

Harlow Local Development Plan

Regulation 22 Consultation Statement

Prepared to meet the requirements of Regulations 18, 19 and 22 (1) Part (c) of the Town and Country Planning (Local Planning) (England) Regulations 2012.

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1. Introduction

1.1 This Consultation Statement explains the stages and processes undertaken by Harlow Council during the preparation of the Harlow Local Development Plan (the Local Plan). In particular it explains how the Council engaged with the local community and other stakeholders within and beyond Harlow to ensure their views were taken into consideration, in order to help shape the Local Plan. It also indicates how the main issues raised through consultation have helped to shape the policies and proposals that are set out in the Local Plan.

1.2 Since the preparation of the Local Plan formally commenced in 2007 a number of consultation exercises were undertaken to help inform the Plan. Over time these were shaped by emerging technical evidence to ensure the socio-economic and environmental characteristics of Harlow were taken into consideration. These are outlined in more detail in subsequent sections of this statement.

1.3 This Regulation 22 Consultation Statement has been prepared to fulfil the requirements of Regulations 18, 19 and 22 (1) Part (c) of the Town and Country Planning (Local Planning) (England) Regulations 2012. It is intended that the Statement will demonstrate to the Inspector at the Examination in Public that the processes undertaken by the Council, leading to Submission of the Local Plan, had regard to Government guidance and the requirements set out in the relevant legislation in respect of public consultation.

1.4 Regulation 22 (1) Part (c) of the above Regulations outlines the scope of the Statement which sets out the following:

- i. which bodies and persons were invited to make representations under Regulation 18 of the Local Planning Regulations;
- ii. how those bodies were invited to make representations;
- iii. a summary of the main issues raised in those representations;
- iv. how those main issues have been taken into account;
- v. if there are representations made under Regulation 20, the number made and a summary of the main issues made in those representations; and
- vi. if there are no representations made under Regulation 20, that no such representations were made.

1.5 All key stages of the consultations undertaken by the Council during the preparation of the Local Plan are set out below:

- Initial frontloading undertaken by the Council between 2007 and 2009 in order to raise awareness about the new Local Development Plan, to scope issues and to explain the plan making process.
- The Core Strategy Issues and Options consultation document, undertaken between 22 November 2010 and 28 January 2011, which set out the key issues affecting Harlow together with potential options for planning the town's future, and a series of policy themes and approaches.
- The Emerging Strategy and Further Options consultation, undertaken between 14 April 2014 and 30 May 2014, considered further the matters in the previous consultation but in addition presented five spatial options of how the identified development needs could be accommodated within Harlow.
- The Development Management Policies document consultation was undertaken between 20 July 2017 and 7 September 2017. The policies set in this document underpinned the overarching policy themes considered previously and were developed to provide the detailed spatial expression of the Strategic Policies in the emerging Local Plan.
- In May 2018 the Council published the Pre-Submission Publication of the Local Plan. The period for the receipt of representations concluded 6 July 2018. This represents the complete Harlow Local Development Plan and it is considered, provides a strategy and spatial vision to deliver growth in Harlow up to 2033. This, therefore, was the final version of the Local Plan for consultation that the Council intends to submit for examination.

1.6 As well as having regard to the requirements of the Regulations referred to above, the Council has also undertaken public consultation and engagement in accordance with the provisions of the Council's adopted Statement of Community Involvement 2014. The Statement of Community Involvement (SCI) sets out how and when Harlow Council will consult with the local community regarding the preparation of planning policies and the determining of planning applications. Following national changes to the planning system, the Council reviewed the original SCI (adopted in 2007) and consulted on a draft SCI Review. The SCI Review was then finalised and subsequently adopted at Full Council on 18 September 2014.

1.7 The Council also considers that the necessary legal and procedural processes have been undertaken throughout the preparation of the Local Plan. A Legal Compliance Checklist is being published separately, as part of the Local Plan Submission.

1.8 All the comments received at each stage of consultation can be viewed in full on the Council's website at www.harlow.gov.uk/local-plan

1.9 Details of the documents to accompany the submission of the Local Plan are also available at the link above.

2. Who we consulted

2.1 The Council has consulted extensively at all stages of preparing the Local Plan, to encourage the maximum level of feedback from the public, key stakeholders and other organisations.

2.2 At each stage, the bodies the Council consulted has included:

- East Hertfordshire District Council
- Epping Forest District Council
- Uttlesford District Council
- Essex County Council (the Highway and Minerals and Waste Authority)
- Hertfordshire County Council
- Highways England
- Homes England (previously known as Homes and Communities Agency)
- NHS West Essex Clinical Commissioning Group
- The Environment Agency
- Historic England
- Natural England
- Princess Alexandra Hospital

2.3 To aid the consultation process, the Council maintains a consultee database (hosted by JDi) which is continuously updated. At the time of the consultation there were approximately 3,000 consultees on the database.

2.4 A list of the bodies who responded to the consultations is available in the Appendices.

3. How we consulted

3.1 The Council undertook extensive consultation on a range of documents throughout the preparation of the Harlow Local Development Plan (Local Plan). The consultation process and the relevant documents leading up to submission of the Local Plan are set out below.

