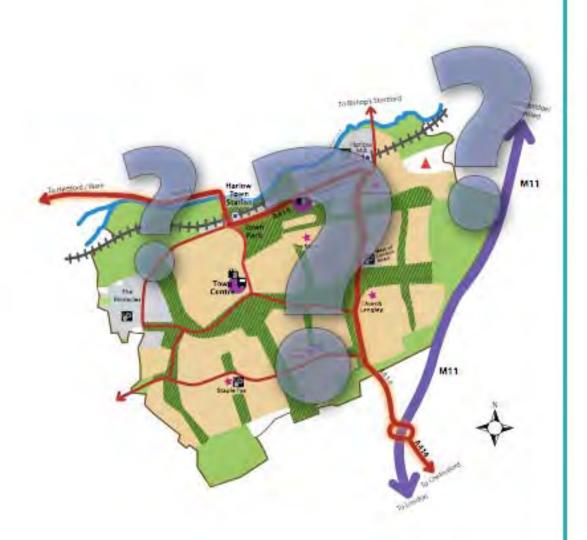


# Core Strategy Issues and Options Consultation Summary Report

February 2012







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# INTRODUCTION

# **Purpose of this Summary Report**

This report summarises the issues raised, and analyses the responses received, in relation to Harlow's Core Strategy Issues and Options consultation which took place during the 10 weeks from 22 November 2010 to 28 January 2011.

It is intended that the comments received from this consultation will assist Harlow Council as it prepares Harlow's Core Strategy; the new overarching planning document that will set out the spatial planning strategy guiding future development in the Harlow District up to and beyond 2026, and supporting the regeneration of the town. This document therefore forms part of the evidence base for Harlow's Core Strategy and is available to view and download at <a href="https://www.harlow.gov.uk/issuesandoptions">www.harlow.gov.uk/issuesandoptions</a>.

This Issues and Options Consultation Summary Report is a factual document and the majority of the text and charts that appear on the following pages are designed to illustrate the main issues raised and analyse the responses received to the 'closed' and 'openended' questions that were contained within the Consultation Document (see section 1.3). To assist with the analysis of the responses, individual representations have been grouped together into relevant issues however please note that in identifying groups of issues individual representations have been subject to interpretation. It should also be noted that it is not the purpose of this report to provide officer responses to individual representations.

#### Format of this Document

This Summary Report is split into 3 sections:

- **Section 1** summarises the background to the consultation, explains the consultation process and provides an analysis of the overall response.
- Section 2 provides an analysis of the responses to the 31 questions contained in the consultation document.
- **Section 3** sets out how the results from this consultation will be used to inform the next stage in the preparation of Harlow's Core Strategy.

A more detailed breakdown of the consultation results is contained in Appendices 1 - 6.

At certain points throughout Section 2 there are boxes (like the one below) which contain additional commentary on the consultation responses. These comments do not constitute formal officer responses to the consultation results but have been included where it is felt that the responses needed clarification.



All the representations made in relation to the consultation can be viewed on the Council's website at http://harlow.jdi-consult.net/ldf or in person at the Civic Centre.

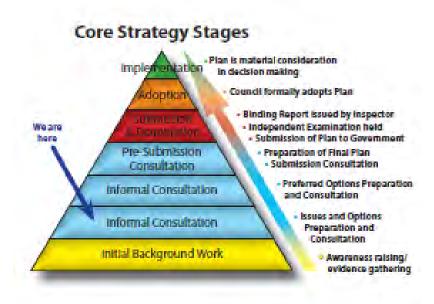
# 1.0 Core Strategy Issues and Options Consultation Document

# 1.1 Background

The Issues and Options consultation was the first stage of Harlow's Core Strategy. The Core Strategy is the main Development Plan Document (DPD) in the town's emerging Local Development Framework (LDF). The LDF, which will eventually replace Harlow's existing Adopted Replacement Local Plan 2006, is a series of documents that will guide planning and development in Harlow up to 2026 and beyond. The nature of these may be reviewed however following the enactment of the Localism Act in November 2011.

The Core Strategy will set out the overarching spatial planning framework guiding development across the Harlow District, setting out the long term vision and objectives for the town. It will set out the principles that will protect the environment and guide the development of new homes, shopping, employment opportunities and infrastructure necessary to meet the needs and aspirations of the community. The Core Strategy will also provide the strategic framework for other detailed planning guidance being produced as part of the LDF. The documents being produced to create Harlow's LDF are illustrated on Harlow Council's dedicated LDF website page at <a href="https://www.harlow.gov.uk/ldf">www.harlow.gov.uk/ldf</a>

There will be a number of stages in the preparation of Harlow's Core Strategy involving several rounds of public consultation. The stages of Harlow's Core Strategy preparation are set out in the following diagram:



The Issues and Options consultation followed a number of "initial" frontloading consultation exercises conducted between September 2007 and December 2009. This helped inform the content of the Issues and Options consultation document. Feedback from the 'initial frontloading' consultation work undertaken can be viewed on the Council's website at <a href="https://www.harlow.gov.uk/ldf">www.harlow.gov.uk/ldf</a> (follow the links to 'Core Strategy' and then 'LDF awareness raising and evidence gathering'). A number of technical evidence base documents also informed the content of the Issues and Options document which can be viewed at <a href="https://www.harlow.gov.uk/ldf">www.harlow.gov.uk/ldf</a> (follow the link to 'Evidence Base').

The consultation document sought views on the vision, themes and objectives that are being used to develop the Core Strategy. The document set out for consideration possible policy areas together with principles that would guide future development. It also included a consultant's assessment of five potential growth options around Harlow based on the policies set out in the East of England Plan. Although the East of England Plan will be withdrawn, the consultant's suggested growth options were included in the consultation document to allow the public and stakeholders to comment on broad options for growth around the town. The inclusion of the spatial options was a starting point to ensure that a range of potential options that could meet Harlow's current and future development needs were considered. The consultation intended to allow the public and stakeholders an early opportunity to identify strengths and weaknesses of the potential spatial options and not as a referendum on which option should be progressed. It also did not preclude the suggestion of alternative growth options and many respondents took the opportunity to make other suggestions in this consultation.

# 1.2 National Planning Context

Since the consultation took place the Government has provided more detail on the changes it proposes to make to the planning system. This is set out in the Localism Bill which is expected to be enacted in November 2011. Further guidance is also set out in the draft National Planning Policy Framework. One of the key changes is the abolition of Regional Strategies including the East of England Plan which means that this will no longer form part of the statutory development plan guiding development and change in Harlow. As the Council continues to prepare its plan for Harlow it will be necessary to respond to the provisions in the Localism Bill and incorporate the proposed changes to national planning policy being developed in the National Planning Policy Framework. This may require key elements of the evidence base to be reviewed to ensure a robust assessment of local social, economic and environmental conditions are fully understood. This may necessitate further public consultation before the Council's preferred strategy is submitted to the Government for public examination and final adoption.

### 1.3 Consultation Process

Public consultation is a key part in the development of Harlow's Core Strategy and Harlow Council is committed to involving the community in the preparation and development of all local planning policy documents in accordance with the methods set out in its adopted Statement of Community Involvement (SCI) 2007. An extensive and rigorous public consultation exercise was undertaken to publicise the Issues and Options document. The consultation period lasted for 10 weeks from 22 November 2010 to 28 January 2011. This exceeded the Council's commitment, set out in its SCI (page 10), to publish the Issues and Options document for public consultation for 6 weeks. A longer consultation was organised in recognition that consultation was run over the Christmas/New Year periods.

The Issues and Options consultation was structured around 31 questions consisting of a mixture of 'closed' (Yes/No, Agree/Disagree, Rank-Order) and 'open-ended' questions.

An 8-page Summary Leaflet was produced summarising the Core Strategy Issues and Options consultation document including the key issues, options for guiding future development and the consultant's suggested growth options. Care was taken to make sure readers were aware that the Summary Leaflet did not include all of the issues or

details that they may have wanted to comment on and so should not have been relied upon solely as the basis of any responses that were made.

Representations were received in the form of paper questionnaires, letters and emails, and via the Council's online planning consultation portal. After the consultation ended all the representations were uploaded into the consultation portal and can now be viewed online at <a href="http://harlow.jdi-consult.net/ldf/">http://harlow.jdi-consult.net/ldf/</a> The main report is therefore a summary of the main issues raised and an analysis of the responses received to the 31 questions.

The Issues and Options Consultation Document was subject to Sustainability Appraisal (incorporating Strategic Environmental Assessment) and The Habitats Regulations Assessment Screening Opinion as required under European law. Sustainability Appraisal systematically assesses the social, environmental and economic effects of policies and proposals contained within the Core Strategy and forms an integral part of the plan making process. The Issues and Options Sustainability Appraisal Report (SA) and the Habitats Regulations Assessment Screening Report (HRA) were prepared by consultants Scott Wilson Ltd and published separately for consultation so the public and stakeholders could make comments. Both documents were available to view online and hard copies were available at the Civic Centre, at all Harlow Libraries and at the community exhibitions. A summary of the responses received in relation to the SA are summarised in Appendix 3. Further appraisals will be carried out as the plan develops ensuring that sustainability considerations inform the development of policies and proposals.

An optional Equalities Monitoring Form was produced to collect demographic information about the respondents. This was designed to help identify any underrepresented groups so that an assessment can be made as to the best methods of targeting them in future consultations. An analysis of the demographic information collected in relation to this consultation is available to view in Appendix 5.

Care was taken to ensure all key stakeholders were engaged including residents, businesses and local/hard to reach groups, and that the consultation had regard to the latest regulations and guidance for consultation on Core Strategies. A summary of the main consultation activities that took place are set out below:

#### Notification Methodology:

- All consultees on Harlow Council's LDF Database were notified about the consultation directly by letter or by email. This included specific (statutory) consultees, neighbouring district, town and parish council's and the Harlow Civic Society (approx 1,800 contacts). See Appendix 7.1 to view a copy of the generic letter sent to LDF Database contacts.
- Bespoke letters together with copies of the Consultation Document, Summary Leaflet and Questionnaire, were sent to hard-to-reach groups including ethnic minority groups, faith groups, local schools, disability groups and sheltered housing tenants. See Appendix 7.2 to view a copy of a bespoke letter.
- CD-ROMs including electronic copies of the Consultation Documents and Summary Leaflet were sent to specific (statutory) stakeholders including East Herts and Epping Forest District Councils and to Essex County Council.
- CD-ROMs including electronic copies of the Consultation Documents and Summary Leaflet were sent to all Harlow Council Members.
- Members of the Harlow & District Chamber of Commerce were notified about the consultation via their monthly e-newsletter (December 2010).

 Hard copies of the Consultation Document were sent to all Members of the Council's LDF Panel and Environment Policy Working Group.

### **Community Exhibitions:**

- Community exhibitions were held at 10 locations across Harlow between 23 November 2010 and 12 January 2011 to enable local residents and other stakeholders to find out more about the LDF process and growth options included in the document (see Appendix 7.3).
- A permanent exhibition was located in the Civic Centre Reception throughout the consultation period (22 November 2010 28 January 2011).

### Press and Publicity

- A media briefing was held at the Civic Centre on Monday 15 November 2010 with Councillors Eddie Johnson and Tony Hall and planning officers to launch the public consultation exercise. The briefing was attended by reporters from BBC Radio Essex, Heart FM Radio, Harlow Star and Harlow Scene. A press release announcing the commencement of the consultation was distributed to media at the briefing and to other media contacts on the day. A copy of the press release can be viewed in Appendix 7.4.
- Extensive media coverage was received on the consultation including news stories on BBC Look East, BBC Essex Online and in local newspapers: <a href="http://www.harlow.gov.uk/about\_the\_council/council\_services/environment/plann\_ing/forward\_planning/local\_development\_framework/core\_strategy/issues\_and\_options/ldf\_media\_coverage.aspx">http://www.harlow.gov.uk/about\_the\_council/council\_services/environment/plann\_ing/forward\_planning/local\_development\_framework/core\_strategy/issues\_and\_options/ldf\_media\_coverage.aspx</a>
- A feature article was published on the Council's LDF web page and a news banner was placed on the Council's website homepage.
- A full page advert raising awareness of the consultation document and public exhibitions was printed in the Harlow Star and Harlow Scene newspapers (18 November 2010). See Appendix 7.5 to view a copy of the newspaper advertisement.
- A double-page feature article about the consultation appeared in Harlow Council's residents' magazine 'Harlow Times' which is delivered to all households in the district (Winter 2010). See Appendix 7.6 to view a copy of the Harlow Times magazine article.
- Posters were displayed in the Civic Centre, in local libraries and in vacant shop windows around Harlow Town Centre. See Appendix 7.5 & 7.7 to view a copy of the consultation posters.
- An article about the consultation was included in the Winter 2010 edition of the Council's LDF e-newsletter. This was distributed to over 600 registered contacts on Harlow's LDF database.

#### Availability of Documentation:

- The Consultation Document, Questionnaire and Summary Leaflet were available
  to the public and stakeholders to download online and hard copies were
  available to view at the Civic Centre, at all Harlow Libraries and at the 10
  Community Exhibition venues.
- Additional copies of the Consultation Document, Questionnaire and Summary Leaflet were available to meet any individual requests.
- Copies of the consultation document and questionnaire were also available on CD-Rom which were sent out following requests.

#### Harlow Youth Council Workshop:

- Although the activities listed above formed the principle elements of the consultation, on 17 January 2011 Forward Planning Officers also attended a meeting with the members of the Harlow Youth Council. This was to ensure that the consultation reached a cross section of age groups within the community.
- A presentation was given to the Youth Councilors to explain the purpose of the Core Strategy and the issues highlighted in the consultation document. Following this a workshop exercise was run to gather feedback the Youth Councilors on the issues that need to be addressed in the town and where new housing could be located. A summary of their responses and a copy of the presentation given at the event is available to view in Appendix 6.1 and 6.2.

# 1.4 Analysis of Overall Response

### Breakdown of Response

A total of 1,913 separate responses were received from private individuals, groups, organizations and developers to the Core Strategy Issues and Options Consultation Document. In response to the open ended questions set out in the consultation document 5,762 individual comments were received. Many of the public responses submitted in respect of the consultation were made by individual's resident outside Harlow District.

#### Response by Type

A statistical analysis of the overall consultation response has been undertaken including all private individuals, organisations and groups that responded. For the purposes of analysis, all private individuals (STOP Harlow North Campaign members and other individuals) have been divided into four geographically-based groups based on their residential addresses:

- Harlow District Residents
- Adjoining Parishes (in East Herts District) Residents
- Adjoining Parishes (in Epping Forest District) Residents
- Residents from Other Locations

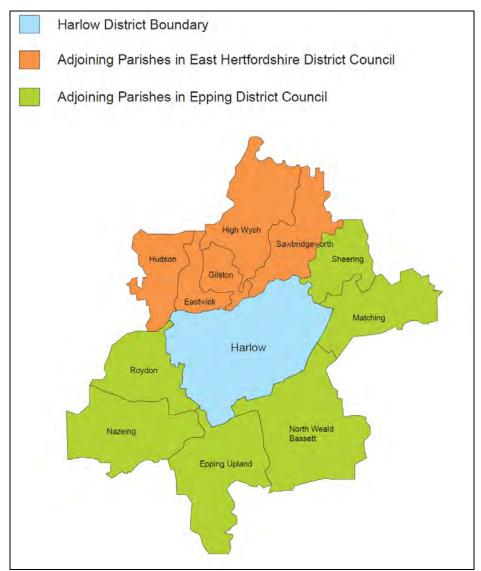
Table 1 presents a breakdown of the private individuals included within each group:

Table 1: Groupings of Private Individuals						
Harlow Residents	Adjoining Parishes East Herts Residents	Adjoining Parishes Epping Forest Residents	Residents from Other Locations			
Respondents from: -Harlow District Council	Respondents from:  -Hunsdon Parish -Eastwick Parish -Gilston Parish -High Wych Parish* -Sawbridgeworth Parish	Respondents from:  -Roydon Parish -Nazeing Parish -Epping Upland Parish -North Weald Bassett Parish -Matching Parish -Sheering Parish	Respondents from:  -East Hertfordshire Parishes (excluding those listed above) -Epping Forest Parishes (excluding those listed above) -All other locations (UK and Overseas)			

<sup>\*</sup>Although High Wych Parish does not directly adjoin Harlow District its close proximity to the town's northern boundary meant it was deemed appropriate to include its residents within this geographical grouping for the purposes of this analysis only.

The location of the parishes included within the "Adjoining Parishes (East Herts) Residents" and "Adjoining Parishes (Epping Forest) Residents" groups in relation to Harlow's District Boundary is indicated in the following illustrative map (see overleaf).

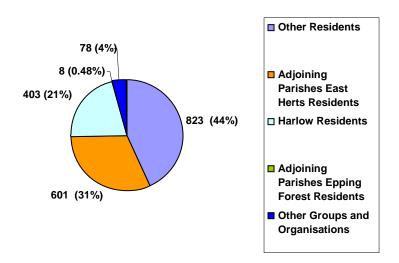
Map 1: Harlow District Boundary in relation to its neighbouring parishes in East Hertfordshire and Epping Forest Districts



Source: Harlow Council

In terms of the overall response, just over 20% (403) of the total responses received were from Harlow-based residents and 31% (601) were from residents of the five adjoining East Hertfordshire Parishes of Hunsdon, Eastwick, Gilston, High Wych and Sawbridgeworth together grouped as 'Adjoining Parishes East Herts Residents' (see Figure 1on following page 13). 8 responses (0.42%) were received from residents in the six adjoining Epping Forest Parishes to the south and south east of Harlow (Roydon, Nazeing, Epping Upland, North Weald Bassett, Matching and Sheering). 44% (823) of the responses were from residents located in other locations within East Hertfordshire and Epping Forest districts or in other parts of the UK and overseas. The remainder of the responses (78) were from other stakeholders including neighbouring district, parish and town councils, local developers and their agents, other business interests, specific (statutory) consultation bodies (including government bodies) and non-statutory interest groups.

Figure 1: Total Response – All Private Individuals Plus
Other Groups and Organisations



### Responses relating to a Planning Application affecting land North of Gilden Way

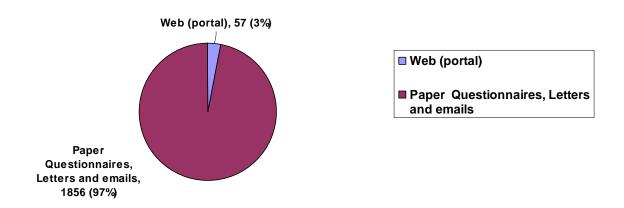
The Issues and Options consultation coincided with developers undertaking a consultation in connection with a planning application on land to the north of Gilden Way. 127 identical responses were received from private individuals who may have seen the consultation as an opportunity to make comments on this site specific issue. However these respondents have not been recognised as a formal group for the purpose of the analysis of these consultation results. The Gilden Way planning application, which was submitted to the Council on 28 February 2011, will be considered against the policies in the current Adopted Replacement Harlow Local Plan (2006) and other material considerations.

#### Responses by Source

Of the 1,913 responses received, 97% were returned paper questionnaires, letters and emails, and 3% (57) were submitted online through the Council's e-consultation portal (see Figure 2).

Whilst the response via the online portal was quite low it is noted that the Issues and Options consultation was the first major consultation exercise to be run online and a greater proportion of responses is expected to be submitted via the portal for future Core Strategy consultations as individuals and organisations become increasingly familiar with using the system.

Figure 2: Response by source for 1,913 private individuals, groups and organisations



### **Anonymous Responses**

Full contact details were requested to be submitted with all completed paper questionnaires so that respondents could be allocated a unique ID number and their responses could be uploaded by officers into the Council's online consultation portal. This electronic record is necessary in order to provide a transparent audit trail of all responses received and the individuals/organisations they relate to during the various stages of public consultation throughout the preparation of the Core Strategy. It also enables individuals and organisations to view and search for representations online.

Two questionnaires were received anonymously and therefore could not be added to the consultation portal or formally taken into account.

# 2.0 RESPONSES TO CONSULTATION QUESTIONS

This section of the report begins by presenting an analysis of the number of responses received by consultation question number. It then presents for consideration a statistical analysis of the responses to the 'closed' consultation questions and short summaries of the flavour of the 'critical' comments received in relation to the 'open-ended' questions, most of which are related to the closed questions preceding them.

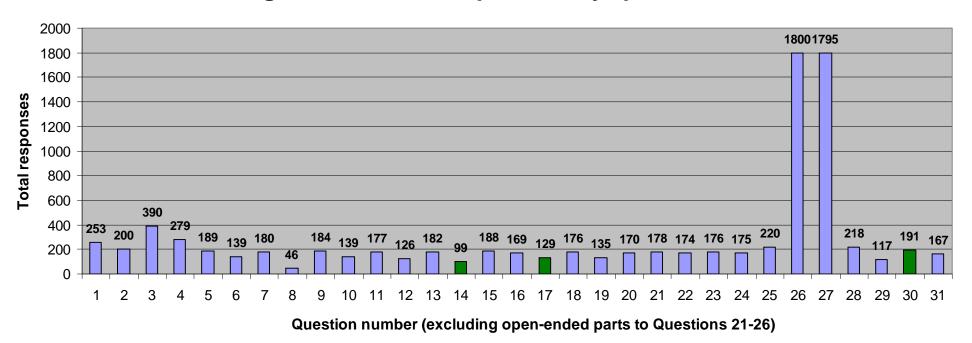
A more detailed statistical analysis of the responses to the closed questions has also been undertaken whereby the overall results have been refined into four sub-groups (as set out in Table 2) to enable a more detailed breakdown of the nature of the respondents. This more detailed analysis, along with more detailed summaries of the issues raised in relation to the open-ended questions, can be found in Appendix 1.

Table 2: Sub-Groups Used to Further Analyse Closed Question Responses in Appendix 1					
Sub-Group Name	Groups/Organisations included in Sub-Group				
Sub-Group 1 – Harlow Residents + Community Groups	<ul><li>Harlow Residents</li><li>Resident/Community Groups</li></ul>				
Sub-Group 2 – Statutory Consultees + Local Groups and Organisations	<ul> <li>Local Authorities, Parish Councils and County Councils</li> <li>Government Agencies and Departments</li> <li>Infrastructure and Utility Providers</li> <li>Faith Groups</li> <li>Local Groups and Organisations</li> <li>Partner Agencies</li> <li>Disability Groups</li> <li>Environmental Groups</li> <li>Ethnic Minority Groups</li> <li>Other groups</li> </ul>				
Sub-Group 3 – Adjoining Parishes Residents + Other residents	<ul> <li>Adjoining Parishes (East Herts) Residents</li> <li>Adjoining Parishes (Epping Forest) Residents</li> <li>Other Residents</li> </ul>				
Sub-Group 4 – Local Developers and Agents	<ul><li>Local Developers</li><li>Planning Consultancies/Agents</li></ul>				

#### Total Responses by Question

The total responses received by question number are provided in Figure 3. This shows Questions 26 and 27 received by far the highest number of responses (1,806 and 1,795 respectively), however this is attributed to the fact that they were the only questions that the members of the STOP Harlow North Campaign completed and, as noted, this group accounted for 76% of the total responses. Excluding Questions 26 and 27, the remaining questions all received a level of response that was within a range of between 46 and 396 responses, with an average rate of 196 responses received per consultation question.

Figure 3 - Total responses by question



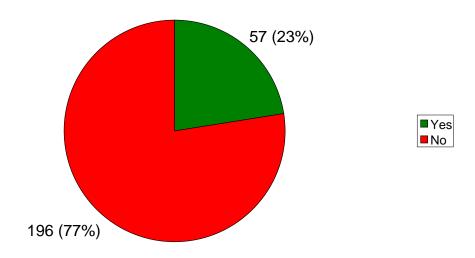
Questions 26 and 27 were responded to by STOP Harlow North Campaign.

Items in **green** denote rank order questions for which only approximate response numbers are given.

# 2.1 Summary of Responses – Chapter 2 – The Issues

Chapter 2 of the Issues and options consultation document included two questions designed to collect feedback on the key development issues identified through the 'initial frontloading' consultation work and evidence base studies as needing to be addressed by the Core Strategy. The outcome is summarised below. The respondents' full comments can be viewed online at <a href="http://harlow.jdi-consult.net/ldf/">http://harlow.jdi-consult.net/ldf/</a> or in person at the Civic Centre.

Question 1 - Do you think the Council has identified all the relevant issues that need to be addressed by the Core Strategy?



\*Figures may not add up to 100% due to rounding.

#### (253 Responses)

Overall, respondents strongly indicated that the issues needing to be addressed through the Core Strategy had not been fully covered within the Issues and Options consultation document. 77% of respondents to this question felt that there are other issues needing to be addressed, whereas only 23% felt that the consultation document had picked up all of the key issues. A more detailed statistical analysis of the responses to Question 1 can be viewed in Appendix 1 (page 52).



The majority of respondents felt there were additional issues that should have been addressed by the Core Strategy Issues and Options consultation; however the majority of the additional issues that were suggested were already identified within the consultation document except for climate change and the development needs of faith groups and an ageing population.

Question 2 was designed to collect comments on the additional issues that respondents think should be considered by the Core Strategy.

# Question 2 – If you disagree, what additional issues need to be considered by the Core Strategy?

200 comments were made in relation to other issues needing to be addressed by the Core Strategy; however it should be noted that many of the suggested 'additional issues' were already highlighted within the consultation document.

Infrastructure was the single biggest issue identified by the respondents as needing to be addressed. Respondents felt that a range of infrastructure improvements are necessary before any further significant growth takes place in Harlow in order to ensure that any such growth will be sustainable. Areas of infrastructure identified as needing improvement include the road and rail systems, water supply, drainage and sewerage disposal, health and education and community facilities. Comments were made that a by-pass / link road would be needed from the A414 to the M11. Comments were also made that growth will place more pressure on Harlow's existing roads and railway station whilst the development of more roads will damage local communities. Traffic congestion and parking were raised as existing issues needing to be addressed. A concern was also raised that the cumulative impact of growth of East Herts and Epping Forest districts will put more pressure on Harlow's healthcare services and facilities.

Respondents commented that new development should conform to the Gibberd Master Plan and that Harlow's existing green spaces, green wedges and open spaces should be safeguarded for future generations. Comments were also made that existing archaeological sites and agricultural land should be protected, and that the town park should be improved - but not relocated.

Regarding the Built Environment, respondents commented that consideration should be given to the needs of faith groups within the town in relation to any future growth. A number of respondents noted that climate change and sustainability should be key issues for consideration by the Core Strategy, including the need for carbon reduction, energy efficiency, and renewable energy and recycling.

In respect of housing, it was argued that more alternative options for the overall level of growth should have been offered in the consultation document, not simply the figure of 16,000 new homes that was designated for Harlow in the East of England Plan. Some respondents argued that any future growth should only be allowed if it supports local rather than regional housing needs. It was also commented that Harlow has an ageing population so consideration must be given to the requirements for Care Homes, Warden Assisted and sheltered housing and Day Centres for the elderly. A respondent argued that all new dwellings built should recognise the requirements of wheelchair users.

In addition to the general issues highlighted above, two technical comments were made regarding the content of this section of the consultation document. One respondent noted that theatre provision was inappropriately included within the Recreation, Sport, Leisure and Open Space section (Para 2.12.2) as this is guided by PPS4 as a town centre element. It was also noted that the statement in section 2.3 that "Greenfield development should be located in the north and east of Harlow" pre-empted the policy process. A more detailed summary of the comments made in relation to Question 2 can be viewed in Appendix 1 (pages 53 to 58).



The purpose of the Issues and Options consultation document was to set out all the key development issues affecting Harlow gathered from previous consultation work and evidence base studies, and to find out whether respondents agreed or disagreed with these issues or if there were any other issues the Council may have missed which will need to be addressed through the Core Strategy.

Over 250 responses were received in response to this question, almost all of the additional issues raised, with the exception of the three issues below, were already covered elsewhere within the consultation document. The three additional issues that will need to be considered during the preparation of the Core Strategy are:

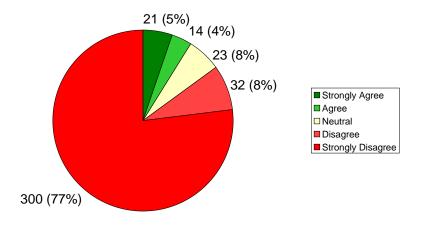
- Climate change mitigation and adaptation
- The development needs of faith groups
- The development needs of Harlow's ageing population

# 2.2 Summary of Responses – Chapter 3 – The Strategic Challenge

Chapter 3 considered the Council's District-wide approach to housing and regeneration to address the issues facing the town identified in Chapter 2. The need for a significant increase in the level of housing and jobs to generate the critical mass to secure Harlow's role as a key sub-regional centre was identified.

Questions 3 and 4 were designed to test opinion on the proposal in the East of England Plan for the provision of 16,000 new homes in Harlow as a starting point for the level of growth required to meet local needs.

Question 3 – Would the provision of 16,000 new homes in and around Harlow meet the current needs of the local community and help secure the regeneration of Harlow?



\*Figures may not add up to 100% due to rounding.

(390 Responses)

Overall, respondents strongly objected to the proposal put forward in the East of England Plan that 16,000 new homes would help address the underlying issues affecting Harlow by stimulating regeneration and renewal of the town. 85% of the 390 respondents either Strongly Objected or Objected to this proposed level of growth, compared to the 9% of respondents who said either Strongly Agreed or Agreed with this level of growth. A more detailed statistical analysis of the responses to Question 3 can be viewed in Appendix 1 (page 59).

Question 4 was designed to collect comments from respondents who objected to the overall level of growth for Harlow in the East of England Plan on what they thought the overall scale of growth should be.

Question 4 – If you disagree/strongly disagree, what do you think the scale of growth should be, ensuring that the Core Strategy addresses the particular issues facing Harlow?

279 comments were made in relation to this question. Overall there was strong support for meeting local housing needs, but not for the level of growth set out in the East of England Plan, and the housing provided to support local needs should be affordable.

There was no real consensus of how many houses should be provided in the Harlow Area. A few responses proposed a range from 800 to 16,000 to the year 2021 with a further 10,100 to 2031. Generally a range of around 4,000 to 5,000 new dwellings was suggested.

The link between regeneration and growth was questioned.

As indicated elsewhere in the questionnaire it was felt that the town's infrastructure would not be able to support development on the scale envisaged in the East of England Plan. A more detailed summary of the comments made in relation to Question 4 can be viewed in Appendix 1 (pages 60 to 61).



The majority of respondents did not appear to support the growth requirement for the Harlow Area set out in the East of England Plan. Following the withdrawal of the East of England Plan and the Government's publication of the Localism Act the Council is verifying future needs through reviewing the evidence base and the development necessary to address regeneration objectives.

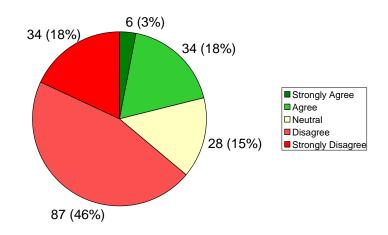
Part of this review will help identify the future housing requirements of the town. In considering the housing needs identified the Council will be also examining the infrastructure benefits that will accrue with different levels of growth. This will take into account the infrastructure provision that has been delivered in Harlow in recent years as a result of being identified as an area for growth.

## 2.3 Summary of Responses – Chapter 4 – Vision, Themes and Objectives

Chapter 4 included eight questions designed to receive feedback on the draft planning framework including the vision, themes and objectives that are being used to develop the Core Strategy.

Questions 5 and 6 looked at the visions and strategies being used to develop the overarching spatial planning vision for Harlow which will be provided by the Core Strategy.

Question 5 – Do the visions and priorities set out in the Community Strategy, the Council's Regeneration Strategy and the Council's Corporate Plan provide the basis to develop the vision for Harlow's Core Strategy?



\*Figures may not add up to 100% due to rounding.

#### (189 Responses)

The majority of respondents felt that more consideration needs to be given to the vision being developed for Harlow's Core Strategy. 64% of respondents Strongly Disagreed or Disagreed that the appropriate visions and priorities had been identified, whilst 21% Agreed or Strongly Agreed with the visions and priorities. A more detailed statistical analysis of the responses to Question 5 can be viewed in Appendix 1 (page 62).

Question 6 was designed to collect comments from respondents who disagreed with the proposed visions being used to develop the Core Strategy vision to find out what they wanted the Core Strategy vision to be based on.

<u>Question 6 – If you disagree/strongly disagree, what do you think the vision for the Core</u> Strategy should be based on?

139 comments were made in relation to the development of the vision for Harlow's Core Strategy. Many of the respondents felt that the approach based on housing growth of 16,000 homes and 8,000 jobs to provide a critical mass for regeneration had not been proven. These respondents felt that the strategy or vision for Harlow should be based on a more modest increase in growth (to meet local needs) and recognise the difficulties of creating so many jobs. A number of respondents did not believe that providing houses and jobs would regenerate the town.

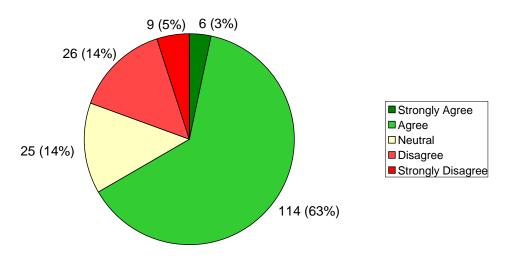
Comments were made that the current vision for Harlow (based on the Community Strategy) is inadequate, that the vision needs to be more ambitious, locally distinctive, and be in no doubt where the town is heading. Comments were also made that the vision should include wider issues that will seek to facilitate regeneration within Harlow. Others commented that regeneration and renewal were important aspects of Harlow's future and that the vision should be aspirational and not mundane. It was also argued that the vision (and growth options) should include references to the town centre and should be focused on making Harlow a magnet for business. A more detailed summary of the comments made in relation to Question 6 can be viewed in Appendix 1 (pages 63 to 64).



The Vision for the Core Strategy is based on the Council's Sustainable Community Strategy. This is currently being reviewed and the final vision for the Core Strategy will have regard to the new Sustainable Community Strategy vision focussing on delivering the Council's corporate priorities and tackling the issues highlighted by the evidence base.

Questions 7 and 8 looked at the themes being used to develop the Core Strategy. Five themes were identified to provide the basis for the development of the spatial strategy policy options – Placeshaping, Housing, Prosperity, Infrastructure and Lifestyles.

Question 7 – Do you think the Core Strategy themes cover the range of planning issues in Harlow?



\*Figures may not add up to 100% due to rounding.

(180 Responses)

Overall, there was general support for the Core Strategy themes, with over 66% agreeing that they reflect the broad range of issues affecting Harlow. A more detailed statistical analysis of the responses to Question 7 can be viewed in Appendix 1 (page 65).

Question 8 was designed to gather comments on any changes that respondents felt should be made to the Council's proposed Themes.

Question 8 – If you disagree/strongly disagree, what changes would you make to the Themes to ensure they address the range of planning issues in Harlow?

46 comments were received in relation to question 8. Of these, many stated that overloaded infrastructure including transport, sewerage, and hospital and GP services were issues that need to be resolved.

It was pointed out that the Themes should deal specifically with recognised topics that more clearly reflect Harlow as a place. This would make it easier for the issues, objectives and policy areas to identify matters that are specific to Harlow.

It was commented that the Themes should include a specific reference to the redevelopment of the town centre and surrounding neighbourhoods. Some commented that the Environment should have its own Theme and include a reference to protecting air, land and water. Others commented there should also be a theme which acknowledges the need for cross boundary working, co-ordination and governance issues.

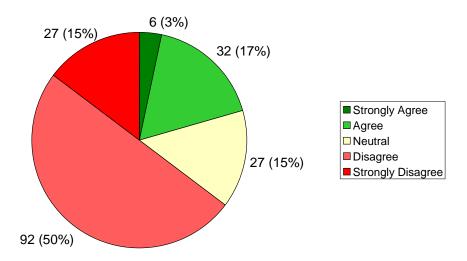
The following matters were also raised: appreciation of the regional purpose of the Green Belt; (the need to contain growth within the bowl of the Stort Valley, protecting the southern ridge line; more prominent and positive support for sustainable construction, carbon reduction and the use of renewable energy; need for formal co-ordinated working with adjoining potentially affected authorities, the setting of the town in relation to surrounding villages, joined up thinking with neighbouring authorities. A more detailed summary of the comments made in relation to Question 8 can be viewed in Appendix 1 (page 66).



There was general support for the existing Core Strategy themes. Some respondents felt that clarity could be improved and reference made to Town Centre redevelopment and cross-boundary working. The themes were devised to assist with the plan making process and the comments will be considered and adjustments made to reflect new issues as they emerge during the preparation of the Core Strategy.

Questions 9 and 10 related to the strategic objectives which will be used to underpin the development of policies and proposals to deliver the planning vision for Harlow. A series of objectives were proposed to address the range of issues identified in Chapter 2 of the consultation document. The proposed strategic objectives were set out in section 4.6.

# <u>Question 9 – Do the strategic objectives provide the necessary framework to deliver the regeneration of Harlow?</u>



\*Figures may not add up to 100% due to rounding.

### (184 Responses)

Overall, the view from the majority (65%) of respondents was that the strategic objectives would not deliver the vision for Harlow and therefore need to be revisited. However, 20% of respondents agreed or strongly agreed that the objectives would deliver regeneration, whilst 15% were neutral on the matter. A more detailed statistical analysis of the responses to Question 9 can be viewed in Appendix 1 (page 67).

Question 10 was included to gather comments on changes that respondents would like to see made to see made to the strategic objectives.

# Question 10 – If you disagree/strongly disagree, what changes would you make to the Strategic Objectives?

139 comments were made in relation to Question 10. Many respondents requested a number of specific changes be made to the Strategic Objectives.

It was also pointed out that the strategy does not state what is to be regenerated other than the Town Centre and there needed to be more focus on the delivery and implementation of the Strategy. It was also mentioned that the objectives should be fully funded before inclusion in the Core Strategy, that housing and employment growth should be linked, and that there should also be a stronger focus on redeveloping the hatches.

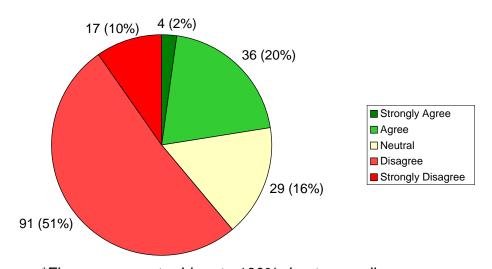
It was commented that joint or co-operative working should be a theme of the Core Strategy, with related objectives, given the regeneration agenda. Others questioned whether there is adequate evidence underpinning the objectives particularly where growth affects adjoining districts. A more detailed summary of the comments made in relation to Question 10 can be viewed in Appendix 1 (page 68).



The majority of respondents considered the Strategic Objectives proposed were not sufficient to regenerate Harlow. Respondents sought more clarity on the areas in need of regenerating (in addition to the Town Centre) and for there to be more focus on the regeneration of hatches; on the delivery and implementation of the Core Strategy, and on the evidence being used to underpin the Strategic Objectives. This level of detail is not appropriate for the Issues and Options stage but will be addressed in subsequent stages.

Questions 11 and 12 set out the Council's initial view on the potential core policy areas that could be developed to help achieve the strategic objectives and form the basis of the more detailed development management policies to guide future development in Harlow.

Question 11 – Do you think the policy areas identified cover the range of issues that are relevant to the regeneration of Harlow?



\*Figures may not add up to 100% due to rounding.

#### (177 Responses)

The majority of those who responded to this question did not think the core policy areas outlined in the consultation document covered the range of issues that need to be addressed in Harlow. However 22% of the respondents agreed that the core policy areas were appropriate to achieve the strategic objectives. A more detailed statistical analysis of the responses to Question 11 can be viewed in Appendix 1 (page 69).

Question 12 sought to identify any changes to the policy areas or additional policy areas that had been missed.

# Question 12 – If you disagree/strongly disagree, what changes would you make to the policy areas?

126 comments were made in relation to the Core Policy Areas. It was commented that the Core Strategy should include policies on dealing with climate change and on the urban fringe. In addition comments were made that the green wedge policy should be strengthened, updated evidence is needed to support retail policies (particularly when defining primary and secondary frontages) and that policies should include minimum requirements / targets in town centre regeneration. It was suggested that the policy on minimum density standards should be omitted and that the policy areas should be better grouped under the appropriate themes, particularly those relating to the development of the town centre.

Others commented that policy areas need to deal with the scope for a Green Belt review, the potential to release Greenfield land for housing, where insufficient previously developed land exists; and direction on how cross boundary growth options could be coordinated. These options need to be tested in the public domain. A more detailed summary of the comments made in relation to Question 12 can be viewed in Appendix 1 (page 70).



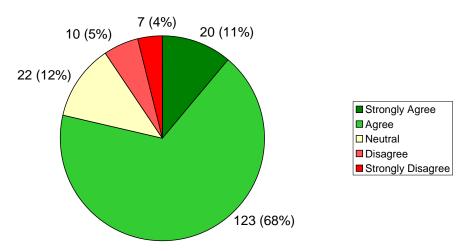
There was general support for the existing policy areas although the majority considered the range of issues that are relevant to regeneration had not been identified. However only policies for dealing with climate change and the urban fringe were identified as missing. Other respondents suggested that the policies supporting Green Wedges should be strengthened and that policy areas should be grouped under appropriate themes.

# 2.4 Summary of Responses – Chapter 5 – Guiding Future Development

Chapter 5 set out the Council's proposition that investment and growth is necessary to deliver regeneration across the District.

Questions 13 to 16 looked at a range of issues that will help inform the preparation of the Core Strategy, including the principles for directing new development, development densities and the role and function of open spaces, underused land and the Green Wedges. Questions 17 to 20 then focussed on the role, function and future development of the town's employment and retail centres.

# Question 13 – Do you agree that new development should be directed to areas that will maximise regeneration of the town?



\*Figures may not add up to 100% due to rounding.

# (182 Responses)

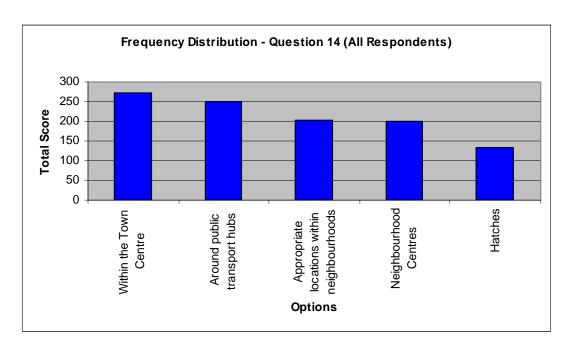
Overall, there was strong support (79% of respondents) for the adoption of regeneration as the guiding principle for directing development across the District. Appendix 1 (page 71) provides a more detailed statistical analysis of the responses to Question 13.



