Library
- Harlow Centre for Outdoor Learning
- Harlow College
- Harlow District Scout Council
- Harlow Education Consortium
- Harlow Ethnic Minority Umbrella
- Harlow Faiths Forum
- Harlow Fields School and College
- Harlow Handicapped Sports Foundation
- Harlow Islamic Centre
- Harlow Jewish Community
- Harlow Latton Bush Centre Mosque / Harlow Muslim Society
- Harlow MENCAP
- Harlow Milan Mandel
- Harlow Northbrook Muslim Community
- Harlow One Stop Shop
- Harlow Passmores Congregation of Jehovah's Witnesses
- Harlow Philippines Culture Group
- Harlow Sea Cadets
- Harlow Sikh Society
- Harlow Social Club for the Physically Disabled
- Harlow Star Youth Community League
- Harlow Vietnamese Catholic Community
- Harlow Wildcats Basketball Club
- Harlow Youth Action Group Football For All (HYAGFFA)
- Harlow Youth Council
- Harlow Youth Netball Action Group (HYNAG)
- Harlowbury Primary School
- Herts and Essex Boarder Ecumenical Area
- Herts and Essex Muslim Cultural Association
- Holy Cross Catholic Primary School
- Hope Church Harlow
- House of Mercy Ministries
- Jack & Jill's Nursery
- Jehovah's Witnesses
- Jerounds Community Infant School
- Jerounds Junior School
- Katherines Primary School
- Kingsmoor Primary School
- Latton Green Primary School
- Learning and Skills Councils
- Light House

- Little Parndon School
- Makin' Steps School of Dance & Performing Arts
- Maranthara
- Mark Hall Library
- Mark Hall Specialist Sports College
- Milwards Primary School & Nursery
- New Life Christian Fellowship
- Oakwood Chapel
- Old Harlow Library
- Our Lady of Fatima & St. Thomas More Catholic Church
- Paringdon Junior School
- Passmores Comprehensive School
- Pear Tree Mead County Primary School
- Peterswood Infant School & Nursery
- Potter Street Baptist Church
- Potter Street Primary School
- Purford Green Junior School
- Purford Green Primary School
- Redeemed Christian Church of God Lord's Vine Parish
- Redeemer Lutheran Church
- Religious Society of Friends (Quakers)
- Science Alive
- Seventh Day Adventists Church
- South East Harlow Youth and Sports Association SEHSYA
- Spinney Infants School
- Spinney Junior School
- St Albans Catholic Primary School
- St James C of E Primary School
- St James Church
- St Luke's Catholic Primary School
- St Mark's West Essex Catholic School
- St Nicholas School
- St. Andrew's Methodist Church
- St. John's Arts and Recreation Centre
- St. Lukes and Holy Cross Church
- St. Mary Magdalene
- St. Mary-at-Latton
- St. Mary's Church Great Parndon
- St. Mary's Churchgate Street
- St. Paul's - Harlow Town Centre Parish
- St. Stephen's Church
- Stewards School
- Tany's Dell Community Primary School
- The Downs Primary School & Nursery
- The Henry Moore Primary School
- The Museum of Harlow
- The National Federation of Gypsy Liaison Groups
- The Roman Catholic Diocese of Brentwood
- The Salvation Army
- Trinity URC

- Tye Green Library
 - Water Lane Primary School
 - West Essex Mind
 - William Martin C of E Infant & Nursery School
 - William Martin C of E Junior School
 - Young Concern Trust
 - Young Peoples Information Centre
- **OTHER CONSULTEES WHO WISHED TO BE NOTIFIED (INCLUDING LOCAL BUSINESSES, RESIDENTS, COUNCIL OFFERS AND COUNCILLORS) (2,139)**

Appendix 7: Respondents

| Name | | Organisation/Company | ID | Sub-group |
|-----------|-----------|------------------------------------|------|-----------|
| Andrew | Acher | | 7858 | 1 |
| Ian | Beckett | | 7894 | 1 |
| Colin | Black | | 6114 | 1 |
| Alan | Bolden | | 7924 | 1 |
| Philip | Bradbury | | 7857 | 1 |
| Joel | Charles | Harlow District Council | 7922 | 1 |
| Lindsey | Cox | | 7892 | 1 |
| Jonathan | Dance | | 7907 | 1 |
| Matthew | Dixon | | 7699 | 1 |
| David | Eve | | 7938 | 1 |
| Giulia | Festa | Harlow District Council | 7918 | 1 |
| Karen | Garrod | | 7961 | 1 |
| Anne | Geiss | | 7923 | 1 |
| David | Giess | | 5825 | 1 |
| David | Gould | | 5901 | 1 |
| Gill | Gould | | 6124 | 1 |
| Sandra | Gray | | 7846 | 1 |
| Robert | Gray | West Sumners Residents Association | 7926 | 1 |
| Ursula | Grover | | 7898 | 1 |
| Peter | Hawkes | | 7895 | 1 |
| VICKI | HUNDLEY | | 7893 | 1 |
| K | Johnson | | 7911 | 1 |
| Moira | Jones | | 5031 | 1 |
| Beverly | Le Long | | 7925 | 1 |
| Albert | Lidbury | | 7891 | 1 |
| Clive | McQuinn | | 7847 | 1 |
| Bernard | Mella | | 5913 | 1 |
| Colleen | Morrison | | 5674 | 1 |
| Barbara | Noble | | 5680 | 1 |
| sean | ockenden | | 7865 | 1 |
| Robert | Quinn | | 7919 | 1 |
| Joy | Robinette | Hunsdon Parish Council | 7878 | 1 |
| Paula | Robinson | | 5677 | 1 |
| Mark | Rowe | | 7845 | 1 |
| Warren | Scott | | 7862 | 1 |
| Sally-Ann | Simpson | | 7843 | 1 |
| Andrew | Stuttle | | 5754 | 1 |
| Sheila | Sullivan | Morley Grove Residents Association | 5043 | 1 |
| Toni | Swatton | | 7905 | 1 |