3.2 Initial frontloading was undertaken by the Council between 2007 and 2009.

Initial frontloading

Harlow Council began its initial frontloading consultation work to inform the preparation of the Local Plan by holding an exhibition at the Harlow Town Show in September 2007. The objective was to raise awareness of the then Local Development Framework (LDF) process and questionnaires were distributed across the town to find out what Harlow residents wanted for the future of the town.

In 2008 Harlow Renaissance and Harlow 2020 organised a joint LDF workshop to provide input to Harlow Council in its development of its new development plan. From this some shared aspirations were identified to help shape the Core Strategy and the issues and options stage of the LDF.

Following on from this two workshop events were held by Harlow Council in June and July 2009 for Harlow Council Officers and Members respectively. The aim was to raise awareness of Harlow's LDF Core Strategy and to gather from members and officers information on existing and emerging issues to underpin the LDF.

Two subsequent informal workshops were held on 8 and 13 October 2009 for the benefit of 'community' and 'key sector' stakeholders to raise awareness about the emerging development plan. This was to ensure that stakeholders, including the public, were engaged in the process and that their views on the key issues affecting Harlow and potential options for addressing them were taken into consideration. This was followed by a presentation to the Harlow Youth Council in December 2009 to ensure young people played a part in shaping the future of the district.

The purpose of these activities was to help inform the development of a Core Strategy that would set out the strategic planning framework for Harlow that would replace the existing Adopted Replacement Harlow Local Plan 2006.

3.3 The Core Strategy Issues and Options consultation document, with consultation being undertaken between 22 November 2010 and 28 January 2011.

The Core Strategy Issues and Options consultation

This document was prepared against the backdrop to the changes being made to the plan making system by Government that saw the abolition of Regional Plans. Notwithstanding these changes and the resultant uncertainties that arose, Harlow Council wished to continue to make progress in preparing a new Local Plan for the district. This was in order to replace the Adopted Harlow Replacement Local Plan July 2006. Through the preparation of Community and Corporate Plans the Council recognised that there continued to be a need to provide new homes and employment opportunities in the district to meet community

aspirations and regenerate the town, together with the provision of key infrastructure, balanced against the need to protect environmental assets. During this consultation a number of themes, strategic objectives and policy approaches were developed and considered and issues arising from emerging evidence were identified for public comment. Emerging issues were articulated through a series of questions.

3.4 The Emerging Strategy and Further Options consultation was undertaken between 14 April 2014 and 30 May 2014.

Emerging Strategy and Further Options consultation

Based on the themes, strategic objectives and policy approaches already set out in the Issues and Options document, and the subsequent changes to the plan making system arising from the Localism Act 2011, this consultation set out options for growth based on the emerging technical evidence. This document explained how the emerging spatial strategy has been developed and how, in the light of the abolition of Regional Plans, the responsibility of identifying development needs rests with local planning authorities. It reflected on and quantified the amount of development required in Harlow, including the amount of housing and employment needed, emerging from a joint Strategic Housing Market Assessment and other related work being prepared under the new Duty to Co-operate. Arising from this work five alternative patterns of development to accommodate the level of growth needed were identified and consulted upon.

3.5 The Development Management Policies document consultation was undertaken between 20 July 2017 and 7 September 2017.

Development Management Policies consultation

This consultation presented a set of Development Management policies that would be set out in the Local Plan which would provide a more detailed planning framework that could be used to determine planning applications. They were informed by previous consultations and national policies and guidance that was set out the Government's planning policies for England and how it expects them to be applied. The Development Management policies have been developed to help achieve sustainable development and to provide the detailed spatial expression of the themes and strategic objectives that underpin the Local Plan.

3.6 Commencing in May 2018 the Council published the Pre-Submission Publication version of the Local Plan. The consultation period concluded 6 July 2018.

Pre-Submission Publication Harlow Local Development Plan

This is the final version of the Harlow Local Development Plan that the Council intends to submit for formal examination. This includes the Local Plan Document and the supporting Policies Map. The Local Plan sets out a long-term vision for Harlow, identifying land where development will be acceptable and where it will be unacceptable. It contains policies that ensure future development is sustainable by meeting the needs of residents, businesses and visitors, while providing the required infrastructure and protecting environmental assets.

Planning applications will be decided against the Local Plan policies.

The Policies Map, which maps the planning policies and proposals across Harlow, accompanies the Local Plan, along with other documents such as the Sustainability Appraisal and Infrastructure Delivery Plan. The policies in the Local Plan are justified by an Evidence Base, which includes studies such as the SHMA and the Green Belt Review and Green Wedge Review.

A separate Area Action Plan is being prepared for Harlow Town Centre in order to address specific regeneration issues and to enhance its retail function.