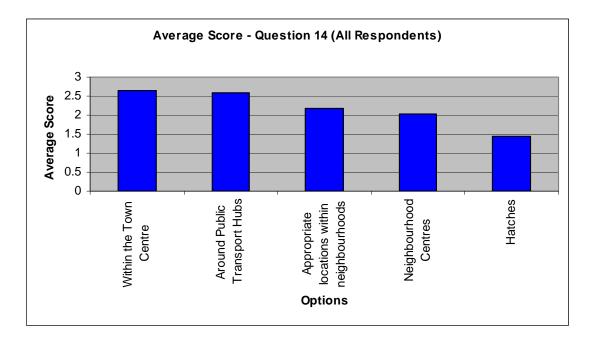
Although there is support for directing new development and housing growth towards areas that will maximise the overall regeneration benefits to the District, it was not considered a high priority when directing growth in and around Harlow in Question 17.

# <u>Question 14 – Please rank, in order of priority, where you think higher densities of development should go within the District? (1 = highest priority, 5 = lowest priority).</u>

Respondents were asked to rank five options where high density development should go in the District, from their highest priority to their lowest priority (1 being their highest and 5 being their lowest). Each option received an average of 99 responses (Figure 5). A point scoring system was used to compare the responses to each option. The 'Frequency Distribution' reports the total score for each option. This was calculated by awarding a score of 4 points to each option every time it was ranked as the highest priority down to zero points if it was ranked as the lowest priority. The total points awarded for each option were then added up to calculate the 'total scores' for each option.

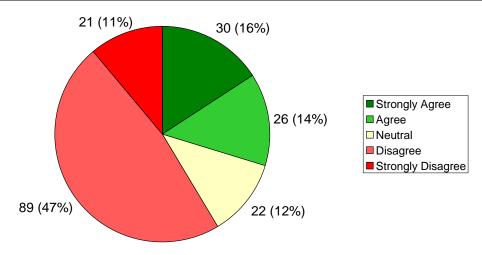


The second chart shows the 'average score' for each option. This was calculated to remove any bias that may have been caused as a result of any single option receiving a disproportionately large number of responses (i.e. some respondents may have only scored one option rather than all five).



Overall, respondents considered the town centre and 'around public transport hubs' to be the most suitable locations for higher density development. After these, neighbourhoods and neighbourhood centres received almost identical scores ahead of hatches which were regarded as the least suitable of the five options provided. A more detailed statistical analysis of the responses to Question 14 can be viewed in Appendix 1 (pages 72 to 76).

# <u>Question 15 – Should the Council consider underused open spaces and other undeveloped land for development before considering releasing land in the Green Belt?</u>



\*Figures may not add up to 100% due to rounding.

### (188 Responses)

More than half (58%) of respondents did not believe underused open spaces and undeveloped land should be used for future development. This compared to 30% of respondents that viewed these as favourable options ahead of releases of the Green Belt to meet new development within the urban area boundary. A more detailed statistical analysis of the responses to Question 15 can be viewed in Appendix 1 (page 77).



Overall there was a lack of support for the development of green spaces and undeveloped land and these were not favoured to be developed before Green Belt. The Council is reviewing its evidence base to consider how to balance future development needs and the protection of the spaces valued by the community.

Question 16 – The Green Wedges have performed a variety of roles in shaping Harlow. Should the roles of Green Wedges be reviewed to meet future development needs in the Harlow area?

Question 16 was an open-ended question which received 169 responses. 40 respondents opposed the principle of reviewing the roles of Green Wedges and 70 stated that they should not be developed on at all. Three responded that they should only be developed as a last resort and two said it would set a dangerous precedent resulting in the loss of all Green Wedges. One proposed that it would be better to build on the Green Belt than destroy Green Wedges, whereas four stated the opposite. Comments were made that they perform important recreational, health/quality of life and movement functions (18) as well as an important flood protection role (16). Others argued access to Green Wedges needs improving (18).

In contrast, 11 respondents wanted a review of the roles of Green Wedges generally, and 12 agreed they should be reviewed but only to be strengthened, improved or enhanced. A further two favoured a review but only to widen roads to ease traffic congestion.

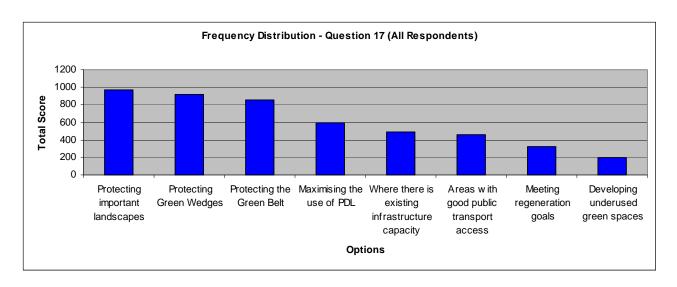
A number of respondents gave more qualified support for a review of Green Wedges. Four considered they should be reviewed where new Green Wedges are required to serve new urban extensions, and three supported a review in order to build things that would benefit neighbourhoods such as schools, leisure facilities and retail facilities. Two concluded only poor quality open spaces should be reviewed, and one said development should be allowed on Green Wedges to enable regeneration, providing there were swaps to enable new Green Wedges to be provided elsewhere. A more detailed summary of the comments made in relation to Question 16 can be viewed in Appendix 1 (page 78).

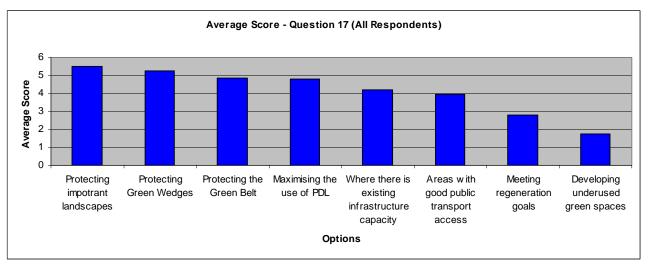


National Planning Policy requires local authorities to undertake assessments of the open spaces within their districts to ensure that the open spaces, including green Wedges, continue to provide a valuable function to meet the needs of residents and visitors. The Council is undertaking an Open Space Assessment which will analyse of the wider green infrastructure network and open space priorities for Harlow.

Question 17 – Please rank, in order of priority, the most important things that you think should direct new development in and around Harlow. (1 = highest priority, 8 = lowest priority).

Respondents were asked to rank eight options for directing new development in and around Harlow from their highest priority to their lowest priority, 1 being their highest and 8 being their lowest. Each option received between 119 and 182 responses. As for Question 14, a points scoring system was used to compare the responses to each option (page 27). The 'Frequency Distribution' chart reports the total score for each option. The second chart shows the 'average score' for each option.



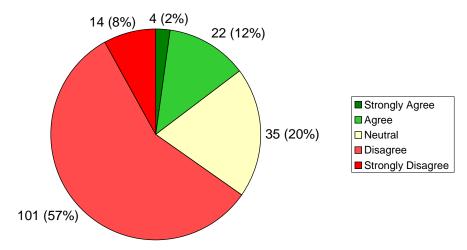


Both charts reveal that respondents value Harlow's natural landscapes, Green Belt land and Green Wedges and want to protect these from development. 'Previously Developed Land' (PDL) and areas with existing infrastructure and good public transport links were ranked by respondents as their third, fourth and fifth priorities respectively in terms of factors that should direct new development. Meeting regeneration goals and development of underused green spaces received the lowest total and average scores overall. A more detailed statistical analysis of the responses to Question 17 can be viewed in Appendix 1 (page 79 to 83).



Respondents' priority was to firstly protect Harlow's natural landscapes, then the Green Wedges and then the Green Belt. Preference was given to maximising the use of Previously Developed Land and locating development where there was infrastructure capacity and good public transport before directing development to meet regeneration goal. However respondents to Question 13 supported the principles of directing development to areas that will bring regeneration benefits to the town as a whole.

# <u>Question 18 – Do the existing employment areas meet current and future employment needs?</u>



\*Figures may not add up to 100% due to rounding.

### (176 Responses)

Respondents have given a strong indication that Harlow's existing employment areas are not responsive to current employment and business needs. 65% of respondents disagreed that the town's current employment areas are appropriate for satisfying current and future employment and business needs against just 14% who felt their current roles, functions and locations were satisfactory. A more detailed statistical analysis of the responses to Question 18 can be viewed in Appendix 1 (page 84).

Question 19 was included to gather comments on the changes that should be made to Harlow's employment areas.

Question 19 – If you disagree/strongly disagree, please explain what changes you think should be made to Harlow's employment areas?

135 responses were received to this question. There was considerable variation in the comments. Some argued that no changes should be made to Harlow's employment areas, others argued they need reviewing / regenerating / redeveloping and more investment to ensure they are fit for modern requirements.

Requests were made to improve the connectivity of existing employment areas, particularly to the Town Centre and areas to the north and west, and to improve public transport links to Templefields/Edinburgh Way and The Pinnacles. Improvements to the public realm in The Pinnacles to attract inward investors were proposed.

It was noted there is vacant employment land in Harlow and a suggestion was made to consolidate employment land within Templefields/Edinburgh Way and The Pinnacles so remaining land can be used for other purposes to help meet the Council's broader regeneration goals.

Suggestions were made for new employment areas to be created in the north east and east. There was particular support for new employment areas to be designated in the south east and south which would have good access to the M11 motorway junction (J7), avoiding the need for employment-related traffic to pass through the town. There were also supporters and objectors to the concept of extending The Pinnacles.

It was suggested that any large urban extension should include a new high technology business site to attract growth sector 'knowledge industry' jobs. A suggestion was also made to designate the industrial area at Staple Tye as a regeneration area for a new mixed-use development and to relocate existing industrial units there to The Pinnacles and Templefields/Edinburgh Way.

There were supporters and objectors to the idea of using of employment sites for housing whilst one respondent suggested employment and housing areas should be integrated to reduce car use and integrate communities.

Other suggestions included encouraging more manufacturing firms and professionals to locate in Harlow, to create more small home-based work units and the need to include employment land provision within any urban extensions. There were also respondents who argued that employment areas should be used to provide jobs for Harlow people. A more detailed summary of the comments made in relation to Question 19 can be viewed in Appendix 1 (pages 85 to 87).



The quality of the town's employment areas are considered to be unsatisfactory, with Templefields and The Pinnacles having poor connectivity and public realm. In light of the changes being made to the planning system, the Council is undertaking an Employment Land Review to assess the performance of the current employment areas, and will be looking to take options forward for improving these areas in the Core Strategy.

# <u>Question 20 – How do you think Harlow Council should shape future shopping development within the town?</u>

Question 20 was an open-ended question which received 170 responses. There was strong support for new retail development being located in the Town Centre, and that there should be no more retail development located in Edinburgh way.

People considered that the existing shopping hierarchy should be maintained and existing centres should be audited for their role, vitality, viability and the ability to incorporate new development.

Overall it was proposed that there should be a more considered approach to Town Centre Strategy and the role that the Centre plays in the town, particularly when viewed in the light of potential growth. There was concern about the potential impact of new shopping centres outside of Harlow, particularly Westfield at Stratford. A more detailed summary of the comments made in relation to Question 20 can be viewed in Appendix 1 (pages 88 to 90).



There was support from respondents for maintaining the existing shopping hierarchy in Harlow, with the Town Centre retained as the main focus for retail development and restricting any further expansion of the retail offer at Edinburgh Way. The Council is continuing to examine the role and function of the retail centres across the District (including the Town Centre, Edinburgh Way, Neighbourhood Centres and Hatches) to ensure they meet the current and future retail needs of the local community.

# 2.5 Summary of Responses – Chapter 6 – Spatial Options for Growth

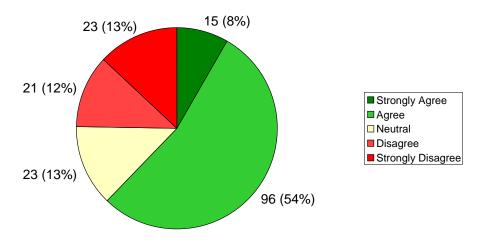
Chapter 6 focussed on the issue of growth around Harlow. Policy HA1 of the East of England Plan designated Harlow as a major regional housing growth point, with 16,000 new houses to be delivered within the 'Harlow area' by 2021. The Plan specifically added that this new housing should be provided in the existing area of the town through selective renewal and redevelopment, including mixed use development in the town centre, and through urban extensions in the adjoining districts to the north, east, and on a smaller scale the south and west. As required by the East of England Plan, and on behalf of Harlow, Epping Forest and East Hertfordshire District Councils, a consultant was appointed to appraise the possible growth options in order to inform the preparation of the Core Strategy. Although the East of England Plan is being withdrawn, the consultant's assessment of five potential growth options around Harlow based on the East of England Plan were set out in the consultation document as a starting point for exploring potential options to meet Harlow's current and future regeneration and housing needs. This, it is stressed, did not represent the Council's preferred approach.

Questions 21 to 26 asked respondents for their views on the consultants' assessments in relation to the five potential growth options (Options A to E), as well as on the consultants' suggested spatial approach to accommodating growth around Harlow. The questions were specifically worded in this way in order to try to avoid the consultation becoming a choice between each growth option. It should be noted however that many of the responses in relation to these questions may have reflected the respondents' views on each option, or on the merit of the distribution of the growth within an option, rather than their views on the consultants' 'findings' regarding each option which was the question being asked. The responses received in relation to each option should therefore be interpreted with care. Question 27 asked respondents for their general comments on the approach to growth around Harlow.

# Question 21 – What is your view on the consultants' recommendations regarding option A?

Option A was based on requirements set out in Policy HA1 of the East of England Plan and placed the bulk of growth to the north of Harlow, together with some growth to the east and smaller elements to the south and west. An illustration of the distributions of development based on this approach can be viewed in Appendix 1 (page 125). The consultants rejected this as a reasonable option primarily because there would be insufficient time available for the key transport infrastructure required for this spatial option

to be delivered. A more detailed summary of the consultants' findings in respect of this option are available in section 6.7.3 of the Issues and Options consultation document.



\*Figures may not add up to 100% due to rounding.

### (178 Responses)

62% of respondents agreed with the consultants' findings regarding Option A, whilst 25% disagreed with their recommendations in relation to this option. A more detailed statistical analysis of the responses to Question 21 can be viewed in Appendix 1 (page 91).

42 respondents stated that development to the north will split the town and is unlikely to feel like part of Harlow. Concerns were expressed regarding connectivity problems across the Stort with a number of respondents stating that connections between Harlow and Harlow north would very difficult to achieve financially and environmentally.

Concerns were raised about the impact this option would have on the historic villages of Hunsdon and Eastwick. Concerns were also raised about the long-term integrity of the Green Belt, given the lack of natural or man made barriers to prevent further urban sprawl. Many respondents from East Hertfordshire expressed the view that land within Harlow should be used before land outside Harlow in East Hertfordshire.

However, some respondents viewed this option positively because of its potential to allow new infrastructure to be provided all in one place, rather than spreading the burden around existing areas of Harlow. Some Harlow residents also favoured development to the North of Harlow in order to safeguard Harlow's Green Wedges.

The view was expressed that this option is predicated on the East England Plan, which is no longer relevant because of the Localism Bill and the impending abolition of the Regional Strategies. Other respondents drew attention to methodological irregularities in the way Scott Wilson have created and appraised these options and suggested that the findings of the study are invalid. Option A was also seen as a very high risk strategy by some respondents since it places the majority of Harlow's future development in a single site which is outside the control of Harlow Council.

Respondents suggested that Harlow's evidence base shows that large-scale urban extensions to the east would have the least environmental impact. Respondents also cited The East of England Plan Panel Report conclusion that the east of Harlow is the least

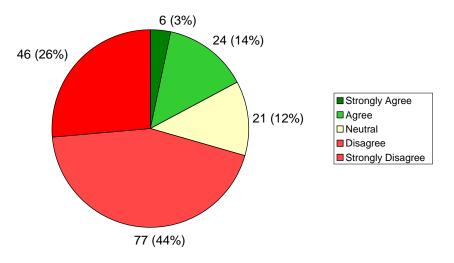
constrained option for growth. For these reasons, the low level of development put forward in this Option in East Harlow was questioned.

Water Cycle Strategies, Flood Risk Assessments and the Sequential Test were seen as important in shaping the future location and scale of growth in Harlow. From an educational perspective it was questioned whether such a large allocation to the north would utilise existing educational capacity in Harlow.

It was questioned whether this option would facilitate the regeneration of Harlow. The methodology utilised by consultants to consider whether development in any location would support regeneration was questioned. A more detailed summary of the additional comments received in relation to Option A can be viewed in Appendix 1 (pages 92 to 93).

# Question 22 – What is your view on the consultants' recommendations regarding option B?

Option B reflected the broad directional and distributional elements of the growth requirements set out in Policy HA1 of the East of England Plan but did not focus the bulk of the new housing provision to the north of Harlow. Instead it examined the opportunities and constraints associated with a number of potential alternative locations around Harlow but which still reflected the general overall approach set out in the guidance of Policy HA1. An illustration of the distributions of development based on this approach can be viewed in Appendix 1 (page 125). The consultants suggested that this would be a reasonable option with more housing growth for the area west of Harlow and greater growth explored to the east and south than option A, and that a proportionate distribution between locations north and south may help to provide critical mass to assist regeneration. A more detailed summary of the consultants' findings in respect of this option are available in section 6.7.6 of the Issues and Options consultation document.



\*Figures may not add up to 100% due to rounding.

#### (174 Responses)

Overall, the majority of respondents (70%) disagreed with the consultants' findings regarding Option B, whilst 17% agreed with their recommendations in relation to this option. A more detailed statistical analysis of the responses to Question 22 can be viewed in Appendix 1 (page 94).

Methodological concerns are raised about Scott Wilson's report and the way in which all spatial options were derived. Concerns were raised that the policy-led approach followed in Option B is based on Policy HA1 of the East England Plan, which is in the process of being withdrawn through the Localism Bill. It was therefore questioned whether such a top-down policy approach was appropriate to shape future development of Harlow, given the bottom-up Localism agenda being pursued by the current Government.

Concerns were expressed about coalescence with Roydon, given the 2,800 dwellings earmarked for development to the west in Option B. Concerns were also raised about coalescence with Sawbridgeworth to the north east. Concerns were raised regarding the level of growth in the south, with a number of respondents expressing the view that any development should not breach the sky line of Rye Hill ridge.

A number of respondents felt that development to the north of Harlow is inappropriate due to the environmental impact on sensitive landscape areas. A number of respondents also felt that directing only 3,300 dwellings to the east of Harlow fails to make use of the least environmentally sensitive land.

A number of questions were raised regarding the spatial distribution of growth and its ability to deliver infrastructure and the regeneration of Harlow. By distributing growth across Harlow more evenly, a number of respondents questioned whether Option B would deliver infrastructure in a comprehensive way. A number of respondents suggested that large scale growth to the north of Harlow could deliver infrastructure required in one location in a more deliverable way. For these reasons some respondents felt that directing only 3,300 new dwellings to the north would be a wasted opportunity.

Some respondents also questioned whether spreading development to a number of different locations would have the same transformational and catalytic effect as large scale development to the north of Harlow. However, many local residents also felt that growth to the north of the Stort would fail to integrate with Harlow and take the form of an independent and competing settlement.

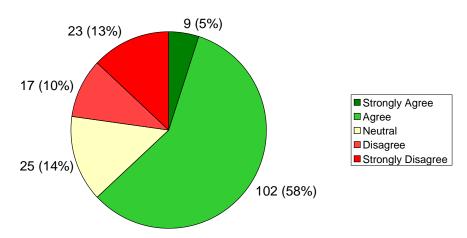
A number of respondents stated that it was unclear how this spread of developments would assist in regenerating deprived neighbourhoods in Harlow. A number of respondents felt that development in the south should be in conjunction with the redevelopment of existing deprived areas.

It was pointed out that Water Cycle Strategies and Strategic Flood Risk Assessments should inform the scale and location of development. Concerns were raised about the sewerage infrastructure required to serve new development and the need for upgrades to the Rye Meads Sewerage Treatment Works. A more detailed summary of the additional comments received in relation to Option B can be viewed in Appendix 1 (pages 95 to 97).

### Question 23 – What is your view on the consultants' recommendations regarding option <u>C?</u>

Option C focussed on locations to the east of the town as the main area of search with less development to the south and west. This approach was based on an assessment of a range of specific environmental criteria including the Green Belt, landscape sensitivity, flood zones, regeneration, objectives and transport accessibility but disregarded the specific strategic directions for growth set out in the East of England Plan. An illustration of the distributions of development based on this approach can be viewed in Appendix 1

(page 126). The consultants suggested this would not be a reasonable option, primarily because it did not conform to Policy HA1 of the East of England Plan, particularly its requirement for an extension to the north of Harlow. A more detailed summary of the consultants' findings in respect of this option are available in section 6.7.10 of the Issues and Options consultation document.



\*Figures may not add up to 100% due to rounding.

#### (176 Responses)

63% of respondents agreed with the consultants' findings regarding Option C, whilst 23% disagreed with their recommendations in relation to this option. A more detailed statistical analysis of the responses to Question 23 can be viewed in Appendix 1 (page 98).

In light of the pending revocation of The East of England Plan (EEP) many respondents questioned whether Option C should have been rejected by consultants because it did not contain development to the north of Harlow and was therefore not compliant with the Policy HA1 of the EEP. A number of respondents cited Scott Wilson's analysis which showed that Option C is a sustainable option and stressed that whether this option complies with the RSS is no longer relevant. Other respondents argued that The East of England Plan remains part of the Development Plan for Harlow, so the consultant's conclusions about this option are valid. Methodological concerns were raised about Scott Wilson's report and the way each spatial option was derived from the assessment of Spatial Land Areas. These irregularities drew some to conclude that the findings of this study are invalid.

Concern were expressed by respondents about the impact this Spatial Option would have on traffic congestion with a number of respondents questioning the capacity of the road system to cope with growth to the east and south of Harlow. However, many other respondents questioned whether certain spatial options can be discounted because of traffic concerns with many pointing out that all options proposed would increase congestion.

Concerns were raised about development to the south and its potential impact on Rye Hill ridge. Some respondents stressed that growth to the east is preferable in terms of Green Belt as the M11 provides a definitive boundary to further expansion. Some respondents also favoured growth to the east, when compared to growth to the north, on landscape sensitivity grounds.

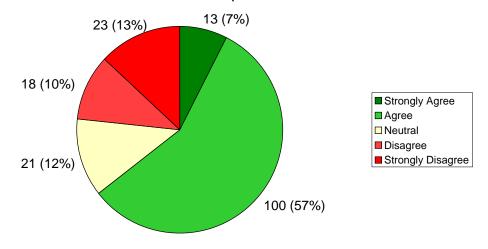
It was pointed out that Water Cycle Strategies and Strategic Flood Risk Assessments should inform the scale and location of development. Concerns were raised about the sewerage infrastructure required to serve new development and the need for upgrades to the Rye Meads Sewerage Treatment Works.

Concerns were raised about the impact of this option on educational infrastructure, particularly the impact on Passmores and Stewards Schools. A more detailed summary of the additional comments received in relation to Option C can be viewed in Appendix 1 (pages 99 to 100).

## Question 24 – What is your view on the consultants' recommendations regarding option D?

Option D examined a distribution of housing based upon securing the greatest potential regeneration benefits for locations within Harlow. This option again focussed on growth to the north of Harlow but with smaller but similar distributions to the east and south with a small amount to the west. An illustration of the distributions of development based on this approach can be viewed in Appendix 1 (page 126).

The consultants felt this was not a reasonable option due to transport and sewerage constraints associated with high levels of development to the north which, they concluded, meant there was an unacceptable risk that the option might not be fully implemented. A more detailed summary of the consultants' findings in respect of this option are available in sections 6.7.14 to 6.7.16 of the Issues and Options consultation document.



\*Figures may not add up to 100% due to rounding.

#### (175 Responses)

64% of respondents agreed with the consultants' findings regarding Option D against 23% who disagreed with their recommendations on this option. A more detailed statistical analysis of the responses to Question 24 can be viewed in Appendix 1 (page 101).

Development to the north was viewed by a number of respondents as being problematic because of inadequate transport connections and sewerage constraints. However, other respondents felt that transport and sewerage constraints to the north are over-exaggerated by the consultants.

Concerns were raised about the impact of development to the north with respect to environmental impact, landscape sensitivity, flooding, southern ridge line and the impact

on the historic villages of Hunsdon and Eastwick. Concerns were also raised about the long-term integrity of the Green Belt, given the lack of natural or man made barriers to prevent further urban sprawl to the north. The emphasis for a number of respondents was that the Green Belt should be protected. A number of respondents stressing that opportunities to bring forward vacant Brownfield sites should be explored before development takes place on the Green Belt.

Some respondents raised concerns that this spatial option places a lot of reliance on building in East Hertfordshire. This was highlighted by some as being a significant risk. Other respondents drew attention to methodological irregularities in the way Scott Wilson have created and appraised these options and suggested that the findings of the study are invalid.

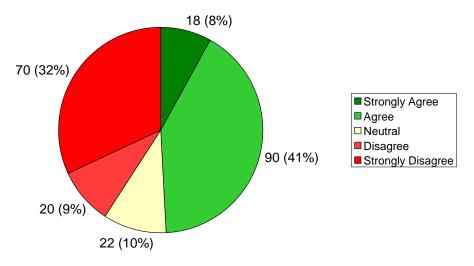
Respondents questioned Scott Wilson's approach to assessing the impact on the regeneration of Harlow. Methodological concerns were raised about the way in which consultants scored different land areas, which was not seen to mirror the reality on the ground in Harlow. Respondents also drew attention to a section of the Scott Wilson report which warns that major growth to the north could negatively impact efforts to regenerate the town by creating a separate new extension that would divert investment away from Harlow. These respondents were concerned that this point seems to have been overlooked when formulating Option D. To regenerate Harlow, a number of respondents expressed the view that there needs to be close proximity between new development and the existing neighbourhoods. Some respondents felt that development to the north of the Stort is likely to link with Hertford and Bishop Stortford, rather than Harlow.

Concerns were expressed by respondents about the impact this Spatial Option would have on traffic congestion with a number of respondents questioning the capacity of the road system to cope with growth to the south of Harlow. However, other respondents questioned whether certain options can be discounted because of traffic concerns, pointing out that all options proposed would increase congestion.

Some respondents felt that Option D fails to utilise the environmentally least sensitive land, which was seen to be to the east. A more detailed summary of the additional comments received in relation to Option D can be viewed in Appendix 1 (pages 102 to 103).

## <u>Question 25 – What is your view on the consultants' recommendations regarding option E?</u>

Option E was based upon the identification of potential broad locations for new housing and distributions based upon areas that can benefit from sustainable transport provision. This option focussed growth to the east of Harlow with smaller distributions to the west and north. It showed distributions that would have sufficient critical mass to support regeneration and the provision of key infrastructure close to existing rail stations together with enhancement of cycle ways and footpath links. An illustration of the distributions of development based on this approach can be viewed in Appendix 1 (page 127). The consultants did not feel this was a reasonable option primarily in light of transport and sewerage constraints associated with high levels of development allocated to urban extensions to the north. A more detailed summary of the consultants' findings in respect of this option is available in section 6.7.19 of the Issues and Options consultation document.



\*Figures may not add up to 100% due to rounding.

#### (220 Responses)

49% of respondents agreed with the consultants' findings regarding Option E, whereas 41% disagreed with the consultants' recommendations on this option. A more detailed statistical analysis of the responses to Question 25 can be viewed in Appendix 1 (page 104).

Option E was supported by a number of respondents because it was seen to be the most likely to increase use of sustainable transport, walking and cycling and reduce congestion. It was pointed out that this option would be reasonable were it not in conflict with the East England Plan, which is in the process of being revoked.

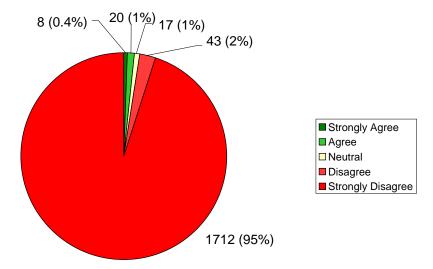
However, concerns were expressed about coalescence with Roydon, Sawbridgeworth and Sheering. Respondents felt that development on land north of Gilden Way would be inappropriate due to the potential impact on sensitive landscapes and archaeological areas, traffic congestion and flooding. However, other respondents suggested that growth to the east could facilitate a future new M11 junction and sustainable transport measures. Other respondents suggested that there needs a new link to the M11 and sustainable transport before development takes place.

A number of respondents supported this spatial option because it did not involve growth to the south and would therefore safeguard the southern ridge line. Respondents suggested that development on Green Belt to the east is preferable as it would be contained by the M11. Respondents suggested that development to the east would integrate better with Harlow and the existing road network and railway stations. Respondents stated that the scale of development to the south and west needs to be sufficient to support the regeneration of deprived areas of Harlow.

Respondents drew attention to methodological irregularities in the way Scott Wilson have created and appraised these options and suggested that the findings of the study are invalid. Respondents also questioned the conclusions of consultants about sewerage constraints. These respondents stressed that all sewerage upgrades and upgrades to Rye Meads will be required irrespective of the location of growth and it is therefore misleading to reject growth in particular locations due to sewerage constraints. A more detailed summary of the additional comments received in relation to Option E can be viewed in Appendix 1 (pages 105 to 106).

## <u>Question 26 – What is your view on the consultants' suggested approach to accommodating growth around Harlow?</u>

This question asked people to state if they agreed or disagreed with the consultants' suggested approach to accommodate housing growth around the town. An illustration of the distributions of development based on this approach can be viewed in Appendix 1 (page 127). This was one of the two questions that the STOP Harlow North Campaign group responded to (the other being Question 27) and therefore received 1,800 responses - 81% (1,462) of which were submitted by the STOP Harlow North campaign group.



\*Figures may not add up to 100% due to rounding.

#### (1,800 Responses)

97% of respondents disagreed with the consultants' suggested approach whilst just 1.4% agreed with this as the most appropriate option. A more detailed statistical analysis of the responses to Question 26 can be viewed in Appendix 1 (page 107).

Each direction of growth (north, south, south west and east) had both its supporters and objectors. Overall on balance people were concerned and wary about the consultant's approach to growth at all points of the compass for a variety of reasons. These included potential flooding; breaching the surrounding ridgeline; not needed; unsustainable; use of farmland; split the town north/south.

In particular there was concern that the approach was "out of date" now that the East of England Plan was likely to be revoked. Indeed it was felt that following the abolition of the East of England Plan, the favoured option was 'C', the constraints led approach.

As expressed elsewhere there were concerns over the ability of the town's infrastructure to cope with the level of growth proposed. Some people expressed objections to expansion into the Green Belt. A more detailed summary of the comments received in relation to the consultants' suggested approach can be viewed in Appendix 1 (pages 108 to 111).



#### Observations to the Responses A - E

Options A to E where developed by consultants to help test and assess the level and location of housing growth as set out in Policy HA1 of the East Of England Plan for the Harlow Area.

The consultants identified different policy approaches that could be used to derive a range of different spatial options. These were as follows:

- Option A An approach based on the directional and distributional elements of Policy HA1.
- Option B An approach based on the directional and distributional elements of Policy HA1 but without a concentration in the north.
- Option C An approach that sieves out constraints such as unsuitable land.
- Option D An approach that examines regeneration benefits.
- Option E An approach based on the benefits of existing or enhanced transport provision.
- The Consultants' Suggested Approach An approach suggested by the consultants based on an assessment of all the other options.

This enabled an assessment of how realistic and sustainable each of the resulting spatial options were for consideration during the preparation of the spatial strategy. The Council considered it was appropriate to consult on this work to find out if a particular approach was preferred.

The responses were generally in support of the consultants' conclusions that the resulting spatial options A,C,D and E, generated from the different approaches, were not reasonable. For Option B respondents did not agree with the consultants' conclusion that this was a reasonable spatial option, providing development was lower to the west and higher to the east and south of Harlow. Option E, was based on enhancing transport but the consultants considered this was not a reasonable spatial option; there were nearly the same number responses which disagreed as agreed with this option. Most respondents disagreed with the consultants' suggested spatial approach.

In retrospect the questions and text were worded in a way that was unclear whether the respondents' were taking into consideration each option as shown on the diagrams, or the approach, or the consultants' assessment of the resulting spatial options arising from that approach.

## Question 27 – do you have any other comments on the approach to growth around Harlow?

This question was designed to gather any additional comments that people may have wanted to express regarding the approach to growth around Harlow. This was the second of the two questions that the STOP Harlow North Campaign group responded to and consequently received 1,795 comments and (as with Question 26), 81% of these were submitted by the Stop Harlow North Campaign group.

A significant number of respondents identified that infrastructure, and in particularly transportation, was a major issue affecting the town and that these would need to be resolved before growth is provided.

A large number of respondents supported limited housing to meet local needs and strongly objected to major development north of Harlow.

Some respondents were concerned that the growth to the north of Harlow would undermine the regeneration of the town and identified some of the arguments put forward during the preparation of the East of England Plan. It was felt that development should integrate with Harlow and not compete against it.

Some felt that better use of unused land within Harlow could be made for future development, and would better support regeneration of the town. One respondent suggested that the Core Strategy look to smaller scale, organic additions to Harlow's existing neighbourhoods that can be implemented with infrastructure improvements rather than major new provision.

It was suggested that the case for growth to the north of Harlow has yet to be made whereas another respondent referred to the block of evidence highlighting that a step change in housing provision is required to meet the backlog of unmet housing need, particularly in the East of England. A more detailed summary of the comments made in relation to Question 27 can be viewed in Appendix 1 (pages 112 to 113).

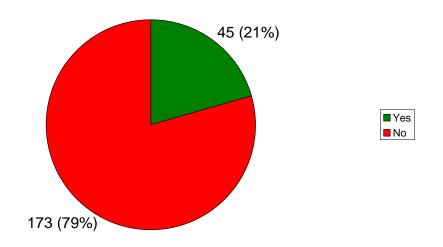


A range of comments were made which will be considered against the background of the changes being made by the Government to the planning system. There was opposition to development north of Harlow but the responses that were received in relation to this question were mostly from residents outside the District.

#### 2.6 Summary of Responses – Chapter 7 – Developing a Delivery Strategy

The final chapter dealt with the key infrastructure that will need to be delivered to underpin the emerging Core Strategy. Questions 28 and 29 were designed to get feedback on whether or not all of the key infrastructure that will be necessary to support the Core Strategy had been identified in the consultation document, whilst Question 30 sought views on the measures that should be adopted to tackle congestion in Harlow. The final Question (31) was designed to collect any other comments that people wanted to make on the development of Harlow's Core Strategy.

Question 28 – Do you think all the key elements of infrastructure necessary to support the emerging Core Strategy have been identified?



\*Figures may not add up to 100% due to rounding.

#### (218 Responses)

The majority (79%) of respondents did not believe all of the key infrastructure needed to support the Core Strategy had been identified. A more detailed statistical analysis of the responses to Question 28 can be viewed in Appendix 1 (page 114).

Question 29 was designed to gather respondents' views on the additional infrastructure that should be considered as the Core Strategy develops.

## Question 29 – If no, what additional infrastructure do you think is needed to support the emerging Core Strategy?

117 comments were received in relation to Question 29. Concerns were expressed that key elements of infrastructure are technically undeliverable. A number of respondents felt that, unless firm commitments are made to invest in Harlow's road, water and sewerage infrastructure, further development of Harlow cannot be justified and should not commence. Some respondents suggested that, given infrastructure costs and difficulties, it is more realistic to scale back level of development to that which can be accommodated within existing infrastructure. The phasing of development was highlighted as a key concern.

Respondents stated that there is a need to demonstrate how this infrastructure will be funded, given that the funding situation has changed dramatically since evidence base studies were published. It was stressed that there will be considerable competition for funds and it is important that sustainable transport is not squeezed out. Development may be discouraged as a result of unviable developer contributions towards infrastructure as the market is fragile. Infrastructure needs of adjoining authorities should also be considered in context of urban extensions and the knock on impacts on infrastructure outside of Harlow should be recognised (e.g. East Herts. and Epping).

Some respondents suggested that Harlow's evidence base (Harlow Infrastructure Study) is based on desk top review at a very superficial level and that schemes put forward in this

study are not supported or justified by any strategic transport modelling work. There were also concerns that all spatial options have not been treated consistently with regard to infrastructure.

Many respondents felt that better access to the M11 was critical to aid both residential and employment growth. However, other stakeholders suggested that the delivery of growth should not become entirely contingent upon the provision of a motorway junction as much can be delivered in advance of that. Respondents felt that gaps in Harlow's cycle network need to be highlighted and plugged and that better bus links are required from Harlow to outlying towns and to serve certain areas of Harlow with poor access. Respondents felt that improvements are required in Harlow Bus Station and railway stations, with access to Harlow Mill being a key concern. Some respondents felt that Harlow should consider extending the central line from Epping.

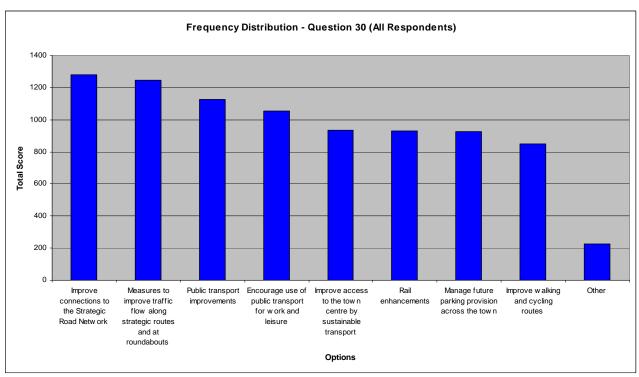
A number of respondents urged the Council to be realistic about car use, stressing the limitations and cost of public transport and people's inclination to drive. Other respondents stressed the effectiveness of Travel Planning. Respondents were concerned that sewerage and drainage infrastructure is overloaded and water supply and sewerage infrastructure should be in place before development commences. Sustainable Drainage Systems should be incorporated into new development. It was highlighted that the Rye Meads Water Cycle Strategy was not a detailed study and only provides suggested solutions and that further work will be required in this area. A more detailed summary of the comments made in relation to Question 29 can be viewed in Appendix 1 (pages 115 to 117).

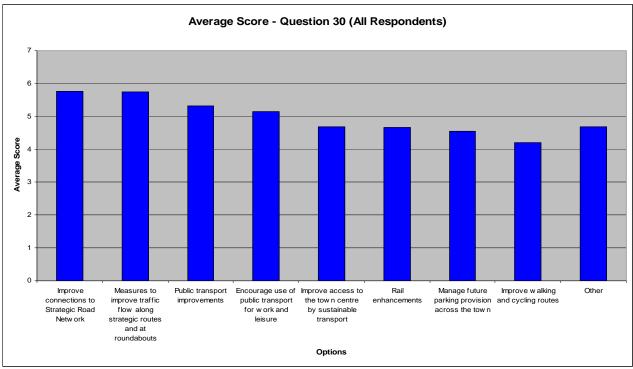


The majority of respondents did not think all the infrastructure necessary to support the Core Strategy had been identified in the consultation document. However the majority of the additional infrastructure issues raised such as the provision of funding and deliverability of infrastructure were already covered in the consultation document. Nevertheless, funding and deliverability issues are important and work is underway accessing the infrastructure requirements for future developments and Harlow's overall infrastructure needs will inform the level and location of growth in the Core Strategy.

Question 30 – Please rank, in order of priority, how Harlow Council should tackle Harlow's congestion problems (1 = highest priority, 9 = lowest priority).

Respondents were asked to rank nine measures that could be adopted by the Council to tackle congestion in Harlow from their highest priority to their lowest priority, 1 being their highest and nine being their lowest. Each option received between 224 and 48 responses. As for Questions 14 and 17 a points scoring system was used to compare the responses to each option. The 'Frequency Distribution' chart reports the total score for each option. The second chart shows the 'average score' for each option.





Improved connections to the strategic road network and measures to improve traffic flow along strategic routes and at roundabouts emerged as the measures which respondents felt were most likely to help alleviate Harlow's congestion issues. Measures to improve and encourage the use of public transport were ranked as respondents' third and fourth priorities for consideration. The remaining four options each received lower but roughly equal support, with the exception of the 'other' option which received a low total score but high average score. This is because only a small number of respondents suggested an 'other' measure (48 out of 222 respondents); however of those that did make an alternative suggestion they ranked it as a relatively high priority. A more detailed statistical analysis of the responses to Question 30 can be viewed in Appendix 1 (page 118 to 122).

A summary of the 'other' measures that respondents suggested should be considered is provided below.

- Reduce cost of public transport.
- Increase parking fees
- Limit car parking in residential areas
- Limit development to prevent more congestion.
- Tramway linking new development areas to rail stations of Harlow, Epping and Harlow Town Centre.
- M11 link / bypass.
- The level of congestion in Harlow is questioned by some respondents.
- Ensuring residents to live and work in Harlow, as originally planned.
- More parking near Harlow Mill Station, so people don't have to drive to Harlow Town Station.
- Dual the A414 throughout the town.
- Improve pedestrian and cycle safety to encourage residents to walk/ cycle more.
- Deal with Harlow's congestion problems on a wider scale than simply Harlow.
- A direct route is needed from Eastwick to the Thorley/ Bishops Stortford bypass and then on to junction 8 on the M11.
- A new M11 junction to the North of Harlow would encourage junction hopping and would be counterproductive.
- Extend the Central Line to Harlow, as the overland train is so expensive.
- Improve traffic flow in neighbourhoods through better designed parking solutions.
- Secure bicycle parking is essential.
- An issue with Harlow's bus system is it's easy to get to the town centre but not to get from neighbourhood to neighbourhood, particularly in the late evening. This makes people completely dependent on their cars for relatively short journeys.
- Bus services are unreliable and infrequent.
- There is not enough affordable parking near train stations.
- Improve pedestrian and cycling access to Harlow town station.
- Harlow needs two park and ride schemes, one close to the M11 and another near the station.
- A new bypass and junction is needed near Edinburgh Way to take traffic from industrial areas to the M11, without dragging it all through the town.
- Car pooling (communal ownership of vehicles)



Improvements to public transport and measures to improve traffic flow and connections on the Strategic Road Network emerged as the most favoured options for tackling congestion. However there was broad support for all of the measures that were proposed in the consultation document.

# Question 31 – Do you have any further comments to make, at this stage, on how Harlow should be developed?

167 comments were received in relation to Question 31. Issues were raised about the validity of the growth considered now that the East of England Plan is to be revoked. Other comments pointed to recent High Court decisions that Regional Strategies are still a material consideration and whilst others considered that the evidence base underpinning them remains valid.

Comments were made that the need for growth is essential whilst others considered that growth was critical to secure new infrastructure. Some respondents proposed that growth should be determined by local needs. It was also pointed out that Harlow cannot allocate land for growth outside its administrative boundaries.

Some respondents considered that any future growth should conform to the Gibberd Plan and the principles of the Garden City movement. A number of suggestions were made for development to the north, south, east and west of the town. Others commented that infrastructure investment and provision will be required including a new junction with the M11, new link roads together with footpaths and cycle ways as well as improvements to sewage and water capacity. Other community infrastructure will be required including places of worship, schools and care provision.