| | | | | |
|--------------|------------|--|------|---|
| Nicholas | Taylor | | 5738 | 1 |
| Edward | Vine | vine | 7890 | 1 |
| Julie | Vinton | | 6007 | 1 |
| Mary | Wiltshire | | 6026 | 1 |
| Janet | Ballard | Roydon Parish Council | 5434 | 2 |
| Andrew | Bramidge | Harlow Council | 7848 | 2 |
| | Chairman | PAH NHS Trust (agent: Lawson) | 4683 | 2 |
| Anna | Cronin | Epping Forest District Council | 7940 | 2 |
| John | Curry | Harlow Civic Society | 5318 | 2 |
| Sue | Dobson | Essex Bridleways Association | 7887 | 2 |
| Paul | Donovan | Hertfordshire County Council (Transport) | 4676 | 2 |
| Rose | Freeman | The Theatre Trust | 216 | 2 |
| Andrea | Gilmour | Hertfordshire County Council (Development Services) | 7904 | 2 |
| Clark | Gordon | Environment Agency | 7942 | 2 |
| John | Greenaway | | 5284 | 2 |
| Richard | Hanrahan | Bruce Maintenance Services Ltd | 3477 | 2 |
| Neela | Hibbert | Harlow Ethnic Minority Umbrella | 154 | 2 |
| Martin | Hicks | Hertfordshire County Council (Ecology) | 7951 | 2 |
| John | Horgan | Bush Fair Management Ltd | 7913 | 2 |
| Riaz | Hussain | Medicare Pharmacy | 7902 | 2 |
| | Manager | Fish Brothers | 3740 | 2 |
| | Manager | Harlow College | 3833 | 2 |
| | Manager | Thames Water (agent: Savills) | 7944 | 2 |
| Mark | Norman | Highways Agency | 7939 | 2 |
| Zhanine | Oates | Essex County Council | 5406 | 2 |
| Aarti | O'Leary | West Essex Clinical Commissioning Group & NHS England (agent: Lawson Planning) | 5845 | 2 |
| Mark | Orson | Eastwick & Gilston Parish Council | 7610 | 2 |
| Mark | Owen | Barton Willmore | 7950 | 2 |
| Martin | Paine | East Herts District Council | 5682 | 2 |
| Carol | Richards | Chelmsford Diocese Board of Finance (agent: Strutt & Parker) | 7772 | 2 |
| Consultation | Service | Natural England | 7715 | 2 |
| Roy | Warren | Sport England | 7871 | 2 |
| Bob | Weaver | | 3345 | 2 |
| Mark | White | English Heritage | 7937 | 2 |
| David | Wright MBE | Memorial University of Newfoundland - Harlow Campus | 6014 | 2 |
| Elizabeth | Ainsworth | | 7864 | 3 |
| Janet | Ballard | | 7908 | 3 |
| Anthea | Bickmore | | 7964 | 3 |
| Alan | Burgess | Alan Burgess | 26 | 3 |
| Nigel | Clark | STOP Harlow North | 25 | 3 |

| | | | | |
|-------------|----------------|---|------|---|
| Colin | Gamage | | 7899 | 3 |
| Phillip | Gibb | | 5725 | 3 |
| Christopher | Long | Harlowsave Credit Union Ltd | 7917 | 3 |
| Madeleine | Paine | | 7850 | 3 |
| Nicola | Wilkinson | The Roydon Society | 27 | 3 |
| Michael | Wilson-Roberts | | 7914 | 3 |
| Karen | Wilson-Roberts | | 7915 | 3 |
| Matt | Wright | | 7853 | 3 |
| Tracyann | Wright | | 7856 | 3 |
| Mark | Bedding | City and Provincial Properties Ltd (Savills) | 5294 | 4 |
| Anna | Davies | Persimmon Homes | 7948 | 4 |
| | Manager | Barratt Eastern Counties (agent: Bidwells) | 7934 | 4 |
| | Manager | Stort Landowners (agent: Sworders) | 7936 | 4 |
| | Manager | Kier Homes (agent: Savills) | 7953 | 4 |
| | Manager | Harlow West Consortium (agent: Pegasus) | 7954 | 4 |
| | Manager | Quod | 7957 | 4 |
| | Manager | Commerical Estates Group and Hallam Land Management (agent: Boyer Planning) | 7960 | 4 |
| | Manager | ReAssure Ltd (agent: Indigo Planning) | 7963 | 4 |
| Bob | Sellwood | Crest Strategic Projects | 7935 | 4 |
| Olivier | Spencer | Miller Homes (agent: Andrew Martin Planning) | 5433 | 4 |
| James | Stevens | Home Builders Federation | 7947 | 4 |
| Manager | | Hubert C Leach (Leach Homes) | 7933 | 4 |