3.7 Copies of consultation material are included within the appendices and were supported by press notices, press releases and articles in the media and are summarised below:

- Statutory notices (list and dates)
- Articles in Harlow Star, Your Harlow (web based news) Harlow Times and Essex Life (web based Harlow Star)
- Press releases issued by the Council (list and dates)

3.8 In addition, Officers attended and gave presentations to a number of meetings with external bodies over the period the Plan has been in preparation, including:

- the Harlow Civic Society,
- Essex County Council managers group,
- the annual meeting of the Churchgate Residents Association ,
- the Harlow Youth Council

4. How we responded

4.1 The Council acknowledges that Government Guidance indicates that Local Plans are the key to delivering sustainable development that reflects the vision and aspirations of local communities. Throughout the course of the preparation of the new Local Development Plan for Harlow, the Council has undertaken ongoing consultation and engagement with the local community, businesses and other organisations and bodies to underpin the themes, objectives and policy approaches that have been developed. This has been an iterative process, acknowledging that the need for growth, identified through objective technical evidence, can be challenging for communities to support. This is especially so as Harlow has tight administrative boundaries that have limited the spatial options available.

4.2 Matters raised throughout the various consultation stages during the preparation of the Local Plan have been considered by elected Councillors at a series of Local Development Plan Panel (formerly Local Development Framework Meetings) and Cabinet meetings, and where necessary meetings of the Full Council. This has included the consideration of a suite of technical evidence base documents prepared to identify the socio-economic and environmental conditions of Harlow in order to develop an appropriate strategic and policy approach supported by specific policy proposals.

4.3 In addition, and in accordance with the requirements of the Duty to Co-operate, Councillors and officers of the Council have worked closely with colleagues at East Hertfordshire, Epping Forest and Uttlesford District Council, together with Essex and Hertfordshire County Councils, through the Co-operation for Sustainable Development Board. This has provided a focused forum to ensure that cross boundary strategic issues were considered and that matters raised through the consultations on their respective Local Plans could be addressed. This has culminated in the signing of a series of joint Memos of Understanding and agreement on a joint policy framework to be included in their respective Local Plans for the strategic sites being promoted around Harlow.

Initial frontloading

4.4 Arising from the initial engagement exercises undertaken by the Council between 2007 and 2009 to scope out key planning issues, and which involved the participation of the public, community and key sector stakeholders, youth representatives and council members, a number of matters were identified. This included the need to

- protect and maintain Harlow's green spaces
- provide more affordable housing for key workers and vulnerable groups
- enhance education, training and skills for Harlow people
- enhance the retail mix in the town centre and shopping areas
- alleviate traffic congestion on A414 and on local roads
- provide adequate parking in housing areas
- provide more recreation facilities for young people

4.5 In addition to the above and having regard to the requirements set out in Government guidance the Council continued to update its technical evidence base in order to identify and consider the socio-economic and environmental characteristics of Harlow. These studies

identified the emerging housing, employment and infrastructure needs for Harlow and across the wider area. Some had been prepared jointly with adjoining local authorities reflecting the Harlow areas identification as a location for strategic growth in the East of England Plan.

4.6 Consequently all these elements helped to inform the initial stages of the preparation of new development plan for Harlow and provided the basis to identify a number of themes within which issues could be considered and appropriate policies developed.

The Core Strategy Issues and Options consultation

4.7 Following the initial frontloading exercises, and the emerging technical evidence, the Council prepared the Core Strategy Issues and Options consultation document. This was prepared against the backdrop of the changes being made by Government to the planning system but reflected the Council's desire to continue to make progress in the preparation of new local development plan. This set out a spatial portrait for Harlow, explained the relationship with other plans and strategies and identified the planning challenges. It also presented a spatial vision together with themes, objectives and policy approaches to address the emerging issues. Finally, and taking into account Harlow's tight administrative boundaries, a number of spatial options were proposed that could help meet emerging development needs. These were acknowledged as being based on the growth requirements set out in the former East of England Plan but which the Council considered as being relevant to test against the backdrop of the emerging technical evidence.

4.8 In response to this consultation 1,913 representations were received in total. The key matters raised are summarised as follows:

- there was general support for the themes set out in the document
- the objectives set out should be fully funded
- the level and validity of growth related to the East Of England Plan was challenged
- there was general support for the protection of the town's open spaces and natural landscapes, prioritising protection of the Green Wedges over that of the Green Belt
- a range of infrastructure improvements will be necessary before any further significant growth takes place in Harlow including improved access to the M11
- improvements required to the cycle network, bus links and Harlow bus and railway stations
- need for a Water Cycle Study and a Strategic Flood Risk Assessment
- incorporating SuDS in new development.
- existing traffic congestion and parking need to be addressed
- new development should conform to the Gibberd Masterplan
- overall support for meeting local housing needs, but not for the level of growth set out in the East of England Plan
- the link between growth securing regeneration had not been proven
- preference should be given to maximising the use of previously developed land
- the quality of the town's employment areas should be improved
- 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

- there was concern about growth taking place to the north of Harlow and the effect this would have on Hunsdon and Gilston
- some challenged the methodology used by the consultants to identify the potential spatial options

4.9 More detail on the comments received is set out in the Core Strategy Issues and Options Summary Report (February 2012). The comments received at this time reflected some of the spatial planning challenges facing Harlow, such as the tight administrative boundaries, which effectively limited development options. Options for delivering the growth needed, as identified in the emerging evidence, was predicated by the need to secure positive outcomes through the emerging Duty to Cooperate, as set out in the Localism Act 2011.