A range of assets were identified as needing protection including the Green Belt, Green Wedges, the River Stort, open spaces and nature conservation sites, as well as historic and archaeological sites. A more detailed summary of the comments made in relation to Question 31 can be viewed in Appendix 1 (pages 123 to 124).



A wide range of comments were received in relation to this question. The Council is reviewing key elements of the evidence base to ensure that a robust assessment of local social, economic and environmental conditions is undertaken in order to help quantify the appropriate level of housing and employment requirements for Harlow's community.

#### 3.0 WAY FORWARD

The Core Strategy Issues and Options consultation has provided the Council with an opportunity to identify the current planning issues affecting Harlow. It also provided the Council with feedback on a range of potential growth options that were considered by consultants as a way of delivering the future development proposed in the East of England Plan for the wider Harlow area.

The growth options were based on the housing figures for the district set out in the East of England Plan which are to be withdrawn upon the revocation of Regional Spatial Strategies. However, in order to develop a future spatial planning strategy for Harlow it was considered relevant to seek comments on these figures as a starting point in order to help quantify the scale of the town's long term development needs.

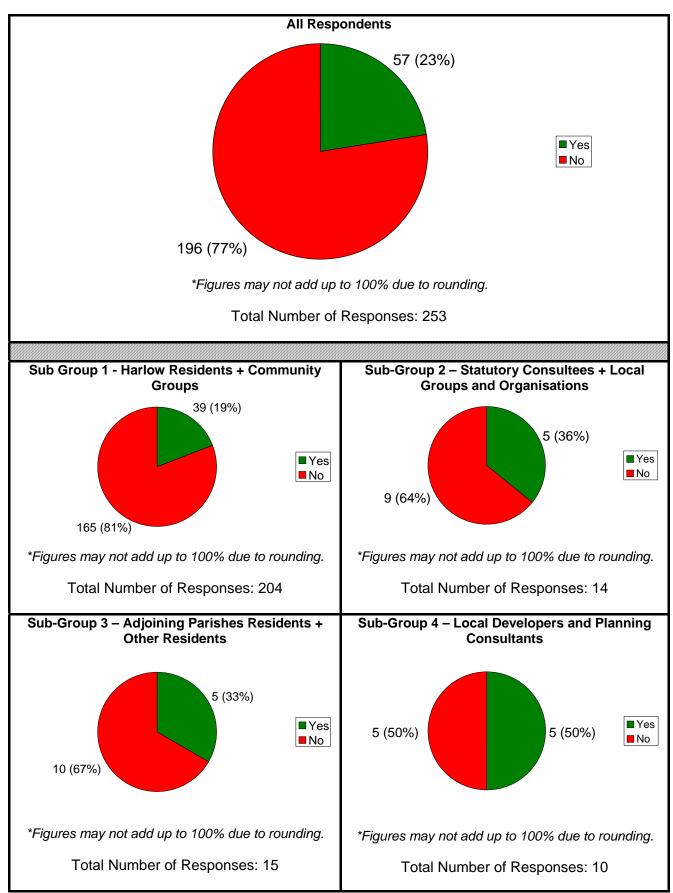
Since the completion of the consultation the Government's Localism Bill was enacted in November 2011. In addition the Government has now published the draft National Planning Policy Framework. This sets out the Government's economic, environmental and social planning policies and articulates its strategy for securing sustainable development.

Both will have a significant impact on the plan making system in England, changing the focus to a greater emphasis on quantifying long term development needs at the local level. In common with many other Local Planning Authorities the Council is reviewing its evidence base to reflect local social, economic and environmental conditions to provide a robust platform to underpin future planning proposals and policies.

In view of the above, therefore, the Council will examine its current programme, as set out in the Local Development Scheme, to ensure that it accords with the emerging plan making system. The Council will also undertake further public consultation on issues that arise from the review of the evidence base to quantify future development needs and to inform the development of the Core Strategy and other local planning documents.

Appendix 1 - Statistical analysis of consultation responses & full summaries of issues raised in open-ended questions

<u>Question 1 - Do you think the Council has identified all the relevant issues that need to be addressed by the Core Strategy?</u>



# Question 2 - If you disagree, what additional issues need to be considered by the Core Strategy?

Set out below is a summary of the key issues raised by respondents in relation to this question:

- The Core Strategy needs to include a mechanism for sustainable growth and regeneration.
- Infrastructure improvements including to road and rail systems, water supply, drainage and sewerage disposal, health, education and community facilities should be implemented before any further significant development is allowed.
- The Core Strategy should provide a method to ensure necessary infrastructure is achieved to support sustainable development.
- Housing should be provided for Harlow people not to accommodate overspill from London.
- The creation of new jobs and attracting companies to invest in Harlow must be a priority.
- Potential for rat-running between Gilden Way/Churchgate Street and the M11.
- Infrastructure improvements are needed just to cater for Harlow's current needs. Even more improvements will be required if the town grows significantly.
- There is a high level of unemployment in Harlow especially among young people.
- Need to ensure development meets the needs of disabled people specifically those with mobility problems.
- A by-pass/link road is needed from the A414 to the M11.
- Plans must take conservation areas into consideration.
- Previously developed land should be developed instead of green sites.
- Better facilities are required within the Town Park e.g. play schemes.
- Green Belt land should not be developed.
- The flooding of roads is a problem which needs to be addressed.
- Infrastructure for water supply and sewerage disposal should be given more prominence.
- Traffic congestion is a problem in the town.
- Further development could result in the loss of key archaeological sites
- Water supplies and drainage needs should be considered if there is future development.
- The requirement for traffic management measures should be included the Core Strategy.
- Further development in Harlow will affect the character of Old Harlow and parts of Hertfordshire.
- Traffic congestion is a significant problem in Harlow and the town's roads are already overcrowded.
- Green spaces should be retained for leisure/recreation purposes.
- Harlow has a high number of unoccupied homes.
- A number of existing primary schools in Harlow are undersubscribed.
- Provision must be made for extra medical and education facilities.
- Development will put too much pressure on infrastructure including local roads and health centres.
- Development would affect traffic congestion, archaeological sites, and flood risk, access to healthcare and transport hubs.

- Consideration should be given to the effects of development on the original Gibberd Master plan which provided for an integrated community with protection for green spaces and the environment.
- Development should only be to meet local needs, not the inflated targets of the East of England Plan.
- Consideration should be given to parking provision, traffic management, schools, facilities, crime, loss of green space and the environment.
- Further development would lead to serious congestion, flood risk, increased crime, and increased pressure on the NHS.
- Overpopulation of a rural area.
- Additional housing will increase further the already high unemployment and existing infrastructure issues.
- Not enough consideration of supporting infrastructure including road access and traffic congestion.
- The Core Strategy needs to make the town 'work', not just expand.
- Developments only serve the interests of the building companies not the residents.
- Development will place additional burden on road routes to the M11 and the railway station and additional roads will damage the local community.
- Development could result in the loss of local agricultural land.
- Sustainability is an issue that needs to be considered (in particular recycling and the green agenda).
- The Plan should be based on the creation of employment through enhancing the town as an attractive place to live whilst investing in skills and training.
- Where are the plans for the infrastructure to support the plans?
- The views of local people should be taken into consideration.
- Traffic flow into Harlow from Shearing and Sawbridgeworth is an issue.
- No provision for infrastructure, road, rail, water, sewerage and community facilities.
- Road and rail infrastructure, health services and schools.
- A plan is needed to address the present and immediate planning problems facing the town which would lay a foundation for any future development.
- The Core Strategy does not provide for the required improvements in infrastructure.
- The necessary infrastructure requirements need to be properly costed.
- Harlow desperately needs a bypass before any further development.
- Existing open spaces should be safeguarded.
- Agricultural land needs to be retained for imminent demand for food production.
- The provision of infrastructure improvements is dependent on the contribution that can be made by bodies other than the Council.
- Harlow's green wedges should be retained for future generations.
- Harlow's infrastructure is already inadequate for the current size of the town.
- Open space should be provided in parkland settings for enjoyment by the public.
- Transport issues in Harlow are an urgent priority.
- Expansion should be directed towards the west of Katherines, towards the Nazeing borders, and to the south towards Epping.
- The provision of working facilities in the town for future generations.
- Parking is a problem in Harlow.
- Existing community facilities throughout the town need to be retained including the Museum, The Gibberd Gallery, Pets Corner and The Playhouse.

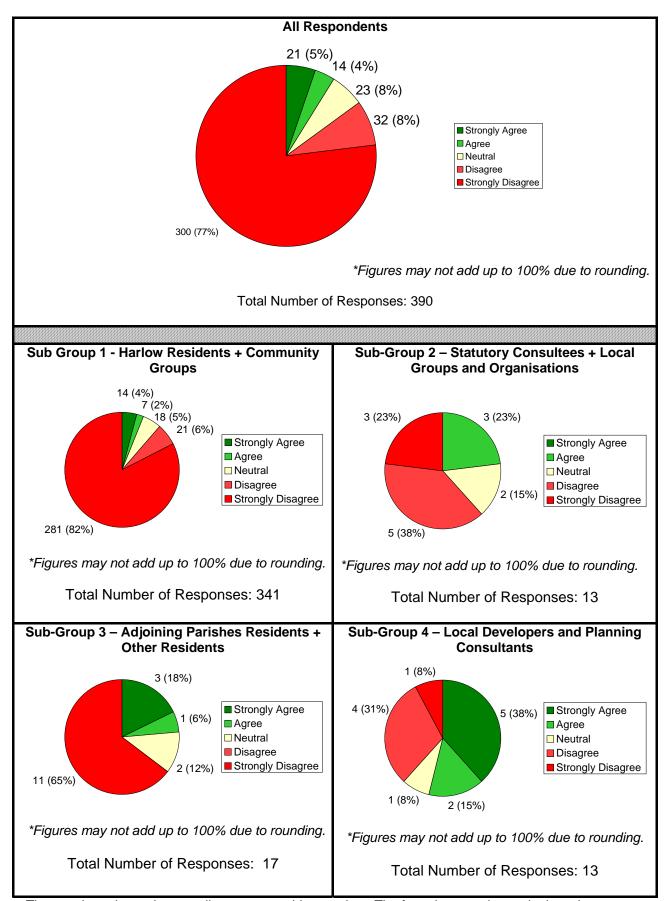
- Extension of the Central Line (Underground) to Harlow is a requirement.
- Traffic congestion is a major problem and access to the M11 from the north side of the town is essential.
- Lack of sufficient infrastructure improvements.
- Rail and road links, congestion, waste supply and sewerage disposal, the need for extra schools and health centres need to be considered.
- Transport infrastructure is inadequate in Harlow and will be overloaded if population growth is not accompanied by considerable investment in roads and public transport.
- Listed buildings, ancient monuments and gardens should be protected which will constrain the areas that can be developed.
- I support the regeneration of neighbourhood centres but not their wholesale redevelopment.
- The Town Park should be improved and enhanced but the location of its facilities should not change.
- Consideration must be given to the impact of major developments on air traffic through the increased road traffic that would be generated.
- Old Harlow and Churchgate Street are a natural boundary to Harlow New Town.
- Affordable housing required for Harlow residents.
- Shopping offer not attractive in Harlow and most people prefer to shop at Lakeside.
- Alcohol and drug abuse, regular and irregular immigration, promotion of integration, mental health issues, noise nuisance.
- Issues identified under housing category need to be more general to avoid prejudging a robust analysis of issues.
- Land outside of the district would be needed in order to meet EEP housing requirement housing.
- Consider the planning needs of faith groups and the spiritual environment before any plans are drawn up.
- Need a bypass and additional access to the M11 north of Harlow before any further new development.
- More emphasis should be put on sustainability considerations including need to recycle, energy efficiency, and water usage and carbon reduction.
- The Green Belt is valued land which plays a strategic role.
- Development has resulted in parking pressure in the Old Harlow area, particularly near Harlow Mill Station.
- Future development should be based on local needs and not on the East of England Plan or any national strategy.
- So much new development will put more pressure on the Council to provide services at a time when its budgets are being cut.
- Harlow's heritage as a 1950s New Town needs to be preserved.
- Harlow needs more social housing to reduce the waiting list.
- Need to avoid Harlow merging with adjoining towns and villages.
- Improvements in public transport will be required for people who don't own / have use of a car as the high price of oil makes private transport very expensive.
- A stronger cross-border approach will be needed to deliver the Core Strategy.
- Many of Harlow's jobs and facilities are taken and used by the residents of neighbouring districts.
- Must identify how investment will be gained from outside the urban boundary in addition to building houses.
- The first priority should be to address local employment provision.

- All new developments must be sustainable.
- Issues are not static and further issues could come to light during the (Plan) development process.
- Harlow needs a coordinated and integrated transport strategy.
- The River Stort is a natural boundary and flood plan and all the options to build north of the river should be discounted.
- Need to ensure Harlow residents have access to a range of community infrastructure.
- A better housing mix is required to avoid the creation of ghetto areas within the town and to break-up areas of low aspiration.
- Harlow needs more good schools including pre-school, primary and secondary schools, and improvements to existing ones.
- The hospital, Police and Fire services will need to be expanded to meet the proposed level of growth.
- A leisure park should be included within the Plan to improve and expand the leisure services in the town.
- Publicly-owned land at Latton Farm should be used for development before any land outside Harlow.
- The Core Strategy should provide housing for people on the Council's waiting lists not for more affluent commuters.
- Harlow people's wishes should be considered in more detail.
- The Core Strategy does not provide for the required improvements in infrastructure.
- Harlow has an ageing population so consideration must be given to requirements for Care Homes, Warden-Assisted and Sheltered Housing and day centres for the elderly.
- Water supply, sewage and surface water drainage already an issue which will get worse if more land is covered by development.
- The Core Strategy makes no suggestion of infrastructure improvements to local road network or rail facilities, other amenities including water and sewage, or other community facilities such as local libraries which will be heavily oversubscribed.
- Harlow needs more low rent accommodation. So called 'affordable' housing is outside most people's range.
- Car parking in residential estates is an issue.
- Consideration must be given to additional parking at railway stations.
- Section 2.5 Infrastructure only considers grey infrastructure predominantly transport and should also consider green infrastructure which is vital to the future health, prosperity and sustainability of the district.
- Climate change should be identified as a key issue for consideration.
- The policies and objectives of the Core Strategy should be aligned with those of key infrastructure providers.
- The capacity of existing healthcare infrastructure needs to be included in the assessment of infrastructure requirements to serve the proposed levels of growth.
- The impact that proposed developments will likely have on healthcare provision (including primary care services) and funding needs to be recognised.
- The cumulative impact of growth proposed in East Hertfordshire and Epping Forest districts on healthcare services, facilities and funding needs to be considered.

- There is a need for further characterisation and assessment of the historic environment of the town. The Market Place and other surviving parts of the Town Centre should be designated as Conservation Areas.
- The Core Strategy fails to address a number of environmental issues including:
  - o There is no reference to groundwater protection.
  - There is no reference to contaminated land or implications of redeveloping land affected by contamination.
  - o The Water Framework Directive has not been mentioned at all.
  - o Biodiversity has not been mentioned, in particular around the Stort Valley.
- The strategic role of the Green Belt and the related policies of adjoining authorities should be recognised.
- The wider landscape setting of the town, including the southern ridge line.
- The lack of alternatives to the option of 16,000 houses.
- More prominence to climate change and more commitment to carbon reduction, energy efficiency and renewable energy.
- The setting of the town in relation to its surrounding villages.
- The role of the Metropolitan Green Belt.
- There is a need for joined up thinking with neighbouring authorities.
- Sustainable transport should be emphasised further.
- Theatre provision has been inappropriately included within Recreation, Sport, Leisure and Open Space (Para 2.12.2) which will defer to PPG17, whereas theatres should be guided by PPS 4 as a town centre element.
- A proportion of all new dwellings across all tenures should be built to recognise wheelchair housing specifications e.g. Habinteg and Thorpe.
- Insufficient emphasis on the need for all new dwellings to meet Lifetime Homes criteria as necessary to achieve social sustainability in the community.
- There should be a reference to 'inclusive play facilities in all types of play areas.
- The Core Strategy needs to address the need for safe walking routes and to segregate all walking and cycling routes on shared surfaces.
- Inclusive design needs to be adopted as a core principle of the Plan.
- There are housing shortages in the District and wide sub-region / region and failure to deliver significant housing and diversifying the housing stock will exacerbate social economic deprivation.
- A greater expansion is needed to realise the transformational change required to alter the image and perception of Harlow for existing and future residents and employers in order to attract inward investment.
- Local residents have difficulty finding high quality jobs.
- High earners are unwilling to locate in Harlow.
- Economic growth should be linked to new housing to attract and retain the skills base needed to encourage inward investment.
- Significant housing is needed to avoid the serious consequences of business growth without sufficient labour supply.
- Harlow has archaeological and historic landscape assets that need to be protected.
- The policy areas do not refer to Harlow's historic environment.
- Harlow Council's support for the level of development justified in the RSS evidence base means housing needs will also be met which are not locally based
- A number of issues addressing common topics such as the Town Centre cut across a number of the proposed Themes which do not provide a clear enough framework for the issue to be set out.

- A framework should be developed to define and measure the outcomes of the Core Strategy.
- There must be housing for all socio-economic groups including for professional and higher income households which is distributed throughout Harlow.
- Other physical and social infrastructure should be acknowledged in addition to transportation infrastructure to ensure the delivery of a sustainable community for existing and future residents, investors and visitors.
- Elements of Harlow's Core Strategy will require the help and support of adjoining Districts as much of the land with potential for expansion lies outside the district.
- A joint policy and implementation area for Harlow's growth should be created including parts of Epping Forest and East Hertfordshire districts as well as Harlow.
- Consideration of Greenfield development should reflect options to the north, east, south and south west of the town.
- The statement in Section 2.3 that "Greenfield development should be located in the north and east of Harlow" pre-empts the policy process.
- Industrial regeneration is desperately needed and there are empty large sites that should be redeveloped.
- The entrance and exit in to Harlow is a bottleneck.
- Not enough emphasis on building on the Gibberd Principles.
- No account is being taken of the real and existing housing needs of Harlow.
- In accordance with PPS 3, Section 2.2.5 (land use) states previously developed land should be utilised before Greenfield land, however the Core Strategy needs to ensure sufficient land is available top meet to substantial existing and growing demand and so should plan for the selective release of Greenfield sites.
- Joint working with adjoining authorities to facilitate the regeneration and transformation of Harlow should be reflected as a key issue on the Core Strategy.

Question 3 - Would the provision of 16,000 new homes in and around Harlow meet the current needs of the local community and help secure the regeneration of Harlow?



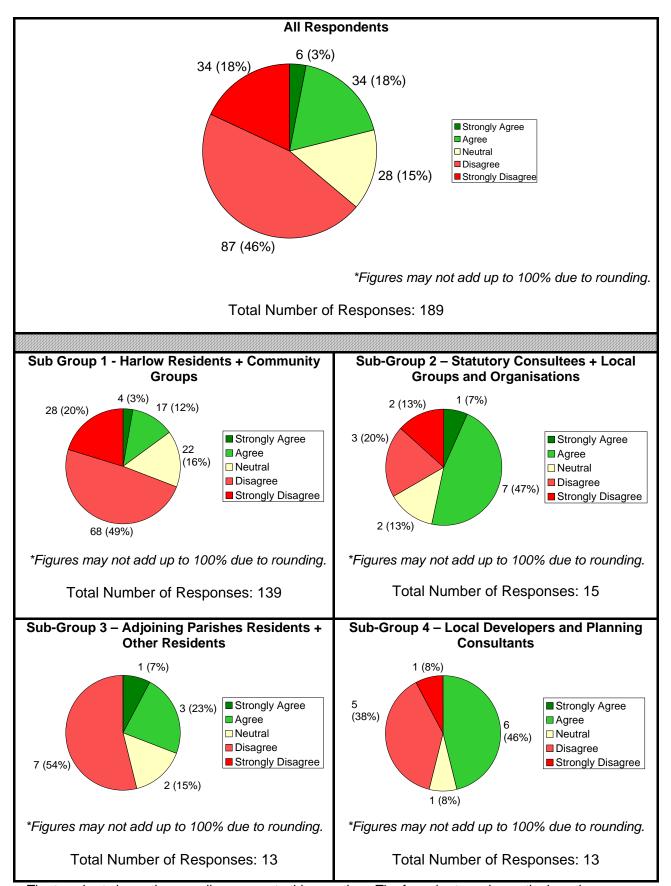
# Question 4 - What do you think the scale of growth should be, ensuring that the Core Strategy addresses the particular issues facing Harlow?

Set out below is a summary of the key issues raised by respondents in relation to this question:

- To meet local needs
- To meet local needs not the inflated targets in the East of England Plan (144)
- Provide a good standard of housing
- Affordable housing should be a priority to meet local needs
- No more private housing in Harlow
- Overdevelopment proposed in the Old Harlow Area
- Less than 16000 homes
- 800 new homes maximum
- Many empty homes, suggesting too many houses
- 16000 houses are too many.
- 16000 will have an impact on public transport, sewerage, water and the countryside
- Don't develop green areas
- Detrimental impact on the road network
- Existing housing sites are not completed, so why build more
- To meet the requirements of sustainable growth
- Surrounding countryside would be ruined
- Previously developed land should be developed in the first instance
- Core Strategy based on belief that 16000 homes and 8000 jobs will create the critical mass for regeneration
- The vision should be based on more modest increases
- Increase in traffic and pollution from Growth will cause health problems
- Not enough support for regeneration projects
- Local facilities will be unable to cope.
- Build housing in line with jobs
- Repair and rebuild existing housing
- Explore growth within town boundaries
- Strong evidence to show local housing need
- Develop at a slower pace than proposed
- The link between regeneration and growth is not made conclusively
- Damaging impact on the environment and wildlife habitats
- Need realistic estimate of local needs
- Max 8000 new homes
- Over development in the south east to the detriment of the regions
- 16000 homes in and around Harlow would go a long way to meet current needs
- Growth should be phased to meet needs
- 16000 homes may not be viable, and will undermine Gibberd's Masterplan
- 10000 maximum to meet local needs
- 4000 dwellings in Harlow North and follow Gibberd's 1974 expansion masterplan
- Housing for Harlow people not catered for.
- 16000 need the associated jobs
- No evidence that the private sector intends to invest in Harlow.
- To cater for local needs and local employment

- Housing of a standard that will attract those who work in Harlow but choose to work elsewhere.
- 2000 maximum
- Regeneration should begin now
- Harlow is full
- 5000-8000
- Not enough jobs for 16000 dwellings
- Tenet of Core Strategy is misplaced and unsustainable
- 1000 would easily meet local needs
- Focus should be on business and industry for regeneration not the other way round.
- Additional 5 years of growth should be added to 2026, therefore 20000 dwelling requirement
- 16000 imply inward migration.
- Scale of growth should be determined by additional employment provision
- 4000 dwellings
- Homes will not resolve lack of employment opportunities and will mostly attract commuters.
- 5000 homes to the east by 2030 then 2000-3000 later
- Policy and Strategy needs to connect old with the new.
- Plans are rapidly becoming out of date. Potential of double counting of people on housing waiting lists
- Why equate growth with regeneration
- Harlow does not need regeneration. It has been allowed to become rundown
- At this level of expansion, we need to look at reconstructing the town, to allow further future expansion.
- If 5000 are planned do we need 16000?
- The more houses you build the more you will have to build in the future.
- Growth delivery in a timely and phased manner is welcomed.
- Redevelop existing, to provide better designed, but at higher densities.
- No proven link between town size and regeneration, flaws in critical mass theory
- Growth led regeneration will enable the town to generate the critical mass to bring investment, and secure it as a key sub-regional centre.
- Do nothing will cause Harlow's economy to decline.
- Harlow's location enables something to be done to address the shortfall in housing
- None of the considered evidence has changed from the East of England Plan
- 16000 homes and 8000 jobs would help secure the regeneration of the town
- Harlow working with neighbouring authorities will have to determine the amount of new housing for the Harlow area, taking into account existing evidence base.
- Technical assessment of housing requirements is required informed by population and household projections. This should be one jointly with adjoining Districts to a common methodology.
- Growth is the only way to achieve a successful regeneration of Harlow, and attract and retain economically active and highly skilled people.
- Substantial growth will facilitate an expanded range of town centre retail and leisure provision, and justify and fund investment in services and infrastructure..
- 16000 to 2021 and a further 10100 to 2031 failure to provide this level will not facilitate transformational change.

Question 5 - Do the visions and priorities set out in the Community Strategy, the Council's Regeneration Strategy and the Council's Corporate Plan provide the basis to develop the vision for Harlow's Core Strategy?



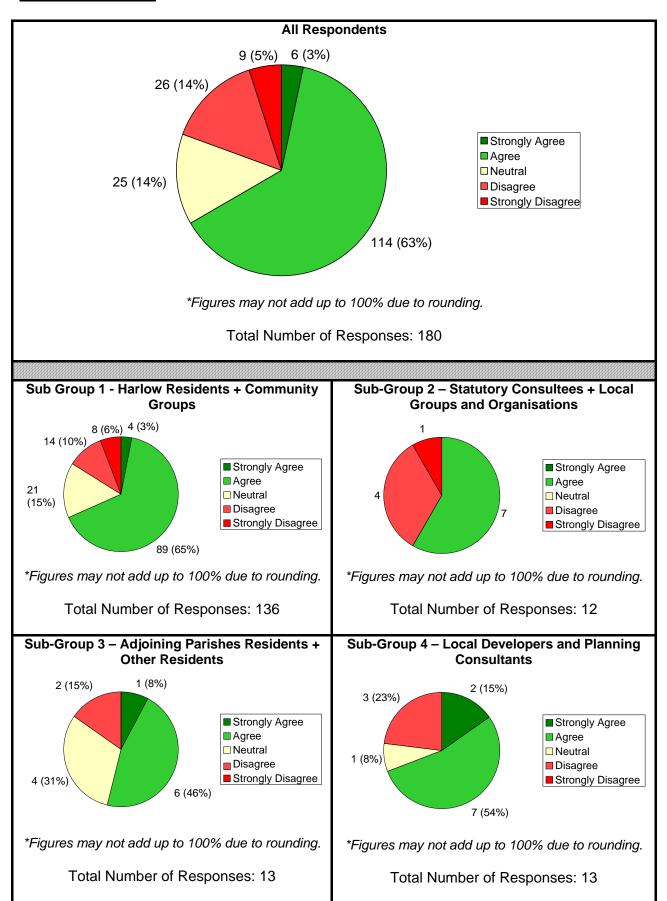
# Question 6 If you disagree/strongly disagree, what do you think the vision for the Core Strategy should be based on?

Set out below is a summary of the key issues raised by respondents in relation to this question:

- Core Strategy based on belief that growth around the level of 16,000 homes and approximately 8,000 jobs will help provide critical mass for regeneration. The vision should be based on much more modest increases and recognise the difficulties creating so many jobs (38)
- The strategy should plan for lower levels of growth, based on local needs (7)
- Houses and jobs alone do not regenerate a town (3).
- Strategy should be based in part to Frederick Gibberd's outlook on a regeneration masterplan (1) Jobs are more likely to be lost, not gain in the current climate (3)
- Community Strategy is inadequate to meet Harlow's aspirations and does not describe the opportunity that the town represents for the wider area. The vision needs to be more ambitious, locally distinctive, and be in no doubt where the town is heading. It should focus on articulating what needs to be done to address its key spatial planning issues. Recommend that the vision includes wider issues that will seek to facilitate regeneration within Harlow (2)
- Plan is based on 'critical mass' idea from the East of England Plan which should be replaced with more modest needs, re-thought in the light of present economic climate (1)
- Too ambitious to believe 16,000 homes and 8,000 jobs will provide the critical mass for regeneration.
- Growth is too high. We need more evidence that growth could be 16,000 and 8,000.
- Strategy should be based on maintenance and renewal of services and not expansion of the town.
- Vision is unobtainable without substantial investment. Partners unlikely to be able to deliver the investment required.
- Focus less on aspiring to be a university town and more on vocational and technical training institutions (1)
- Strategy prepared in an era of regional planning. Until a robust evidence base has been established, there is no basis in these documents for growth outside Harlow District.
- Need a vision and priorities as set out in part 4. Regeneration and renewal are important aspect of Harlow's future. Harlow has the ability to change whilst keeping the fundamental elements of its historic past. Our legacy is based around renewal (1)
- Input on the cultural aspect is needed to make Harlow a vibrant exiting town it once was (1)
- For regeneration to be successful you need to make the town centre more appealing, reducing parking costs, encouraging people to use the town and doing up the north part of the town centre. Reduce rents and encourage a variety of shops (1)
- Do not agree that housing will provide necessary catalyst for wider regeneration. Development should be more focused on specific issues rather than the notion that 'more' will solve the problems facing the town.
- Growth options fail to consider the core of the town as the centre.

- The vision should be more exciting the vision should be explicitly aspirational and not mundane and corporate.
- Should regenerate and revitalise the current town and encourage industry to return to Harlow. Make Harlow a place for business to gravitate to.
- Vision is a good starting point but there needs to be a good management plan to ensure that the vision strategies are fulfilled. Concerns over how schemes will be delivered in current climate.
- Vision and priorities generally provide a suitable basis to develop the Core Strategy. However, the priorities should refer to the town's role as a key centre for growth. This is consistent with both the EEP and Gibberd's vision.
- Agree with vision if it can be fully implemented Vision should take full account
  of the equivalent documents of adjoining authorities.
- Visions are solid and succinct and when combined will provide a stable underpin for the objectives and subsequent policies.
- Vision should refer to a strong town centre and retail destination.
- Visions are quite generic and could apply to any town 2
- Vision should be more specific to what the document is actually trying to achieve. The vision should make explicit reference to population increase.
- Vision should more explicitly point to the growth of the town.

# Question 7 - Do you think the Core Strategy Themes cover the range of planning issues in Harlow?

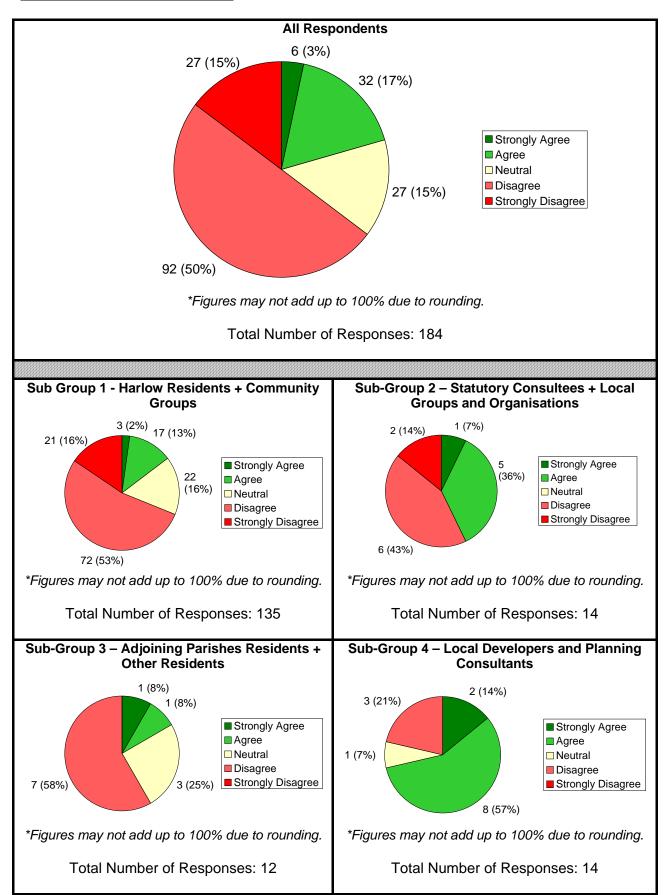


# Question 8 - If you disagree/strongly disagree, what changes would you make to the Themes to ensure they address the range of planning issues in Harlow?

Set out below is a summary of the key issues raised by respondents in relation to this question:

- Overloaded infrastructure including transport, sewerage, hospital, GP services
   (8)
- Need to protect green wedges and open spaces (3)
- Lack of parking provision (2)
- Need specific inclusion of a 'health' theme (2)
- Specific reference should be made to the redevelopment of the town centre and surrounding neighbourhood areas (2)
- The Environment should have its own section and include reference to protecting air, land and water (2)
- Include a theme which acknowledges the need for cross boundary working, coordination and governance issues (2)
- Themes should deal more specifically with recognised topics that more clearly reflect Harlow as a place. This would make it easier for the issues, objectives and policy areas to identify matters that are specific to Harlow (1)
- Need to include an objective of creating the right quality of employment premises as distinct from housing (1)
- Stronger emphasis on preserving the historic, iconic and natural environment wherever possible. Regeneration should be prioritised over new build on undeveloped land (1)
- Specific reference should be made to the historic environment, social infrastructure and climate change in the themes (1).
- Opposed to development which disrupts the wildlife, the natural countryside and above all out archaeological remains (1)
- Not enough emphasis on quality of architecture and green spaces (1)
- Agree with 4.3. and 4.4 but don't understand what resources would be put in place these into action. There is not enough explanation of how this will be delivered (1)
- Harlow's boundaries should be respected so as to preserve the rural character of the countryside (1)
- Welcome the recognition of infrastructure as a key theme (1)
- appreciation of the regional purpose of the Green Belt; (b) the need to contain growth within the bowl of the Stort Valley, protecting the southern ridge line; (c) more prominent and positive support for sustainable construction, carbon reduction and the use of renewable energy; need for formal co-ordinated working with adjoining potentially affected authorities (1)
- The setting of the town in relation to surrounding villages, the role of the Green Belt, joined up thinking with neighbouring authorities (1)
- Pleased with the themes that relate to the river Stort. Strategic objective 24: an opportunity to enhance public transport and cycleway links to rail and bus stations (1)
- Specific reference to achieving social sustainability (community building) within an increasingly diverse community (1).
- Should acknowledge that the housing, employment and retail development provisions should all seek to meet more than just locally generated needs (1)

# <u>Question 9 - Do the Strategic Objectives provide the necessary framework to deliver the regeneration of Harlow?</u>

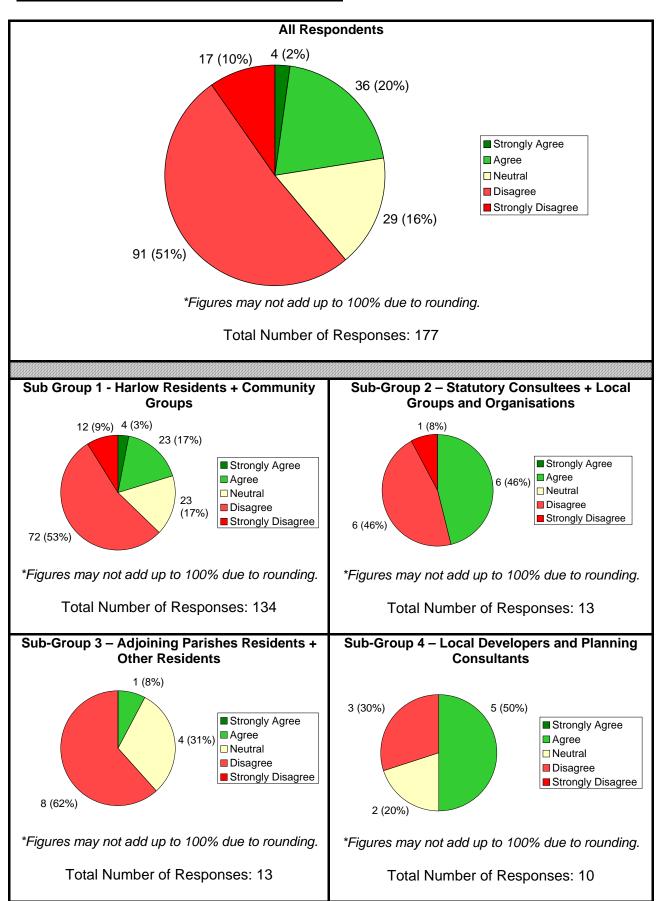


# Question 10 - If you disagree/strongly disagree, what changes would you make to the strategic objectives?

Detailed changes to wording of the strategic objectives were put forward. See schedule of responses for full details.

- Main changes include:
  - Objective 4: Allow growth only is sustainable areas
  - Objectives 8 & 9: Rewrite to reflect the need for housing tenures and types to meet local need
  - Objective 17: Include employment uses in town centre regeneration proposals to provide capital market for new retail and leisure.
  - Objective 24: Rewrite to include Northern bypass and new M11 junction
  - Objective 1: protect green wedge areas
  - Objective 4: add town centre to this paragraph
  - Objective 6: Ensure new infrastructure
  - Objective 9: Ensure new housing caters for our local needs and those people coming into Harlow for work
  - Objective 3: change 4th paragraph to read 'acknowledge and build on principles of Gibberd.
- New strategic objective to refer to need for delivery agency and the role of adjoining local authorities.
- Allow growth in few locations. Recognise need for housing tenures and types to meet local need. Include employment targets in town centre regeneration (6)
- More emphasis on enhancing the town centre
- Sufficient housing to meet local needs and growth in selected areas. Also look at growth with current job prospects in mind.
- Respect Gibberd's Masterplan
- Concentrate on developing Brownfield sites first
- Greater provision of affordable and rented accommodation
- Strategy does not say what is to be regenerated other than the town centre.
- Stronger focus on redeveloping the hatches
- More focus is needed on the delivery and implementation of the strategy.
- Objectives should be fully funded before they are put in the Core Strategy.
- Further work on characterisation of heritage assets is required.
- Housing and employment growth should be linked.
- Joint or co-operative working should be a theme of the Core Strategy, with related objectives, given the regeneration agenda.
- Question whether there is adequate evidence underpinning the objectives particularly where growth affects adjoining districts.

Question 11 - Do you think the policy areas identified cover the range of issues that are relevant to the regeneration of Harlow?

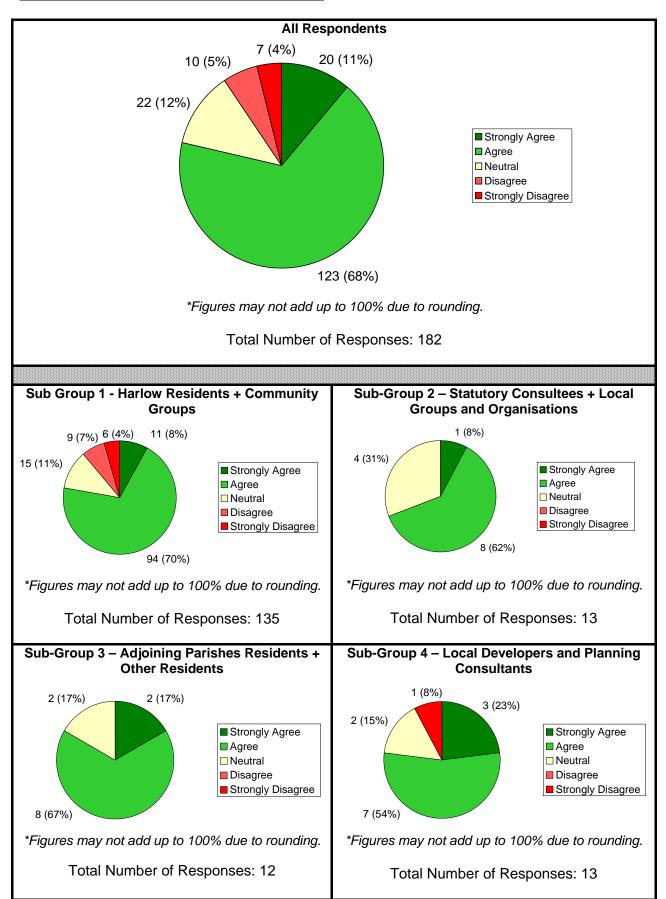


# Question 12 - If you disagree/strongly disagree. What changes would you make to the policy areas?

There were a number of suggested amendments to the policy areas. The key suggestions are as follows:

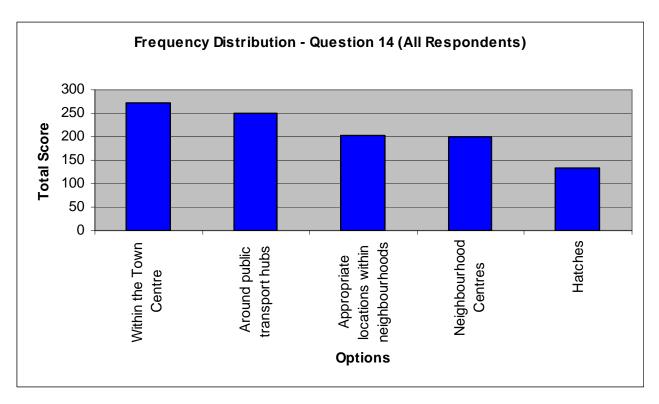
- Rewrite policy to protect the role and function of green wedges
- Rewrite policy to acknowledge and build upon the design principles established by Gibberd in securing sustainable development
- Add policy for town centre development
- Rewrite policy to ensure infrastructure provisions precede house completions
- Rewrite policy to ensure new housing development caters for local need and provides housing of such standards that would appeal to those who choose to work in Harlow but live elsewhere.
- Omit policy on minimum density standards
- Housing should cater for local housing needs.
- Need policy dealing with low carbon/climate change.
- Updated evidence is needed to support retail policies particularly the definition of primary and secondary frontages.
- Include employment minimum requirements / targets in town centre regeneration.
- Strengthen policies concerning health provision.
- Policy areas need to deal with the scope for a Green Belt review, the potential to release Greenfield land for housing, where insufficient previously developed land exists; and direction on how cross boundary growth options could be coordinated. These options need to be tested in the public domain.
- Reference to inclusive access
- Policy areas should be better grouped under the appropriate themes, particularly those relating to the development of the town centre.
- Consideration should be given to policies relating to the urban fringe.
- Policy framework needs to consider the future role, scope and function of the existing and future neighbourhood centres and hatches and the town centre in Harlow.
- Core Strategy should provide appropriate strategic policies that continue to promote and facilitate future economic growth within the health sector.

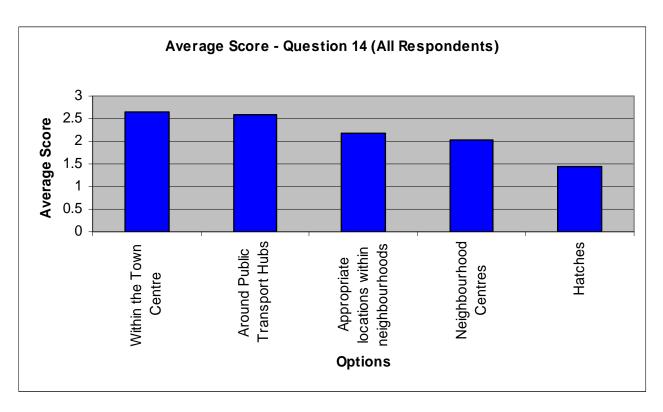
Question 13 - Do you agree that new development should be directed to areas that will maximise regeneration of the town?