Appendix 8: Example of notification letter

«Short_Name»
«Organisation»
«Address»
«Post_Code»

Forward Planning
Harlow Council
Civic Centre
The Water Gardens
Harlow
Essex CM20 1WG
www.harlow.gov.uk

Telephone: (01279) 446 577
Email: myharlow@harlow.gov.uk
Date: 11 April 2014

Dear «Short_Name»,

HARLOW LOCAL DEVELOPMENT PLAN

Harlow Council is preparing a Local Development Plan for the period of 2011 to 2031. The Plan will set out how the town will develop, including how many new homes are needed and where development will take place. You have been contacted as you are on our consultation database. If you wish to no longer be informed about the progress of the Plan, please email us and request your removal from the database.

The Council previously consulted on an Issues and Options document. However, the Council is now reviewing the strategy for Harlow and has also prepared a revised Statement of Community Involvement, following Government changes to the planning system. These documents can be downloaded from the Council's website at www.harlow.gov.uk/local-plan or viewed at the Civic Centre, Central Library and Old Harlow Library during normal opening hours.

The public consultation on the documents runs from **Monday 14 April to Friday 30 May 2014**.

Emerging Strategy and Further Options

The Emerging Strategy and Further Options document presents five examples of how new housing development could be accommodated within Harlow. A questionnaire on the Strategy can be completed online at www.harlow.gov.uk/local-plan Alternatively a hard copy can be printed from the website and returned to Forward Planning, Harlow Council, The Civic Centre, Water Gardens, Harlow, Essex CM20 1WG. The questionnaires will inform the preparation a preferred spatial strategy which will be further consulted on. Information about public exhibitions being held in Harlow during the consultation can be found on the website

Statement of Community Involvement (SCI) Draft Review

The SCI sets out how and when the Council will consult with people on planning matters and how they can get involved. Comments on the SCI Draft Review can be emailed to myharlow@harlow.gov.uk or returned to the postal address above. Comments will be considered by the Council before the Review is adopted.

By responding you are giving your consent to the Council to hold and process your personal data in accordance with the requirements of the Data Protection Act 1998. Your name, organisation and comments may be available for others to view at the Council's offices and on the Council's website. The data gathered through this consultation will be held for the duration of the LDP up to and probably beyond 2031.

If you have any questions, please telephone 01279 446577 or email myharlow@harlow.gov.uk

Yours sincerely,

Dianne Cooper
Planning & Building Control Manager

Appendix 9: Harlow Times news article (Spring 2014)

Planning Harlow's Future

Consultation on the next stage of the Local Development Plan, looking at the possible location of future housing in Harlow, is set to start this spring.

The consultation findings will help to prepare the new statutory Local Development Plan for Harlow, guiding future development in the town up until 2031.

The Plan will reflect the future needs of the community and businesses and provide a framework for the consideration and assessment of planning applications.

→ The consultation will be advertised in the local press and on the Council's website: www.harlow.gov.uk/local-plan

Appendix 10: Harlow Star news article (30 January 2014)

email: star@harlowstarnews.co.uk

NEWS FOCUS Harlow Local Plan

Could Harlow become the next Cambridge by 2031?

GEMMA GARDNER

gemma.gardner@harlowstarnews.co.uk

HARLOW Council is hoping to create a town of "aspiration, innovation and prosperity" as they prepare their blueprint for development over the next 20 years.

Last Thursday, the authority's cabinet agreed to hold a public consultation on their proposals.

The work will help prepare an updated statutory Local Plan for Harlow which will guide where future new housing, jobs and services will go in the town up until 2031.

Clr Paul Sztumpf, portfolio holder for regeneration and chairman of the local development plan panel, said: "The local plan will provide a framework for the town to secure more and better housing, regeneration, a thriving economy, a green environment and social inclusion. Securing all of these will not come without significant challenges, particularly when it comes to protecting our environment."

Harlow's Local Plan will need to reflect the future needs of the community and businesses, as well as provide a framework for the consideration and assessment of planning applications.

The consultation will involve asking the public and businesses for views on a series of development scenarios which aim to provide more housing and jobs. The consultation will also include looking at where housing could go in the town and outside the town's borders to meet Harlow's future needs.

Five options are being put forward by Harlow Council. These options provide between 4,000 and 18,000 homes and between 1,200 and 18,000 jobs respectively.

Choosing the later option would provide enough homes to "transform Harlow into the



FUTURE: Development may still take place at Harlow North



WHERE IN HARLOW SHOULD FUTURE DEVELOPMENT TAKE PLACE? HAVE YOUR SAY AT www.harlowstar.co.uk

inquiry in public."

Each option focuses on a different vision for the future from regeneration to improving transport links and infrastructure.

Councillor Phil Waite, portfolio holder for environment, said: "All of the suggested

thing we should do."

Conservative group leader Clr Andrew Johnson said: "I fully support more and better housing through regeneration and growth, but I've some concerns about giving a planned number of options to the public."

present-day Cambridge" according to a report to councillors.

But Cllr Sztrumpf was keen to point out that the proposals could change based on public reaction.