4.10 As the Local Plan progressed, the Council continued to work with key stakeholders and partners to develop policies and proposals that both reflected the emerging technical evidence and the observations of respondents to consultations. This assumed greater impetus through the obligations of the Duty to Cooperate that resulted in the commissioning of joint evidence base documents with other Councils, including joint demographic studies, a SHMA and FEMA as well as the consideration of transport issues. Other Harlow focused work included the Harlow Future Prospects Study (2013).

4.11 In addition the general issues raised were considered by the Council and against the findings of the emerging evidence to ensure that appropriate policies were developed and that these also had regard to the requirements set out in Government guidance and best practice.

Emerging Strategy and Further Options consultation

4.12 The Emerging Strategy and Further Options consultation, undertaken between 14 April 2014 and 30 May 2014, considered further the matters in the previous consultation but in addition presented five spatial options for comment on how the identified development needs could be accommodated within Harlow. This focused on the housing and employment requirements for Harlow and how this be accommodated based on the emerging joint evidence that was being prepared through the Duty to Cooperate including Essex wide work on demographics to assist in the preparation of SHMA's, and a joint SHMA prepared on behalf of Broxbourne, East Hertfordshire, Epping Forest, Uttlesford and Harlow Councils.

4.13 In response to this consultation 117 representations were received, including a petition containing 1,846 signatures from the STOP Harlow North campaign. The key matters raised are summarised as follows

- the levels of growth proposed are excessive and unsustainable
- there should be a higher target for housing and jobs
- more affordable housing is required to deliver regeneration
- there is a lack of infrastructure
- there were varying levels of support for the spatial options proposed
- development to the east of Harlow could deliver a new junction on the M11
- the town's distinctive character is not being protected
- enhancement of public transport and infrastructure is needed

- concern about the loss of Green Belt
- there would be increased traffic congestion and pollution in the south of the town
- new development should be actively and physically linked to Harlow
- development to the west of the town could aid regeneration of Pinnacles and Katherines
- high quality transport links will be required
- development north of Harlow would be close to Harlow rail station
- the technical and financial viability of the northern bypass was questioned
- a blend of options would be more sustainable
- preferred options will depend on the outcomes of the Duty to Cooperate

4.14 More detail on the comments received is set out in the Emerging Strategy and Further Options Consultation Summary Report (December 2014). Following this consultation the joint work being undertaken through the Duty to Cooperate intensified in order to confirm the development requirements for Harlow and the wider area and the most sustainable spatial options, through the preparation of the Harlow Strategic Site Assessment (2016), the Sustainability Appraisal of Strategic Spatial Options for the West Essex and East Hertfordshire HMA (2016), an updated SHMA (2017) and Affordable Housing Update (2017) and West Essex and East Hertfordshire Assessment of Employment Needs (2017). In addition an updated Gypsy and Traveller Study to acknowledge the new Traveller definition was prepared.

4.15 In addition, Harlow specific evidence, including the Open Space and Green Infrastructure Study (2013), the Employment Land Review (2013), the Green Wedge Review (2014) and the Green Belt Review (2016), was prepared.

4.16 As updated evidence emerged, the general issues raised during the consultation were considered by the Council to ensure that the emerging policies were reasonable, justified and appropriate and that these also had regard to the requirements set out in Government guidance and best practice.

Development Management Policies consultation

4.17 In order to ensure that a detailed planning framework was contained in the Local Plan to underpin the strategic policies, and which would be used to determine planning applications, the Council decided to undertake a consultation on a suite of Development Management Policies. This consultation was undertaken between 20 July 2017 and 7 September 2017.

4.18 In response to this consultation 195 representations were received. The policies set out in the document were generally supported and some suggested a number of minor amendments, but other matters raised are summarised below:

- there is a need for improvements to the highway network including passenger network as well as reference to the needs of equestrians
- some of the evidence base is out of date
- the Gibberd principles should continue to apply
- policies should refer to the need for compensatory measures where appropriate
- policies should not duplicate Building Regulations
- Green Wedge and Finger policies should be more flexible to allow specific uses

- policies should encourage the provision of bungalows
- the viability of the policies should be assessed
- a district wide Article 4 Direction is needed to address HMOs
- concern about the requirement for the provision of self-build plots
- A5 uses in retail areas close to schools could fuel childhood obesity
- contributions for strategic infrastructure should apply to all sites
- an updated Infrastructure Delivery Plan will need to be prepared

4.19 The comments made in respect of the consultation on the Development Management Policies document were considered by officers and members and, taking account of updated technical documents, work continued on the preparation of the Pre-Submission Publication version of the Harlow Local Development Plan. This also took into account the outcomes of the Duty to Cooperate and in particular the agreements reached at the Co-operation for Sustainable Development Board. This included the signing of a number of MOU's in respect of the Objectively Assessed Housing Need, employment provision and distribution, transport needs and need to mitigate the impact of growth on the Epping Forest SAC, which have also helped to shape policies in the emerging Local Plan.

4.20 In addition work was progressing on developing an approach to bring forward the Harlow and Gilston Garden Town, arising out of agreements reached at the recently constituted Garden Town Board. This included the agreement of joint strategic policies for inclusion in the emerging Local Plans in the area, in order to secure a co-ordinated approach, in the delivery of the agreed housing distribution.