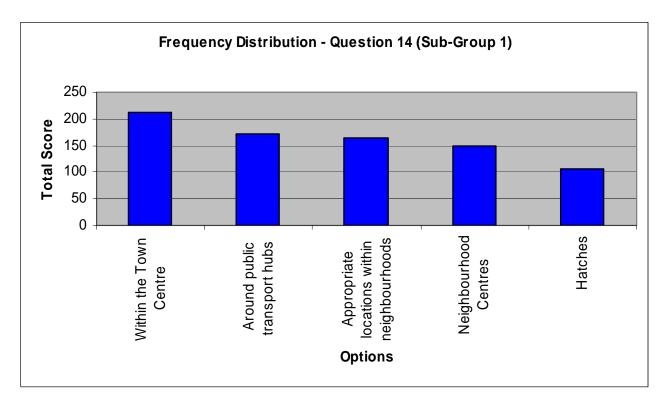
Question 14 - Please rank, in order of priority, where you think higher densities of development should go within the District (1 = highest priority, 5 = lowest priority)

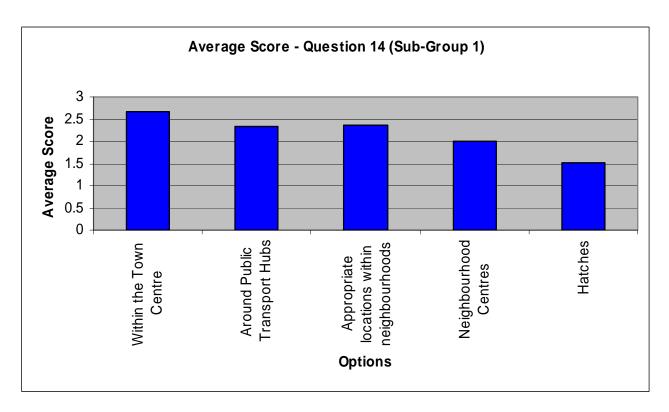
#### **All Respondents**



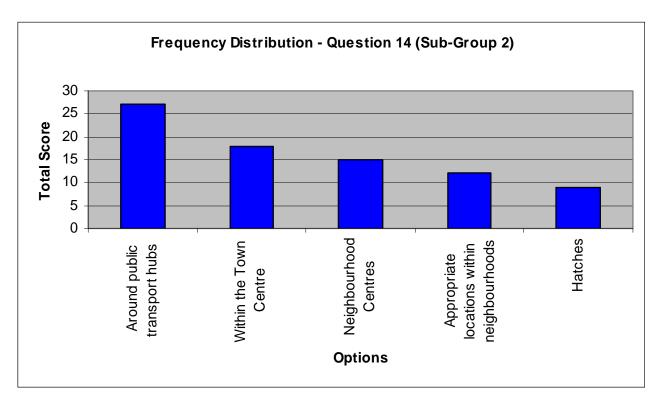


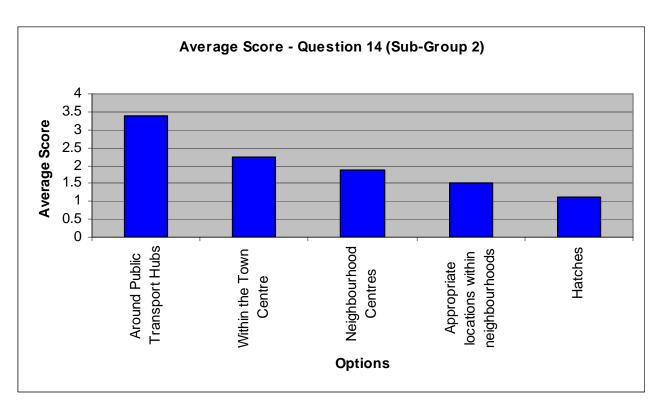
**Sub-Group 1 – Harlow Residents + Community Groups** 



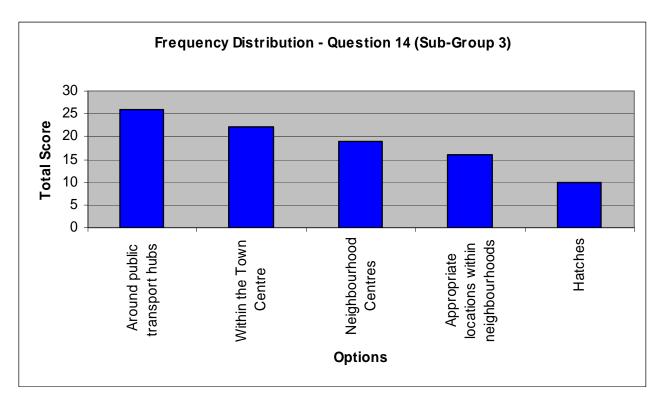


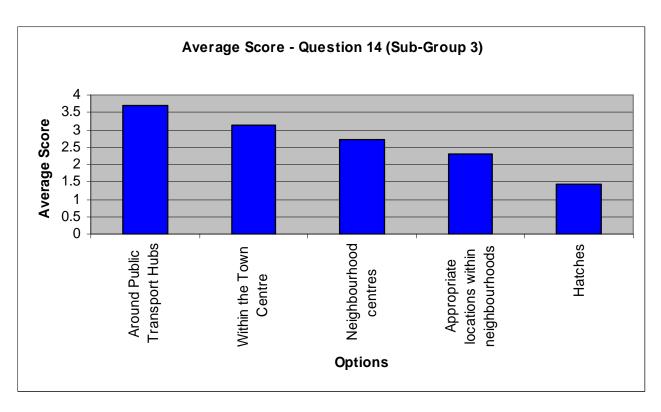
Sub-Group 2 – Statutory Consultees + Local Groups and Organisations



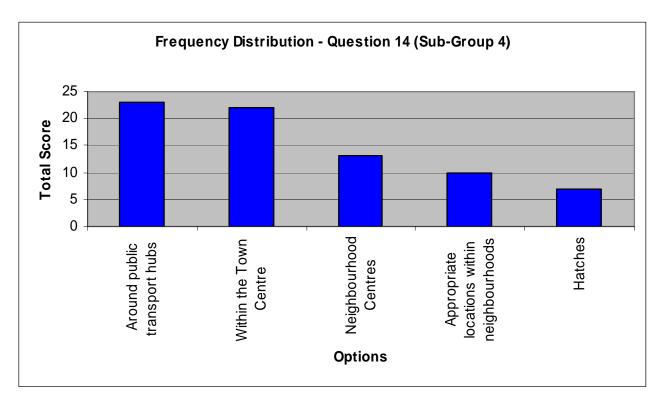


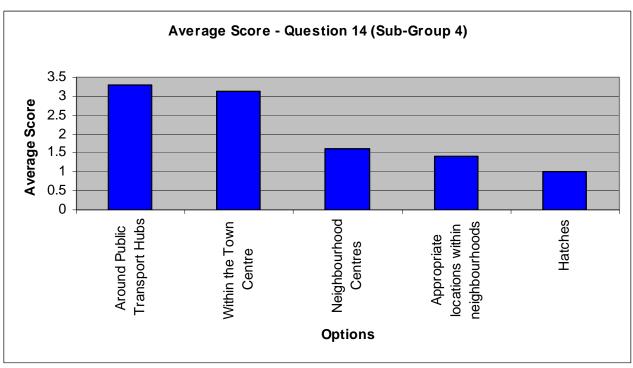
**Sub-Group 3 – Adjoining Parishes Residents + Other Residents** 



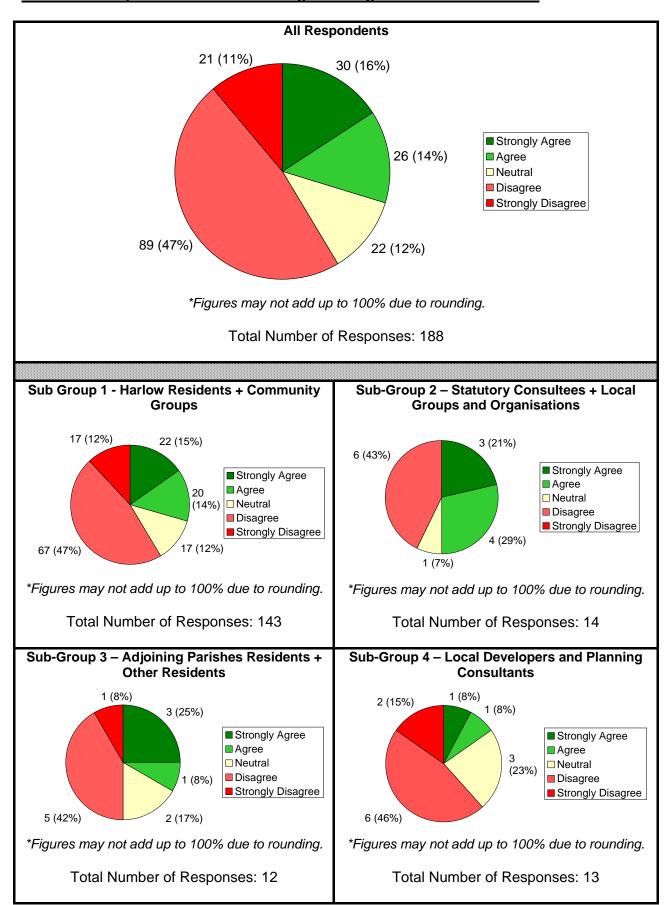


**Sub-Group 4 – Local Developers + Planning Consultants/Agents** 





Question 15 - Should the Council consider underused open spaces and other undeveloped land for development before considering releasing land in the Green Belt?

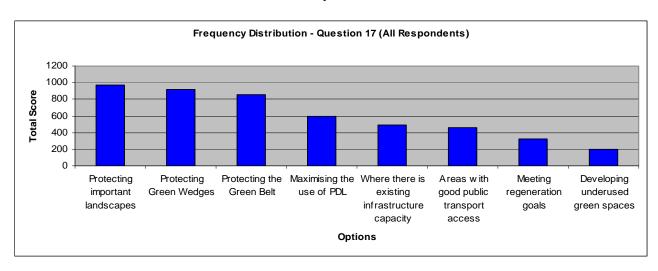


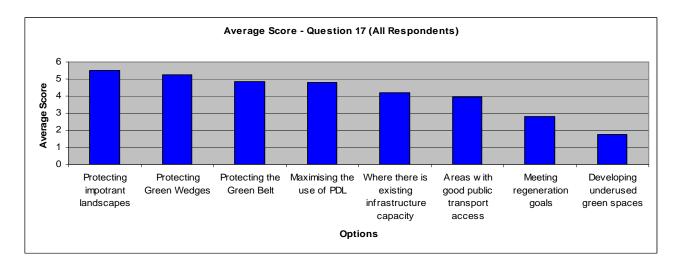
# Question 16 - The Green Wedges have performed a variety of roles in shaping Harlow. Should the roles of Green Wedges be reviewed to meet future development needs in the Harlow area?

- No no details (40)
- Yes no details (11)
- Green Wedges should not be developed on (70)
- Green Wedges are fundamental to Harlow's character (51)
- Green Wedges should be reviewed, but only to be strengthened/ improved / enhanced (12)
- Green Wedges should be reviewed, but only to widen roads to ease traffic congestion (2)
- Green Wedges perform an important flood protection role (16)
- Green Wedges perform important recreational, health/ quality of life and movement functions (17)
- Access to Green Wedges should be improved (18)
- This sets a dangerous precedent could lead to loss of all Green Wedges (2)
- Better to build on Green Wedges than build on the Green Belt and destroy countryside around Harlow. (4)
- Better to build on Green Belt than destroy Green Wedges. (1)
- Yes but only in order to build things that benefit neighbourhoods, e.g. schools, leisure facilities, retail facilities. (3)
- Yes, but only if open spaces are of poor quality / use (2)
- Green Wedges should only be developed as a last resort / only if absolutely necessary (3)
- Review of Green Wedges should consider where new Green Wedges are required to serve new urban extensions. (4)
- Development could take place on Green Wedges to enable regeneration of Harlow, if land swaps could re-provide Green Wedges elsewhere (1)
- Why should Harlow residents trust the Council to carry out this review correctly?
   (1)
- Consideration needs to be given to how they interface with developed areas, which often face away from them. (1)

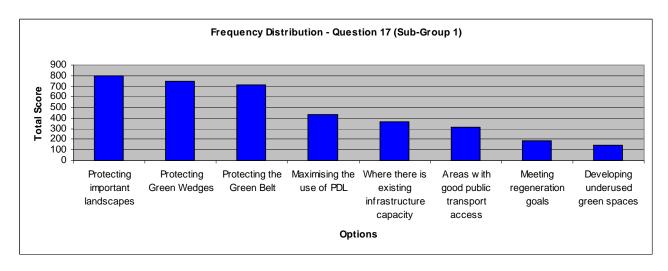
Question 17 - Please rank, in order of priority, the most important things that you think should direct new development in and around Harlow (1 = highest priority, 8 = lowest priority)

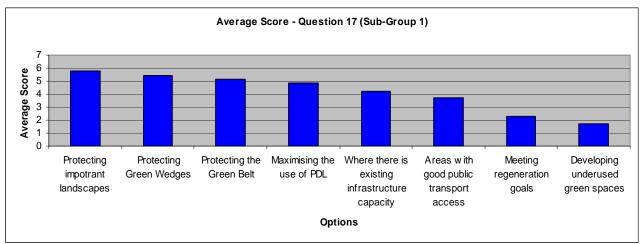
#### **All Respondents**



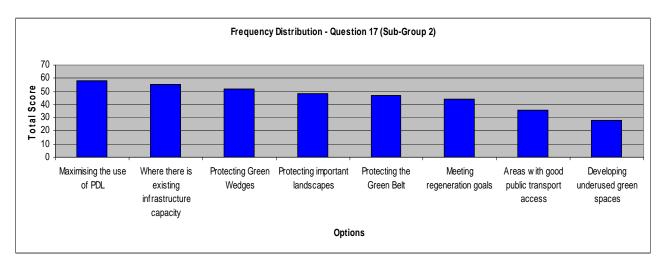


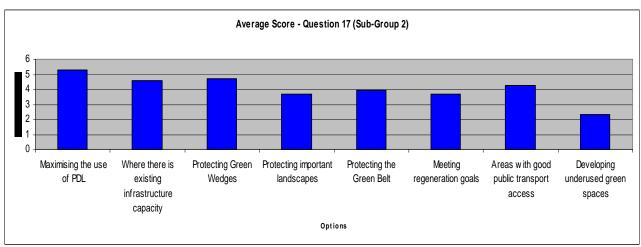
**Sub-Group 1 – Harlow Residents + Community Groups** 



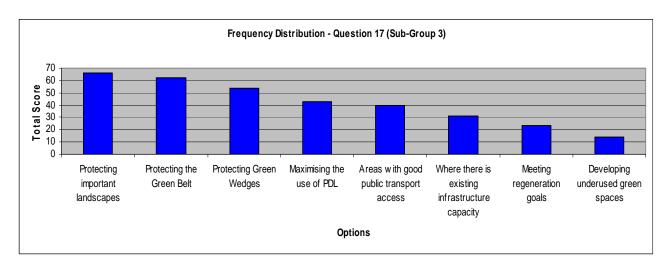


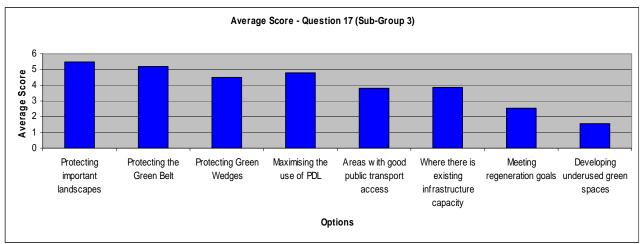
**Sub-Group 2 – Statutory Consultees + Local Groups and Organisations** 



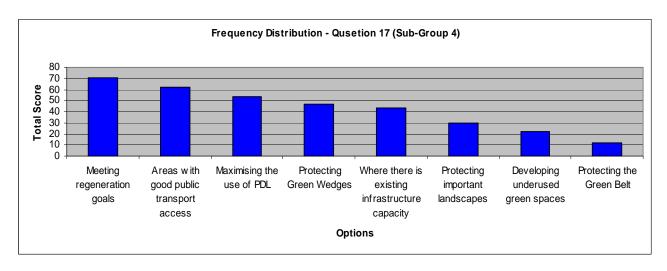


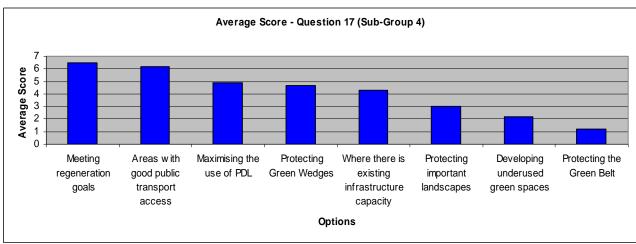
Sub-Group 3 – Adjoining Parishes Residents + Other Residents



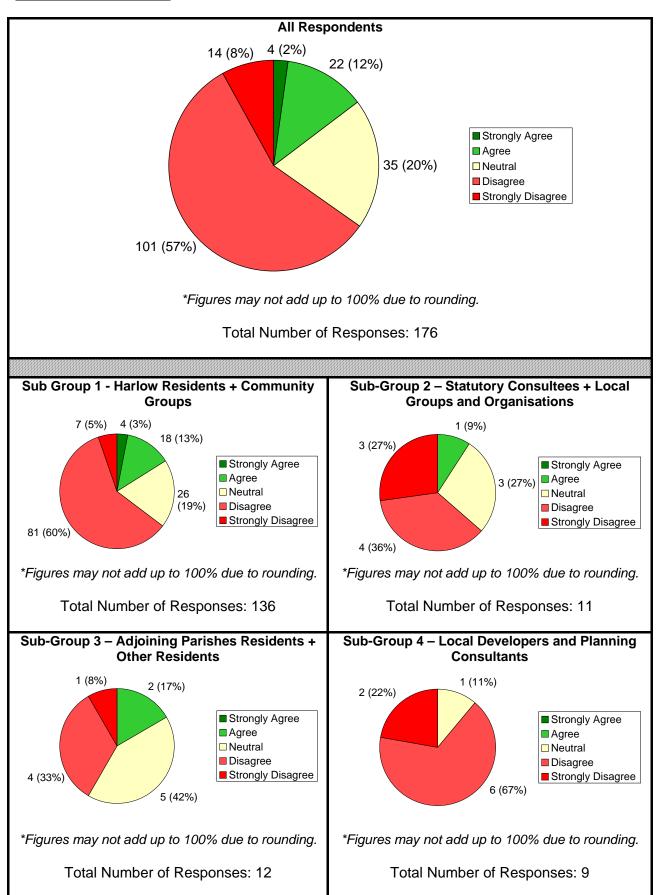


**Sub-Group 4 – Local Developers + Planning Consultants/Agents** 





# <u>Question 18 - Do the existing employment areas meet current and future employment needs?</u>



# Question 19 - If you disagree/strongly disagree, please explain what changes you think should be made to Harlow's employment areas?

Set out below is a summary of the key issues raised by respondents in relation to this question:

#### No / small changes

- o Templefields and The Pinnacles provide sufficient employment opportunities for the town and the wider sub-region.
- Parts of some existing employment areas may be suitable for other purposes however it is vital to retain the bulk of employment land in its existing locations.
- Protect employment areas from inappropriate development like housing.

#### Just consolidation

- Templefields and The Pinnacles should remain as the town's principal employment clusters. However clear opportunities exist for consolidation as much of the space in these areas is vacant which could provide space for employment growth and for consolidation from other areas.
- Consideration must be given as to whether employment land is in the right location and if the town's broader regeneration objectives could be achieved through the release of some existing land for other purposes.

#### Review their role / location

 The role and function of current employment sites should be reviewed to ensure the Council's regeneration and economic development goals are achieved. This should include consideration of the connectivity of the strategic road network and congestion from local employment sites.

#### Redevelop / regenerate them

- o Employment areas should be re-developed.
- Some existing buildings need to be revamped.
- o Existing employment areas need regenerating.
- Industrial areas need to be redeveloped.
- O Harlow's employment areas should be redeveloped as they were built in the 1950s/60s and are no longer fit for the needs of the 21st century.

#### More investment

- Some employment areas need investment to meet present requirements.
- The quality of employment land should be improved.
- o Improve linkages between employment areas and the Town Centre.
- o Make employment areas more flexible.
- A new M11 junction would provide an opportunity to deliver a high quality employment / commercial development as part of a new northern gateway to the town.
- Templefields has outdated spaces needing modernisation to attract new business, and infrastructure constraints need to be addressed with the creation of a new road link from River Way to the Sawbridgeworth Road.
- The expansion of Pinnacles should be examined further as the key employment area located closest to the Town Centre, There is a need to create high-value jobs by delivering appropriate business infrastructure and nearby links between employment sites and housing.

- New infrastructure is required to improve access to the existing employment areas to the north and west of the town.
- The immediate constraint on all traffic movements into and out of Harlow (including commercial traffic) is the limited capacity of M11 Junction 7. The first priority should be early implementation of proposals to upgrade and remove capacity constraints at this junction. In the longer term, a partial or complete southern bypass is the best solution to Harlow's highway capacity problems and to the problem of access to existing and proposed employment areas south and west of the town.
- o Improve the public realm in The Pinnacles to attract inward investors
- Integrate housing and employment sites to reduce car use
  - Housing and employment areas should be integrated to reduce car use and integrate communities.
- Use some employ areas for housing
  - o Fringe areas of employment land may be better suited for residential use.
  - o Convert disused employment areas for low-cost housing.
- Encourage more small work units
  - Encourage more small work units in Edinburgh Way.
  - Create employment opportunities in non-employment areas and small homebased work/work units in residential areas.
  - Too much emphasis on warehousing which creates few jobs and causes congestion problems. Create more SMEs and encourage home working.
- Employment areas should be for Harlow people
  - Employment areas should provide jobs for Harlow people.
  - o Existing employment areas should provide jobs for Harlow people.
  - o Create employment opportunities which meet the skills of local people.
- Need to attract more professionals to Harlow
  - Provide employment opportunities that will encourage professionals to come to Harlow.
  - o Encourage qualified people to work in Harlow.
- Need to attract more manufacturing to Harlow
  - Encourage more manufacturing firms to locate in Harlow to improve the local economy and assist in regeneration.
- Traffic congestion is a problem
  - Better transport infrastructure required to serve employment areas.
  - o Tackle traffic congestion in The Pinnacles.
- Improve public transport to employment sites
  - o Improve public transport links to Edinburgh Way and The Pinnacles.
  - Better access to public transport.
  - o Improve public transport links to The Pinnacles.
  - o Improve public transport links to Edinburgh Way and The Pinnacles.
- More leisure and recreation facilities in employment sites

#### Staple Tye

The industrial area at Staple Tye, including Lister House Health Centre, the low grade retail mews and Council depot should be identified as a regeneration area with the potential to bring forward a mixed use development that could support a range of new residential development and enhance the neighbourhood centre. Furthermore some of the larger industrial units at Staple Tye could be relocated to The Pinnacles or Edinburgh Way although some small, high quality business starter units could be developed to retain some employment function at Staple Tye but in a way that is more sympathetic to the surrounding area. Staple Tye should be identified as a regeneration and growth area and earmarked for an Area Action Plan within the LDF.

#### New high tech site

 A new high technology business site should be allocated in any new large urban extension to attract growth sector 'knowledge industry' jobs.

#### New areas in South close to J7 M11

- Designate some employment areas on the south side of the town close to Junction 7 of the M11.
- Future employment/industrial development should have direct access to the M11 so related traffic does not have to pass through the town.
- Consideration should be given to land at Harlow Park Nursery as a strategic employment location with good access to the M11.
- o Employment sites should be located closer to the strategic road network.

#### New areas in West / South West (not Roydon)

 New employment areas should be focussed in the west and south west of the town but away from Roydon.

#### New areas in North east

 Moderate employment development should be allowed in north-east of the town.

#### New areas to east of M11

o Harlow should be expanded to the east beyond the M11 with employment land being part of that expansion.

#### New areas in east / south east

 More employment land should be allocated on the east and south east of the town which have good motorway links.

#### Extend Pinnacles

- New employment areas should be designated including extensions to The Pinnacles to make up for these losses.
- The Pinnacles should not be extended as it would have an adverse impact on Roydon Village.

#### Urban extensions

Need to consider employment land provision within any urban extensions

# Question 20 - How do you think Harlow Council should shape future shopping development within the town?

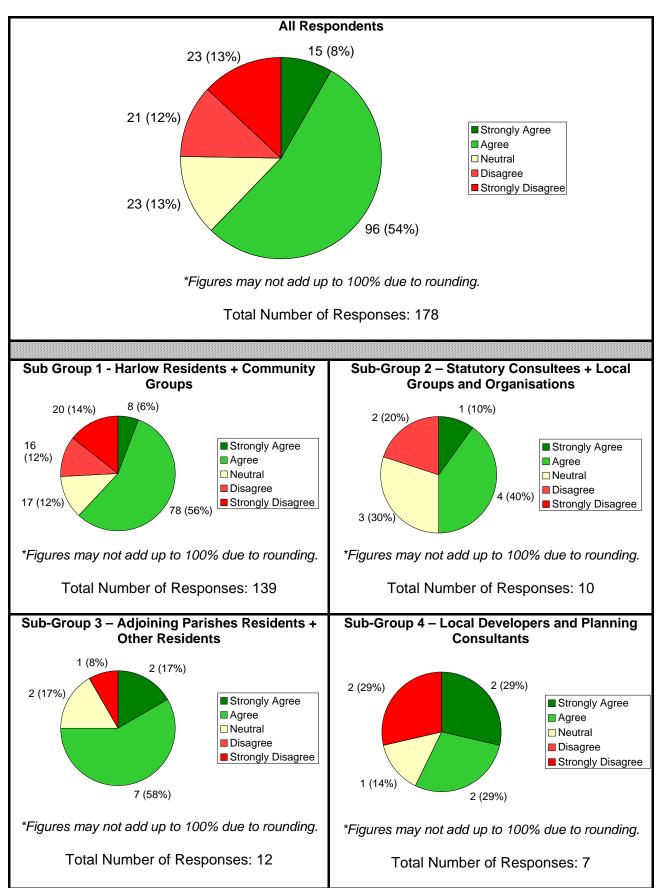
Set out below is a summary of the key issues raised by respondents in relation to this question:

- Retail development should be encouraged to locate in the town centre
- Develop the area around the Odeon
- Refurbish town centre
- Edinburgh Way retail is inaccessible to those without cars
- No more retail in Edinburgh Way
- Additional quality shops food and clothing
- Better shopping environment
- General shops in hatches, mixed shopping in neighbourhood centres
- More shops in Town Centre
- Provide a link between Queensgate and harlow Retail Park (Homebase, Argos etc)
- Department Store in Town Centre
- Lower rents/rates in shops
- Cheaper car parking
- Difficult to find your way around to key retailers
- Fewer fast food outlets and restaurants
- More independent outlets
- Better pedestrian links between retail areas, including bridges and crossings
- Distribute shopping to neighbourhood centres
- No more shops in Town Centre
- Reshape shopping areas to uniquely reflect Harlow, not like other shopping centres
- Regenerate all shopping areas
- Regenerate market area
- Harlow should not become a regional shopping centre
- Redevelop northern Town Centre should be a priority
- Reverse the trend of "Retail Parks" offer free parking in Town Centre
- Empty shops should have alternative uses
- Cinema should be brought back into use, as public hall
- Promote night time economy
- Potential in the existing architecture of northern town centre.
- A vibrant enclosed market in a permanent building
- Traffic congestion effects shopping, do not increase floorspace until this is resolved
- Sheltered links between shops
- A mixture of shops and housing to provide a more vibrant centre
- Study the needs of the local community and which shops should be provided to draw people in.
- Competition from the Westfield Stratford shopping Centre
- Move bus station to the north side of Market Sq. Develop bus station for a Department Store
- General environmental maintenance
- Major retail centre in north east Harlow would support new M11 junction and northern by pass.

- Need for another large supermarket is debateable
- Better consultation of land owners over redevelopment plans
- Reconsider Primary frontage policy as a tool to promote vitality and viability
- The Strategy is appropriate for the town as a sub-regional centre, and in terms of protecting neighbourhood centres and hatches.
- Existing shopping hierarchy should be maintained
- Densification of mixed uses is supported at neighbourhood centres and hatches
- Use growth agenda to accelerate redevelopment/regeneration of hatches
- Council should use compulsory purchase powers to facilitate redevelopment
- The Council should define options for the Town Centre and consult on them, this will enable the Council to choose a developer partner for redevelopment
- Town Centre SPD should not proceed in advance of the Core Strategy defined options for Town Centre development
- In this economic climate time should be allowed to prepare the "policy foundations" to assist in future interventions
- Options for Town Centre improvement could include
  - o A greater or lesser extent of growth in retail floorspace
  - Extent of growth in supporting uses: including leisure and recreation, culture, employment and residential
  - o Redevelopment confined to Local Plan boundaries or wider
  - Single developer partnership redeveloping comprehensively or a collective of individual landowners/developers
  - o Phasing of redevelopment
- Uncertainty caused by revocation of East of England Plan extends to growth in retail expenditure and the scope to regenerate the Town Centre
- Core Strategy should be realistic in what can be achieved in short to medium term.
- Balance is needed in what can be achieved by a Town Centre Strategy
- Key drivers for Town Centre policy are the need to ensure realistic, viable and flexible proposals that are capable of implementation with a clear distinction between short, medium and long term plans.
- Comprehensive redevelopment of the Town Centre may not be appropriate at this stage, and should constitute an option at this stage.
- Include clear concise policy regarding retail centres in Harlow, whilst recognising an awareness of economic changes.
- Policy on the retail network should clarify the following:
  - How Harlow will accommodate identified need for growth in Town Centre use
  - How Harlow will accommodate identified need for growth in neighbourhood centres and hatches
  - How extension of Town Centre will be integrated into the existing uses and function
  - Actively work with neighbouring authorities to recognise Harlow's role as a sub-regional centre
- Provide a clear understanding how the shopping hierarchy will support major growth and contribute to regeneration and economic development.
- Economic growth should ensure that the quality of lives for deprived communities.
- Audit existing centres, for role, vitality, viability, and ability to incorporate new development.

- Consideration of alternative centres to accommodate new development, especially urban extensions
- Developing policy options with best access to Town Centre will assist the Council's aims.
- Harlow's Retail Market is characterised by:
  - o Trade "leaks" to other retail centres
  - o Decline in rental values and high vacancy rates
  - o Primary catchment area less affluent than the secondary one
  - o Retail offer is primarily value and mass, with few premium retailers
- New population in growth area will provide a an increase in retail expenditure capacity
- Retail in Harlow North would not compete with the Town Centre

# Question 21 - What is your view on the Consultant's recommendations regarding Option A?

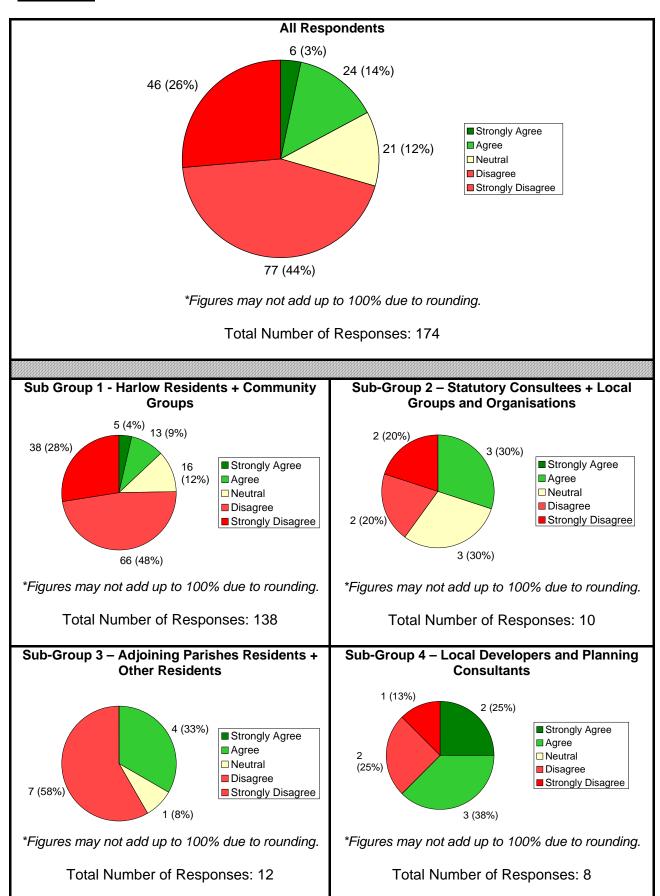


Set out below is a summary of additional comments received in relation to Option A:

- Development to the north will split the town.
- Development to the north will never be part of Harlow.
- There isn't sufficient capacity in the road system, without a new access to the M11.
- This option would have a negative effect on the historic villages of Hunsdon and Eastwick.
- Why is Harlow preserving its environment at the cost of residents in another District?
- This option doesn't seem to comply with the themes and other strategies referred to in the Issues and Options document.
- This option is preferred as it allows new infrastructure to be provided all in one place, rather than spreading the burden around existing areas of Harlow. The Green Belt should be left alone.
- Development to the North of Harlow is preferable to destroying Harlow's Green Wedges.
- Careful thought is required to ensure growth to the north is linked to the town centre and Temple Fields for pedestrians in terms of crossings and paths.
- This approach can only be considered if appropriate transport links are in place.
- Harlow doesn't need to expand any more. What is needed is better housing for the existing population.
- The brief for the Options Study was misguided so all options are irrelevant.
- Harlow north development would lie outside both Essex and Harlow Council's control, so wouldn't work without changes to administrative boundaries.
- It's unwise to put all our hopes for growth on this option as East Herts. Council are the decision makers and do not favour this option.
- Proposed housing is way beyond local need.
- The East of England Plan is discredited and shouldn't be used.
- Connectivity problems across the Stort make this option unviable. Connections between the north and south would be very difficult and costly, financially and environmentally.
- Unless access between the A414 and the M11 is addressed this would increase congestion.
- Expansion to the west is supported, which scores highly in the Scott Wilson report.
- Consultants are correct to view transport connections as being inadequate to support this option.
- This is the best option, if the Green Belt has to be developed.
- This option will result in urban sprawl into the Green Belt and amalgamation with existing towns.
- Because there are methodological irregularities with the way Scott Wilson have created and appraised these options, the findings are invalid.
- Any extension to the west or south is unsuitable because of the sensitivity of the landscape and the distance from major facilities and public transport.
- Housing without employment will create a dormitory town.
- There are hundreds of empty homes in Harlow.
- This is the best location near railway, A414 and not far from the M11.
- It would be essential for sewerage / water infrastructure problems to be resolved.
- This option is predicated on the East England Plan, which is no longer relevant.

- It is unclear why Harlow is consulting on these options as they were not intended to form options for consultation at Issues and Options stage.
- Flood Risk Assessments and the Sequential Test should inform the location of growth in Harlow.
- Uncertainty exists over the delivery (in terms of land acquisition and funding of infrastructure)
- There is uncertainty about the planning and political acceptability of growth to the north with East Herts. DC and Herts. CC.
- Harlow's evidence base shows that large-scale urban extensions to the east would have the least environmental impact.
- The East of England Plan Panel Report concluded that the east of Harlow is the least constrained option for growth. However, Option A fails to direct a significant quantum of growth to the east.
- Considering existing allocations in Harlow's Local Plan at New Hall, it would appear that less growth is directed to the east than is already approved.
- Scott Wilson should have concluded that Option A does not utilise the least sensitive land.
- Option A is top down and based on flawed and withdrawn policy in the East England Plan.
- Option A is a very high risk strategy since it places the majority of Harlow's future development in a single site which is outside the control of Harlow Council.
- Large allocation to the north fails to utilise existing educational capacity, most notably at primary schools.
- There is a need for more realism about feasible annual house building rates.
- This option will not facilitate the regeneration of the town.
- The methodology utilised by consultants isn't adequate to consider whether development in any location would support regeneration.
- Lower levels of growth to the north, immediately adjacent to the town, coupled with expansion to the east, south and west would offer significantly better outcomes in terms of regeneration and sustainable transport.
- Perceived negative constraints to development to the north by consultants aren't actually barriers to development.

# Question 22 - What is your view on the Consultant's recommendations regarding Option B?



Set out below is a summary of additional comments received in relation to Option B:

#### Existing Infrastructure Deficit

- Expansion of East Harlow would increase traffic congestion in Harlow, damage Harlow's economy and result in loss of jobs and deter new businesses.
- The road system cannot cope with this level of growth to the east.
- o Growth to the east would increase flooding problems in this area.
- This option would generate demand for secondary schools which would overwhelm current provision, without providing sufficient dwellings to justify a new secondary school in any single location.
- Concerns about lack of transport infrastructure to the south of the town and that housing development here would encourage car use and increase traffic congestion.
- Expansion to the east would further stretch road, rail and school infrastructure.
- This option doesn't support Harlow's rail infrastructure.
- This option will have a major impact on Roydon, particularly in terms of traffic.
- Development to the north of Harlow is not possible because of inadequate transport connections.
- Option B proposes far too much growth for Old Harlow and Churchgate Street, which cannot cope with more traffic and flood risk.
- Northern growth would add to traffic problems.
- Consultant's views about growth to the south encouraging car use are shared.
- Development to the south and west would not have good access to schools, healthcare, shops and the roads couldn't cope.

#### Direction of Growth

- The East of the town is the only place which should be expanded.
- Spatial Option B reflects a more balanced distribution of growth within Harlow.
- Harlow north being limited to below 4,000 is supported.
- More development to the west and less development to the east is suggested.
- The proposals are very vague and lack detail.
- This option would successfully complete the Katherines and Sumners extensions to Harlow.
- The level of growth is far greater than Harlow needs.
- The East England Plan required significant growth to the north, recognising this would act as a transformational catalyst to stimulate further investment in Harlow and address current deficiencies. Small scale incremental development would not provide this level of change.
- Harlow north is the only realistic location where the level of growth required could be provided.
- o 3,600 dwellings to the north would be a missed opportunity.
- o It would be preferable if more houses were built in the south than the west.
- The level of growth to the north in this option needs to be on a greater scale, as, unlike extensions to the east, south and west, development to the north would not be able to link into existing neighbourhoods and infrastructure.

- o Harlow north is better related to transport and town centre, employment areas.
- Water Cycle Strategies need to inform the level of water infrastructure required to serve developments.
- Strategic Flood Risk Assessments be used, along with the sequential test approach to determine the location of growth.
- o This option is favoured but only if Gilden Way is not developed.
- There shouldn't be development in East Herts.; there is sufficient space around Harlow in Essex for development.
- Option B directs only 3,300 dwellings to the east, even though the housing capacity in Miller Strategic Land's control is 4,500 to 5,000.
- Directing only 3,300 dwellings to the east of Harlow fails to utilise the least environmentally sensitive land.
- This level of growth to the east and south could result in coalescence with Roydon and would compromise the southern ridge line.
- Roydon Village could be adversely affected by this option and absorbed into Harlow.

#### Providing additional Infrastructure

- o Fragmented development wouldn't raise sufficient funds to upgrade the existing infrastructure in order to cope with development.
- This option would spread the load but new infrastructure would be more costly and unfeasible.
- It won't be possible to provide the right infrastructure for all of these new separate developments.
- Development to the north of Harlow will need to fund a sewerage treatment works.
- Development to the east will require an upgrade to the Rye Meads Sewerage Treatment Works.
- Development to the north would be able to accommodate all necessary physical and social infrastructure for new residents, avoiding negative impact on existing services and facilities in Harlow. Option B would fail to provide infrastructure in a similarly comprehensive way.
- The potential to explore innovative energy and drainage technologies on north Harlow would reduce the sewerage constraints.
- o Focusing growth to the north provides the opportunity to leverage investment rather than focusing growth in incremental parcels of land around Harlow.

#### Environmental Constraints

- Any development to the south should not breach the sky line of Rye Hill ridge.
- Expansion to the south would bridge the edge of the basin and be visible for miles around, contrary to Gibberd's original plan.
- There would be a huge impact on the character of existing communities.
- o Growth to the north and east of Harlow would infringe areas of natural wildlife, historic habitats and unspoilt countryside.
- o There should be no development on the Green Belt.
- o Development to the east of Harlow would be environmentally undesirable.
- o It is environmentally unacceptable to develop the north.
- o Growth to the west risks coalescence with Roydon.
- Growth to the north will not avoid coalescence with Sawbridgeworth at all.

#### Policy Context

- Option B is based on Policy HA1 of the East England Plan and therefore explicitly top-down.
- This recommendation is based on flawed and withdrawn policy which should no longer be considered.
- People are more important than the policy of the East England Plan.
- Despite being a "policy-led approach", Option B fails to distinguish between the size of urban extensions to the east and west, as stipulated by Policy HA1 of the East England Plan.

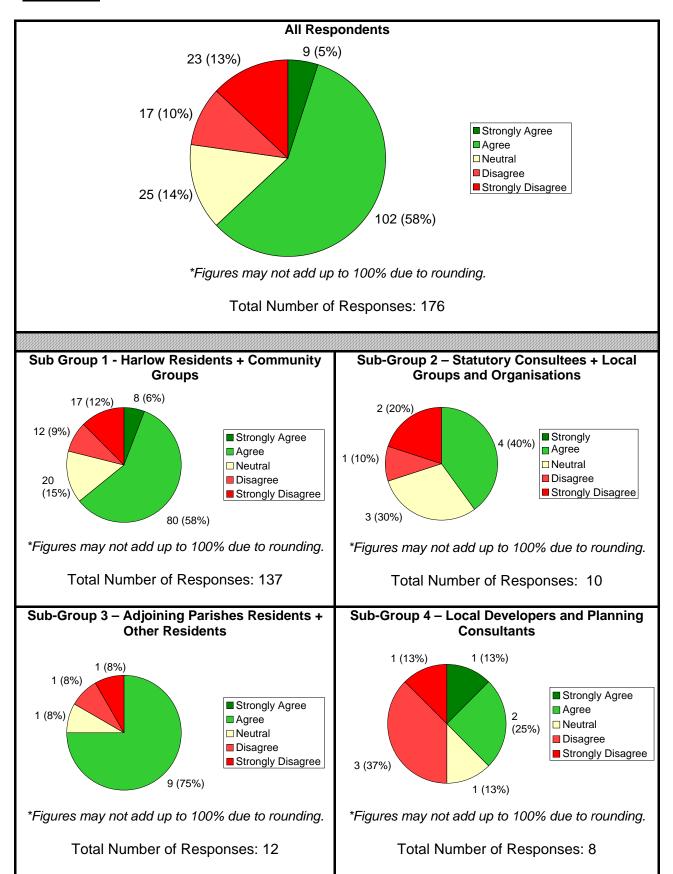
#### Regeneration

- o Growth north of the Stort wouldn't be part of Harlow.
- Any development to the south should be in conjunction with the redevelopment of existing areas. Lower growth could be possible in the south if nearby areas were redeveloped.
- o It's unclear how these developments will assist regeneration of adjoining Harlow neighbourhoods.