He said: "They are examples - it's all open for debate. This consultation is completely not about giving up our green spaces, it's about strengthening our protection in the case of an

options will be subject to further evaluation taking into account such matters as schools, health services, transport and the results of the consultation."

And Cllr Tony Durcan, portfolio holder for resources and enterprise, said: "If we want to move this town forward we need housing, [and] some needs to be in Harlow. We must look at Harlow first. It's overdue and some-

"It will be very easy for the public to think Harlow Council want to build in those places. I don't think they'll be happy with any of the examples in this report."

Cllr Emma Toal, portfolio holder for youth and citizenship, said: "What do the people of Harlow want this town to be like in 2031? I'm quite excited and looking forward to what the public have to say."

'We'll be at the mercy of developers without plan'

A 'ROBUST' local plan will help to protect Harlow from developers, the town's ruling Labour group say.

Cllr Paul Sztrumpf explained that without a local plan, rejected planning applications could be overturned by the Government's planning Inspectorate.

He said: "The truth is Eric Pickles, the Government's local government minister, has transformed our national planning system into a fragmented, developer led wish list.

"The local plan is local people's best and only means of shaping their own environment. I hope a maximum number of people will participate in this consultation. Without a robust local plan, developers who get planning permission refused locally, will simply appeal to Mr Pickles and win as they did on Gilden Way."



Council leader Mark Wilkinson, pictured, said: "New housing, new jobs and having the right infrastructure is key to Harlow's future. These are important issues for the town and are among the highest priorities for our residents.

"We are committed to developing this plan in an open and transparent manner and I hope the consultation will bring about a healthy debate.

"We need new housing for Harlow people but where should it go?"

Councillor Phil Waite, portfolio holder for environment, said: "If the plan is not robust, supported by objective evidence, and reflects the views of Harlow people, we will be at the mercy of developers and the planning Inspectorate. Decent housing is crucial for the thriving community and has to be our priority."

Land identified as possible sites for housing until 2031

- >> Land west of Sunners
- >> Land east of Katherines
- >> Harlow north
- >> Land south of the town between Harlow and Epping
- >> Land north of Gilden Way and the playing field south of Gilden Way
- >> Former Passmores School
- >> Land east of the Newhall development
- >> Terminus House and car park
- >> Purford Green School
- >> Garage blocks adjacent to Nicholls Tower
- >> Slacksbury Hatch and associated garages
- >> Wissants and adjacent playground
- >> Kingsmoor House and car park

For a full list of sites visit www.harlow.gov.uk.

No new housing 'is not an option'

RESIDENTS and businesses are being urged to have their say on where new homes and jobs should be created in Harlow.

Consultation on Harlow Council's Local Plan, a blueprint for future development in the town, starts on Monday.

Views will be sought on five different examples for how new housing developments could be accommodated within Harlow and possible locations outside the town.

The council say all examples "protect Harlow's existing green spaces as much as they can".

A council spokesman said: "Harlow was never meant to stand still and today Harlow faces a number of issues and development pressures.

"The council needs to plan for the future by providing development to meet local needs and to deliver the regeneration of the town."

The Local Plan will set out how many new homes and jobs are to be provided in Harlow up to the year 2031.

It should reflect the future needs of the community and

GEMMA GARDNER

gemma.gardner@herbesssexnews.co.uk

businesses, and will provide a framework for the consideration and assessment of planning applications received by the council.

To achieve the council's key priorities of delivering more and better housing, regenerating the town and stimulating the local economy, evidence shows that between 12,000 and 15,000 new homes and between 8,000 and 12,000 jobs will be required up to 2031.

Planning permission has already been granted for 4,500 homes in Harlow, so locations for a further 7,500 to 10,500 homes need to be identified.

Approximately 30 per cent of new homes will be affordable/social housing to help families and individuals that cannot currently afford to buy their own home.

The council is required by Government policy to boost significantly the supply of housing to meet the needs of the community, which means that 'no housing growth' is not an option.

The spokesman added: "If we do not deliver the housing to support regeneration the risk is that Harlow will decline.

"We all know what new housing and new jobs mean to Harlow so we need as many people from the young to the old and all sized businesses to let us know their views on this vital issue.

"We want to start a healthy debate on Harlow's future. We need new housing for Harlow people but where should it go?"

The council has published the Emerging Strategy and Further Options document for consultation and this document can be read and views given at www.harlow.gov.uk/local-plan from today. Further consultations will take place later this year.

The document will also be available in the Civic Centre, Central Library and Old Harlow Library. Exhibitions will also be held throughout the consultation and details of these will on the Council's website.

The consultation closes on May 30.

Appendix 12: Harlow Star news article (8 May 2014)

EMAIL: star@harlow Essex NEWS.CO.UK

Follow us on Twi

Examples of new housing developments go on display

RESIDENTS will be able to learn more about the five examples of how new housing development could be accommodated within Harlow as plans are due to go on display.

Details will be shown at local development plan exhibitions which are staffed by members of Harlow Council's forward planning team.

The exhibitions will give residents and businesses the opportunity to see the five examples of new housing development, which form part of the proposed Emerging Strategy and Further Options consultation.

The consultation has been running since April and, after the consultation results are in, one - or a combination of examples - will become a part of the emerging Local Development Plan.