Pre-Submission Publication Harlow Local Development Plan

4.21 All the comments received throughout the preparation of the Local Plan were taken into consideration by the Council during the preparation of the Pre-Submission Publication version of the Local Plan that the Council now intends to submit to the Secretary of State, for Examination. This document was published under Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended), on 24 May 2018 until 6 July 2018. This Publication period included an exercise to notify organisations and individuals on the Local Plan consultation database, reflecting the provisions of the Council's Adopted Statement of Community Involvement and national legislation.

4.22 In response to this 72 representations were received making 165 comments which are set out in the appendices together with 3 petitions containing in total 367 signatures from the Harlow Alliance Party. Arising, however, from observations made to the Publication version a Schedule of Minor Modifications has been prepared to submit with the Local Plan to provide the Inspector, if minded to accept, with the most up-to-date policy position. These will address minor issues that have been raised in the submitted representations, as well as the matters that will be agreed through emerging Statements of Common Ground, together with other minor changes to ensure clarity and consistency, and which will not affect the soundness of the Local Plan.

Town and Country Planning (Local Planning) (England) Regulations 2012 Regulations 18 to 22

Preparation of a local plan

18.—(1) A local planning authority must—

- (a) notify each of the bodies or persons specified in paragraph (2) of the subject of a local plan which the local planning authority propose to prepare, and
- (b) invite each of them to make representations to the local planning authority about what a local plan with that subject ought to contain.

(2) The bodies or persons referred to in paragraph (1) are—

- (a) such of the specific consultation bodies as the local planning authority consider may have an interest in the subject of the proposed local plan;
- (b) such of the general consultation bodies as the local planning authority consider appropriate; and
- (c) such residents or other persons carrying on business in the local planning authority's area from which the local planning authority consider it appropriate to invite representations.

(3) In preparing the local plan, the local planning authority must take into account any representation made to them in response to invitations under paragraph (1).

Publication of a local plan

19. Before submitting a local plan to the Secretary of State under section 20 of the Act, the local planning authority must—

- (a) make a copy of each of the proposed submission documents and a statement of the representations procedure available in accordance with regulation 35, and
- (b) ensure that a statement of the representations procedure and a statement of the fact that the proposed submission documents are available for inspection and of the places and times at which they can be inspected, is sent to each of the general consultation bodies and each of the specific consultation bodies invited to make representations under regulation 18(1).

Representations relating to a local plan

20.—(1) Any person may make representations to a local planning authority about a local plan which the local planning authority propose to submit to the Secretary of State.

(2) Any such representations must be received by the local planning authority by the date specified in the statement of the representations procedure.

(3) Nothing in this regulation applies to representations taken to have been made as Mentioned in section 24(7) of the Act.

Submission of documents and information to the Secretary of State

22.

(1) The documents prescribed for the purposes of section 20(3) of the Act are—

- (a) the sustainability appraisal report;
- (b) a submission policies map if the adoption of the local plan would result in changes to the adopted policies map;
- (c) a statement setting out—
 - (i) which bodies and persons the local planning authority invited to make representations under regulation 18,
 - (ii) how those bodies and persons were invited to make representations under Regulation 18,

- (iii) a summary of the main issues raised by the representations made pursuant to regulation 18,
- (iv) how any representations made pursuant to regulation 18 have been taken into account;
- (v) if representations were made pursuant to regulation 20, the number of representations made and a summary of the main issues raised in those representations; and
- (vi) if no representations were made in regulation 20, that no such representations were made;
- (d) copies of any representations made in accordance with regulation 20; and
- (e) such supporting documents as in the opinion of the local planning authority are relevant to the preparation of the local plan.

(2) Notwithstanding regulation 3(1), each of the documents referred to in paragraph (1) must be sent in paper form and a copy sent electronically.

(3) As soon as reasonably practicable after a local planning authority submit a local plan to the Secretary of State they must—

(a) make available in accordance with regulation 35—

- (i) a copy of the local plan;
 - (ii) a copy of each of the documents referred to in paragraph (1)(a), (b) and (c);
 - (iii) any of the documents referred to in paragraph (1)(d) or (e) which it is practicable to so make available, and
 - (iv) a statement of the fact that the documents referred to in sub-paragraphs (i) to (iii) are available for inspection and of the places and times at which they can be inspected;
- (b) send to each of the general consultation bodies and each of the specific consultation bodies which were invited to make representations under regulation 18(1), notification that the documents referred to in paragraphs (a)(i) to (iii) are available for inspection and of the places and times at which they can be inspected; and
- (c) give notice to those persons who requested to be notified of the submission of the local plan to the Secretary of State that it has been so submitted.