#### Methodological Concerns

- Option B being the only option consultant's viewed as being "reasonable" –
  is surely worthy of serious consideration.
- Scott Wilson's report was intended to be evidence base, so putting such a large volume into the Core Strategy is unhelpful to the process of providing potential options.
- Methodological concerns are raised about Scott Wilson's report. The report fails to consider urban extensions fairly and the methodology is flawed, as one Spatial Land Area was split. The conclusions of this study are therefore invalid.

# Question 23 - What is your view on the Consultant's recommendations regarding Option C?

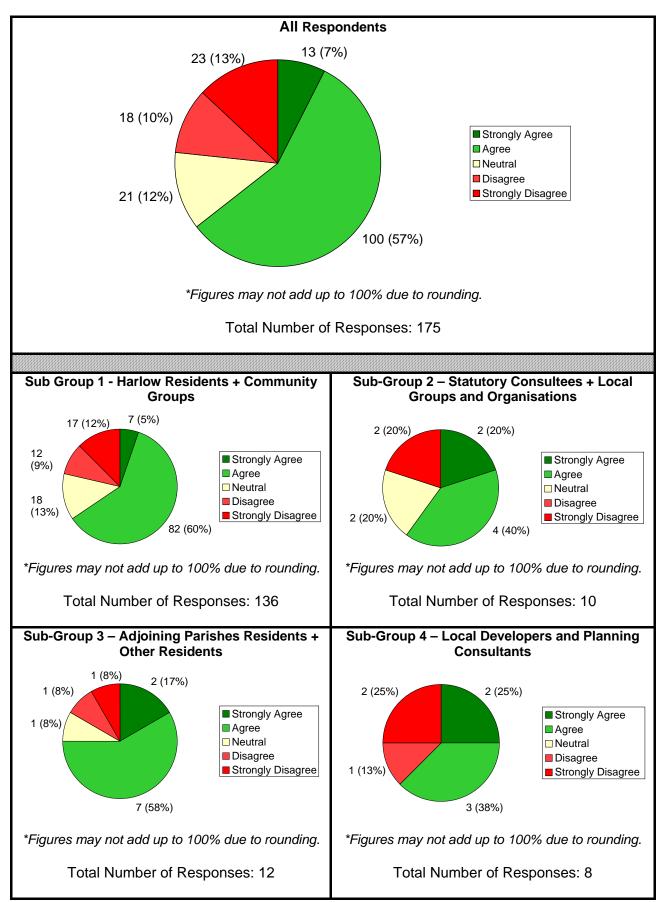


Set out below is a summary of additional comments received in relation to Option C:

- Expansion of East Harlow would increase traffic congestion in Harlow, damage Harlow's economy and result in loss of jobs and deter new businesses.
- The road system cannot cope with this level of growth to the east.
- Traffic congestion would be worse under this option.
- Flooding would increase.
- The RSS should not drive considerations now.
- The Green Belt should be retained and left free from development.
- Public transport links need to be improved to Harlow and Epping station.
- Any expansion to the south would increase traffic congestion on the A414 and M11
- It is not right to develop Rye Hill ridge, which would remove an important natural barrier between Harlow, Epping and London.
- Growth to the west should be directed to areas which score well for bringing about regeneration, e.g. land west of Katherines.
- Consultants are overly concerned with private car use.
- It isn't acceptable that this option is ruled out simply because there is no development to the north.
- All options proposed are going to lead to car use, so it's pointless to discriminate on this basis.
- This option would destroy historic villages of Old Harlow and Churchgate Street.
- Methodological concerns are raised about Scott Wilson's report. The conclusions of this study are therefore invalid.
- This option would be least disruptive to the rest of Harlow.
- There's no evidence this would increase traffic congestion on Southern Way.
- This option doesn't address Harlow's transport problems.
- Scott Wilson's analysis is that Option C is the most sustainable option but doesn't comply with Policy HA1. This is based on top down policy which is now removed, so shouldn't apply.
- Flood Risk Assessments and the Sequential Test should inform the location of growth in Harlow.
- The criteria used by Scott Wilson to assess the impact on regenerating Harlow is flawed.
- The study also overplays the proximity to the M11 junction in encouraging car use and congestion. Surely growth to west would lead to cars traversing Harlow to get to the M11 and causing congestion?
- Growth to the east is preferable in terms of Green Belt as the M11 provides a definitive boundary to further expansion.
- Growth to the east provides the opportunity to provide land for a new M11 junction and a park and ride facility to the north east of Harlow.
- Proximity to Templefields employment land and Harlow Mill Train Station are key sustainability benefits for growth to the east.
- The ridge line would be breached which is unacceptable.
- Growth to the south could also increase pressure for a southern bypass which is also unacceptable.
- From and educational and care perspective this spatial option is likely to require a secondary school without utilising existing capacity at Mark Hall School.
- Passmores and Stewards schools are also likely to find the proposed scale of growth challenging.

- Growth to the east should be strongly linked to existing public transport interchanges such as the town centre and Harlow station.
- The residential nature of southern way means that it cannot cope with this level of growth to the South.
- Whether this option complies with the RSS is no longer relevant.
- All spatial options will impact on car use and congestion.
- There is the potential for a rapid bus transit route between southern extensions, existing neighbourhoods and the town centre.
- From a landscape perspective this option would be preferable.
- Extensions to the east and south could incorporate many landscape principles, e.g. Gibberd.
- Methodological inconsistencies raised about Scott Wilson's study.
- The East of England Plan remains part of the Development Plan for Harlow, so the consultant's conclusions about this option are valid.

# Question 24 - What is your view on the Consultant's recommendations regarding Option D?



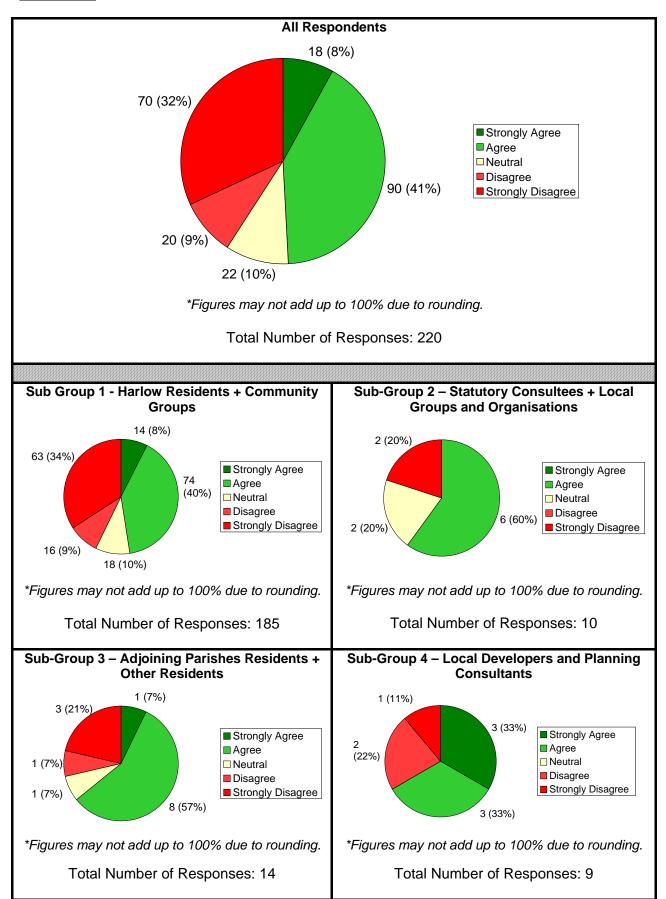
Set out below is a summary of additional comments received in relation to Option D:

- Development to the north is problematic because of inadequate transport connections.
- Large scale development to the north is unachievable because of sewerage constraints.
- Development to the north is unacceptable because of the environmental and landscape impact.
- Flooding is a real possibility north of the Stort.
- Development to the east would negatively affect the historic villages of Old Harlow and Churchgate Street and surrounding ancient landscape.
- Development to the north wouldn't regenerate Harlow and is likely to deplete the quality of life of people already living there.
- The Green Belt should be protected.
- Development to the north of the Stort is likely to link with Hertford and Bishop Stortford, rather than Harlow.
- All opportunities to bring forward vacant Brownfield sites should be explored before development outside Harlow.
- Money needs to be spent on regenerating the existing housing first.
- Archaeological sites should be considered, prior to development.
- The southern ridge is vitally important geographic division from Epping and London and should be retained.
- This level of growth cannot be catered for by Harlow's schools.
- There is a lot of reliance on building in East Hertfordshire, which is a risk.
- Expansion to the east of the town will put unacceptable pressure on infrastructure.
- Housing to the west of Harlow is supported (i.e. land to west of Katherines).
- Development to the north will split the town due to connectivity problems across the Stort.
- Development to the south will create unacceptable pressure on existing infrastructure.
- Major development very close to Harlow's main train station should be considered.
- This option risks coalescence with neighbouring towns and villages in the Green

  Belt
- Concerns are raised about methodological irregularities in the Scott Wilson Report. Namely, the way consultants developed spatial options. This means that the options put forward are based on a biased and flawed approach.
- Employment growth is necessary before housing, to avoid creating a dormitory town.
- The green areas within the town should not be destroyed.
- Major growth to the north does not fit in with the original plans for the town.
- Development to the north will increase traffic congestion in Harlow.
- The level of development to the east is not relevant to bringing forward a new junction on the M11.
- The evidence used by Scott Wilson to develop the regeneration-led option should guide development to the south and east, rather than the north (see figure 8 in the Scott Wilson Report).
- In Scott Wilson's study, areas to the north of Harlow score well on regeneration but this is as a result of specific rural circumstances. However, this has no relationship with the regeneration needs of Harlow and is a major flaw.

- The Scott Wilson report warns that major growth to the north could negatively impact efforts to regenerate the town by creating a separate new extension. However, this point seems to have been overlooked when formulating this regeneration-led option.
- Flood Risk Assessment and the sequential test should guide any final option.
- Growth to the north will require upgrades to the Rye Meads Sewerage Treatment Works.
- To have regeneration benefits to Harlow, there needs to be close proximity between new development and the existing neighbourhoods in order to improve housing, employment and environmental conditions for areas in need of regeneration. In this context, large-scale development to the north is questioned.
- Option D fails to utilise the environmentally least sensitive land to the east.
- Proposed development to the south is likely to result in increased traffic congestion on Southern Way.
- Comments on the highways impact on the south of Harlow are objected to. Surely, there will be highways impact as a result of any growth in all these locations, so it is unclear why southern way is singled out in particular.
- Harlow lacks credible evidence to support regeneration-led growth.
- Harlow's Regeneration Strategy should be the cornerstone of any regenerationled approach, but it is lacking in detail.
- Development to the north on this scale would be a competing settlement with Harlow, as recognised by the Panel Report to the Examination in Public of the East England Plan. This issue isn't considered by the Options Study.
- Major development to the north would divert investment away from Harlow and undermine regeneration aims.
- The provision of only 5,720 dwellings to north Harlow is a missed opportunity.
- Transport and sewerage constraints to the north are over-exaggerated by the consultants.
- The Harlow Infrastructure Study does not represent a sufficiently robust assessment to allow conclusions about infrastructure requirements for north Harlow to be drawn.
- Traffic modelling undertaken on behalf of developers demonstrates that development could be accommodated with minor improvements to the existing network.

# Question 25 - What is your view on the Consultant's recommendations regarding Option E?

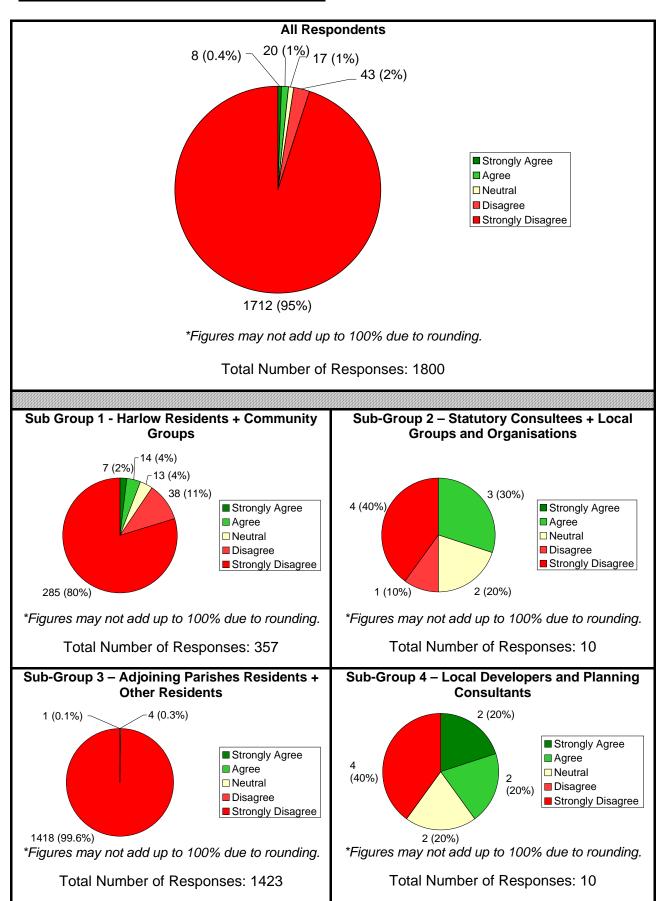


Set out below is a summary of additional comments received in relation to Option E:

- Concerns about coalescence with Sheering.
- Coalescence with Roydon is unacceptable.
- Growth to the west is supported over growth to the south (which has more significant landscape and southern ridge line)
- Other respondents drew attention to methodological irregularities in the way Scott Wilson have created and appraised these options and suggested that the findings of the study are invalid.
- Development on land north of Gilden Way would be inappropriate for landscape, archaeological, traffic congestion and flooding reasons.
- Consultants don't seem to have knowledge of local issues.
- Traffic congestion would reach saturation point under this option.
- The Green Belt should be protected and retained.
- There needs a new link to the M11 before development takes place.
- There needs to be more sustainable transport going through the town.
- Transport led investments should be directed to Harlow Mill Station.
- Harlow Mill is a local stopping only and cannot be considered as a major transport link.
- Growth to the west would cause access and parking issues with Roydon Station and cause traffic congestion.
- Development to the west would impact the Stort Valley landscape areas.
- The scale of development to the south and west needs to be sufficient to support the regeneration of deprived areas of Harlow.
- Scott Wilson's report states that Spatial Land Areas EH10, EH6 and EH7 do not score highly and the barriers between these areas and Harlow (i.e. the A414, River Stort and Navigation Way).
- Strategic Flood Risk assessments and the sequential test should guide the location of growth.
- All sewerage upgrades and upgrades to Rye Meads will be required irrespective of the location of growth. Therefore it is incorrect to discount particular locations for these reasons.
- If enhanced sewerage capacity isn't provided in time to serve land to the east of Harlow, then on-site provision of treatment will be feasible either on a temporary or permanent basis.
- Growth to the east provides more potential to make land available for a future new M11 junction and necessary highway approaches from east Harlow.
- This area could also provide a continuous public transport corridor between the M11 and Harlow Town Centre, in addition to potential park and ride facilities.
- The availability of transport infrastructure and the ability to safeguard and deliver new transport infrastructure is a strong reason to direct development to the east of Harlow.
- Growth to the south, north and west of Harlow would not deliver the transport and infrastructure benefits which growth to the east could provide.
- This option provides an unbalanced distribution of growth and fails to take advantage of small scale growth to the south west.
- Development on Green Belt to the east is preferable as it would be contained by the M11.
- Development to the east would also relate better to Harlow and relate to the existing road network and railway stations.

- This option would require 2 new secondary schools and would make utilising the expansion potential of Mark Hall challenging.
- This option is supported because it is most likely to increase use of sustainable transport, walking and cycling and reduce congestion.
- This option would be reasonable were it not in conflict with the East England Plan.

# <u>Question 26 - What is your view on the Consultant's Suggested Approach to accommodating growth around Harlow?</u>



Set out below is a summary of additional comments received in relation to the consultants' suggested approach:

- Concerns raised about development on the eastern side of Harlow, in particular the inclusion of Land North of Gilden Way.
- Land North of Gilden Way should be kept in reserve for Council House building
- There must be growth.
- One step at a time
- Development will be above the ridge line all round Harlow.
- The rejection criteria of other Spatial Options are just as valid for this option.
- The option does not appear to take into account potential flooding.
- All options will destroy attractive and historic landscapes and countryside.
- There should be as little expansion as possible into the Green Belt.
- The western expansion is perhaps the least harmful
- Agree in general with the consultants comments.
- Deal with traffic congestion first.
- This option removes the "Green Village" concept of Harlow's design.
- Regeneration within town would be better investment
- Development is not wanted
- The consultants were asked how to accommodate growth, rather than what is best for Harlow. It was the wrong question
- Quality of life sacrificed for bureaucratic targets.
- Will cause drainage problems and traffic congestion
- We don't need another village. Need for recreational space, and heritage protection
- Strongly disagree. Option is constrained by Policy HA1 of the East of England Plan which is to be revoked. Without that constraint option c is preferred.
- This approach is unsustainable, and will do damage to the economy and environment of the area.
- No analysis has been provided to indicate how much development would provide overall benefit to Harlow.
- Support a better not a bigger Harlow.
- The area north of Harlow should remain an essential part of the Green Belt.
- Future direction and strategy should wait until the Localism Bill is enacted.
- This is the Preferred option, but without the houses north of the river.
- Cover valuable farmland
- Object to expansion into the Green Belt
- Object to expansion to the north
- Object to expansion the north east
- Object to expansion in the south west
- Object to expansion to the south
- Growth to the east should be limited to around Newhall
- Expansion east will create acceptable pressure on infrastructure connecting to town centre, M11, and stations
- Expansion south will create acceptable pressure on infrastructure connecting new development to M11
- Development north would potentially split the town in two. Connections north and south would be problematic and costly financially and environmentally
- Land to the west has been identified as appropriate.
- Gilden Way is important boundary to the expansion of Harlow

- Level of development near M11 J7 is too high
- Growth west is supported, not next to the Pinnacles, but adjacent to Katherines. This is supported by the consultants
- Development to the north should take priority
- Do not understand the diagram
- Consultants have argued against land to the north, yet in this option they recommend it.
- Development to the north would not integrate with Harlow
- Least suitable of all the options
- Strongly disagree with development to the east
- Harlow north fits the criteria if it is nationally clear we need more houses
- Option is loathsome and illogical.
- Agree with some reservations about potential resistance to development.
- Growth should be more equal around Harlow
- Most logical
- Phased development
- The need for new development is not being driven by housing need, but as way to raise funds.
- Consultant's report is flawed concerning the western growth area in terms relation to this option, and should be removed as part of the evidence base.
- No development outside present areas is necessary.
- Employment must come first to provide the incentive to improve the environment.
- Housing without employment will create a dormitory town.
- Junction onto the M11 is the highest priority for regeneration and sustainability
- Fail to see how this will sole any of the issues and the other problems
- Does not offer any benefits to the town
- Empty homes in Harlow that are too expensive, building thousands of homes is not the answer.
- A new M11 link road would not be able to cope.
- Regeneration areas should not prejudice the rest of the town
- Options Study should be reviewed in the light of the revocation of the East of England Plan.
- Concentrate development in one area, so that proper infrastructure can be provided.
- Consultant has turned down first five options regardless of his previous objections
- Best option, however, less housing to east and more in the south
- North is the best option. Fragmenting development is not a good idea. Remove
  east, west, and south, and concentrate in the north where infrastructure could be
  provided form funds from development.
- Against any development in Hertfordshire, especially Gilston and Eastwick
- Sustainability appraisal should be informed by a strengthened evidence base for the historic environment
- Suggested approach should be viewed in the context of the abolition of the E o E Plan
- The abolition of East of England Plan makes the constraints led approach option set out in the Consultant's study more relevant, and would indicate development to the east was appropriate.

- Options A-E and suggested option could all be acceptable, sequential test and Strategic Flood Risk Assessment should inform decision on option.
- East of Harlow could accommodate around 7700.
- East is least environmentally sensitive location
- M11 junction can only be achieved if Eastern growth is brought forward first.
- Lack of certainty over cooperation between Harlow and adjoining districts, may frustrate growth.
- Eastern growth can be brought forward as a standalone first phase of growth.
- Address environmental concerns
- Potential problems with southern ridgeline
- South and west allocations are not strongly related to the town centre, employment sites or station, thus increasing car commuting.
- Most appropriate distribution to ensure best use is made of opportunities, but avoiding pressure in particular locations
- The case for Harlow north is generally supported
- Consultants' study lacks detail in appraising sites around Harlow, and is consequently not a robust assessment.
- East of England Plan evidence base remains relevant
- Majority (11000) of the 16000 requirement should be accommodated at North Harlow.
- Development to the North will benefit East Herts. in that its development can be focussed here rather than in isolated villages and towns.
- Development in North Harlow will be able to bring about transformational change.
- A road link from the Pinnacles northwards should be promoted, which will bring a number of benefits.
- Stort Valley could become a new focus for the town.
- Consultant's report is a robust piece of work.
- Findings of the report still hold good as to the most appropriate way to accommodate growth.
- Additional housing units to 2031 make new secondary schools viable.
- From educational and care service it is preferable that northern extension is delivered before eastern to provide services earlier in the plan period.
- Expansion potential at Mark Hall may be utilised for early growth in the east.
- Precise phasing is required to ensure social infrastructure is in place.
- This option addresses some of the key transportation issues associated with north and east development.
- Development in south and south east will have significant impact on Southern Way.
- A Green Belt review should consider all land on the edge of Harlow as to whether it is performing the Green Belt function, and ensure that sufficient land is available and does not require further review.
- Justification for suggested option is consistent with the way options A-E were assessed.
- Southern growth area in this option does not reflect the higher growth target accepted in option B.
- Highway constraints have not been applied consistently in the options
- This option failed to consider a lesser sized urban extension to the west of Harlow.
- Land to the west should be identified as an alternative site to the south.

- The pending revocation of the East of England Plan points to the constraints-led option in the Spatial Options Study.
- Growth of Harlow can achieve regeneration, but as the EIP panel notes that it is the form of the development is as, if not more, important than the quantum.
- Must ensure that a separate settlement is not created, which would happen if north Harlow developed significantly.
- Balance of issues following the revocation of The East of England plan should concentrate on regeneration.
- Growth North of Harlow can relieve pressure on the historic towns in East Hertfordshire and Epping.
- Disagree with the consultant's assessment of the constraints in the Northern growth area.
- Expansion east and south will put considerable pressure on infrastructure.

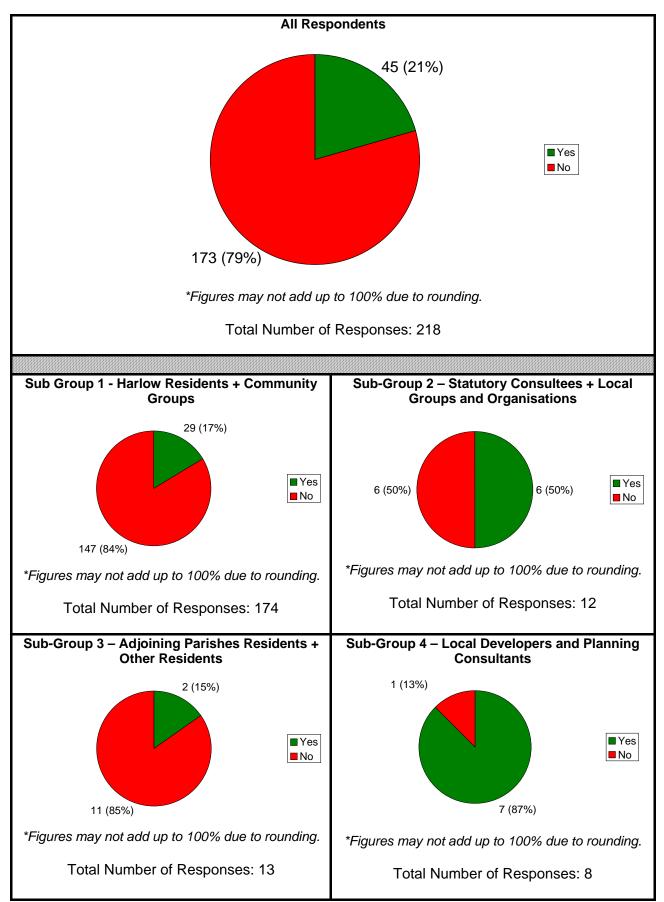
# Question 27: Do you have any other comments on the approach to growth around Harlow?

Below is a summary of the comments received in relation to this question:

- Harlow's infrastructure is inadequate to provide for the large scale development proposed
- Traffic congestion is significant issue in Harlow. Until firm commitments to infrastructure investment are made (particularly road, rail, water supply and disposal, flooding and traffic) no further development should be started around Harlow.
- Any further development on Harlow's perimeter will only encourage London commuters to the area with no input to the local community.
- Green fields north of Harlow are not suitable as a broad location to meet district
  wide housing requirements. The towns and villages north of Harlow should be
  treated no differently in the LDF from other towns and villages of similar size and
  character in the district.
- I support limited housing to meet local needs in accordance with locally developed parish and town plans. I strongly object to major development north of Harlow.
- Insufficient capacity at local hospital, surgeries, schools and leisure facilities
- Development would damage green space and Green Belt
- Development strategy could blanket out the historic value of the town. Should look at Letchworth and Broxbourne for examples of places that have retained theirs.
- Shouldn't progress given the intended abolition of the East of England Plan.
- Development to the north of Harlow is badly thought out and would lead to an unbalanced development
- Growth to the north has been undermined by Independent Inspector, Local authority, County Council and UK Government. Argument for Harlow north have failed
- Brownfield land should be used before any Green Belt land is considered.
- Harlow needs to be regenerated from within and not by building around the town.
- Important agricultural land would be lost.
- Plenty of green areas within Harlow to support new housing.
- Impact on villages to the north of Harlow.
- Destruction of important habitats in the area and loss of valued countryside.
- Growth to the north would compete with Harlow for regeneration.
- Make better use of unused land within Harlow i.e. around industrial areas which could be rezoned for residential areas.
- Development to the north would result in a loss of amenity for walkers
- Potential for more infill within Harlow.
- Question Options Appraisal methodology when assessing he suitability of land for development,
- South and East Harlow has potential for further growth.
- Concerns with the methodological irregularities of the Options Appraisal report and believe that the study is flawed and does not provide a robust basis to inform growth options around Harlow.
- Plans should consider the shape and design of Harlow.

- Growth must regenerate the central areas, otherwise these will be left bleak for a generation.
- A case for growth to the north of Harlow has yet to be made. Harlow Council should not pre-empt East Herts. Council's policy process and should not proceed unilaterally with a preferred option based on growth to the north.
- If East Herts. Council's preferred option does suggest that development north of Harlow should form part of a development strategy for East Herts. District, Harlow Council should reflect this in its Core Strategy.
- Water cycle study should be used to inform the most sustainable solutions in water supply. SuDs and biodiversity measures should be included in the proposal.
- It is important to consider capacity issues at Rye Meads.
- Concern that only one growth option is being presented for consultation. Other reasonable alternatives should be considered, to satisfy the requirements of PPS12.
- There is a block of evidence highlighting that a step change in housing provision is required to meet the backlog of unmet housing need, particularly in the East of England. Evidence underpinning growth requirements set out the RSS remains largely unchanged despite the pending revocation.
- Current economic climate means that the Core Strategy should look to smaller scale, organic additions to Harlow's existing neighbourhoods that can be implemented with infrastructure improvements rather than major new provision. Further development should be progressed when market conditions improve and public funding is available. There is scope for this type of growth to the south of Harlow.
- Development should integrate with Harlow and not compete against it. Smaller scale proposals would facilitate regeneration and renewal.

<u>Question 28 - Do you think all the key elements of infrastructure necessary to support the emerging Core Strategy have been identified?</u>



The top chart shows the overall response to this question. The four charts underneath show the responses to this question broken down into the four sub-groups defined in Table 2 (Chapter 2)

# Question 29 – If no, what additional infrastructure do you think is needed to support the emerging Core Strategy?

Set out below is a summary of the key issues raised by respondents in relation to this question:

- Funding and Delivery of Infrastructure
  - Unless firm commitments are made to invest in Harlow's road, water and sewerage infrastructure, further development of Harlow cannot be justified and shouldn't be started.
  - Development not supported by appropriate infrastructure should not be supported.
  - It is essential that development is phased with the provision of infrastructure.
  - Infrastructure required should have been detailed for each of these options before opinions can be given.
  - o Key aspects of infrastructure are technically undeliverable.
  - Given infrastructure costs and difficulties, it is more realistic to scale back level of development to that which can be accommodated within existing infrastructure.
  - Harlow Council will need to demonstrate how this infrastructure will be funded, given that the funding situation has changed dramatically since HIS was published in March 2010 (and the bulk of the study was carried out during 2008).
  - o There will be considerable competition for funds between different categories and it is important that sustainable transport is not squeezed out.
  - Development may be discouraged as a result of unviable developer contributions towards infrastructure. Market is fragile. Small requirements can have a major impact upon project viability, meaning schemes may not proceed.
  - Infrastructure needs of adjoining authorities should also be considered in context of urban extensions and the knock on impacts on infrastructure outside of Harlow should be recognised (e.g. East Herts. and Epping).
  - This question is impossible to answer as the Core Strategy does not contain any formal proposals.

#### Reliability of Harlow's Evidence Base

- Evidence base (Harlow Infrastructure Study) is based on desk top review at a very superficial level. Therefore, the schemes put forward in this study are not supported or justified by any strategic transport modelling work. Further evidence will be required before the transport proposals of the Core Strategy could be defended at an Examination in Public.
- Evidence base for the Core Strategy identifies key elements of infrastructure but there is a lack of clarity in stating how this relates to different quantities of growth in different locations. Options for development to north, east, south and west of Harlow are not treated consistently with regard to infrastructure.
- o It would be helpful to see thresholds of development in each location that would trigger particular infrastructure requirements and to prioritise development that can be brought forward with improvements to existing infrastructure, as opposed to major new infrastructure.

#### Road Infrastructure

- Traffic on main roads around Old Harlow is already too high for roads' capacity.
- o Proposals are simply going to exacerbate the problem.
- o More slip roads and roundabouts are required.
- Maintenance of existing infrastructure should be considered.
- Development in Sumners West would need its own access road to prevent the existing Sumners estate becoming swamped with traffic.

#### Traffic Management

- o Accidents on M11 cause gridlock in Harlow.
- Bus lanes should be reviewed and are not the answer. Better roads (dual carriageways) are required, not more under-used bus lanes.
- o More examination is required into congestion on roads.
- Reduce the number of traffic lights along Edinburgh Way, First Avenue and Second Avenue to allow traffic to flow more freely.

#### Bus Services

- Better bus links from Harlow to outlying towns and villages is required.
- o There are parts of Old Harlow with no bus service.
- o Public transport needs to be more convenient and better value.
- For many destinations, no direct bus routes are available (needing to changes at Town Centre). This makes buses unattractive compared to the car.
- Commuters coming into Harlow for employment purposes need a reliable public transport service.
- o Reference should be made to Harlow Bus Station and railway stations.

#### Train Stations

- Car parking at Harlow Mill Station
- Better use and access to Harlow Mill Station.
- More parking at Harlow Town Station.

#### Central Line Extension

- If development occurs to the south of Harlow, we need to consider extending the underground from Epping.
- o Tube extension to junction 7a with park and ride.
- A train linking Harlow Town Centre to the Central Line Station in Epping, providing direct access to employment opportunities being created in East London and also Canary Wharf.

#### New Junction / Bypass

- The Core Strategy should be explicit in the desire to promote better access to the M11 to aid both residential and employment growth. This is best achieved through the provision of a new motorway junction to the north east of the town.
- North east access to M11 is required.
- Moving traffic away from current A414 by building a new link that does not go through Harlow at all, connecting back onto the A414 before entering M11 directly.
- An M11 link road to prevent grid lock of Harlow.

- The A414 shouldn't be extended east to M11 as it would destroy valuable recreation space along the River Stort.
- A414 needs to bypass the town.
- Delivery of growth should not become entirely contingent upon the provision of a motorway junction as much can be delivered in advance of that.

### Cycling

- o Cycle ways and footpaths and green infrastructure need to be considered.
- o Harlow urgently needs a cycle track from Harlow to Epping, Loughton.
- Cycle routes need better maintenance of surfaces, removal of broken glass, etc.

#### Potential for Modal Shift

- Fuel costs are going to make a car based transport system increasingly uneconomic and the alternatives are non-existent, unreliable or overloaded.
- The Council needs to be realistic about car use. Many people travel into the town for work and they cannot or will not use public transport.
- o Road traffic is the elephant in the room in respect of housing development.
- o The point should be to develop Harlow as a place for green living, not increase infrastructure provision.
- Travel planning has reduced car use by 10% in some areas and should be rolled out across the town.
- Harlow shouldn't rely on the findings of consultants who do not know the town.

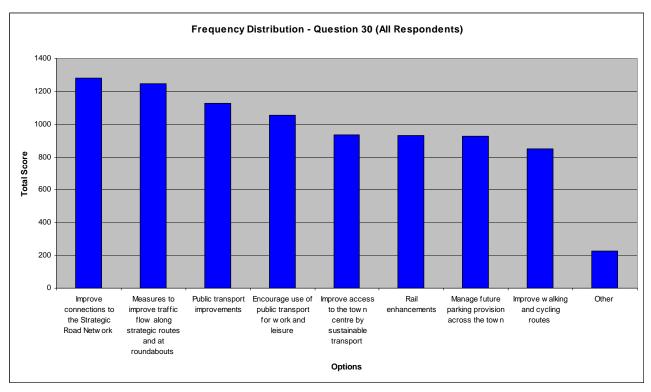
#### Social Infrastructure

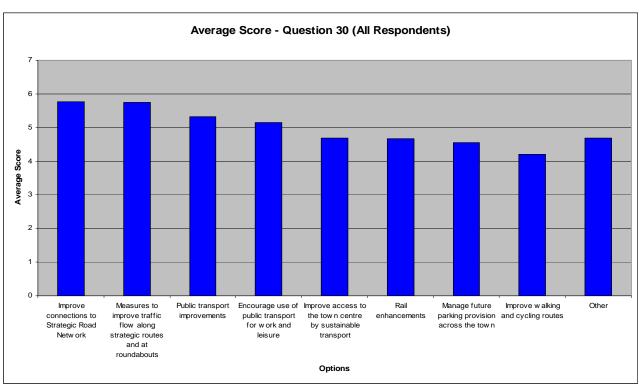
- Access to schooling and healthcare.
- o Improved housing and heating design upgrades.
- o More open parkland.
- Hospital provision is overloaded.
- Places of worship and culture (e.g. a new theatre)
- A larger hospital is required and other social services.
- Why is Harlow closing schools and building houses on sites and then needing more schools.

#### Water and Sewerage Infrastructure

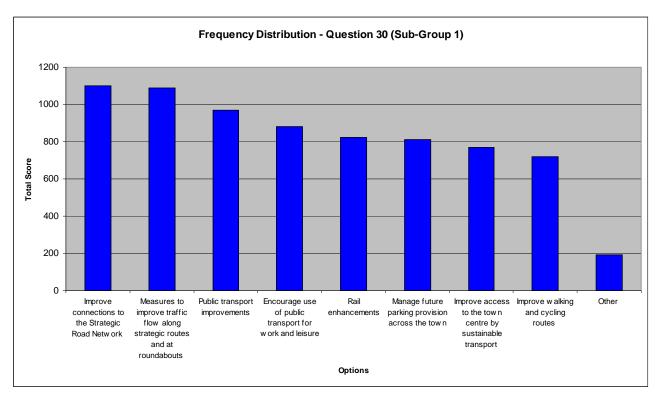
- Sewerage and drainage infrastructure is overloaded.
- Water supply and sewerage infrastructure should be in place before development commences.
- o Potential flooding is a concern.
- Sustainable Drainage Systems. Core Strategy should be clear that Harlow has insufficient capacity in drainage network and any expansion of the town should address this issue, through SUDs
- Rye Meads Water Cycle Strategy was not a detailed study and only provides suggested solutions. Several areas of concern remain unresolved.

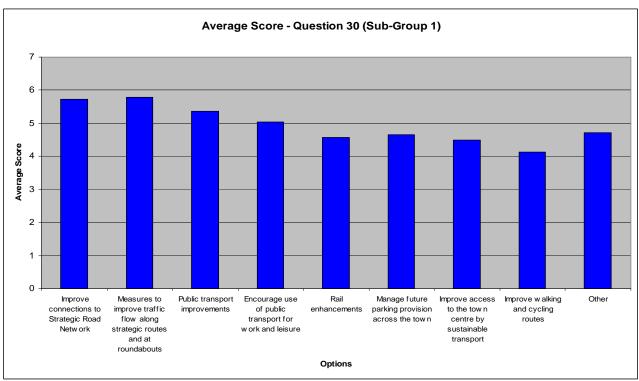
### **All Respondents**



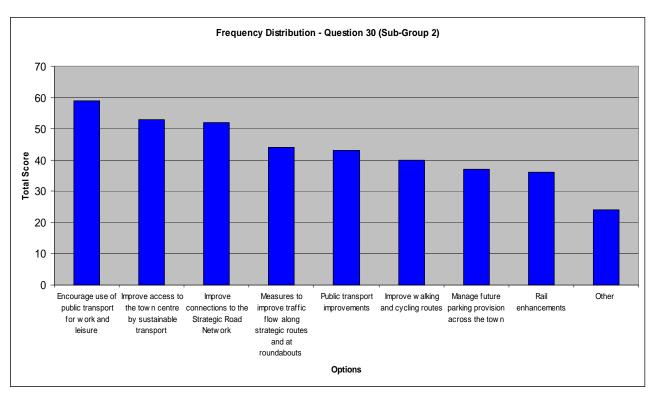


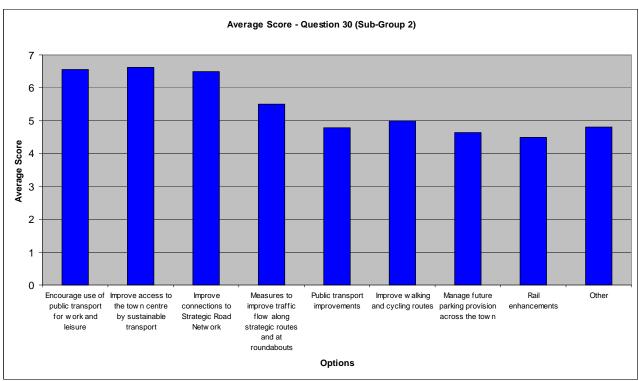
**Sub-Group 1 – Harlow Residents + Community Groups** 



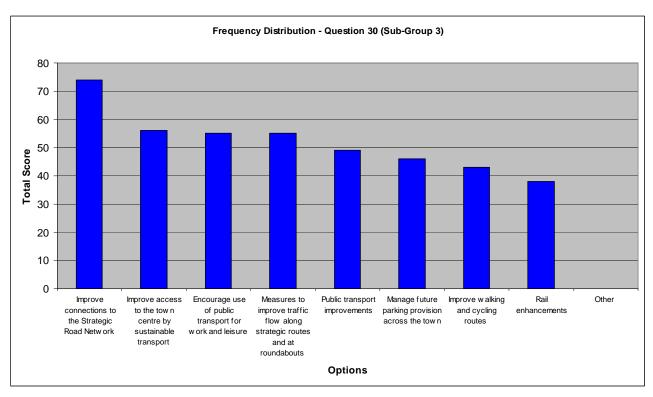


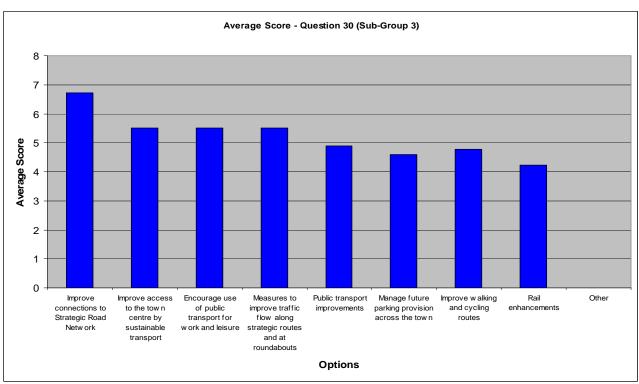
Sub-Group 2 – Statutory Consultees + Local Groups and Organisations



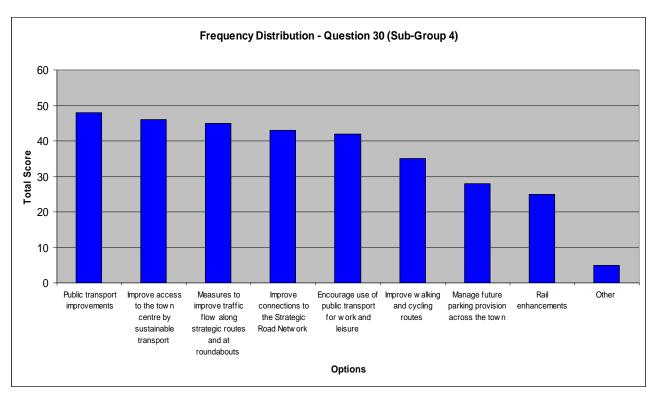


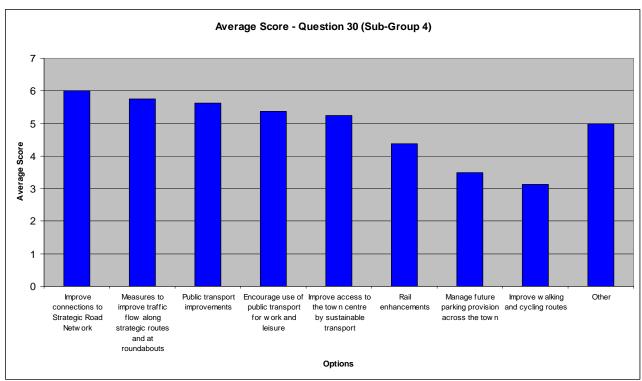
Sub-Group 3 – Adjoining Parishes Residents + Other Residents





**Sub-Group 4 – Local Developers + Planning Consultants/Agents** 





# Question 31 – Do you have any further comments to make, at this stage, on how Harlow should be developed?

Set out below is a summary of the key issues raised by respondents in relation to this question:

#### Strategic issues

- The implication of the revocation of the East of England Plan and the Localism Bill needs to be considered.
- o If the East of England Plan is revoked much of the evidence remains valid.
- The Cala Homes judgement means the East of England Plan is still a material consideration.
- Need for some modest development in Harlow but the infrastructure is inadequate for the level proposed.
- There is a need for regeneration and new housing in Harlow balanced against the need to protect the countryside, Green Wedges and open spaces.
- Justifying growth to secure infrastructure provision is flawed, reckless and unachievable.
- Local needs should determine level of growth.
- The growth proposed is essential
- Using critical mass to justify development produces highly fragile growth.
- o Climate change and the impact of carbon emissions need to be considered.
- Impact of ageing populations and of high density development on mental health needs to be considered.
- o Green Belt and Green Wedges should be protected from development.
- The River Stort makes an important contribution to green infrastructure.
- Developing Harlow as a major retail centre will add to congestion.
- The development of the town should be based on Garden Cities principles and the Gibberd Plan.
- The Council's previous plans have not reduced housing waiting lists or traffic congestion and have caused flooding, erosion of green spaces, the loss of the swimming pool and sports centre.
- o Development should take place in other towns rather than Harlow.
- o There is not enough space in Harlow to accommodate more people.
- o Regeneration is a top priority.
- o There is no clear mechanism to achieve regeneration.