Visitors will be able to pick up copies of the consultation leaflet and questionnaire as well as talk to members of the Forward Planning Team about the proposals.

The exhibitions will be held at the Latton Bush Centre, Southern Way on Wednesday, (May 14) from 3-9pm and another at the Harvey Centre on Wednesday, May 21 from 10am-5pm.

There will also be an unstaffed exhibition at the Civic Centre in the Water Gardens and from May 22 a second unstaffed exhibition at Harlow Central Library. Both stands will be available for viewing until May 30 when the consultation comes to an end.

Responses to the consultation can be made via the questionnaire.

For more information on Harlow's Local Development Plan and the consultation - visit www.harlow.gov.uk/local-plan.

Appendix 13: Exhibition board panels



Harlow 2031 – Have your Say

The Council is currently preparing a new Local Development Plan which will cover the period 2011 to 2031. This plan sets out how many new homes and jobs are to be provided in Harlow by 2031. The plan will also include locations where development will take place.

Development Needed - The Council is required by Government planning policy set out in the National Planning Policy Framework to boost significantly the supply of housing in order to meet the needs of the community. This means that 'no growth' is not an option for the new Local Development Plan.

The Council's key priorities are to deliver more and better housing, regeneration and a thriving economy. To achieve these priorities evidence shows that between 12,000 and 15,000 new homes and 8,000 to 12,000 jobs between 2011 and 2031 will be required to meet Harlow's objectively assessed development needs and to deliver the regeneration of the town.

Accommodating Future Development - In Harlow 4,500 homes have planning permission so locations for a further 7,500 to 10,500 dwellings will need to be identified to meet housing need. Five examples of how future development could be provided across Harlow are proposed; each focuses on different Council priorities.

The Council wants your views on the preferred level of development and the examples presented.

The consultation runs from **Monday 14 April to Friday 30 May 2014**. The consultation document can be viewed online at www.harlow.gov.uk/local-plan or at The Civic Centre, Central Library or Old Harlow Library.

If you have any comments these should be made by completing the online questionnaire.

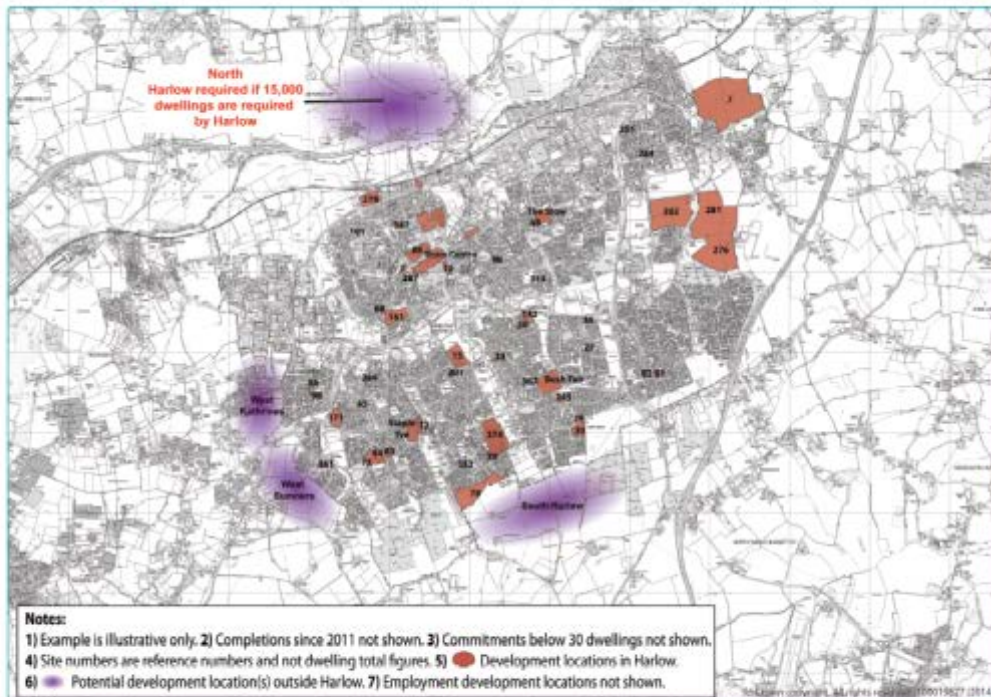
If you wish to discuss this consultation further please contact Forward Planning on 01279 446897 or email myharlow@harlow.gov.uk