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		Allard		[6592]
Elaine		Allen		[6031]
Michael		Allen		[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		Austin		[7203]
P	N	Austin		[6188]
Steve		Avis		[7339]
Anna		Avis		[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	[5434]
Derek	Bandy	[6673]
Irene	Bannister	[6708]
Steven	Barker	[7665]
Ellen	Barker	[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	[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]
A	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	[470]
Jenny	Bennett	[6204]
Maureen	Bennett	[7166]
M	Bennett	[6975]
Tony	Bennett	[6675]
Michael	Bentley	[6707]
R	Best	[7237]
T	Best	[7240]
B	Beverley	[6039]
B	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]
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]
M		Blundell		[7419]
Catherine		Boaden		[6235]
A		Bond		[6280]
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]
Vanessa		Bowerman		[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]
C		Brentnall		[6563]
Giles		Brentnall		[6268]
Ian		Brett		[7490]
Virginia		Brett		[7489]
Leslie		Brewster		[6299]
Pauline		Brewster		[6298]
Jean		Brian		[6838]
Stephen		Brickwood		[7569]
Susan		Brickwood		[7586]
Richard		Brickwood		[7458]
Moir		Bridge		[6400]
Colin		Bridgeman		[6572]
Gina		Bridgman		[7271]
Chris		Bridle		[7305]
Geoff		Bridle		[7302]
Jeff		Bridle		[7304]

Paul	Bridle	[7309]
Zoe	Bridle	[7303]
Neil	Bridle	[6584]
Sue	Bridle	[6548]
Linda	Brierly	[7030]
Bob	Bright	[6516]
Ian	Brinham	[6347]
Lilian	Brinham	[6278]
G	Brinkley	[6804]
B	Brinkley	[7447]
V	Brinkley	[7448]
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]
N	Brown	[6807]
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	Bryant	[6071]
Sharon	Bryant	[6623]
Janine	Bryant	[6070]
Lucy	Buckland	[7453]
Josh	Buckland	[7452]
K	Buckland	[7451]
Andrew	Buckle	[6364]
Ann	Buckle	[5964]
Eric	Buckmaster	[6373]
Francesca	Buckmaster	[6379]
Louisa	Buckmaster	[6374]
Ruth	Buckmaster	[6378]
Helen	Buckworth	[6590]
Nick	Buckworth	[6263]
Teresa	Bulloch	[7042]
Barbara	Burge	[5093]
Alan	Burgess	[26]
Anthony	Burgess	[7312]
Mark	Burgess	[6869]
Clare	Burkett	[6469]
Wayne	Burlingham	[7578]
Mr	Burnay	[7210]
Ria	Burns	[6212]
Andrew	Burtenshaw	[6368]
Gerald	Burtenshaw	[6072]
Dawn	Burtenshaw	[6068]
Keely	Burtenshaw	[7609]

Protection of Roydon Area PORA

Keith		Busby		[6240]
Thomas		Busby		[6844]
Marion		Busby		[6848]
D	C	Butler		[7574]
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		[7229]
Janet		Carter		[7230]
Ben		Carter		[6099]
Lilli-May		Carter		[6044]
Sarah		Carter		[6499]
B		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]
C		Casey		[7187]
I		Casey		[7186]
Mr		Cash		[6079]
Mrs		Cash		[6080]
Thomas	& Audrey	Castle		[6191]
Hugh		Cater		[6425]
M		Cavalier	Cavalier Land Co	[5717]
P		Chad		[7116]
Peggy		Chad		[6762]
David		Chalk		[5889]
Margaret		Chalk		[7666]
Mike		Chapman		[6852]

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	[6962]
Karen		Cherry	[6960]
Martin		Chown	[5853]
N		Chrimes	[6433]
Brenda		Church	[6346]
David		Clapham	[6834]
Nigel		Clark	[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]
T		Clark	[7289]
Judith		Clark	[7397]
M		Clark	[7288]
Karen		Clark	[6435]
Paul		Clark	[6922]
Rachel		Clark	[6512]
Sam		Clark	[5722]
Matt		Clarke	[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	[5721]
Janet		Clemmett	[5874]
Michael		Clemmett	[6022]
Dean		Clemmett	[6027]
Brian		Clenshaw	[6458]
Philip		Clewes-Garner	[7020]
George		Clifton	[7015]
James		Clifton	[7556]
Revd		Clive	[7577]
J		Cobby	[6861]
Charles		Cochrane	[5891]
Paul		Cochrane	[6355]
Adrian		Coggins	[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	[7127]
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]
Ian	Cooper	[7158]
Louise	Cooper	[5759]
Kristiina	Cooper	[5960]
Nicholas	Cooper	[7221]
D	Coote	[7307]
Ryan	Copping	[6303]
E	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	[7470]
Jennifer	Cummins	[6682]

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	[7032]
E	Day	[6546]
Robert	Day	[6122]
A	De	[6843]
E	De	[6089]
Gwenda	Deal	[6857]
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]
Faye	Dixon	[5946]
Paul	Dixon	[7007]