#### Cross Boundary issues

- o Harlow cannot allocate land outside its administrative boundaries
- o Expansion of Harlow can only be achieved with the agreement of neighbouring planning authorities.
- It would be premature to propose locations for growth until East Herts. DC have considered their options.

#### Development location issues

- Harlow could expand to the west of Pinnacles and to the west and south west of Katherines where there are sustainable workplaces.
- o Harlow North is a better location for development as it is near rail links.
- Harlow should expand eastwards including beyond the M11 to create new housing, retail, employment and leisure linked to a new junction to the motorway.

- Low density housing could be located at Essex Hunt Kennels with no visual harm.
- Option C should be the preferred option.
- Consideration should be given to Harlow Development Corporation's plans for the Tylers Cross area.
- Development north of Gilden Way is opposed because of traffic and a range of environmental impacts that would occur as well as the impact on Old Harlow.
- Development north of Harlow is opposed because of the impact on existing villages and on the environment.
- Better use should be made of land within Harlow, including using land at the Hatches, adding extra floors to offices and flats with higher densities in the town centre and using empty employment land

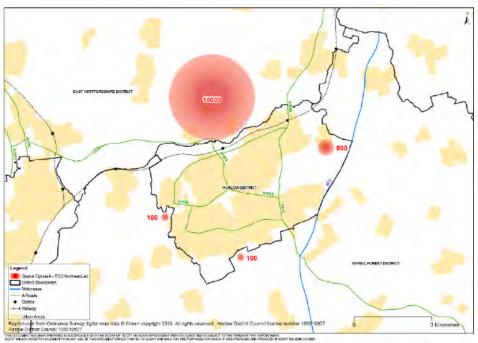
#### Infrastructure issues

- Existing road, footpath and cycle path infrastructure should be improved together with a new junction to the M11.
- Sewerage and water capacity needs to be improved and the impact of flooding needs to be considered.
- Other community based infrastructure is needed including places of worship, schools and care provision.
- Car parking provision should be increased to reflect the dependence of the car.
- A park is needed for Old Harlow.

### **Consultant's Suggested Growth Options**

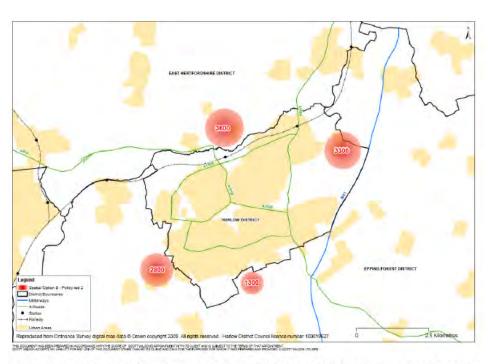
The consultant, Scott Wilson, tested five growth options. The full report can be viewed online at <a href="https://www.harlow.gov.uk/ldf">www.harlow.gov.uk/ldf</a> (follow the link to 'LDF Evidence Base').

Option A - RSS: Northern-Led



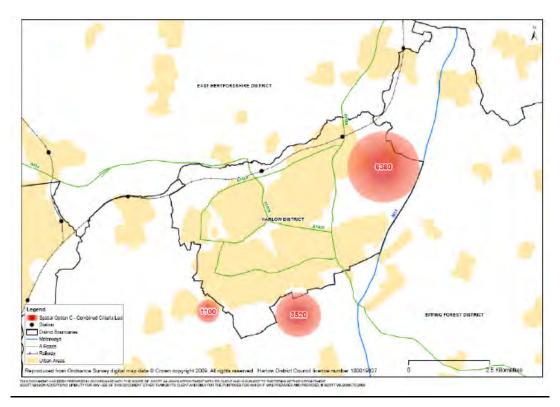
please note: distributions of development are purely illustrative and do not represent fixed boundaries. The specific location of new development will be identified at subsequent stages of the planning process

### Option B - Policy-Led 2

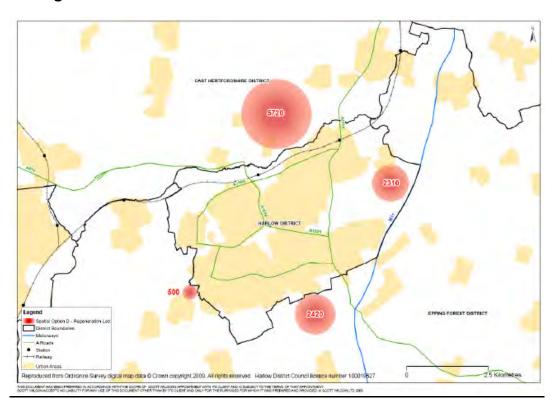


please note: distributions of development are purely illustrative and do not represent fixed boundaries. The specific location of new development will be identified at subsequent stages of the planning process

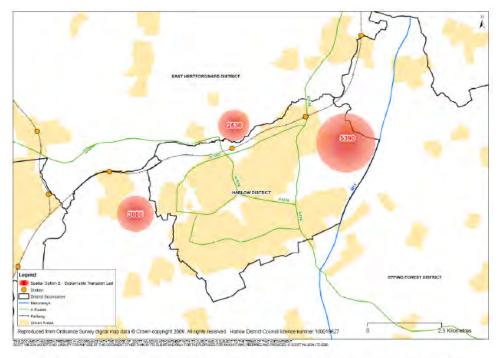
Option C: Combined Criteria-Led



Option D: Regeneration-Led

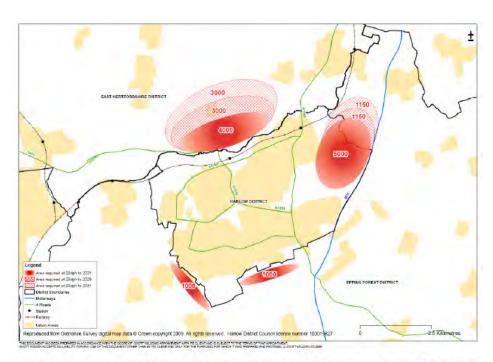


**Option E: Sustainable Transport-Led** 



please note: distributions of development are purely illustrative and do not represent fixed boundaries. The specific location of new development will be identified at subsequent stages of the planning process

### The Consultants' Suggested Spatial Approach



please note: suggested distributions of development are purely illustrative and do not represent fixed boundaries. The specific location of new development will be identified at subsequent stages of the planning process

# Appendix 2 - Summaries of responses from 'Specific Consultees'

### Appendix 2.0 Summaries of responses from 'Specific Consultees'

This section contains summaries of the responses received from organisations identified as 'Specific Consultation Bodies' within the Council's 2007 adopted *Statement of Community Involvement* (SCI, page 26). The full representations made by these bodies can be viewed on the Council's website at <a href="http://harlow-jdi.consult.net/ldf">http://harlow-jdi.consult.net/ldf</a>

Table 3 sets out the Specific Consultation Bodies that responded to the consultation in alphabetical order. The summaries of their representations follow in the same order.

Responses received from Specific Consultation Bodies
East of England Development Agency
East Hertfordshire District Council
Eastwick and Gilston Parish Council
4. English Heritage
5. Environment Agency
Epping Forest District Council
7. Epping Upland Parish Council
8. Essex County Council (Environment, Sustainability and Highways)
Hertfordshire County Council (Environment and Commercial Services)
10. Hertfordshire County Council (Property)
11. Hertfordshire Biological Records Office
12. The Highways Agency
13. High Wych Parish Council
14. Hunsdon Parish Council
15. Little Hadham Parish Council
16. Much Hadham Parish Council
17. Natural England
18. NHS West Essex (Estates)
19. NHS West Essex (Public Health and Property)
20. Roydon Parish Council
21. Sawbridgeworth Town Council
22. Thames Water Property Services
23. Widford Parish Council

#### 1. Summary of representation received from East of England Development Agency

- The East of England Plan is still the part of the adopted Development Plan and therefore decision makers should have full regard to this.
- Council should reinstate references to the Regional Strategy and including policy targets and key centres for development and change to ensure that it has relevant, appropriate and sound evidence to support its policies and the approach to its delivery and implementation.
- Harlow and its urban sub region and its hinterland are expected to disproportionately drive growth, given the importance of agglomeration and the concentration of assets. The strategic ambitions identified below and should be expressed in Harlow's Core Strategy.
  - 1. Support the expansion of important high value sectors such as pharmaceuticals, aerospace, and film production.
  - ensure employment land and premises meet the needs of business and high growth clusters
  - 3. Invest in major transport corridors to tackle congestion and improve capacity, including rail routes to London, M11 and A1
  - 4. Improve connectivity within the arc, particularly the links between Harlow and Stansted
  - 5. Tackle shortages of affordable housing and housing for key workers as part of creating sustainable communities.
  - 6. Support measures to raise employment rates and the profile of higher value employment across the London Arc by overcoming barriers to employability and raising basic high level skills and participation in deprived wards
  - 7. Support further expansion of the higher and further education offer across the arc, focussed on key centres, including Harlow, to strengthen skills at NVQ3 and 4 sectors to facilitate progression to higher education that supports the arcs globally competitive position.
  - 8. Support the sub regional roles of key centres of development and change by recognising the reality of sub regional economies and the need to support the roles that they play within the region and sub region.
  - 9. Deliver a high quality and sustainable urban environment across the arc that supports historic assets, brings forward brown field sites for development and delivers new town regeneration.
- It is important that the strategy sets out clearly the economic aspirations for Harlow including the role and functions of its partners including adjoining authorities. There are considerable cross boundary issues relating to the growth associated with Harlow and EEDA would suggest that a spatial option should be included that refers more closely to the location and distribution of economic growth as well as housing growth.
- EEDA is pleased that the economic development of the district is identified as a major issue. Harlow has many implicit advantages in order to pursue the renewal and growth ambitions of the district.
- Support is also given to section 2.11 in respect of prosperity which gives a succinct and accurate over view of the issues experienced by Harlow. The complex socio economic factors require holistic policies to ensure that Harlow develops spatial options which are both realistic and deliverable.

#### 2. Summary of representation received from East Hertfordshire District Council

- Maintains total opposition to any development north of Harlow, in East Hertfordshire District, for the growth of Harlow, as contained in the East of England Plan 2008.
- Considers it premature to base the Harlow Core Strategy on the East of England Plan 2008, in the light of the Government's intention to reform of the planning system embracing the localism agenda. It is now necessary to re-examine the case for growth north of Harlow from the bottom-up.
- Raises a number of concerns about Harlow Council's evidence base and advises that the evidence base be reviewed and updated in order for the Council to prepare a fully bottom up strategy for Harlow. These concerns need to be addressed prior to the development of a preferred approach. Specific concerns include:
  - The scope of much of the evidence base for the expansion of Harlow was limited by the top-down policy direction of the East of England Plan. There were a number of limitations in this work that need to be reassessed.
  - Harlow Council's evidence base is lacking in any fresh studies conceived outside the former government's framework. This is a major omission and some basis for an independent assessment agreed by both Councils is urgently required.
  - Harlow Council's evidence base does not provide any robust evidence either way linking growth to regeneration and affirms that the arguments for critical mass as a basis for regeneration remain unclear.
- The agreement of both Councils is necessary in order to proceed with any proposals for growth of Harlow into East Herts.
- East Herts. Council sets out the planning history in the lead up to the preparation of the East of England Plan and sets out its response to the East of England Plan. It also provides extracts of the Panel Report. East Herts. District raises concerns about how decisions regarding growth around Harlow were informed.
- Raises concerns about the conclusions of the options appraisal study and the determining role that the RSS policy had on selecting the preferred option for growth around Harlow.
- Prior to advancing their Core Strategy Preferred Options, Harlow Council should pay particular attention to how infrastructure is to be funded, in order to ensure that development and infrastructure are appropriately phased.

#### 3. Summary of representation received from Eastwick and Gilston Parish Council

- Strongly object to major built development north of Harlow.
- Support limited housing north of Harlow in East Herts. to meet local needs in accordance with locally developed parish and town plans.
- Well before the adoption date of the Core Strategy there will no longer be a
  prescriptive development strategy for Harlow set out by national or regional
  planning strategies. Specifically, there will no longer be any need to distribute
  development in accordance with policy HA1 of the East of England Plan.
- The green fields north of Harlow are not suitable as a broad location to meet Harlow's housing requirements on sustainability, planning, environmental, social, infrastructure and economic grounds.
- The consultant's own work highlight that removing the locational constraint imposed by Policy HA1 it would appear that Option C is the preferred option.
- Eastwick and Gilston Parish Council sets out the planning history in the lead up to the preparation of the East of England Plan. It also provides extracts of the Panel

- Report. Concerns are raised about how decisions regarding growth around Harlow were informed.
- Strongly oppose a review of the Green Belt to support the growth of Harlow to the north. East Herts. is no longer required to undertake a Strategic Green Belt Review as part of the LDF as the East of England Plan is to be revoked.
- Loss of Green Belt to the north of Harlow risks potential coalescence with other settlements.
- There are concerns over the deliverability of the infrastructure to support significant development on land to the north of Harlow.

#### The Economy and Jobs:

- There is no evidence to support the argument that housing growth north of Harlow will deliver the regeneration benefits sought in Harlow. The suggested benefits are all illusory or can be achieved in some other, less damaging way. The potential harm to the regeneration of the town caused by growth is likely to outweigh any benefits.
- There is little thought of the reuse of redundant employment land in Harlow ahead of developing urban extensions as advocated in PPS 4 Planning for Sustainable Economic Development.
- It is acknowledged that an element of growth is likely to be beneficial to the regeneration of Harlow, but not on the scale proposed. Other, more focused strategies, or indeed a robust regeneration strategy for the town, which currently does not exist, would better achieve the suggested benefits of growth for regeneration. The potential harm to the regeneration of the town caused by the proposed scale of new growth is considered to outweigh these benefits.
- Development of at least 10,000 dwellings with associated employment land north of Harlow will have long term damaging effects on the vitality of the market towns of Hertford, Ware, Sawbridgeworth and Bishop's Stortford as well as Harlow. The need to maintain the vitality and viability of market towns in East Herts. must be acknowledged in the Harlow Core Strategy.
- The idea that Harlow might become a sub-regional shopping centre is not supported. This would damage the local market towns of Hertford, Ware, Sawbridgeworth and Bishops Stortford. The notion that extra population north of Harlow will support the failing Harlow town centre ignores other changes in retailing practice (e.g. internet sales) and the counter-magnet retail outlets that have been created along the A414 within Harlow and along the A10.

#### Sustainability:

- The Sustainability Statement prepared by EERA for the East of England Plan Examination in Public concluded that the location [north Harlow] was in the highest category of sensitivity to anything more than development of 50-100 dwellings and was unlikely to accommodate the particular type of change without extensive degradation of character and value. Mitigation measures are unlikely to be able to address potential landscape/environmental issues.
- Growth needs in East Herts. and Harlow should be accommodated by maximising the use of existing infrastructure and services through organic growth of existing settlements and on brown field sites.

#### Infrastructure:

- Water, sewage, roads and other essential infrastructure cannot be provided to support the development north of Harlow within the short or medium term.
- The Harlow Regeneration Study has identified up to £354M current 'infrastructure deficit costs'. The growth agenda would add up to £474M as the public cost of growth excluding matters such as hospitals, water importation and water treatment. It is unrealistic to expect these costs to be met by Government in the foreseeable future.
- Development north of Harlow will place an undue financial burden on Hertfordshire authorities which already have an overwhelming infrastructure deficit resulting from other development pressures.
- There are likely to be considerable funding shortages for the required infrastructure. There is likely to also be a considerable miss match in the collection of funding (through all sources) and the need for the infrastructure.
- A northern by-pass was stated by EERA as "an absolute prerequisite to development north of Harlow. There is no prospect of such a by-pass.

#### Planning drivers

- There has been no proper consideration of the best future urban form for Harlow in the context of sustainability or urban function.
- The proposed release of Green Belt north of Harlow demonstrates there is no recognition of its role in conserving the carefully planned urban form of the New Town. It fails to appreciate that a key role of the Green Belt is to prevent coalescence of settlements and it is most surprising that, given the need for regeneration in Harlow, there is no understanding that it is there to encourage regeneration rather than take the easy green field option which allows obsolescence to remain in the town.
- The Green Belt should be expanded to recognise the need to contain pressures which will otherwise result in the coalescence of settlements from Harlow northwards to Bishops Stortford.

#### Stansted:

- This is the wrong place for a major development and this location was rejected by SERPLAN for this reason.
- Despite the constraints now placed on the Airport's development, to deliberately place thousands of new homes north of Harlow, where they will be subject to noise, inconvenience, pollution and potential danger of a rapidly increasing number of landing aircraft.

#### Environmental concerns:

- Harlow Area Landscape & Environment Study states (page 9) "Avoid intrusive development on the visually prominent open ridges and slopes around High Wych that are important as the countryside backdrop to the setting of Harlow" and (page 10) the "Desirability of retaining the rural character of largely undeveloped/open countryside to the north of the Stort Valley, and avoiding an increased sense of urbanisation through erosion of individual identity of rural settlements and their dispersed pattern within the landscape"
- The following study data seems to have been disregarded by the consultants:

- Land to the north of Harlow was considered to be the most sensitive (compared to south, east or west) (A Study of the relationship between Transport and Development in the London-Stansted-Cambridge-Peterborough Growth Area- Colin Buchanan and Partners & GVA Grimley, August 2004 commissioned by ODPM)
- The Landscape Character Assessment north of Harlow is one of 'conserve and improve' (Hertfordshire County Council landscape assessment)
- The Harlow Green Infrastructure Plan emphasises the important environmental, historic and landscape role of the Stort valley and encourages the implementation of the Gilston Great Park Plan.
- Development to the north of Harlow would have a serious impact on 16 County wildlife sites, 3 Scheduled ancient Monuments, 6 areas of Archaeological Significance and a number of historic gardens, especially on the Gilston estate.
- Any development north of the Stort valley and A414 will breach important thresholds and result in a loss of control of further development.

#### Gilston Great Park:

• The STOP Harlow North Campaign is promoting land to the north of Harlow for an "actively managed countryside" as an alternative to housing development. We look forward to support from Harlow Council for Gilston Great Park to become an essential part of the future planning framework for the area.

### 4. Summary of representation received from English Heritage

- Harlow has a significant and distinctive New Town character.
- This provides an opportunity for Harlow to regenerate itself in a distinctive way.
- Further characterisation and appraisal of Harlow's heritage should be carried out as part of the supporting evidence base. This should also inform the sustainability appraisal.
- The characterisation and appraisal of Harlow's heritage should focus on:
  - Market Place and West Square in the Town Centre;
  - o undesignated neighbourhoods and their landscape settings; and
  - o Pre-new town features.
- Where appropriate, designation or extension of conservation areas may be justified.
- English Heritage recommends the preparation of a Local List of buildings of architectural or historic interest.
- The Town Centre is of importance in defining the character of Harlow, especially in the case of Market Place. Its heritage value should be a key factor in its future development. Assets such as Market Place could be designated as conservation areas.
- Green Wedges are an important element of the Gibberd principles in laying out Harlow and should be protected from future encroachment.
- English Heritage generally concurs with the preferred option for expansion.

Specific advice is provided on sections of the document in the main representation.

### 5. Summary of representation received from Environment Agency

- The Environment Agency is disappointed that Harlow's Core Strategy has not fully addressed environmental issues.
  - o There's no mention of climate change mitigation and adaptation.
  - o There's no reference to groundwater protection;
  - There's no reference to contaminated land or implications of redeveloping land affected by contamination.
  - o The Water Framework Directive has not been mentioned at all.
  - o Biodiversity has not been mentioned, in particular around the Stort Valley.
- There is a need to achieve good ecological status in all water bodies and ensure no deterioration.

#### The Stort Valley and Cannons Brook:

- The Core Strategy should aim to enhance the Stort Valley a critical biodiversity resource in the area containing BAP habitats, wetlands including, floodplain grazing marsh and wet woodland.
- Pollution of Canons Brook should be addressed as it is affecting the status of Hunsdon Mead SSSI (see Hunsdon Mead Diffused Water Pollution Plan).
- The Meads adjacent to the River Stort provides an important function for climate change adaptation, flood risk, biodiversity and water quality.

#### **Green Wedges:**

- Harlow *must* consider underused open space and other undeveloped land for development before considering releasing land in the Green Belt.
- Several of the Green Wedges provide flood alleviation benefits and it's important that these areas are kept free from development.
- Development on these Green Wedges may increase the flood risk elsewhere and have a negative impact upon local biodiversity.

#### Flooding:

- The expectation is for all plans to achieve and go beyond the aims of PPS9, PPS23 and PPS25.
- This means that flood zones 2 and 3 are avoided, contaminated land is remediated and groundwater protected.
- Buffer strips are required adjacent to water bodies to allow for biodiversity, to reduce flood risk and improve water quality.
- Sustainable Drainage Systems are required for new development as they provide benefits in terms of flood risk, biodiversity and water quality.

#### Evidence Base:

- Strategic Flood Risk Assessments should be used with the sequential approach taken to site selection.
- The Rye Meads Water Cycle Strategy (RMWCS) highlights the limitations and time restrictions linked to development in Harlow.
- The Harlow Green Infrastructure (GI) Plan should be used to inform where there are links and deficiencies in GI provision.

• Local Authority's have a duty to have regard to the River Basin Management plan for their relevant catchment.

#### Infrastructure:

- Harlow has insufficient capacity in its drainage network and any expansion of the town should address this issue (RMWCS).
- Sustainable Drainage Systems are essential to restrict run-off rates.
- Scott Wilson's comments on limitations of certain spatial options with respect to infrastructure cannot be ignored.
- Any development to the east will rely on a sewer upgrade to Rye Meads STW.

#### Water Efficiency for New Development:

 The Rye Meads Water Cycle Strategy indicated all new homes should be built to a minimum water efficiency of 105 litres per person per day.

#### Climate Change Mitigation:

- Measures are required to reduce carbon emissions. These would include energy efficiency and green transport plans.
- Adaptation measures will be needed to cope with the consequences of changing temperatures, increased storm frequency etc. Measures include water efficiency, SuDs, resilience, sustainable construction and buffering of wildlife sites.

#### **Spatial Options:**

- Options A-E and the suggested approach could all be acceptable provided they are the most sustainable locations and are designed to ensure sustainable development.
- The right assessments must be used to inform the chosen option.

#### **Suggested Amendments:**

Natural England recommend that "The Environment" should have its own section: "Environment – enhancing and protecting land, air and water."

These are the elements that we feel should fall under the environment theme.

- 1) To protect and enhance green infrastructure.
- 2) Deliver most sustainable developments.
- 3) Safeguarding Floodplain.

Core Strategy policies are required covering the following issues:

- Green Infrastructure
- Water quality e.g. from the impact of any new development.
- Adapting to climate change e.g. through appropriate design measures including, landscaping and drainage.
- To mitigate flood risk by applying the sequential test approach to avoid development in areas at risk of flooding.

#### 6. Summary of representation received from Epping Forest District Council

- Issues which should be included are: The strategic role of the Green Belt, and the
  related policies of the adjoining authorities; The wider landscape setting of the town,
  including in particular the southern ridge line; The lack of alternatives to the option
  of 16,000 houses; More prominence to climate change and more commitment to
  carbon reduction, energy efficiency and renewable energy.
- Regeneration of Harlow is supported. RSS evidence should be reconsidered, with other growth options for consultation.
- Vision should account for equivalent documents from adjoining authorities.
- Need for formal coordinated working with adjoining Districts.
- Strategic objectives should be broader than the town itself, encompassing the two adjoining Districts. Thus the function of the Metropolitan Green Belt, the landscape setting of the town, climate change and methods to reduce or mitigate its impact should be included. "Delivery" of regeneration will require the co-ordinated input of a wide range of authorities and agencies, so joint or co-operative working should be a theme of the Core Strategy with related strategic objectives.
- Strongly supports a review of the Green Wedges.
- The employment needs of the wider area (i.e. at least the two adjoining authorities) should be included in any assessment. This Council would be concerned about any extension to the Pinnacles, and would need to consider employment land provision in the urban extensions.
- The retail strategy proposed in the consultation document is appropriate for the town as a sub-regional centre, and in terms of protecting the role of the neighbourhood centres and hatches.

#### **Consultants Option A:**

• This Council favours this option over all the others. The greatest part of the growth will be close to the town centre, railway station and two of the main employment areas (The Pinnacles and Templefields). There will be minimal intrusion into the Green Belt in this district and no threat to the southern ridge line. The option does require significant new road infrastructure.

#### **Consultants Option B:**

 The Council agrees that it would be difficult to accommodate this level of growth to the west without significant adverse effect on the character of the area (including settlement coalescence with Roydon), but also feels that the southern ridge line could be threatened. The consultants' concerns about encouraging increased use of the car are shared by the Council.

#### Consultants Option C:

 This option is wholly unacceptable to this Council. The ridge line would be completely breached. Not only would there be significantly increased traffic using J7 of the M11, but there could be pressure for a southern bypass to Harlow. A new junction 7A will be needed to cope with the proposed eastern expansion.

### **Consultants Option D:**

Unacceptable to this Council because of the impact to the south. If a substantial
part of the southern allocation could be re-located to the east, this could be a

reasonable option from this Council's perspective. The northern distribution, and the readjusted eastern total, would be likely to require road infrastructure.

#### **Consultants Option E:**

• The Council agrees with the consultants that this option is liable to lead to settlement coalescence with Roydon, which is wholly unacceptable

#### **Consultants Suggested Approach:**

- This addresses most of this Council's environmental concerns, but there are still
  potential problems with the southern ridge line. The south and west allocations are
  not strongly related to Harlow's town centre, the main employment sites or the
  railway station, so this could increase car commuting.
- There is concern that only one growth option is being presented for consultation.
  Other reasonable alternatives should be considered, to satisfy the requirements of
  PPS12. There is a need for joint or co-ordinated working at Member as well as
  officer level, and this should encompass the two County Councils as well as the
  adjoining authorities.
- The infrastructure needs of the adjoining authorities should be considered in the context of the urban extensions.
- Agree that new development should be directed to areas that will maximize regeneration, but with the proviso that potential impact upon adjoining authorities must be taken fully into account.
- Agree that underused open spaces and undeveloped land should be considered before releasing Green Belt, but this will also depend on whether the spaces have other, currently unrecognised value, e.g. for wildlife or informal recreation.
- there is a need for joint or co-ordinated working at officer and Member level of all the authorities, including the two County Councils;
- The Options consultation needs to include other reasonable alternatives
- The RSS targets and assumptions need to be re-examined, to establish whether the target of 16,000 homes is the right figure.

#### 7. Summary of representation received from Epping Upland Parish Council

- Provision should be made for the effect of traffic outside of the main Harlow area
- Preference for Gypsy and Travellers sites to have access to Harlow's amenities
- Development should be on the vacant spaces including brownfield sites which are already available within Harlow before expanding outside the town's administrative area.
- Need to protect the Green Belt around Epping Green as it forms a strategic gap preventing Harlow and Epping from merging and any development in this location would impact upon the openness and function of the Green Belt

# 8. Summary of representation received from Essex County Council (Environment, Sustainability and Highways)

#### Social Infrastructure:

• Sections on infrastructure should include a wider range of social and physical infrastructure, in addition to transport.

- Early Years, Child Care, Primary and Secondary schools as well as post sixteen and other forms of education need to be recognised.
- Primary school numbers are forecast to increase in Harlow.
- Health, police and fire services and facilities also need to be considered, along with strategic utilities e.g. Rye Meads Sewerage Services.
- Growth in Harlow will have a significant impact on the provision of social and physical infrastructure.
- Prior discussion with Essex County Council is required to before determining the preferred spatial approach.

#### Funding Infrastructure:

- It's unrealistic to expect all infrastructure requirements to be provided for by partners particularly in the current financial climate.
- Other funding mechanisms may need to be utilised. e.g. CIL

#### Regeneration, Transport and Accessibility:

- Accessibility to strategic centres such as London and Stansted will enhance regeneration and investment potential within Harlow.
- The town centre needs to be well connected and accessible by a range of transportation modes.
- It is important to improve cycling and walking networks in Harlow, with a focus on safer routes to schools.
- The public transportation section should reference Harlow Bus Station.

#### Climate Change:

- Climate change and the need to reduce carbon emissions needs to be addressed.
- There is no reference to climate change, low carbon and renewable energy, or water efficiency.

#### Historic Environment:

- The historic environment should also shape pattern of growth and is important in terms of place making.
- Policies on historic environment should cover designated and undesignated heritage assets (see PPS5).

#### Minerals and Waste:

- Existing and future minerals and waste needs should be covered.
- Harlow Mill Rail Depot is a strategic mineral activity in the West of Essex and is safeguarded in the adopted Essex Minerals Local Plan (and is proposed to be safeguarded in the Minerals LDF).
- Land uses adjacent to the depot should be compatible.

#### Housing:

There needs to be housing for all socio economic groups throughout Harlow.

 Currently there is a lack of accommodation for professional and higher income households.

#### Localism Bill:

- When the RSS has been repealed, Harlow will need to work in partnership with neighbouring local planning authorities to determine the amount of new housing required.
- In doing so it will have to take into account the evidence base prepared for the East of England Plan and national policy.

#### Sustainable Community Strategy:

- Harlow's current Sustainable Community Strategy vision is insufficient to provide the basis for the Core Strategy.
- The Core Strategy needs a more locally distinctive vision focusing on the key spatial planning issues facing Harlow.
- The review of Harlow's SCS needs to involve collaborative working between all stakeholders.

### Rural-Urban Fringe:

- Gibberd highlighted the importance of Harlow's landscape setting and Green Wedges.
- This was recognised in Policy SS8 of The East of England Plan.
- Given the potential urban extensions, its surprising this issue isn't covered.
- A Core Strategy Policy on the rural-urban fringe is needed covering:
  - o character and appearance;
  - Recreational and biodiversity value;
  - o The role of proposed urban extension(s) in delivering networks of green infrastructure linking Harlow town and the countryside.

#### Prosperity / Retail Hierarchy:

- Gibberd Masterplan emphasises the important role of the central town centre, accompanied by three major neighbourhood centres and a series of local centre (hatches).
- Harlow should consider how the principles of Gibberd Masterplan may continue to influence the urban form and character of Harlow (and proposed urban extensions).
- PPS4 requires a clear network / hierarchy of centres to be defined.
- It should be clear how growth in centres will support regeneration.

#### Town Centre & Regeneration:

- Role and function of Harlow Town Centre is crucial to regeneration of Harlow.
- It's also important to ensuring growth at the centres improves the quality of lives for the deprived communities.
- Growth of Town Centre will require collaborative working with neighbouring authorities and ECC to ensure sub regional role for Harlow Town Centre is recognised and appreciated.

#### Prosperity – Promote Health and SME's:

- Harlow has a strong health care related economy.
- Policies are required to promote growth within this sector.

#### **Employment Sites:**

- Review of employment sites has to take place and it is important that this is robustly undertaken.
- PPS4 states unimplemented employment allocations shouldn't be taken forward unless there's:
  - o Evidence of need; and
  - o Prospect of delivery.
- If not, alternative uses should be considered.
- Employment review should examine attractiveness of Harlow for investment and how to enhance its attractiveness.
- Review should consider connectivity to the strategic road network and congestion from local employment sites.
- It should consider whether highway improvements could enhance connectivity and accessibility to employment sites.

#### Densities:

PPS3 and PPG14 cited as basis for developing policies on densities.

#### Green Belt Release:

- PPG2 and PPS3 oblige Harlow to maximise use of existing urban area before considering sites in Green Belt.
- Priority should be to maximise regeneration benefits for existing urban area and communities.

#### Green Wedges:

- Review of Green Wedges should provide a modern definition.
- Green Wedges could function as access corridors for pedestrians, cycling, walking, and passenger transport.
- The design of Green Wedges in urban extensions is important.

#### Where should development be directed?

- A clear criteria is needed to determine locations for growth and show why decisions have been taken.
- The criteria in the questionnaire is not exhaustive. The following should also be considered:
  - Contribution reducing carbon emissions.
  - Accessibility to the strategic road network.
  - Deliverability
  - Scale of development needed to support infrastructure

#### Spatial Options for Growth around Harlow:

- Location of growth needs to reflect capacity of existing infrastructure.
- It should also reflect feasibility and deliverability of physical and social infrastructure services and facilities.
- A threshold of development is required to sustain certain education and care facilities and services.

#### Option A:

- Large dwelling allocation to the north fails to utilise existing educational capacity, particularly primary schools.
- There may be viability issues for care facilities and transport.
- Robust mechanisms are needed to highlight the timing and scale of infrastructure required and its delivery and funding.

#### Option B:

- Distribution of growth in this option is undesirable.
- Demand generated may overwhelm secondary school provision without providing sufficient critical mass to justify a new school in any single location.

#### Option C:

- This option is likely to require a secondary school.
- However, it fails to utilise the expansion potential at Mark Hall School.
- Passmores and Stewards Schools will struggle to accommodate growth.
- Development east should be strongly linked to existing public transport interchanges e.g. Town Centre and Harlow Mill Station.
- Proximity of growth to the M11 may encourage private car use.
- Concerns about significant development south of the town and impact on the existing highway network, particularly Southern Way.
- The residential nature of this route means it does not have the capacity to accommodate significant levels of growth.

#### Option D:

- Growth would utilise existing capacity in educational and care facilities.
- But in some cases educational and care facilities would be at capacity.
- Development does provide sufficient threshold to deliver new educational and care facilities.
- But proposed level of growth within the south of Harlow is likely to generate significant traffic congestion on Southern Way which is difficult to accommodate.

#### Option E:

- Concerns about the potential negative impact on the local transportation network within Harlow.
- Will require careful consideration regarding the provision of educational and care facilities and services;

- It may require two secondary schools, and with the secondary school in the north requiring 4 forms of entry.
- However, ECC is likely to question the viability of a four form entry secondary school.
- Option E will require additional educational and care capacity in the east of Harlow.
   But a second school to the east of Harlow is likely to make utilising expansion potential at Mark Hall challenging.

#### Consultant's suggested approach:

- From an educational and care service perspective the consultants suggested approach up to 2021 has similar drawbacks to those highlighted in spatial option E.
- But additional growth up to 2031 would make both new secondary schools viable.
- From an educational and care service perspective it is preferable that the northern extension is delivered prior to the east Harlow extension - providing critical mass for new services earlier in the plan period.
- Expansion potential at Mark Hall may be utilised for limited early growth to the east.
- ECC strongly recommends that the precise phasing of the growth within Harlow is properly considered, to ensure that social infrastructure can support Harlow's community.
- Consultants suggested approach does address some of the key transportation and highways issues, particularly those associated with development at the north and east of Harlow.
- Cumulative impact of growth within the south and southeast of Harlow there is likely to be a significant impact on Southern Way.

#### Congestion:

- This question is relevant to Harlow's key issues but the way in which it has been expressed is incomplete.
- The potential solution to congestion will require a combination of approaches some of which are not acknowledged.
- Some of the approaches fall within the scope of the Core Strategy process, but others will be implemented through other strategies, plans.

#### Evidence Base:

The County Council recommends that the Core Strategy includes the following within the evidence base:

- 1) Childcare Sufficiency Assessment,
- 2) Children and Young People's Plan; and
- 3) Essex School Organisation Plan in particular policy B10 Guidelines for School Planning.

The LDF is should be supported by historic environment evidence.

A Historic Characterisation Study for Harlow may be utilised to inform policy and shape the spatial distribution of future development (see PPS5).

# 9. Summary of representation received from Hertfordshire County Council (Environment and Commercial Services)

#### Growth Levels:

- The approach taken towards the level of growth in the Issues and Options is flawed.
  By the time the Core Strategy is adopted there will be no nationally prescribed
  growth levels for Harlow. Appropriate growth levels will need to be determined
  locally based on an appropriate evidence base and engagement of public and
  stakeholders.
- The Council will need to identify, assess and seek views on a range of alternative housing and economic/employment growth levels and spatial options for accommodating the level of growth. This will need to be addressed in subsequent stages of the Core Strategy preparation process for the Core Strategy to satisfy PPS12 requirements.
- Reinforced position that there should be staged approach to regeneration and growth at Harlow. Rather than an aspiration growth agenda from the outset, there should initially be a concentration on regeneration accompanied by a moderate level of growth. Only when that strategy has proven to be successful should one move on towards a strategy aimed at more aspirational growth levels.
- There is a need to take a fresh look at what realistic options there may be for economic and job growth aspirations for the town, present the rationale for these and seek views. This approach should look at a closer housing/jobs alignment than the RSS and that considered in this issues and options consultation.

#### **Growth locations:**

- When the Regional Strategy is abolished there will no longer be any spatial prescription on where any growth around Harlow should be directed. This removes any requirement to direct substantial growth to the north of Harlow.
- The County Council has previously expressed reservations about the Options Appraisal. These comments still stand and have been attached. Furthermore, the County Council's recommendations in relation to how the Core Strategy process should go about assessing growth outside the perimeter of the town do not appear to have been addressed.
- The County Council will expect the ongoing Core Strategy preparation to consider all options at each broad location for growth (around Harlow) and fully assess all natural and built environment assets, infrastructure constraints and requirements. Until such time as that intelligence is compiled and presented the County Council will reserve its position on spatial options around and beyond Harlow (subject to maintaining its objection to growth to the north of Harlow North).

#### The evidence base:

- The evidence base needs to be revised to assess the implications of growth levels other than those within the East of England Plan and the potential impact of the decision not to progress a second runway at Stansted.
- The extent to which substantial growth is required to secure the 'regeneration' of Harlow needs to be further clarified. Specifically, what are Harlow's regeneration issues and which of those issues require housing growth? To what extent would each of the options for major housing developments on the periphery and beyond the town complement/run contrary to regeneration aspirations/requirements?

- Considerably more evidence is required in terms of the existing and likely transportation and water/sewerage requirements of the town. Further work on infrastructure requirements, including identified funding sources – for different scales of growth and spatial distributions, within the context of a comprehensive Delivery Plan
- Evidence on what rates of housing and employment growth are genuinely likely to materialise at Harlow given the current state of the economy and the housing market (to inform target-setting).

#### North of Harlow:

- The County Council affirms its concerns about growth to the north of Harlow and considers that the Secretary of State's reasons for setting aside the East of England Plan's Panel's conclusions and recommendations was flawed.
- The County Council takes the view that unless there is substantive evidence to the contrary, the East of England Plan Panel's conclusion that the growth strategy for Harlow should be one based on development within the town and peripheral growth to the east, south and west should be progressed.
- The scale of growth [to the north] was not adequately justified, the case for the perceived causal links between housing growth and regeneration benefits not adequately made, large scale new settlement size development to the north of Harlow would not be linked adequately to the town and would operate as a satellite and competing settlement rather than contributing towards Harlow regeneration, the adverse impacts on land to the north of Harlow are unacceptable.

#### Developing a delivery strategy:

- A fundamental issue for the Core Strategy is the extent to which adjacent local authorities are willing to support the growth aspirations/infrastructure/other proposals of Harlow Council beyond its administrative boundaries.
- Further stages of Core Strategy preparation need to be informed by a comprehensive Delivery Plan with sign-up from relevant organisations. If this proves not to be possible there is every likelihood that the Core Strategy would not be found sound at Examination.

#### Sustainability Appraisal:

• The sustainability appraisal simply accepts the stance that the Core Strategy and Harlow Options Appraisal study take – the delivery of the East of England Plan growth target requirements. Therefore the sustainability appraisal also fails to identify, describe and evaluate reasonable alternative housing and employment growth levels and reasonable alternative spatial options beyond the Harlow town boundary. The approach to Sustainability Appraisal needs to be substantively revisited during subsequent Core Strategy stages.

#### Transportation:

- The County Council remains concerned about the impact of the proposed growth around the town on the transportation infrastructure within Hertfordshire including the WAML, A414 and A1184.
- Planned and proposed increases in capacity to the road and rail network need to be fully assessed prior to the production of a preferred strategy.

- The County Council has yet to see any convincing case for a A414-M11 link road.
   The main case for the scheme seems simply to serve a northward expansion of Harlow.
- There is no clarification on what 'promoting the role of Harlow as a transport interchange along the M11' (Objective 24) actually means.
- In terms of sustainable transport issues the Core Strategy appears to be somewhat deficient. Little consideration seems to have been given to the strategic rail network.
- Possibility of increases to the capacity of the central line (resulting from cross rail) need to be included in the Core Strategy as this provides a valid alternative for commuting
- None of the options described in the Core Strategy appear to give sufficient consideration to transport infrastructure. The County Council welcomes the commitment to further explore transportation issues and, as an adjacent transportation authority, will expect to be fully involved in any ongoing and future technical work.

#### Historic environment:

- This area has an exceptionally rich and varied historic environment (including buried archaeological remains, buildings and settlements of historic importance, and historic landscapes). Development within it would therefore have substantial implications for the protection of the historic environment.
- The County Council suggest a number of changes to the Core Strategy with regard to the historic environment and highlight that the County Council is willing to provide information to Harlow Council.

#### Other:

 The County Council make some suggestions on how to incorporate minerals and waste considerations and environmental issues. Reference is made to the attached comments made by the Hertfordshire Biological and Records Centre.

## 10. Summary of representation received from Hertfordshire County Council (Property)

- Essential that Hertfordshire County Council is fully involved in the LDF process if development is envisaged to take place in East Hertfordshire District as any such development would have an effect on County Council service requirements.
- Re-submitted response made to the Harlow Infrastructure Study Stage 2 which relates to the future infrastructure requirements for adult social services, children's services, primary and secondary education, emergency services, libraries, youth services and solid waste management.
- In addition to the resubmitted response Hertfordshire County Council suggested changes to Para 2.5.2 to reflect the fact that delivering certain elements of the Core Strategy will require consultation, help and support from both Essex and Hertfordshire County Council.

## 11. Summary of representation received from Hertfordshire Biological Records Office

- This area of consideration is much more than 'Green Wedges' and 'Green Spaces'.
   Emphasis must be placed on protecting and enhancing the natural environment; both habitats and species.
- Spatial Options A, D, E show negative effects on county Wildlife Sites and ancient woodlands to the north of Harlow.
- There is a substantial data gap that must be filled before development on these scales can proceed, including the impact of development on protected areas (county Wildlife Sites and ancient woodlands) amongst others.
- Biodiversity is a key test of sustainable development, in line with national Government policy, and an essential ingredient of quality of life by contributing positively to environmental objectives.
- Key wildlife habitats and species must be protected from harm and the potential impact of development and every opportunity should be taken to enhance existing habitats and species populations and to create new habitats in line with national and county Biodiversity Action Plan targets.
- Wildlife sites must be retained, protected and buffered from development and wildlife corridors (green spaces) should be created between sites to allow wildlife species to migrate between sites and out into the open countryside.
- Natural features and habitats, and the species they support, must be viewed as important. SSSIs are important because of their national statutory status; County Wildlife Sites are locally important because they represent what is considered to be important at a district level. All wildlife sites must be protected and connected together via a network of functional ecologically robust green corridors (networks); not isolated from each other and surrounded by housing.
- Sustainable Urban Drainage Systems (SUDS) should be included in the design of proposed development, to control and contain polluted surface water run-off.
- Open spaces within developed areas should consist of multifunctional green spaces
  that link together and form corridors through and between each neighbourhood and
  ultimately link those neighbourhoods with the surrounding countryside. Green
  corridors and green spaces should be used to form pedestrian walk ways and cycle
  routes, so that residents are able to walk/cycle to local shops, facilities and schools
  without using roads and cars.