Example 1 – Focused on Priority Regeneration Areas

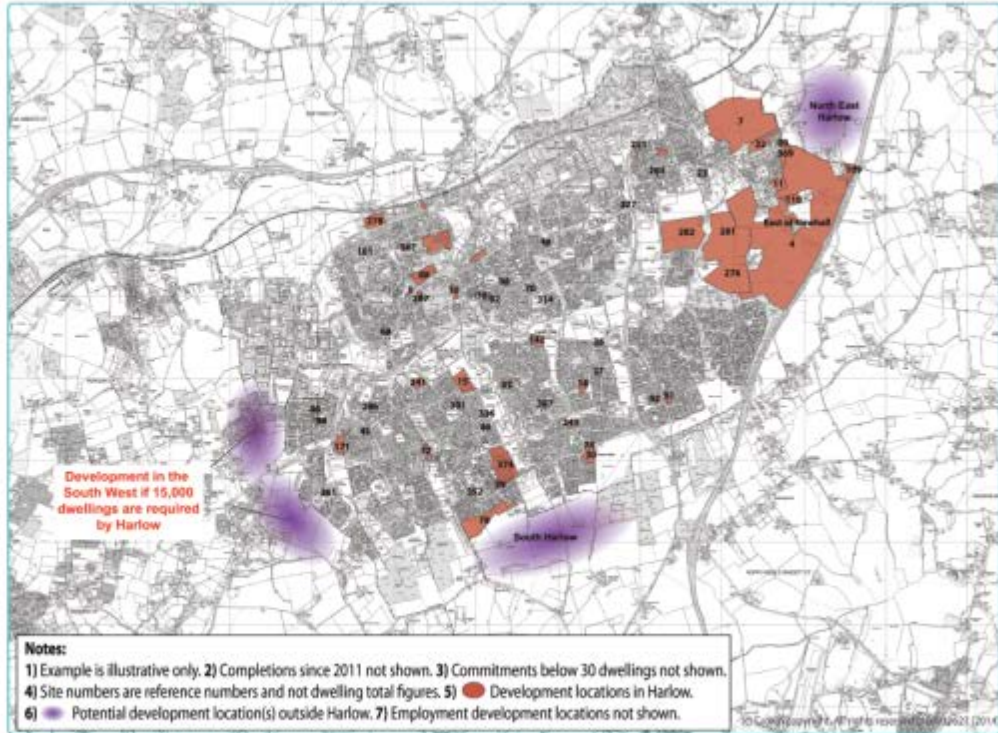
- Focusing development in and around identified priority areas for regeneration.
- Providing additional residential development through the redevelopment of Town Centre and Neighbourhood centres.
- Any development required outside Harlow's boundaries is suggested to be located in areas most likely to help regeneration objectives.
- Development to the north is suggested if 15,000 dwellings are required to support the regeneration of the town.

The site numbers are references and relate to the lists contained in appendix 1 of the consultation document.



Example 2 - Environmental / Landscape Led

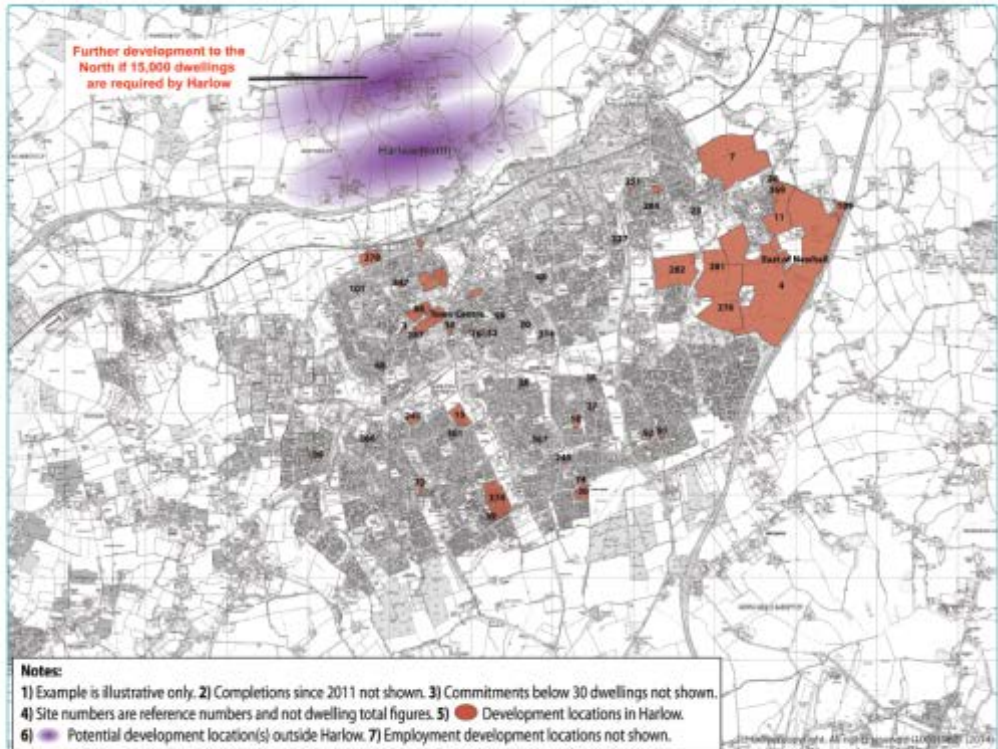
- Focusing development on the less sensitive environmental areas within Harlow.
- Any development required outside Harlow's boundaries to be focused to the north east and south within the ridge line of Harlow which has less landscape and environmental constraints.
- Development to south west is suggested if 15,000 dwellings are required.