Stanley	Dixon	[7415]
Stephanie	Dodd	[6537]
Barbara	Doherty	[7057]
P	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]
Patrick	Dudley	[7284]
Sheena	Duigenan	[6617]
Ian	Duncan	[5848]
Michael	Dunlea	[6179]
Alan	Dunnage	[6698]
L	Dunnage	[6688]
John	Dunne	[7476]
Judy	Dunne	[5051]
Liam	Dunne	[7474]
Claire	Dunstan	[7239]
Jo	Dunstan	[7243]
Kath	Dunstan	[6733]
Paul	Dunstan	[7244]
Ken	Dunstan	[6587]
Jordan	Durber	[6505]
Philip	Durber	[6619]
Jennie	Durber	[6618]
Christopher	Durman	[7119]
Jack	Durman	[7121]
Molly	Durman	[7120]
Lucy	Durman	[6340]
Nat	Durman	[7122]
Giuseppe	D'Urso	[7283]
P	Dyball	[7541]
Peter	Dyble	[6830]
E	Eastwood	[5972]
James	Eastwood	[7040]
L	Eastwood	[6604]
Noel	Eastwood	[5968]
Rupert	Eastwood	[7004]
Fiona	Eaton	[7376]
James	Eaton	[7378]
John	Eaton	[7377]
Tracy	Eaton	[6965]
Sarah	Edmonds	[6442]
B	Edwards	[6495]
D	Edwards	[6632]
Gruff	Edwards	[6037]
Margaret	Edwards	[7170]
Mary	Edwards	[7248]
Michael	Edwards	[6564]
Anthony	Edwards	[6770]

David	Edwards	[6758]
Stephen	Edwards	[6494]
Beryl	Edwards	[6772]
Edna	Edwards	[6311]
Roy	Edwards	[6986]
Kim	Elaine	[7436]
Ottoline	Elbishlawi	[7607]
Mrs	Elfick-Wood	[6594]
Katharine	Elliot	[6514]
Elizabeth	Elliot	[6854]
Alan	Elliott	[6117]
Susan	Elliott	[6163]
Sarah	Elliott	[6985]
Jon	Ellis	[7527]
Brian	Ellis	[6606]
Joan	Ellis	[6371]
W	Ellis	[7185]
Brian	Elms	[6637]
Guy	Elms	[6749]
Andrew	Elsdon	[6042]
Nina	Elsdon	[7516]
Gareth	Emanuel	[7290]
Linda	Emanuel	[5958]
Muriel	Emanuel	[5957]
Dominic	Emery	[6901]
Keren	Emery	[7335]
Dawn	Emery	[5740]
John	Ensell	[5755]
Richard	Epworth	[6963]
A	Etter	[6096]
Peter	Etter	[5226]
Tony	Evans	[5664]
Adrian	Evans	[7498]
Maureen	Evans	[7442]
Michael	Evans	[6356]
Susan	Evans	[7184]
Laura	Fabiani	[6171]
Laura	Fabiani	[6466]
Derek	Farley	[6853]
Suzanne	Farmer	[7421]
David	Farningham	[5042]
Ken	Faux	[7380]
Michael	Fearn	[7654]
Helen	Feeney	[6706]
Christine	Fells	[6217]
Angela	Felstead	[6721]
John	Felstead	[6528]
Kealy	Felstead	[6722]
Ian	Felstead	[6250]
June	Felstead	[6328]
Elaine	Ferguson	[5991]
J	Field-Bibb	[6387]
Victoria	Fifield	[6253]
Chris	Finch	[6699]
D	Findlay	[7101]
Peter	Findlay	[6508]
P	Finlay	[6763]
Lorraine	Firth	[6750]
Julia	Fisher	[6813]
Pauline	Fitch	[6959]

Harlow Civic Society

RAMCO (Harlow) Ltd

Rebecca		Fitch		[6553]
Ciaran		Fitzgerald		[7105]
Niamh		Fitzgerald		[7104]
Sean		Fitzgerald		[7106]
Suzanne		Fitzgerald		[7107]
R		Flagg		[6551]
Katherine		Fletcher	English Heritage	[4850]
Y		Flowers		[7360]
Amanda		Fordham		[5922]
Craig		Fordham		[5919]
Doris	Evelyn	Fordham		[6182]
Michael		Fordham		[5996]
Ian		Foreman		[6788]
Mrs		Foreman		[6782]
S		Forsyth		[7109]
Diane		Fossey		[7384]
David		Foster		[6882]
John		Foster		[7296]
Terry		Foster		[5955]
Samantha		Foster		[6889]
Nicola		Foster		[6459]
Skye		Foster		[6881]
Harrison		Foster-Butters		[6891]
Bethany		Foster-Butters		[6890]
Matthew		Fowell		[6764]
Robert		Fowell		[6767]
Hannah		Fowell		[6765]
Sally		Fowell		[6766]
Chris		Fox		[6990]
Matthew		Fox		[6914]
Jonathan	& Nina	Fox		[6081]
Julie		Fox		[6352]
Katherine		Fox		[6353]
Rob		Francis		[5812]
Rob		Francis		[7668]
Diane		Franzman		[7433]
Michael		Franzman		[7464]
Rose		Freeman	The Theatres Trust	[216]
Cathy		Freeman		[7252]
Carl		French		[6403]
S		Freshwater		[6808]
Betty		Fricker		[7581]
Michelle		Frost		[6295]
Mauro		Fugazza		[5158]
Diana		Fullbrook		[6900]
Elaine		Furness		[6574]
Andy		Furze		[5688]
Bob		Gabriel		[6919]
Roger		Gaitley		[6153]
Andrew		Gale		[7054]
David		Gale		[5859]
David		Gale		[6533]
J		Gallantree		[6065]
Ian		Gallantree		[6061]
B		Gallantree		[6062]
P		Galoppi		[6221]
Gina		Galoppi		[6284]
Adam		Garwood	Historic Environment Branch	[215]
Robert		Garwood		[7276]
Susan		Garwood		[7277]