#### 12. Summary of representation received from The Highways Agency

- The Highways Agency can't be expected to cater for unconstrained traffic growth generated by new development.
- Highways Agency's role is to safeguard the core function of the strategic road network
- Policies and proposals should aim to reduce traffic generation at source.
- The Core Strategy should consider the provision of public transport to each broad development site and how services will connect with the existing urban area of Harlow, particularly town centre, railway stations, employment areas and neighbouring towns.
- Consideration needs to be given to the relationship between employment and residential development.
- Development options which maximise investment in and use of public transport, walking and cycling to local employment in preference to the car should be encouraged.

- Sustainability of all site options will be dependent on co-location of employment, public transport and access to services and facilities.
- Evidence supporting the Core Strategy should include traffic modelling modelling commissioned through the Harlow Stansted Gateway Board will be very useful in this regard.
- Based on the level of detail provided in CSIO, it is too early to estimate precisely the traffic impact on the strategic trunk road and motorway network.
- There is a general presumption against new junctions on motorways (particularly where this does not provide strategic benefit or is provided purely to accommodate new development).
- Evidence in form of modelling will need to demonstrate the impact of a new junction on the M11.
- Business case for a new link road and junction will need to demonstrate that it is deliverable.
- Diversion of funding to new link road and new junction should not undermine any improved public transport services.
- Based on limited information available, development to the south of Harlow may be considered less sustainable because the site is located further away from railway stations and town centre and employment sites, compared to other spatial options.
- All spatial options may experience these disadvantages to some degree.
- Southern Site also next to Junction 7, potentially reducing the incentive to use sustainable transport methods, even if improved.

#### 13. Summary of representation received from High Wych Parish Council

The Core Strategy appears to lack clear focus.

#### Regeneration:

- The link between regeneration and growth is not made conclusively.
- The Core Strategy should focus on the existing housing and employment issues in Harlow.
- The aim should be to enhance Harlow as an attractive and sustainable place to live, whilst investing in skills and training.

#### Growth to the north of Harlow:

- It is incredible Harlow is seeking to preserve its own environment by degrading another District's.
- Spatial Options are based on flawed and withdrawn policy which should no longer be considered.
- The Council will need to take account of the Localism Bill and the pending abolition of the RSS.
- Key aspects of infrastructure are technically undeliverable and most other infrastructure has no prospect of being funded. The consultation should reflect these realities.
- Wildlife and habitat associated environmental impact of development to the north of Harlow makes it unacceptable.
- The development won't regenerate Harlow and will likely deplete the quality of life for many.

- The local communities proposal for Gilston Great Park should direct how land north of Harlow is used.
- The Stop Harlow North submission fully reflects the view of High Wych Parish Council.

#### Environmental Issues:

• The damaging impact on the environment and wildlife habitats does not appear to be given sufficient priority in the Core Strategy.

#### **Skills & Training:**

- The Council should focus on vocational training institutions rather than aspire to be a University Town, (i.e. meet needs of existing and future employers).
- More focus is needed on enhancing the town's facilities to make it attractive for new employers.
- There's an opportunity to provide regeneration and new infrastructure through low carbon and renewable power.
- Policies focused on attracting new employers to Harlow are weak.

#### **Green Wedges:**

 The Green Wedges should be reviewed to meet future development – as per quote from Gibberd about Harlow being an organism which changes as people's needs change.

#### Employment:

- There is a heavy bias towards retail in town centre. Maybe more could be done to encourage employment here?
- Given congestion problems, employment sites could be identified on the South side of the town near junction 7.
- Edinburgh Way contributes much traffic congestion. The Council should encourage shops in local neighbourhoods to reduce this.

#### 14. Summary of representation received from Hunsdon Parish Council

- Disagrees with the assertion that Greenfield development should be located to the north of Harlow. This pre-empts the policy process. At the Issues and Options stage, <u>all</u> options should be on the table but no decisions made.
- 16,000 new homes far exceeds local needs and there is no proven link between town size and regeneration (reference made to Harlow Council's own evidence studies)
- Paragraph 3.4.3 is not supported and urgent attention is needed to deficiencies in Harlow Council's evidence base.
- Growth outside Harlow District is a matter for the respective authorities and not for Harlow to unilaterally to decide.
- Proposals are prepared in the era of regional planning and until a robust evidence base is established, there is no basis for growth outside Harlow District.

- Growth in sustainable locations is appropriate but current evidence base needs to be reviewed and gaps filled before 'sustainable locations' can be identified. Statements identifying Harlow north are therefore premature.
- No robust evidence has yet been produced that growth into neighbouring districts is required in order to enhance or reinforce Harlow's sub-regional role.
- Scott Wilson report suggests that there is a danger that large-scale development north of the Stort could drain investment away from the existing town.
- Development should be directed to areas that would maximise regeneration but only convincing evidence relates to sites within the existing town.
- Employment evidence concludes that with the 'land north of Nortel' Harlow District
  has enough employment land to meet future requirements for the base case and
  the growth scenarios in a gross sense. From the point of view of establishing future
  need, the argument is based on a circular logic resulting in a self-fulfilling prophecy,
  i.e. the need is the RSS policy requirement. In a post-RSS era such a definition of
  need cannot be left unchallenged.
- The growth options, but particularly option A and B, are based on the top-down options arising from the wording of Policy HA1. With the changes to the planning system since the study was published, there are no longer effective grounds for this option going forward. It is unclear why Harlow Council is consulting on Options A to E as the Scott Wilson report as the options were not developed as stand alone options for consultation.
- Option C is the most sustainable option based on the combined criteria from the assessment.
- Raise a number of concerns about the Options Appraisal Methodology.
- Question the relationship between housing to the north of Harlow and delivering the regeneration of Harlow (Option D, regeneration led).
- There is a striking omission in the evidence base regarding the delivery of regeneration. Such evidence would need to be the cornerstone of a clear strategy to directly address this issue, without which there is a danger that expansion could jeopardise the future of Harlow, as Scott Wilson consultants point out.
- Reference made to East Herts. Council's current analysis and suggest that only
  when the results of this analysis are known and other technical work has been
  undertaken will it be known whether north of Harlow is considered an appropriate
  location for development.
- The Scott Wilson Harlow Options Appraisal was prepared in accordance with HA1
  of the East of England Plan. The Government has made clear its intention to
  abolish the Regional Strategies including the East of England Plan. The suggested
  approach should therefore be viewed in the context of the new government's
  approach to planning, as set out in the Localism Bill.
- Reference made to Question 43 of East Herts. Core Strategy consultation (Growth
  to the north of Harlow). If East Herts. Council's emerging Preferred Option does not
  suggest that development north of Harlow should form part of a development
  strategy for East Herts. district, then Harlow Council should reflect this in its Core
  Strategy Preferred Options. Harlow Council should not attempt to pre-empt East
  Herts. Council's policy process and should not proceed unilaterally with a Preferred
  Options based on growth to the north.
- Highlight a number of concerns about the cost of infrastructure. Harlow Council will need to demonstrate satisfactorily how this infrastructure will be funded, given that the funding situation has changed dramatically since HIS was published in March 2010 (and the bulk of the study work was carried out during 2008).

- The Rye Meads Water Cycle Strategy was not a 'detailed' strategy in that, whilst it
  provided some suggestions, there were several major areas of concern remaining
  to be resolved if any development at Harlow is to be served by Rye Meads Sewage
  Treatment Works.
- As work on its Core Strategy progresses, it would be sensible for Harlow Council to pay heed to the changing policy context at national, regional, and local levels. Harlow Council will be unlikely to adopt a Core Strategy whilst the East of England Plan still forms part of the Development Plan. Under proposed new legislation it appears likely that any expansion of Harlow could only be achieved with the agreement of the neighbouring local planning authorities and communities. Given this changing policy context, the evidence from the Harlow Options Appraisal by Scott Wilson consultants suggests that the situation on the ground would indicate that Option C should be the preferred option. Such an option does not include development to the north of Harlow.

#### 15. Summary of representation received from Little Hadham Parish Council

- The Parish Council supports the Stop Harlow North Campaign and objects to any further development to the areas north of Harlow
- Any further development to the north of Harlow will cause increased congestion and pollution in Little Hadham and the surrounding villages
- Any further development to the north of Harlow will spoil the rural ambiance of Little Hadham and the surrounding area.

#### 16. Summary of representation received from Much Hadham Parish Council

- Totally opposed to the development of Harlow North proposed in the East of England Plan
- Endorses the objections made by Stop Harlow North to any development north of Harlow
- The East of England Plan's housing requirement for Harlow was based purely on political considerations and the Government paid little or no attention to planning considerations
- Unclear why Harlow Council has consulted on the potential for development north
  of Harlow when all the land for this lies within East Hertfordshire and East Herts.
  Council remains opposed to any development north of Harlow
- Unclear how the necessary infrastructure for Harlow North would be financed given the current constraints on public spending
- If Harlow North went ahead some of the residents would work to the north of Harlow putting more pressure on transport infrastructure to the north especially the B180 and B1004. Furthermore, increased traffic running through Much Hadham would cause more emissions, more damage to the historic buildings fronting on to the High Street and more accidents
- Harlow North Joint Venture's (HNJV) main objective is not to regenerate Harlow but to make money by creating a development which is separate from Harlow in location and atmosphere. This was demonstrated when HNJV sent a flyer to local residents which claimed that Harlow North would deliver all the new housing that East Herts. Council needs to build to meet the East of England Plan's housing target for East Herts. by 2031
- Consultants have suggested growth to the north could undermine the regeneration of Harlow and "work" would be needed to avoid this. Unclear how this could be achieved

- Consultants made it clear without the constraints of the East of England Plan their preferred option would have been (Option C) which would not involve building to the north of Harlow
- The immediate priority should be the redevelopment of Harlow itself, especially more affordable housing, rather than on a new development to the north where the necessary infrastructure does not exist
- The benefits of the Council Tax paid by residents in Harlow North would accrue to East Herts. Council not to Harlow Council. There is no suggestion the Essex/East Herts. boundary should change
- The overwhelming majority of residents in Much Hadham, Widford, Hunsdon, Eastwick and Gilston oppose Harlow North

#### 17. Summary of representation received from Natural England

#### Infrastructure:

- All relevant issues have not been addressed.
- All the elements of infrastructure have not been identified. The section only refers to grey infrastructure, and predominantly transport.
- Green Infrastructure has vital role to play in the development of the district so has to be considered alongside other infrastructure types.

#### Climate Change:

• Climate change has not been identified as a key issue. The need to mitigate and adapt to climate change should be a pivotal issue in the Core Strategy.

#### <u>Green Wedges / Green Infrastructure:</u>

- It's important to retain and enhance existing green spaces in Harlow.
- The Green Wedges are important aspects to Harlow's development allowing for biodiversity, recreation, alongside relatively high densities.
- NE supports the strengthening of Green Wedges and we expect to see these spaces preserved into the future.
- Green Wedges and Green Belt should be lowest priority for new development.
- The Council should not consider underused open spaces for development before releasing land in the Green Belt.
- Most important priorities directing new development are: Protecting green wedges

   (1), areas with good access to public transport and other services and facilities (2), protecting important landscapes (3) and protecting the Green Belt (4).
- Policies should establish a network of multi-functional green infrastructure and afford stringent protection to the existing designated sites.
- NE strongly supports the recognition of the importance of the natural environment and biodiversity as a theme in its own right in the 'Placeshaping' section and in 'Lifestyles'.
- The Appendix should list the 2010 Green Infrastructure Report & Delivery Plan.

#### 18. Summary of representation received from NHS West Essex (Estates)

- The Council has not identified all the relevant issues.
- The Core Strategy should seek to align its policies and objectives with those of key infrastructure providers such as West Essex PCT.
- The objectives and priorities set out in the Joint Strategic Needs Assessment should inform the Core Strategy.
- The impact of additional housing on health care provision and funding needs to be recognised.
- The cumulative impact of growth proposed in East Hertfordshire and Epping Forest on healthcare services, facilities and funding needs to be considered.
- The need to support funding for health facilities should be recognised within the Core Strategy.
- An increase in the population of 1,800 people generates the need for an additional general practitioner (GP) and associated services.
- Therefore, the population growth associated with the provision of 16,000 new homes is likely to generate a requirement for approximately 8 GPs (based on Harlow's average household size of 2.3 people and taking into account existing operational capacity).
- These additional GPs will need to be accommodated through enhanced or additional health care provision over the plan period.
- WEPCT supports delivering growth "in a phased and co-ordinated way to ensure appropriate and timely delivery of a range of infrastructure necessary to support growth"
- Extra care housing is required.
- Objective 7 Provision for elderly and disabled people and other special needs housing, taking account of the additional social infrastructure requirements generated by such development.
- Objective 23 Developer contributions should be sought for new facilities and ongoing revenue funding. This amendment would allow for flexibility where the provision of new or enhanced healthcare facilities may not be in line with WEPCT's programmes.
- Objective 23 This policy area should not impinge on WEPCT's statutory duty to commission all health care and provide primary health care facilities within Harlow.
- Objective 23 should support expansion of existing health centres, in accordance with the health authority's plans and programmes.
- But this policy should not prejudice the relocation of existing facilities, where this is a more appropriate option.
- Objective 25 should aim to align policies with those of key infrastructure providers.
- Open spaces and green wedges should be retained where possible.
- Public health benefits arising from access to and use of open space should inform the decision to redevelop underused open spaces and green wedges.
- Opportunities to regenerate underused open spaces should be considered before redeveloping them for other purposes.
- The amount of open space available within Harlow should be assessed against national standards.

## 19. Summary of representation received from NHS West Essex (Public Health and Property)

#### Withdrawal of the Regional Strategy & Harlow's Aspirations:

- Withdrawal of the regional strategy gives Harlow a greater degree of choice about development.
- Development should be based on the needs and aspirations of local people.
- Methodology to identify what those needs and aspirations are should be robust and could usefully include commissioned social marketing work.
- Whilst the theme of raising aspirations is often quoted, more work is needed to understand what this means to people who live and work in Harlow.
- Doing this properly will require an investment of time and effort, and possible external resources.

#### Regeneration Ambitions of Harlow:

- The criteria by which development will "maximise regeneration" is not defined.
- Harlow stakeholders would benefit from a shared vision about what regeneration means.
- Specific regeneration outcomes need to be identified.
- Areas of deprivation in SW Harlow are well known plans should ensure prosperity and health gap between the best and worst off in the town does not widen.

#### An Outcome Framework:

- Generally, there should be more emphasis on defining and measuring outcomes, with reference to a specific outcomes framework.
- The vision and strategic objectives need a clear outcomes framework.
- Partnership work could then be based on agreed priorities.

#### Alignment with the Community Strategy:

• Greater linkages are required between the health and well being section of the community strategy and the emerging Core Strategy themes.

#### Themes:

- We will need to be wary of silo thematic approaches and instead look at spatial/ geographical approaches.
- It is not just housing and lifestyles which impact upon health and well being but also infrastructure and prosperity.

#### Evidence Base - Integrating the Core Strategy with Health Plans:

- Planning and Health plans and strategies need to be aligned.
- The Joint Strategic Needs Assessment provides forecasts and advance warning of likely population need and how circumstances can be mitigated.
- Harlow Health Profile 2010 is a key document.
- PCT Strategic Plan 2009-14.

• The evidence base on effective interventions to achieve *behaviour change*, reviewed and published by the National Institute for Clinical Excellence, should be given due consideration.

#### Health Services:

- Growth in population may require growth in health services, but it is not a linear correlation.
- Planning for population growth needs to be considered in the context of health service and facility redesign, such as care closer to home and the drive towards home or community based care rather than hospital based care.
- The increased demands of an ageing population will also require planning and provision.
- The likely impact of Harlow growth on health need will require detailed consideration and close liaison between planners and PCT staff to ensure health workforce and facility plans are fit for purpose.

#### **Health Impact Assessments:**

 Health Impact Assessment should be used to review infrastructure plans and the Council's Core Strategy.

#### Level of Growth:

• No strong disagreement with the level of growth provided those homes are serviced by the necessary transport and social infrastructure.

#### Green Wedges / Green Spaces:

- All efforts should be made to protect Harlow's green spaces.
- Development should focus on underused brown field sites.
- Natural environment for outdoor recreation and biodiversity is important and should be protected
  - o There is good evidence that exposure to nature and a natural environment promotes positive mental health.
  - o There is also some evidence that living in an environment with close proximity to green spaces reduces crime and domestic violence.

#### Cycling and Walking:

- Improving and extending the cycle network is welcomed.
- But this in itself will not automatically increase cycling and physical activity.
- There's a need to address both behavioural and environmental factors.
- A targeted and geographic approach is likely to be more effective than silo approach.
- Personal Travel Planning is important.
- Secure cycle parking should be made if this is found to be a barrier to cycle usage.

#### Traffic Congestion:

- Increased traffic congestion in Harlow is avoidable by encouraging a shift to healthier forms of transport for the majority of people who live and work in the town.
- Health impacts of pollution should provide an added incentive to reducing congestion, as well as the cost of lost productivity to Harlow businesses.

#### Where should higher densities go?

- 1. Around public transport hubs
- 2. At appropriate locations within neighbourhood areas
- 3. Hatches
- 4. Neighbourhood Centres
- 5. Within the Town Centre
- Given the potential negative effects of high population density on mental health, development should take account of existing densities and minimise the increase in density in areas where it is already relatively high.
- However, this has to be balanced against protection of green wedges.

#### Flooding:

• There is potentially a serious public health impact of flooding to be considered if building development on floodplains occurs.

#### <u>Directing new development in Harlow:</u>

- 1. Meeting regeneration goals
- 2. Protecting Green Wedges
- 3. Maximising the use of previously developed land
- 4. Protecting the Green Belt
- 5. Where there is existing infrastructure capacity
- 6. Developing underused green spaces
- 7. Protecting important landscapes

#### **Existing Employment Areas:**

- Employment areas serving deprived areas to the SW are important since employment is a key determinant of good health.
- We need to monitor effect of job creation schemes on the worst off people living in South West Harlow.
- Such schemes should be subject to an equality impact assessment to ensure that the prosperity and health gap between the best and worst off in the town does not widen.

#### Shopping:

Development should maximise the public health impact by ensuring:

- A range of shops should be high quality, diverse and affordable.
- A focus on local grocery and butcher stores who source fresh local produce and fruit and vegetables

 Reduction in the number of fast food/high fat food outlets to help counter Harlow's high prevalence of obesity.

#### **Spatial Options:**

#### Option A

- This is obviously a good location if plans to create a new junction from the A414 to the M11 come to fruition.
- The obvious need for primary care facilities to service 10,000 new homes north of Harlow.
- In the design of new areas it is important to address wider determinants of health.
- Harlow was designed to maximise the positive public health impact and new development should take the same approach.
- Public health impact can be improved by providing:
  - strong social networks
  - o Opportunities for outdoor recreation and exposure to nature in close proximity to the houses, e.g. through the use of "pocket parks".
- We would recommend that a health impact assessment be considered for the Harlow North development option.

#### Option B

 We agree with the consultant's concerns about the lack of transport infrastructure to the south of the town and that housing here would encourage private car usage and increase traffic congestion.

#### Option C

We agree

#### Option D

We agree

#### Option E

 We strongly support this option because of its positive public health impact in promoting sustainable transport.

Consultant's suggested approach to accommodating growth

• We agree

#### 20. Summary of representation received from Roydon Parish Council

#### Additional issues:

- The setting of the town in relation to surrounding villages; The role of the Metropolitan Green Belt; Joined up thinking with neighbouring authorities.
- The Core Strategy should consider its affects on neighbouring authorities/areas
- Green Wedges should be reviewed.
- Any extensions to the Pinnacles area could have an adverse effect on Roydon village in EFDC district.

#### Consultants Option A:

 This is the best of the proposed options. There will be minimal intrusion into the Green Belt and the integrity of Roydon village would be preserved.

#### Consultants Option B:

 Roydon village could be very adversely affected by this option and could in fact be absorbed into Harlow.

#### Consultants Option E:

This option would see Roydon become part of Harlow

#### Consultants Suggested Approach:

- The southern and western extensions would have little relevance with the town centre and are not near to the main transport links.
- Transport links need to be improved (even allowing for the work that will shortly finish on the A414) roads in and around Harlow are often gridlocked
- Transport infrastructure needs to be improved. Some areas where additional housing is proposed are already heavily congested.

#### 21. Summary of representation received from Sawbridgeworth Town Council

- Disagrees with the assertion that Greenfield development should be located to the north of Harlow. This pre-empts the policy process. At the Issues and Options stage, <u>all</u> options should be on the table but no decisions made.
- 16,000 new homes far exceeds local needs and there is no proven link between town size and regeneration (reference made to Harlow Council's own evidence studies).
- Paragraph 3.4.3 is not supported and urgent attention is needed to deficiencies in Harlow Council's evidence base.
- Growth outside Harlow District is a matter for the respective authorities and not for Harlow to unilaterally to decide.
- Proposals are prepared in the era of regional planning and until a robust evidence base is established, there is no basis for growth outside Harlow District.
- Growth in sustainable locations is appropriate but current evidence base needs to be reviewed and gaps filled before 'sustainable locations' can be identified. Statements identifying Harlow north are therefore premature.
- No robust evidence has yet been produced that growth into neighbouring districts is required in order to enhance or reinforce Harlow's sub-regional role.
- Scott Wilson report suggest that there is a danger that large-scale development north of the Stort could drain investment away from the existing town.
- Development should be directed to areas that would maximise regeneration but only convincing evidence relates to sites within the existing town.
- Employment evidence concludes that with the 'land north of Nortel' Harlow District
  has enough employment land to meet future requirements for the base case and
  the growth scenarios in a gross sense. From the point of view of establishing future
  need, the argument is based on a circular logic resulting in a self-fulfilling prophecy,
  i.e. the need is the RSS policy requirement. In a post-RSS era such a definition of
  need cannot be left unchallenged.
- The growth options, but particularly option A and B, are based on the top-down options arising from the wording of Policy HA1. With the changes to the planning system since the study was published, there are no longer effective grounds for this option going forward. It is unclear why Harlow Council is consulting on Options A to

- E as the Scott Wilson report as the options were not developed as stand alone options for consultation.
- Option C is the most sustainable option based on the combined criteria from the assessment.
- Raise a number of concerns about the Options Appraisal Methodology.
- Question the relationship between housing to the north of Harlow and delivering the regeneration of Harlow (Option D, regeneration led).
- There is a striking omission in the evidence base regarding the delivery of regeneration. Such evidence would need to be the cornerstone of a clear strategy to directly address this issue, without which there is a danger that expansion could jeopardise the future of Harlow, as Scott Wilson consultants point out.
- Reference made to East Herts. Council's current analysis and suggest that only when the results of this analysis are known and other technical work has been undertaken will it be known whether north of Harlow is considered an appropriate location for development.
- The Scott Wilson Harlow Options Appraisal was prepared in accordance with HA1
  of the East of England Plan. The Government has made clear its intention to
  abolish the Regional Strategies including the East of England Plan. The suggested
  approach should therefore be viewed in the context of the new government's
  approach to planning, as set out in the Localism Bill.
- Reference made to Question 43 of East Herts. Core Strategy consultation (Growth
  to the north of Harlow). If East Herts. Council's emerging Preferred Option does not
  suggest that development north of Harlow should form part of a development
  strategy for East Herts. district, then Harlow Council should reflect this in its Core
  Strategy Preferred Options. Harlow Council should not attempt to pre-empt East
  Herts. Council's policy process and should not proceed unilaterally with a Preferred
  Options based on growth to the north.
- Highlight a number of concerns about the cost of infrastructure. Harlow Council will need to demonstrate satisfactorily how this infrastructure will be funded, given that the funding situation has changed dramatically since HIS was published in March 2010 (and the bulk of the study work was carried out during 2008).
- The Rye Meads Water Cycle Strategy was not a 'detailed' strategy in that, whilst it
  provided some suggestions, there were several major areas of concern remaining
  to be resolved if any development at Harlow is to be served by Rye Meads Sewage
  Treatment Works.
- As work on its Core Strategy progresses, it would be sensible for Harlow Council to pay heed to the changing policy context at national, regional, and local levels. Harlow Council will be unlikely to adopt a Core Strategy whilst the East of England Plan still forms part of the Development Plan. Under proposed new legislation it appears likely that any expansion of Harlow could only be achieved with the agreement of the neighbouring local planning authorities and communities. Given this changing policy context, the evidence from the Harlow Options Appraisal by Scott Wilson consultants suggests that the situation on the ground would indicate that Option C should be the preferred option. Such an option does not include development to the north of Harlow.

#### 22. Summary of representation received from Thames Water Property Services

- It is essential to ensure that such infrastructure is in place to avoid unacceptable impacts on the environment such as sewage flooding, pollution and water shortages.
- The section on infrastructure needs to refer to wastewater infrastructure.

- Strategic Objective 25 should be amended to read "Work with key providers to ensure that the infrastructure requirements to serve development can be met ahead of occupation".
- It would be easier to provide the wastewater infrastructure upgrades required for large scale developments than for more spread out options.
- The preferred approach from a wastewater infrastructure point of view would be for development to be located in sites to the east and north of Harlow.
- It would be more difficult to provide the required wastewater infrastructure for the development sites shown within Epping Forest to the south and west of Harlow.
- But it would be possible to provide infrastructure for small scale developments of less than 500 dwellings.
- All the sites proposed in Harlow will require sewer upgrades.
- Development should be phased over a 20 year period so that infrastructure can be identified, funded and delivered.
- Water and sewerage undertakers also have limited powers to prevent connection ahead of infrastructure upgrades and therefore rely heavily on the planning system to ensure infrastructure is provided ahead of development either through phasing or the use of Grampian style conditions.
- There should be a Core Strategy policy on water and sewerage infrastructure capacity. This should state that planning permission will only be granted for development where sufficient capacity exists or where extra capacity can be provided in time to serve the development.
- There should also be a Core Strategy policy on Water and Sewerage Infrastructure Development. This should support the development or expansion of water supply or waste water facilities, provided that the need for such facilities outweighs any adverse impact or that any such adverse impact is minimised.
- The wastewater infrastructure capacity for Harlow (sewerage and treatment) is considered in the Rye Meads Water Cycle Study which forms part of the evidence base for the Core Strategy.

#### 22. Summary of representation received from Widford Parish Council

- Fully supports the submission that was made to the Issues and Options consultation by Stop Harlow North
- Objects to any development on Green Belt land north of the River Stort in East Hertfordshire which is unnecessary, unsustainable and undemocratic

# Appendix 3 – Summary of Responses to the Sustainability Appraisal

## Appendix 3.0 Sustainability Appraisal (incorporating SEA) and Habitats Regulations Assessment

Six groups and organisations commented on the Sustainability Appraisal (SA). Set out below is a summary of the key issues raised in relation to the SA:

- The SA needs to assess more fully the impact of Climate Change and put forward mitigation/adaption measures for inclusion in the Core Strategy.
- The SA needs to be substantively revised during subsequent Core Strategy stages to reflect changes resulting from the revocation of the East of England Plan. Currently the SA simply accepts the stance that the Core Strategy should deliver the East of England Plan growth target requirements. When the East of England Plan is revoked the SA will need to identify, describe and evaluate reasonable alternative housing and employment growth levels and reasonable alternative spatial options beyond the Harlow district boundary.
- The options tested in the SA only related to those suggested in the Spatial Options Report. This appears to have prejudged the Issues and Options stage as the only options tested are those put forward in an evidence base document undertaken to inform the Core Strategy rather than to establish the strategy. The SA must be redone once appropriate Spatial Strategy Options have been set out by the Council.
- The SA fails to fully consider the dynamics of the housing market and the implications of locating development within an area accessible to London.
- The SA provides no commentary on the potential environmental, social and economic problems that would result if housing shortage is not eased.
- There is a lack of understanding about other sub-regional economic issues impacting on the Core Strategy.
- The SA does not give enough weight to the significant positive sustainability impacts in terms of economic and social regeneration of Harlow.
- There is a lack of evidence to support statements made about the impact of development on the southern ridgeline. Further investigation is required to ascertain the impact of development (and what scale) in the south on the ridgeline. Furthermore, the appraisal over emphasises the significance of the ridgeline as a constraint, given the statutory designations within the vicinity of other spatial options. The SA needs to consider further measures, including view management frameworks, that could be included to mitigate the impact of development in the south on the ridgeline.
- It is unclear why the "eastern growth area" has been identified as one of the spatial area criteria, given that its planning status is the same as the other growth locations (i.e. north, south and west) under consideration.
- The report alludes to drainage infrastructure limitations which do not exist.
- The SA does not sufficiently identify and balance environmental concerns with social and economic impacts.
- Whist the Issues and Options Consultation Document did not test alternative housing requirements, the housing requirement identified in the document was tested during the formation of the East of England Plan and found to be appropriate.
- Greater emphasis appears to be given to environmental constraints, not all of which
  are necessarily significant. The SA should give greater emphasis to the significant
  positive sustainability impacts in terms of economic and social regeneration of
  Harlow, and proximity to public transport. The SA also fails to recognise that the
  approach to delivering growth at Harlow is about the wider housing needs of
  Hertfordshire, Essex and London.

## **Appendix 4 - List of Respondents**

### Appendix 4.0 List of Respondents

FIRST NAME	MIDDLE NAME	SURNAME	COMPANY/ORGANISATION	PERSON ID
Ernesto		Abad		[6282]
Sarah		Abbott		[6510]
Terry		Abel		[6159]
Ben		Acheson		[6908]
Tim		Acheson		[6523]
Mark		Adams		[6839]
Beyrl		Adams		[6639]
J		Agate		[6579]
William		Aitken		[6441]
Jeremy		Aknai		[6105]
Peter		Aknai		[5987]
Sally		Aknai		[6414]
Richard		Allanach		[5791]
David Elaine		Allard Allen		[6592]
Michael		Allen		[6031] [6172]
Stan		Allen		[5775]
Dominic		Allington-Smith		[7140]
Dean		Amor		[6375]
Bobby		Anderson		[7287]
Gary		Anderson		[7414]
John		Anderson		[7509]
Daniel		Andrews		[7073]
Maureen		Annetts		[6828]
Edward		Anthony		[6074]
Tina		Arden		[6973]
Warren		Arden		[6971]
Jame		Argent		[7492]
John		Argent		[6116]
Carol		Arnesen		[5915]
Vince		Arrowsmith		[6489]
Sue		Ash		[6953]
Lorraine		Ashall		[7356]
Rod		Ashall		[7352]
Sheila		Ashall		[7353]
Brenda		Ashley		[7482]
John		Ashley		[7480]
Roy		Atkins		[7379]
Suzanne		Atkins		[7416]
Liz		Atkinson		[7580]
Irene		Auerbach		[6897]
Gary P	N	Austin Austin		[7203] [6188]
Steve	IN	Avis		[7339]
Anna		Avis		[7359] [5956]
Karen		Backshall		[7503]
Paul		Backshall		[7508]
Mrs		Bacon		[6472]
Jane		Badrock		[6992]
Sarah		Bagnall		[7079]
Alyson		Bailey		[6909]
Bob		Bailey		[6581]
Eliot		Bailey		[6481]
T		Bailey		[6552]
Helen		Bailey		[6873]
Willow		Bailey		[6480]

Glen	Baker		[6921]
Mark	Baker		[7053]
Lucy	Baker		[7592]
Sarahjayne	Baker		[6970]
Colette	Balch		[6260]
Trevor	Bale		[7456]
Janet	Ballard	Roydon Parish Council	[5434]
Derek	Bandy	•	[6673]
Irene	Bannister		[6708]
Steven	Barker	H C Leach	[7665]
Ellen	Barker	11 0 200011	[7341]
S	Barker		[7263]
Robert	Barker		[6979]
Tim	Barnard		[6810]
Teresa	Barnard		[6216]
Les	Barnes		[6879]
Rod	Barnes		[6719]
M	Barnes		[6717]
Melanie	Barnes		[6351]
Veronica	Barnes		[6878]
John &	Barnes		[5828]
Jane	Barnett	Briggens Estate	[7651]
David	Barnett		[6377]
Laurie	Barnett		[6386]
Paul	Barnett		[5993]
Ronald	Barnett		[7065]
Victoria	Barnett		[6535]
Irene	Barrall		[6152]
Roger	Barratt		[7074]
Andrew	Barrett		[6539]
Jane	Barrett		[6538]
Mag	Barrett		[5857]
Joanna	Barter		[5701]
Nicholas	Barter		[6408]
Gillian	Bassett		[5921]
John	Bassett		[5920]
Gillian	Baxter		[7078]
Darren	Beardon		[6910]
Catherine	Beaujeux		[5976]
Peter	Beaumont		[7286]
Α	Bebee		[6624]
Michael	Beckman		[6488]
Claire	Beckmann		[7080]
Ed	Beckmann		[6738]
Ray	Beddoes		[5970]
Roger	Beeching		[7398]
L	Bell		[7018]
Anthony	Bellotti		[7048]
Sandra	Bellotti		[7047]
E	Belsey		[6780]
Mark	Bennet	St James Church	
	Bennett	ot James Chulch	[470]
Jenny			[6204]
Maureen	Bennett		[7166]
M	Bennett		[6975]
Tony	Bennett		[6675]
Michael	Bentley		[6707]
R	Best		[7237]
Т	Best		[7240]
В	Beverley		[6039]
В	Beverley		[6038]

Tina		Bewley		[6376]
Robyn		Bewsey-Holden		[7150]
Peter		Bickley		[6194]
Evan		Bickmore		[7345]
Grace		Bickmore		[7064]
Lucy		Bickmore		[7554]
David		Bindefeld		[7530]
P		Bindefeld		[6611]
William		Bird		[5083]
C		Black		[5995]
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Jennifer		Black		[6114]
Jayne		Black		[6856]
Andrew		Blackwell	Barratt Strategic	[7662]
David		Blake		[7606]
Max		Blakeman		[6620]
Hilary		Blease		[6803]
Trevor		Blease		[7322]
Mark		Bloss		[7085]
Claire		Bloss		[6395]
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Catherine				= = = = = = = = = = = = = = = = = = = =
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J		Bond		[6281]
Barbara		Borowski		[7524]
John		Borowski		[7523]
Lino		Bottalico		[6871]
Eve		Bottalico		[6258]
Oonagh		Bottalico		[6259]
Tracy		Bottalico		[6872]
Frances		Boul		[7264]
Francine		Bourgeois		[7027]
Steve		Bourne		[7481]
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Vanessa				[6294]
Linda		Bowes		[5881]
Peter		Bowes		[6167]
Stuart		Bowman		[7169]
Richard		Bowran	Sawbridgeworth Town Council	[4945]
		Boxford-		
Veronica		Brookes		[7215]
G		Brace		[6341]
Frederick	David	Bracey		[5882]
Robert		Bramich		[6181]
Andrew		Bramidge	Harlow Renaissance	[259]
D		Brand		[6344]
С		Brentnall		[6563]
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lan		Brett		[7490]
Virginia		Brett		[7489]
Leslie		Brewster		[6299]
Pauline		Brewster		[6298]
Jean		Brian		[6838]
Stephen		Brickwood		[7569]
Susan		Brickwood		[7586]
Richard		Brickwood		[7458]
Moira		Bridge		[6400]
Colin		Bridgeman		[6572]
Gina		Bridgman		[7271]
Chris		Bridle		[7305]
Geoff		Bridle		[7302]
Jeff		Bridle		[7304]
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Paul -	Bridle		[7309]
Zoe	Bridle		[7303]
Neil	Bridle		[6584]
Sue	Bridle		[6548]
Linda	Brierly		[7030]
Bob	Bright		[6516]
lan	Brinham		[6347]
Lilian	Brinham		[6278]
G	Brinkley		[6804]
В	Brinkley		[7447]
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Brenda	Brinn		[7351]
Tomy	Brinn		[7393]
A	Brix		[6781]
Nicola	Brockington		[7052]
Michael	Brookes		[6596]
Ann	Brookfield		[6556]
Canan	Brown		[7025]
Douglas	Brown		[5052]
Joyce	Brown		[6930]
Michael	Brown		[5764]
Terence	Brown		[6297]
Val	Brown		[5961]
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Nicola	Brown		[6271]
Paul	Brown		[6269]
S	Brown		[7504]
Terry	Brown		[6739]
Anita	Brummit		[6063]
Gerald	Brummitt		[6066]
Frankie	Brunker		[7099]
Mark	Brunker		[7100]
Chris	Brunton		[6497]
Liam Sharon	Bryant		[6071]
	Bryant Bryant		[6623]
Janine	Buckland		[6070]
Lucy Josh	Buckland		[7453]
K	Buckland		[7452]
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Ann	Buckle		[6364]
Eric	Buckmaster		[5964] [6373]
Francesca	Buckmaster		[6379]
Louisa	Buckmaster		[6374]
Ruth	Buckmaster		[6374]
Helen	Buckworth		[6590]
Nick	Buckworth		[6263]
Teresa	Bulloch		[7042]
Barbara	Burge		[5093]
Alan	Burgess	Protection of Roydon Area PORA	[26]
Anthony	Burgess	1 Total Control Roydon Area 1 Orta	[7312]
Mark	Burgess		[6869]
Clare	Burkett		[6469]
Wayne	Burlingham		[7578]
Mr	Burnay		[7210]
Ria	Burns		[6212]
Andrew	Burtenshaw		[6368]
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Dawn	Burtenshaw		[6068]
Keely	Burtenshaw		[7609]
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Keith		Busby		[6240]
Thomas		Busby		[6844]
Marion		-		
D	0	Busby		[6848]
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Emily		Butler		[7438]
Jack		Butler		[7437]
Paul		Butler		[5951]
Deanna		Butler		[6799]
Phil		Butler		[6507]
Steven		Butler		[5053]
Kevin		Butters		[6894]
Carol		Butters		[6887]
Henrietta		Buxton		[7167]
David		Buxton		[6380]
Nicholas		Buxton		[7555]
Fiona		Byatt		[6898]
Michael		Byatt		[6254]
Pat		Byatt		[6937]
Tony		Byatt		[7526]
Ed		Byrch		[6536]
Adam		Byrne		[6821]
Paul		Caddick		[6462]
Amanda		Cadisch		[6820]
Michael		Cairns		[6938]
Colin		Campbell	C. J. Pryor (Plant) Ltd	[7645]
Anthony		Camplin	, , , , ,	[6648]
Sarah		Camplin		[7347]
Isabelle		Carr		[7326]
Catherine		Carrdus		[6628]
Jane		Carrington		[6011]
Sheila		Carroll		[5765]
Christian		Carruth		[6949]
Helen		Carruth		[6968]
Alyson		Carter		[7529]
David		Carter		[7329]
Janet		Carter		[7230]
Ben Lilli Mov		Carter		[6099]
Lilli-May		Carter		[6044]
Sarah		Carter		[6499]
В		Carthy		[7086]
Chris		Carthy		[6059]
Rob		Carthy		[6054]
Tim		Carthy		[6055]
Jackie		Carthy		[6049]
Matthew		Cartmell		[6530]
Alexis		Casey		[6812]
James		Casey		[7151]
K		Casey		[7241]
С		Casey		[7187]
1		Casey		[7186]
Mr		Cash		[6079]
Mrs		Cash		[6080]
Thomas	& Audrey	Castle		[6191]
Hugh		Cater		[6425]
М		Cavalier	Cavalier Land Co	[5717]
Р		Chad		[7116]
Peggy		Chad		[6762]
David		Chalk		[5889]
Margaret		Chalk		[7666]
Mike		Chapman		[6852]
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The		Chapman's		[5824]
Brian		Chappell		[6994]
Chris		Chappell		[6954]
Chris		Chappell		[6995]
Jack		Chappell		[6996]
Tina		Chappell		[6075]
Michael		Charles		[5929]
Janet		Cheek		[7525]
Ray		Cherry	RGW Cherry & Associates	[6962]
Karen		Cherry	,	[6960]
Martin		Chown		[5853]
N		Chrimes		[6433]
Brenda		Church		[6346]
David		Clapham		[6834]
		•	Chan I laylow North	
Nigel		Clark	Stop Harlow North	[25]
Amy		Clark		[7207]
Derek		Clark		[5065]
Michael		Clark		[7540]
Eileen		Clark		[6950]
Kate		Clark		[7545]
Michael		Clark		[6663]
Peter		Clark		[6613]
Brian	& Barbara	Clark		[5820]
Andrew		Clark		[6487]
Phil		Clark		[6436]
Т		Clark		[7289]
Judith		Clark		[7397]
M		Clark		[7288]
Karen		Clark		[6435]
Paul		Clark		[6922]
Rachel		Clark		[6512]
Sam		Clark	Descrit Otractania Descriptora a G. Taudan Wissan au	[5722]
Matt		Clarke	Barrat Strategic Persimmon & Taylor Wimpey	[7653]
David		Clarke		[6522]
John		Clarke		[6694]
Kim		Clarke		[6028]
Les		Clarke		[6388]
Ena		Clarke		[6389]
Lara		Clarke		[6223]
Sue		Clarke		[6746]
Cynthia		Clarkson		[6102]
Vanessa		Clay		[5969]
David		Clee		[7270]
Marianne		Clee		[5983]
Christopher		Clemmett	MRB Services Ltd	[5721]
Janet .		Clemmett	MRB Services Ltd	[5874]
Michael		Clemmett	MRB Services Ltd	[6022]
Dean		Clemmett	MRB Services Ltd	[6027]
Brian		Clenshaw		[6458]
Philip		Clewes-Garner		[7020]
George		Clifton		[7015]
James		Clifton		[7556]
		Clive		
Revd				[7577]
J		Cobby		[6861]
Charles		Cochrane		[5891]
Paul		Cochrane		[6355]
Adrian		Coggins	NHS West Essex	[5845]
Dave		Coghill		[7246]
Debbie		Cole		[6196]
Ann		Coliings		[6653]