Harlow's Local Development Plan

Example 3 – Passenger Transport Led

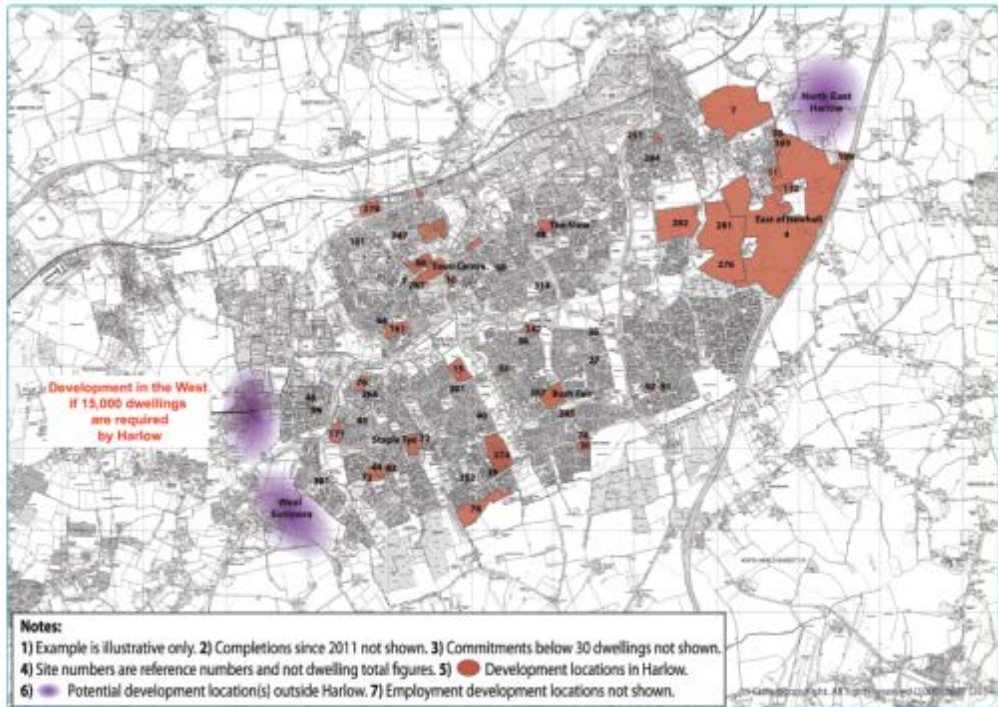
- Focusing future development within Harlow closer to passenger transport hubs such as the train stations and Town Centre bus interchange.
- Development locations in south Harlow are reduced.
- Any development required outside Harlow's boundaries is suggested to be located to north, the closest area to the transport hubs (train stations and town centre bus interchange).
- If 15,000 dwellings are required then further development to the north is suggested.



Harlow's Local Development Plan

Example 4 – Regeneration and Landscape Led

- Future development seeks to balance landscape impacts and achieving regeneration of urban area.
- Providing additional residential development as part of redevelopment of town centre and Neighbourhood centres.
- Development to the north is suggested if 15,000 dwellings are required.

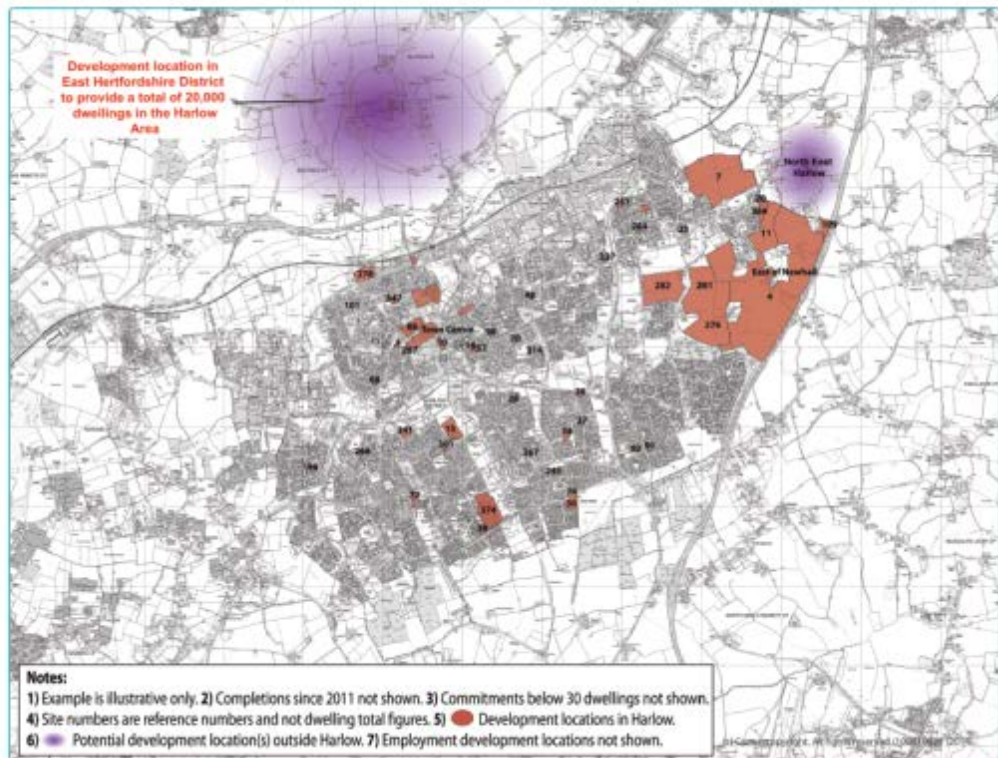


The site numbers are references and relate to the lists contained in appendix 1 of the consultation document.