Andrew	Colley	[6942]
John	Collier	[6457]
Joyce	Collins	[6127]
Inga	Collins	[6125]
Jean	Collins	[6005]
John	Collins	[6006]
Ken	Collins	[6126]
Lisa	Collins	[5836]
Mary	Collins	[5925]
J	Collins	[7357]
Nicola	Collinson	[6057]
Rod	Colwell	[7493]
Kim	Compton	[7435]
A	Connolly	
		[5907]
Barry	Cook	[7242]
Steve	Cook	[6252]
Sophie	Cooke	[6085]
Michael	Cooksey	[6983]
Charmaine	Cooper	[7220]
Colin	Cooper	[7219]
David	Cooper	[6607]
Derek	Cooper	[6969]
Giles	Cooper	[7218]
lan	Cooper	[7158]
Louise	Cooper	[5759]
Kristiina	Cooper	[5960]
Nicholas	Cooper	[7221]
D	Coote	[7307]
Ryan	Copping	[6303]
É	Copping	[6300]
Judy	Corkill	[7000]
Jean	Corlett	[5866]
Peter	Corlett	[5756]
Jan	Cornelius	[6729]
Andrew	Cornthwaite	[6428]
Jim	Cosgrove	[6835]
Suzanne	Costello	[7067]
Ronald	Coultrup	[6440]
Claire	Coupe	[6987]
M	Cox	
		[7455]
Trevor	Cox	[6249]
Sophie	Cox	[6855]
Taylor	Coxall	[7223]
Carole	Crabb	[7028]
Carol	Creswell	[6200]
Kevin	Creswell	[6199]
Neal	Creswell	[6201]
Bramwell	Cripps	[7060]
Kim	Cripps	[7061]
Sarah	Cripps	[7214]
Peter	Crool	[5999]
David	Cross	[6306]
Philip	Crowe	[6078]
Anne	Crowther	[7035]
Tim	Crowther	[6509]
David	Cullingford	[5225]
David	Cullingford	[6470]
R	Cumings	[7426]
Barry	Cummins	[7420]
Jennifer	Cummins	[6682]
Jerminer	Cultillinis	[0002]

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John	Cunningham	[7023]
C	Curran	[6397]
John	Curry	[5781]
Jon	Curtis	[7014]
Terase	Curtis	[7443]
Robert	Dagnell	[6325]
Diane	Dagnell	[6326]
Tim	Dalton	[6730]
Claire	Dangan	[7439]
Matthew	Dangell	[6323]
Robert	Dangell	[6313]
Colin	Daniels	[6726]
Graham	Daniels	[6369]
Alison	Daniels	[6370]
Joanne	Darrell	[6215]
Paul	Darrell	[6287]
Hazel	Davey	[7181]
Richard	Davey	[5941]
Alan	David	[6107]
Martin	Davie	[6858]
Craig	Davies	[6888]
Stephen	Davis	[6040]
Neil	Dawson	[7055]
Peter	Dawson	[7031]
Sarah	Dawson	[7031]
E	Day	[6546]
Robert	Day	[6122]
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Matthew	Dean	[7168]
F	Deether	[6251]
John	Deether	[6989]
Philip	Degen	[5949]
Karen	Denbow	[7075]
Douglas	Dennis	[6123]
David	Dent	[7045]
J	Denton	[6976]
Frances	Dewsett	[6119]
James	Dickinson	[5986]
Scott	Dickinson	[5984]
Astrid	Dickinson	[5947]
Linda	Dickinson	[5985]
William	Dickson	[6455]
Paul	Dines	[6229]
Angela	Dines	[6230]
Colin	Dingwall	[5924]
J	Dingwall	[6727]
Adele	Dixon	[6652]
Caroline	Dixon	[7006]
Chris	Dixon	[6506]
Edward	Dixon	[6525]
Graham	Dixon	[6796]
Jill	Dixon	[6583]
Laura	Dixon	[7029]
Lynette	Dixon	[6565]
Maria	Dixon	[7005]
Matthew	Dixon	[6612]
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Faye		[5946]
Paul	Dixon	[7007]

Stanley	Dixon	[7415]
Stephanie	Dodd	[6537]
Barbara	Doherty	[7057]
Р	Dollery	[6818]
Peggy	Doman	[7512]
Mr	Donald	[6842]
Mrs	Donald	[7321]
Chris	Donnelly	[6190]
Rachel	Donnelly	[6192]
Susan	Donohoe	[7059]
Lee	Dorman	[6410]
Kay	Douglas	[7024]
Peter	Douglas	[5054]
James	Downing	[7501]
Sarahhelen	Dowse	[6568]
John	Drake	[6737]
Tom	Duckmanton	[6304]
Vivien	Dudley	[6036]
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Elias		Mavrommati		[6567]
Edward	& Ethel	Mawdsley		[6009]
Toni		Max		[7281]
Gillian		May		[6742]
Hilda		May		[6021]
Regina		May		[6679]
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Henry		Mayes		[7200]
Jemima		Mayes		[7197]
Lydia		Mayes		[7198]
Sarah		Mayes		[7199]
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Patricia		Mayhew		[5810]
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Ken		Mcdonald		[7204]
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Jo Graham		Mcisaac		[7183] [7375]
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Graham Paula Hugh		Mcisaac McManus Mcmanus		[7375] [6293] [7392]
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Robert		Morrison		[6393]
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Colleen		Morrison		[5674]
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Ben		Newman		[6245]
Rachel		Newman		[5934]
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Pamela		Newman		[6176]
Victoria		Newman		[7584]
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Hedley		Newton	·	[7506]
Linda		Newton		[6166]
Marco		Newton		[7297]
Kay		Newton		[5942]
Paul		Newton		[5871]
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Kaye		Nightingale		[7570]
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Ruth		Noakes		[6814]
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Matthew		O'Shea		[6283]
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Ruth		Palmer		[7631]
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Т		Slater		[5884]
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Molly		Sleigh		[6131]
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I		Small		[7457]
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Bea		Smith		[7411]
Carol		Smith		[7145]
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Officiality		Official		[1391]

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Peter		Sowden		[6982]
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J		Staples		[5978]
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Karn		Stephen		[6815]
J		Stevens		[7033]
Chris		Stevens		[6291]
Denise		Stevens		[6292]
Paul		Stevens		[7225]
T		Stevens		[7034]
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Douglas		Stewart		[7285]
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Mrs		Stickler		[5940]
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David		Stuart		[7103]
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Matthew		Taylor		[6195]
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Ben	1 03(0)	Taylor		[6491]
Nicholas		Taylor		[5738]
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Joan		Tracey		[6362]
Veronica		Tracey-Micheli		[6361]
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R		Traer		[6866]
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Michael	Twist		[7502]
lan	Tyler		[5945]
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Hebe	Vaizey		[7593]
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	Walsh		[7350]
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Paul	Watson		[7173]
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Paul	Whitehead		[7051]
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Reuben		Wilkinson		[5057]
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		Wren		
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Colin		Wright		[5898]
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		-		
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J		Wright		[7261]
Jean		Wright		[5878]
Jessica		Wright		[7208]
Gabriella		Wright		[6896]
М	J	Wright		[6211]
(*)	J	vviigiit		[0211]

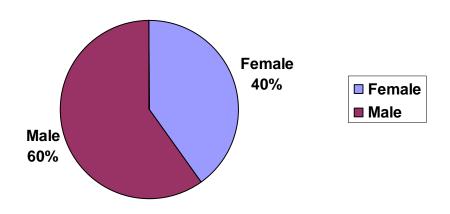
Celia	Wright	[6385]
Sarah	Wright	[7542]
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Da	Wynn	[7134]
Kate	Yarnold	[6837]
Jane	Yates	[5864]
Joanne	Yates	[6350]
Christopher	Young	[7582]
Glynis	Young	[7514]
Jo	Young	[7562]
Roy	Young	[6399]
Lewis		[7597]
Lina		[7596]
Belinda		[6745]
Deborah		[6094]

## **Appendix 5 - Demographic Monitoring Results**

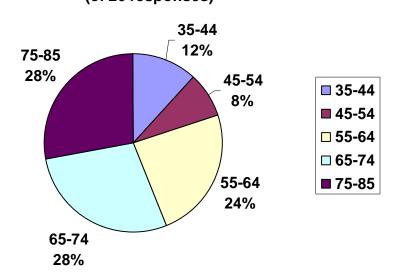
### Appendix 5.0 Demographic Monitoring results

This section provides a demographic analysis of the 26 (1.34%) of respondents who chose to complete the optional Equalities Monitoring Form published with the Questionnaire.

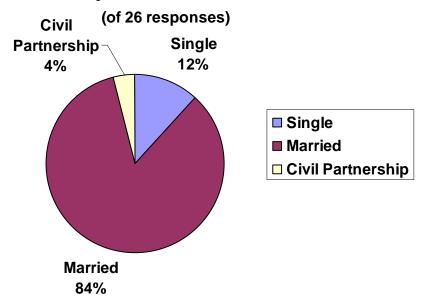




## Which age group do you belong to? (of 26 responses)

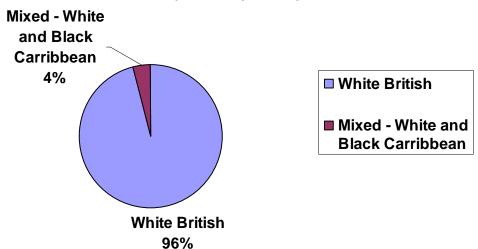


### What if your Marital Status?



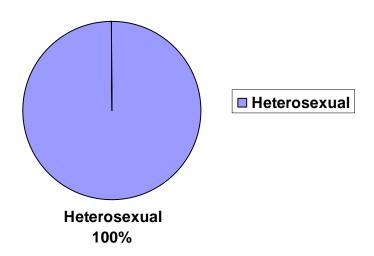
## How would you describe your race/ethnicity?

(of 26 responses)



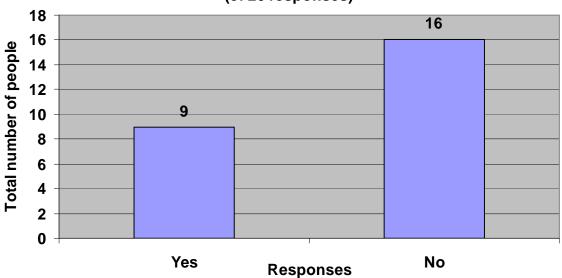
### How would you descibe yourself?

(of 26 responses)



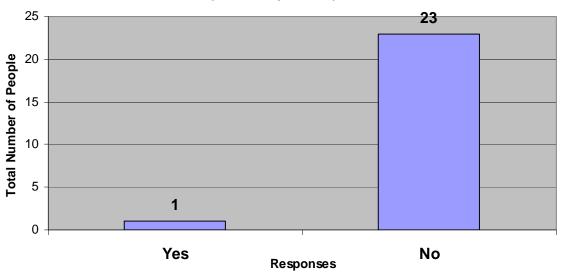
## Do you consider yourself to have a physical or sensory impairment or disability?

(of 26 responses)



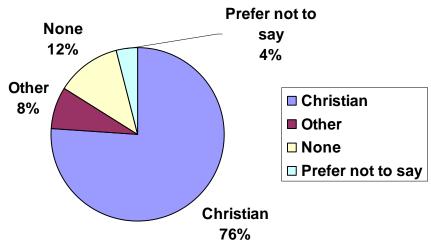
# Do you consider yourself to have a mental impairment or disability?

(of 26 responses)



## Which religion do you belong to?

(of 26 responses)



Appendix 6	- Harlow	Youth	Council	Workshop	Results

### **Appendix 6.1** Harlow Youth Council Workshop Results

This section provides a record of the feedback received from the 'Issues and Options' workshop held on 17 January 2011 with the Harlow Youth Council.

A decision was taken to hold a workshop with the Youth Council during the Issues and Options consultation period as an additional consultation activity in order to help ensure that Harlow's future generation were engaged with, and had an opportunity to comment on, the Issues and Options consultation. Bespoke letters and information packs were also sent to local schools and to Harlow College to ensure young people in the town were aware of the consultation exercise.

### The purpose of the workshop

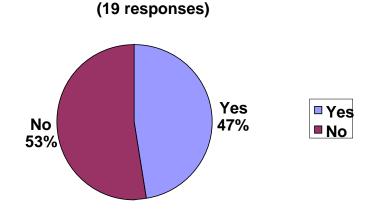
The aim of the Youth Council Workshop was to gather young people's views on a range of issues related to the questions that were contained in the Issues and Options consultation document. Whilst the feedback received from the workshop cannot be formally taken into account as part of the Issues and Options consultation results, the feedback is still valuable as it provides further evidence of the views of Harlow's young generation as to the issues that need to be addressed in Harlow which, in turn, will help to shape the potential options for addressing these problems through the Core Strategy.

18 Youth Councillors attended the consultation workshop which was held in the Civic Centre in Harlow Town Centre. The workshop began with a short presentation by the Council's Forward Planning Team explaining the purpose of the Issues and Options consultation and some of the development issues identified within the consultation document gathered from previous consultation events. A copy of the presentation given to the Youth Councillors can be viewed in Appendix 6.2. A carefully crafted workshop was then undertaken to gather feedback from the Youth Councillors on a range of issues that need to be addressed in the town through the Core Strategy including housing, traffic congestion, employment opportunities, the provision of green spaces and improvements to the Town Centre. A summary of the results from the workshop is provided below.

Question 1: Do you like living in Harlow?

### Workshop results

### **Question 1 – Do you like living in Harlow?**

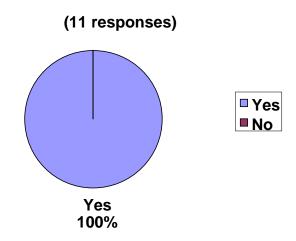


19 Youth Councillors answered this question. Nine stated that they liked living in Harlow compared to ten who stated they did not. The reasons given by those who stated that they liked/disliked living in Harlow are given below:

Reasons given for why Harlow is a good place to live	Reasons given for why Harlow is a bad place to live
<ul> <li>Good reputation</li> </ul>	<ul> <li>Bad reputation</li> </ul>
<ul> <li>Good location</li> </ul>	<ul> <li>Economically deprived</li> </ul>
<ul> <li>Good schools</li> </ul>	<ul> <li>Boring</li> </ul>
<ul> <li>Convenient for shopping</li> </ul>	<ul> <li>Pollution</li> </ul>
Useful green space	<ul><li>Litter</li></ul>
<ul> <li>Their friends live in the town</li> </ul>	<ul> <li>Teenage pregnancy</li> </ul>

### Question 2 – Would you like to live in Harlow when you are older?

Question 2: Would you like to live in Harlow when you are older?



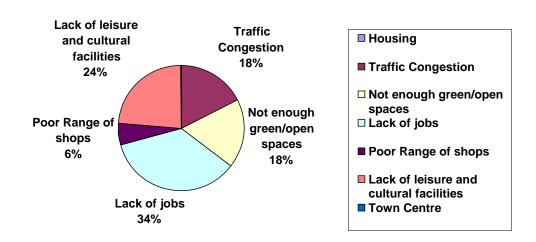
The 11 Youth Councillors who responded to this question all stated they would like to live in Harlow in the future. Reasons given for this included 'family', 'familiarity' and 'commuting'. The Youth Councillors also felt that Harlow offers more employment opportunities that elsewhere and less 'hustle and bustle' than places like London. Furthermore, they stated they saw the new university building as being a positive development for Harlow.

### Question 3 – What do you think is the biggest problem in Harlow?

For Question 3, seven frequently identified issues facing Harlow were presented to the Youth Councillors and they were then asked to vote for which one they felt was the biggest needing to be addressed. 17 Youth Councillors responded to this question. The results are provided on the following page.

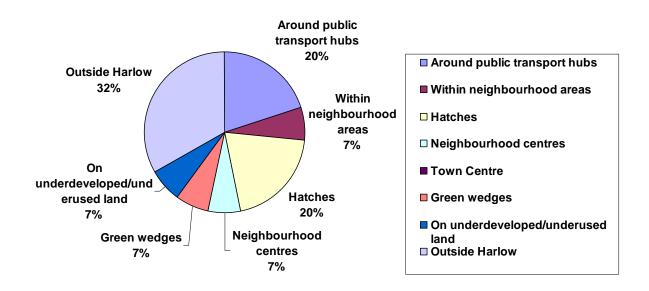
'Lack of jobs' (5) and 'lack of leisure and cultural facilities' (4) received the most votes followed by 'traffic congestion' and 'lack of green spaces' which each received 3 votes. Only one Youth Councillor voted for 'poor range of shops' whilst 'housing' did not receive any votes.

Question 3: What do you think is the biggest problem in Harlow? (17 responses)



### Question 4 – if new homes are needed, where should they be built?

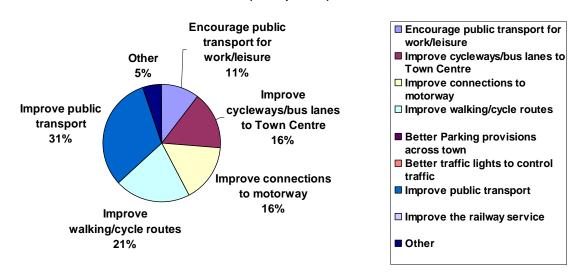
Question 4: If new homes are needed, where should they be built?
(15 responses)



Eight possible locations where new houses could be built were presented to the Youth Councillors who were then asked to vote for which one they thought would be the most suitable approach. 15 Youth Councillors responded to this question. 'Outside Harlow' received the most votes (8), followed by 'hatches' and 'around public transport hubs' which each received 3 votes. All remaining options each received a single vote with the exception of the Town centre which received none.

### Question 5 – How do you think Harlow's congestion problems should be solved?

Question 5: How do you think Harlow's congestion problems should be solved? (19 responses)



None possible options for solving Harlow's traffic congestion problems were presented to the Youth Councillors who were then asked to vote for which one they thought would be the most suitable intervention. 19 Youth Councillors responded to this question. The most popular options were 'improvements to public transport' and 'improvements to walking/cycle route' which received six and four votes respectively. Improvements to cycleways and bus lanes to the Town Centre' and 'improved connections to the Motorway' were the next most popular options, each receiving 3 votes, whilst measures to encourage people to use public transport for work/leisure received two votes. One youth Councillors voted for the 'other' option but did not state what that option could be.

### Question 6 – What sort of jobs should be available in Harlow?

Question 6: What sort of jobs should be avaliable in Harlow? (17 responses)

Office
12%

Science/Research
Development
53%

Shopping/Retail
35%

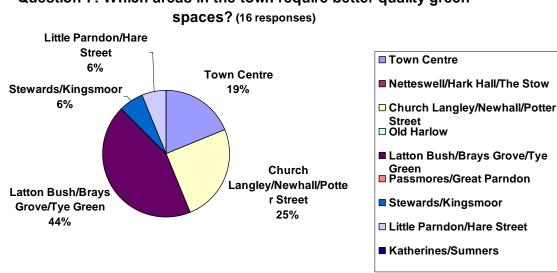
Science/Research
Development

Warehouse/Distribution

Question 6 sought the youth Councillors' views on the types of jobs they would like to see available in Harlow in the future. 17 Youth Councillors responded to this question. More than half of the Youth Councillors (9) thought that Harlow should be a location for 'science/research development' related jobs.

There was also support for Harlow being a location for 'shopping/retail' jobs (5 votes) and 'office' related jobs (3 votes). No Youth Councillors thought that Harlow should be a location for manufacturing or warehouse/distribution related jobs.

### Question 7 – Which areas of the town require better quality green spaces?



Question 7: Which areas in the town require better quality green

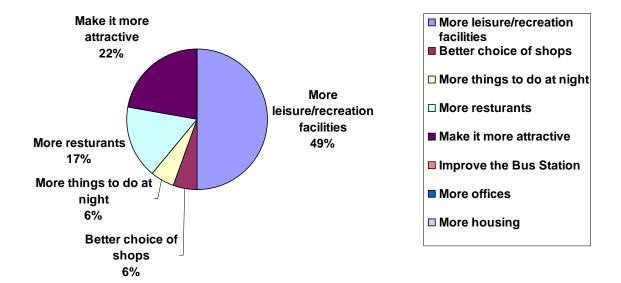
Nine locations roughly corresponding to the neighbourhood areas were presented the Youth Councillors who were then asked to vote for which they felt most required better quality green spaces. 16 youth Councillors responded to this question. Bush/Brays Grove/Tye Green received the most votes (7), followed by Church Langley/Newhall/Potter Street (4) and then the Town Centre (3). Three areas - Old Harlow, Passmores/Great Parndon and Katherines/Sumners did not receive any votes.

### Question 8 – What improvements do you want to see in the Town Centre?

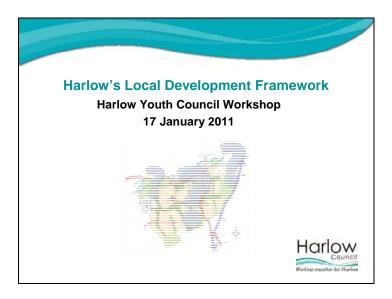
Eight potential improvements that could be made to the Town Centre were presented to the Youth Councillors who were then asked to vote for which one they thought should be undertaken. 18 Youth Councillors responded to this question and the results are presented on the following page.

Half (9) of the Youth Councillors stated that they felt more leisure/recreation facilities were needed to improve the Town Centre. Other improvements receiving support were measures to make the Town Centre more attractive (4 votes) and provision of more restaurants (3 votes). The two other Youth Councillors voted for there to be more things to do at night and for a better variety of shops (1 vote each). None of the Youth Councillors wanted to see more housing of offices within the Town centre, and none saw the Bus Station as being a major problem.

Question 8: What improvements do you want to see in the Town Centre?
(18 responses)



### **Appendix 6.2** Harlow Youth Council Presentation Slides



### What are we doing and why are we here?

- We are preparing a new plan that will regenerate Harlow by:
- Providing more homes, employment, shopping, education, transport improvements, health, leisure, and green spaces
- Protecting important environmental areas (2 Sites of Special Scientific Interest and 2 Local Nature Reserves)
- We want as many people and groups involved as possible and can have their say on Harlow's future
- This includes the young people in the town, including  $\underline{\textbf{YOU}}!$





### **Issues and Options Consultation**



- Consultation from 22 November to 28 January 2011
- The consultation was launched at an event at Harlow Train Station on 23 November
- Exhibitions at the Harvey Centre, community centres and churches across Harlow
- A presentation to Harlow's Youth Council tonight!
- A video on the consultation can be viewed on-line at www.youtube.com/harlowcouncil
- Document and questionnaire can be viewed on-line at www.harlow.gov.uk/issuesandoptions



Harlow, the story so far...







- Home to big companies (GSK, Pitney Bowes, Raytheon)
  Sculpture Town
- Excellent leisure and cultural facilities
- But it also has many issues:

   Deprived areas, poor quality housing, congestion





### So what's been happening?







- Workshops with local people and organisations (including previous Youth Councillors) to identify development issues affecting the town
- Some of the issues already highlighted....



### What are the key issues?

Green spaces (including Green Wedges) should be maintained and protected...





High quality architecture and design should be promoted...



### What are the key issues?

A better range of housing to meet the needs of the whole community...









### What are the key issues?

The Town Centre needs to be improved...with a better choice of shops to encourage more shoppers to come in to Harlow...





Education, training and shills need to be improved in the town

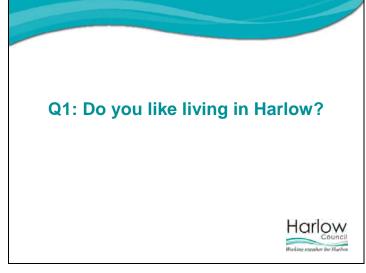


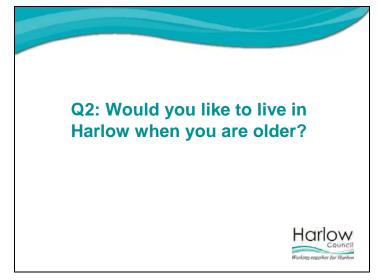












## Q3: Please vote on what you think is the biggest problem in Harlow?

- •Housing
- Traffic congestion
- •Not enough green/open spaces
- •Lack of jobs
- •Poor range of shops
- •Lack of leisure and cultural facilities
- •Town Centre



# Q4: If new homes are needed, please vote on where you think they should be built?

- •Around public transport hubs (Train/Bus Stations, Bus Stops)
- •Within neighbourhood areas
- •Hatches
- •Neighbourhood centres
- •Town Centre
- •Green Wedges
- •On undeveloped / underused open land
- •Outside Harlow



## Q5: How do you think Harlow's congestion problems should be solved?

- •Encourage more people to use public transport for work and leisure
- •Improve cycleways and bus lanes to the Town Centre
- •Improve connections to the motorway
- •Improve walking and cycle routes in the town
- •Better parking provision across the town
- •Better traffic lights to control traffic better
- •Improve public transport
- •Improve the railway service
- •Other



## Q6: What sort of jobs should be available in Harlow?

- Office
- •Manufacturing
- •Shopping/Retail
- •Science/Research & Development
- •Warehouse/Distribution



## Q7: Which areas of the town require better quality green spaces?

- •Town Centre
- •Netteswell/Mark Hall/The Stow
- •Church Langley / Newhall /Potter Street
- •Old Harlow
- •Latton Bush/Brays Grove / Tye Green
- •Passmores/Great Parndon
- •Stewards/Kingsmoor
- •Little Parndon/Hare Street
- •Katherines/Sumners



## **Q8: What improvements do you want to see in the Town Centre?**

- •Better choice of shops
- •More things to do at night
- •More restaurants
- •More leisure / recreation facilities
- •Make it more attractive
- •Improve the Bus Station
- •More office
- •More housing



licity materials

### **Appendix 7.1** Generic Consultation Letter

(This letter was sent out on 22 November 2010)

Dear Sir or Madam,

#### HARLOW CORE STRATEGY ISSUES AND OPTIONS CONSULTATION

I am writing to advise you that Harlow Council will be consulting on its Core Strategy Issues and Options document for ten weeks from 22 November 2010 to 28 January 2011.

The Core Strategy will be the main planning document in Harlow's emerging Local Development Framework (LDF). The LDF is a series of documents that will guide planning and development in Harlow to 2026 and beyond.

The Issues and Options consultation is the first stage of Harlow's Core Strategy, setting out the key issues that need addressing in Harlow and proposing possible options for planning the town's future.

### Have your say!

This is your chance to have your say at the start of the process.

Your responses and suggested solutions to the questions in the Issues and Options document are important and will help the Council to prepare Harlow's final Core Strategy.

The following documents are now available to view online at www.harlow.gov.uk/issuesandoptions:

- Issues and Options Consultation Document
- Questionnaire
- Sustainability Appraisal incorporating Strategic Environmental Assessment
- Habitats Regulations Assessment Screening Report
- Summary Leaflet

There is also a link on the above webpage to view a LDF consultation video explaining the role of the LDF.

Paper copies of the consultation document are available for inspection during normal office hours at the Civic Centre and in local libraries. Copies of the documents on CD-Rom can be obtained by emailing <a href="mailto:myharlow@harlow.gov.uk">myharlow@harlow.gov.uk</a> or calling 01279 446028.

### How to respond

You can comment on the Issues and Options consultation document by:

- Submitting your responses via the Council's online Consultation Portal at <a href="http://harlow.jdi-consult.net/ldf/">http://harlow.jdi-consult.net/ldf/</a>
- 2. Emailing your completed questionnaire to myharlow@harlow.gov.uk:
- 3. Hand delivering your completed questionnaire at the Civic Centre; or by
- 4. Posting your completed questionnaire to: Issues and Options Consultation, Forward Planning Team Harlow Council, Civic Centre, The Water Gardens, Harlow, CM20 1WG.

### Please note:

- 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 comments will be available for others to view at the Council's offices; and
- The data gathered through this Issues and Options consultation will be held for the duration of this LDF up to and probably beyond 2026.

### **Exhibition Drop-ins**

You are welcome to attend, or send a representative to, one of the community exhibitions listed below to find out about the Issues and Options consultation process, the LDF, and possible options for planning the town's future.

- Harlow Town Train Station Tuesday 23 November 2010, 7am 10am, and 4.30pm 7pm
- The Latton Bush Centre Wednesday 24 November 2010, 6pm 9pm
- Sumners Leisure Centre Tuesday 30 November 2010, 6pm 9pm
- Great Parndon Community Centre Wednesday 1 December 2010, 6pm 9pm
- Potter Street Community Centre Tuesday 7 December 2010, 6pm 9pm
- Church Langley Community Centre Thursday 9 December 2010, 5.30pm 7.30pm
- Trinity United Reformed Church (Hare Street) Wednesday 15 December 2010, 6pm 9pm
- Moot House (The Stow) Tuesday 4 January 2011, 7pm 9pm
- St John's Arc (Old Harlow) Tuesday 11 January 2011, 6pm 9pm
- The Harvey Centre, Harlow Wednesday 12 January 2011, 9am 5pm

#### **Deadline**

The deadline for responding to the Issues and Options consultation is 5pm on Friday 28 January 2011.

Following the consultation the representations will be analysed by the Council and a Consultation Summary Report will be published on the Council's website. The Issues and Options consultation will inform Harlow's Core Strategy. There will be another consultation on a Core Strategy Preferred Options document before the final Core Strategy document is submitted to the Government and a public examination held before it is adopted.

If you have any questions about the Issues and Options Consultation please contact a member of the Forward Planning Team on 01279 446028.

Yours faithfully,

Dianne Cooper

Planning & Building Control Manager

Samo Coopes

### Appendix 7.2 Bespoke Consultation Letter

(This letter was sent to ethnic minority groups on 7 December 2010)

Dear Sir/Madam,

### INVOLVING HARLOW'S ETHNIC MINORITY GROUPS IN PLANNING FOR HARLOW'S FUTURE

Harlow Council is asking the people of Harlow their views on a new plan for the town's future called the Local Development Framework (LDF). A major element of the LDF will be a document called The Core Strategy which will guide development in Harlow to 2026 and beyond. It will set out how much housing is needed and where it should be located. It will also address future employment needs and consider transport and social/community infrastructure provision including the needs of Harlow's ethnic minority groups.

The Core Strategy "Issues and Options" document has been published by the Council for a ten week public consultation. This is just is the first stage of Harlow's Core Strategy and sets out the main development issues affecting the town as well as possible options for planning the town's future.

#### Harlow's faith groups should have their say!

Harlow Council is keen to engage with the town's ethnic minority groups including umbrella groups to understand their needs and to encourage them to get involved in the preparation of Harlow's LDF.

Enclosed is a CD Rom which includes copies of the following documents:

- Consultation Document
- Summary Leaflet
- Questionnaire
- Equalities Monitoring Form (optional)
- Core Strategy Issues and Options Sustainability Appraisal
- Core Strategy Issues and Options Sustainability Appraisal Non-Technical Summary
- Habitat Regulations Assessment
- Habitat Regulations Assessment Non-Technical Summary

These documents and details about the community exhibitions that are taking place are available to view on the Council's website at <a href="www.harlow.gov.uk/issuesandoptions">www.harlow.gov.uk/issuesandoptions</a>.

Also available to view on the website is our LDF DVD explaining the role of the LDF, and Frequently Asked Questions about the Core Strategy and consultation being carried out.

We would be grateful if you could share this information with your group and encourage them to fill out a questionnaire or to go online to find out more information about the consultation.

#### How to respond

There are fours ways that comments can be made to ensure their voices are heard:

- 1. Submit responses via the Council's online Consultation Portal at <a href="http://harlow.jdi-consult.net/ldf/">http://harlow.jdi-consult.net/ldf/</a>
- 2. Email completed questionnaires to <a href="mailto:myharlow@harlow.gov.uk">myharlow@harlow.gov.uk</a>;
- 3. Hand deliver completed questionnaires at the Civic Centre; or by
- 4. Posting completed questionnaire to: Issues and Options Consultation, Forward Planning Team Harlow Council, Civic Centre, The Water Gardens, Harlow, CM20 1WG.

### Please note:

- By responding your members are giving their consent to the Council to hold and process their personal data in accordance with the requirements of the Data Protection Act 1998;
- Your members' comments will be available for others to view at the Council's offices; and
- The data gathered through this Issues and Options consultation will be held for the duration of this LDF up to and probably beyond 2026.

### **Deadline**

The consultation will run until 28 January 2011.

Following the consultation the representations will be analysed by the Council and a Consultation Summary Report will be published on the Council's website. There will be further consultation on the Council's Preferred Options for the Core Strategy, before the final Core Strategy document is submitted to the Government and a public examination held before the document is adopted to guide Harlow's future development.

If you have any questions about the Issues and Options Consultation please contact Chris Gatland, our dedicated Forward Planning Consultation Officer on 01279 446028.

Yours faithfully,

Dianne Cooper

Planning & Building Control Manager

samme Coopes

### **Appendix 7.3** Community Exhibitions

This table sets out the venues, dates and times of the 10 'Issues and Options' community exhibitions that took place across the town during the consultation period (22 November 2010 - 28 January 2011).

Venue	Date	Time(s)
Harlow Town Train Station	Tuesday 23 November 2010	7am - 10am & 4.30pm - 7pm
The Latton Bush Centre	Wednesday 24 November 2010	6pm - 9pm
Sumners Leisure Centre	Tuesday 30 November 2010	6pm - 9pm
Great Parndon Community Centre	Wednesday 1 December 2010	6pm - 9pm
Potter Street Community Centre	Tuesday 7 December 2010	6pm - 9pm
Church Langley Community Centre	Thursday 9 December 2010	5.30pm - 7.30pm
Trinity United Reformed Church	Wednesday 15 December 2010	6pm - 9pm
Harlow Town Library	Monday 20 December -	Normal library opening hours
(Static Un-staffed Exhibition)	Friday 31 December 2010	
Moot House (The Stow)	Tuesday 4 January 2011	7pm - 9pm
St. John's Arc, Old Harlow	Tuesday 11 January 2011	6pm - 9pm
The Harvey Centre, Harlow	Wednesday 12 January 2011	9am - 5pm

In addition to the venues listed above, a permanent unstaffed exhibition will be located in the Civic Centre reception throughout the consultation period.

### Appendix 7.4 Press Release

(This press release was sent out to local and regional media on 15 November 2010)

### News from Harlow Council: Public to be asked how they would plan Harlow's future

A ten-week public consultation exercise on Harlow's future development begins next Monday (22 November 2010).

Harlow Council is asking residents, businesses and local groups where new homes, employment areas, shops, schools, community and leisure facilities, green spaces and transport improvements in Harlow should be located in the future.

The consultation is on the first stage of Harlow's Core Strategy called "Issues and Options". The Core Strategy is the main planning document in the town's emerging Local Development Framework (LDF).

The LDF, which will replace the Local Plan, is a series of documents that will guide planning and development in Harlow up to 2026 and beyond.

A series of community exhibitions are taking place across the town from next week where people can find out about the issues and options, the LDF and possible options for planning the town's future.

Local people and organisations have already suggested what they think are the main development issues affecting the town. These are included in the consultation document, which sets out the vision, themes and objectives that are being used to develop the Core Strategy.

The document also sets out the main principles for guiding future development. It includes a consultant's assessment of five potential growth options around Harlow based on the East of England Plan. Although the East of England Plan is being withdrawn, the consultant's suggested growth options are proposed as a starting point for exploring potential options to meet Harlow's current and future regeneration and housing needs.

Full details about the consultation and how to respond will be available on the Council's website from 22 November 2010 at <a href="www.harlow.gov.uk/issuesandoptions">www.harlow.gov.uk/issuesandoptions</a>. The consultation will run until Friday 28 January 2011.

Councillor Tony Hall, Harlow Council Executive Committee Member and Chairman of the Council's Environment Policy Working Group, said: "We want the future development of Harlow to be a 'hot topic' in the town so residents, businesses and local groups take part in this consultation. We are at an important stage in developing proposals and we want people's views on where different land uses should be located in the future."

In August 2010 the Council reconfirmed its commitment to the principle of supporting high quality growth to deliver regeneration. This continues to have cross-party support on the Council.

Harlow Council's three Group Leaders, Councillor Andrew Johnson (Leader of the Council), Councillor Mark Wilkinson (Labour Group Leader) and Councillor Chris Millington (Liberal Democrat Group Leader), said: "We are committed to the regeneration of Harlow, securing infrastructure improvements and providing much needed housing for local people. We believe growth is the way to achieve this.

"There is a housing shortage in Harlow and we know that the town's green spaces are highly valued by residents. We urge residents to let us know where they think the new homes should be built."

### **Ends**

### Notes to editors

Following the consultation all views will be analysed and a Consultation Summary Report will be published on the Council's website.

There will be further public consultation on a Core Strategy Preferred Options document. This will be before the final Strategy document is submitted to the Government and a public examination held.

### List of community exhibitions:

- Harlow Town Train Station Tuesday 23 November 2010, 7am 10am, and 4.30pm 7pm
- The Latton Bush Centre Wednesday 24 November 2010, 6pm 9pm
- Sumners Leisure Centre Tuesday 30 November 2010, 6pm 9pm
- Great Parndon Community Centre Wednesday 1 December 2010, 6pm 9pm
- Potter Street Community Centre Tuesday 7 December 2010, 6pm 9pm
- Church Langley Community Centre Thursday 9 December 2010, 5.30pm 7.30pm
- Trinity United Reformed Church (Hare Street) Wednesday 15 December 2010, 6pm 9pm
- Moot House (The Stow) Tuesday 4 January 2011, 7pm 9pm
- St John's Arc (Old Harlow) Tuesday 11 January 2011, 6pm 9pm
- The Harvey Centre, Harlow Wednesday 12 January 2011, 9am 5pm

A permanent unstaffed exhibition will be located in the Civic Centre Reception throughout the consultation period. An additional unstaffed exhibition display will also be located in Harlow Town Centre Library during the Christmas holidays.

#### **Niel Churchill MCIPR**

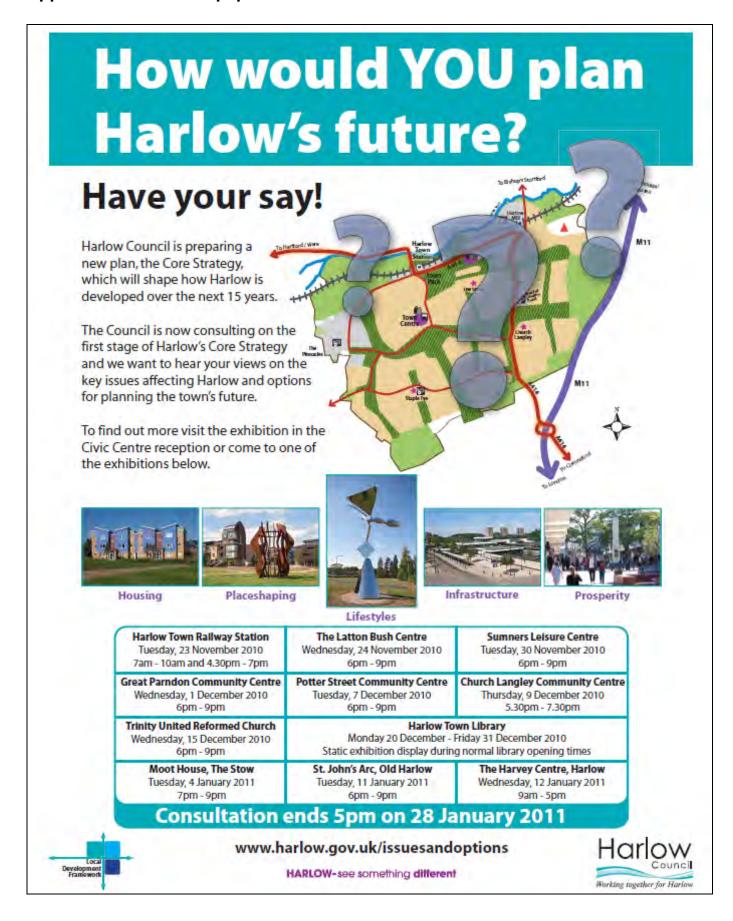
Communications Officer Harlow Council, Civic Centre, The Water Gardens, Harlow, Essex CM20 1WG

Tel: 01279 446710 Mobile: 07872416206 Fax: 01279 446637

Alternative Contact: Andre Ferreira 01279 446185

www.harlow.gov.uk

### Appendix 7.5 Newspaper Advertisement and Consultation Poster



#### Appendix 7.6 **Harlow Times Magazine Article**

### How would you plan Harlow's future?



Where would you put the new homes, employment, shops, schools, community and leisure facilities, green spaces and transport improvements that Harlow needs to grow?

That's the question Harlow Council is asking you as it prepares to plan the town's future.

We're asking for your views on the blueprint for Harlow called the Local Development Framework (LDF) - which will guide development in the town to 2026 and beyond.

Harlow needs to expand to meet demands for housing and factor in the leisure and other facilities that go with that. There are five options outlined where that growth could take place - and we want to hear your views before moving forward.



The LDF will set out where new homes, employment, shops, schools, community and leisure facilities, green spaces and transport improvements will be located. These plans will be on show across Harlow for the next ten weeks, and it's critically important your voice is heard.

Local people and organisations have already suggested what they think are the main development issues affecting the town. These are included in the consultation document.

The consultation - which you can see online - sets out the vision, themes and objectives that are being used to develop the Core Strategy.

At its heart is the discussion over how we meet Harlow's current and future regeneration and housing needs.

We want Harlow to be a place where people want to live and raise families - and employers want to base their companies - so the right mix and location of housing is vitally important. The public consultation runs until 5pm on 28 January 2011. So please visit a road show, have a look at the document and tell us what you think.

How can you view the consultation document?

The issues and options consultation document is available to view online at www.harlow.gov.uk/issuesandoptions

Paper copies of the document are also available for inspection during normal office hours at the Civic Centre and in local libraries.

There is also a summary leaflet available on-line at www.harlow.gov.uk/issuesandoptions or at the Civic Centre and in local libraries.

Copies of the documents on CD-Rom can be obtained by emailing: myharlow@harlow.gov.uk or calling (01279)

Four ways to have your say

You can comment by:

- 1. Submitting your responses at http://harlow.jdiconsult.net/ldf/
- 2. Emailing your completed questionnaire to myharlow@harlow.gov.uk
- 3. Dropping your questionnaire into the Civic Centre; or by
- 4. Posting your completed questionnaire to:

Issues and Options Consultation, Forward Planning Team

- Harlow Council, Civic Centre, The Water Gardens, Harlow, CM20 1WG.

The deadline for responding to the consultation is 5pm on Friday 28 January 2011.

Community Exhibitions

A number of exhibitions are taking place across the town where you can find out more about the LDF process and look at the options being put forward.

- Potter Street Community Centre Tuesday 7 December 2010, 6pm-9pm
- Church Langley Community Centre Thursday 9 December 2010, 5.30pm-7.30pm
- Trinity United Reformed Church (Hare Street) Wednesday 15 December 2010, 6pm-9pm
- Moot House (The Stow)

Tuesday 4 January 2011, 7pm-9pm

• St John's Arc (Old Harlow)

Tuesday 11 January 2011, 6pm-9pm

• The Harvey Centre, Harlow

Wednesday 12 January 2011, 9am-5pm

A permanent unstaffed exhibition will be located in the Civic Centre Reception throughout the consultation period.

An additional unstaffed exhibition display will also be located in Harlow Town Centre Library during the Christmas holidays.

Stay right up to date

You can sign up to receive Harlow Council's free electronic newsletter to keep up to date with Harlow's future plans by completing the LDF Database Form at: www.harlow.gov.uk/ldf

### Appendix 7.7 Window Poster in Civic Centre Reception Area



### **Appendix 7.8** Exhibition Display Panels