Harlow's Local Development Plan

Example 5 – Northern Bypass Led

- Provides for 20,000 dwellings across the Harlow Area.
- Focuses future investment in areas more likely to support a new northern bypass to Harlow.
- Development is also provided closer to passenger transport hubs (train stations and town centre bus interchange).
- Less development to be located in the south of Harlow.



The site numbers are references and relate to the lists contained in appendix 1 of the consultation document.

Harlow's Local Development Plan

Appendix 14: Exhibition photos

Staffed exhibition, St John's ARC, 6 May 2014



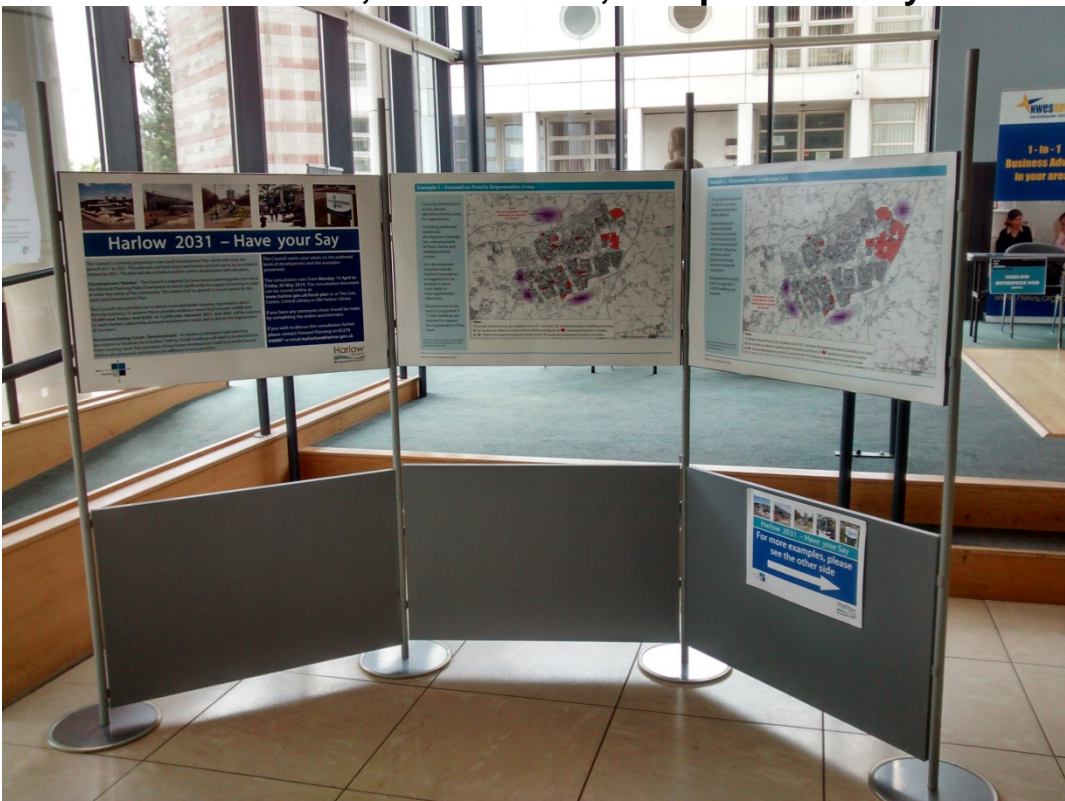
Staffed exhibition, Latton Bush Centre, 14 May 2014



Staffed exhibition, Harvey Centre, 21 May 2014



Unstaffed exhibition, Civic Centre, 14 April – 30 May 2014



Unstaffed exhibition, Harlow Central Library, 22 to 30 May 2014

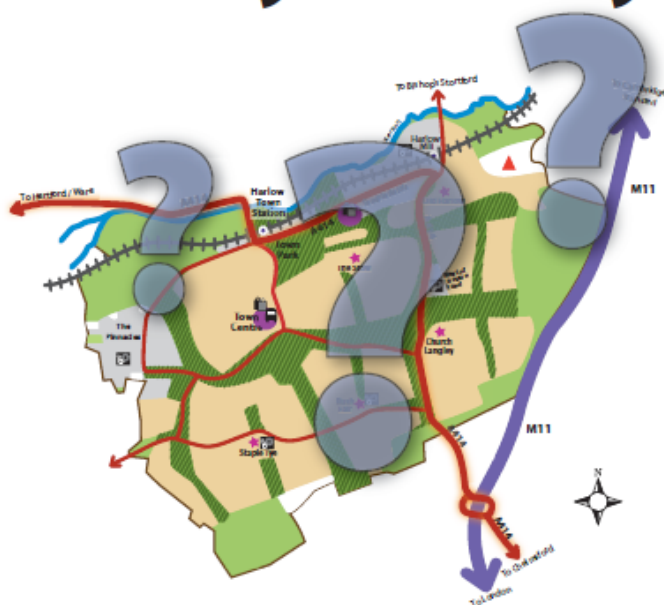


Appendix 15: Window poster in Civic Centre

How would YOU plan Harlow's future?

Harlow's Local Development Plan

Have your say!



Emerging Strategy and Further Options Consultation

14 April 2014 to 30 May 2014

View the consultation document, pick up a questionnaire
and see the exhibition in the reception area, or visit

www.harlow.gov.uk/local-plan



Harlow
Council
Working together for Harlow

Appendix 16: Website banner



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