Pamela	Gates	[7320]
Paul	Gates	[7440]
Alan	Gatland	[5880]
Janet	Gatland	[5879]
Angus	Gauld	[7564]
Denise	Gauld	[7565]
Finlay	Gauld	[7563]
Matt	Geddes	[6411]
Richard	Geddes	[6851]
Jackie	Geddes	[6876]
Tim	Geddes	[6697]
Rachel	Geller	[7247]
Simon	Geller	[6912]
Victoria	George	[7235]
D	Ghadami	[6424]
Jeremy	Gibb	[6090]
Phillip	Gibb	[5725]
David	Gibbs	[7572]
Linda	Gibbs	[7573]
Emma	Gibson	[7471]
Helen	Giles	[7325]
Ian	Gill	[7494]
Ann	Gillanders	[6402]
B	Gillespie	[5932]
Roy	Gillman	[7293]
Jacqueline	Gillman	[7589]
Kerry	Girolami	[7255]
Mark	Girolami	[7256]
Phil	Gladman	[7576]
Laura	Gleed	[7043]
Kevin	Gleeson	[7160]
D	Goggin	[7315]
Duncan	Goldsby	[5916]
Ian	Goldsmith	[6920]
Ruth	Gonzalez	[6327]
Chris	Gooch	[7295]
Judy	Gooch	[7294]
Doreen	Goodall	[5805]
Christopher	Goodbody	[6870]
Denise	Goodchild	[6609]
Trevor	Goodey	[7217]
Paul	Goodman	[6132]
Juliette	Goodwin	[6558]
Sean	Goodwin	[7282]
T	Goody	[6826]
Robin	Goodyear	[6829]
David	Gould	[5901]
David	Graham	[5886]
Ann-Marie	Grant	[4896]
Mark	Grant	[6405]
Robert	Grant	[6120]
Karen	Graves	[6728]
Richard	Greaves	[5555]
Angela	Green	[6734]
Ava	Greenwell	[6541]
John	Greenwood	[6650]
M	Greenwood	[6657]
Jennifer	Greenwood	[6674]
Julia	Gregory	[4726]
John	Gregory	[6164]

West Essex Primary Care Trust

Stansted Airport Limited

T	Gregory	[6141]
L	Gregory	[6187]
Philip	Greswell	[7510]
Kevin	Griffin	[6744]
Ian	Griffiths	[7579]
Paul	Griffiths	[6945]
Doreen	Grocott	[6645]
Michael	Grocott	[6656]
Rhoda	Grocott	[6335]
Tiziana	Groom	[5700]
Robert	Groves	[5840]
Kevin	Growden	[6483]
Ramesh	Gulrajani	[7002]
Chris	Gurry	[6519]
Denis	Gurry	[6521]
Gary	Gurry	[6513]
Norma	Gurry	[6517]
Peter	Haagensen	[5959]
Janet	Haley	[6479]
Janet	Hall	[6202]
John	Hall	[6203]
Philippa	Hall	[6257]
Sally	Hall	[6936]
Karen	Hambro	[6301]
Thomas	Hamilton	[6593]
Roget	Hamlett	[6460]
Shaun	Hammond	[6883]
Alan	Hampton	[6367]
Patricia	Hampton	[7608]
Mark	Hancock	[6008]
H	Hancock	[7634]
K	Hancock	[7172]
Patricia	Hannaford	[7231]
Richard	Hannah	[5938]
Ian	Happe	[6671]
D	Harman	[7069]
V	Harris	[7082]
G	Harris	[6532]
Steve	Harris	[6043]
G	Harris	[6531]
Susan	Harris	[6575]
Diana	Harrison	[5980]
Sally	Hart	[6649]
Elizabeth	Harvey	[6832]
Linda	Harvey	[7317]
Kathleen	Hastings	[6225]
Allan	Hatch	[6526]
David	Hatch	[6798]
Patricia	Haupt	[6398]
Roger	Havard	[7603]
Donna	Hawkins	[7125]
Jeff	Hawkins	[6560]
Steve	Hawkins	[6935]
Treena	Hawkins	[6561]
S	Hawryski	[7228]
Ron	Hawthorne	[6112]
Helen	Hawthorne	[6111]
Vivienne	Hayes	[7180]
Carol	Hayward-Peel	[6792]
Steven	Hearn	[6630]

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W	Hebblewhite	[7081]
William	Heelan	[7205]
Judy	Heilpern	[7117]
Dawn	Helder	[6416]
Linda	Helm-Manley	[7333]
Dean	Hemmings	[6333]
Jason	Hemmings	[6713]
Junko	Hemmings	[6330]
Vivienne	Hemmings	[6714]
Tony	Hemmings	[6646]
William	Henderson	[4968]
Janet	Henderson	[7118]
E	Henderson	[6605]
James	Henderson-Gibb	[6091]
Georgiana	Henderson-Gibb	[6092]
Margaret	Henderson-Tew	[6093]
Hazel	Henniker-Horn	[7216]
Caroline	Henry	[6262]
Alan	Henson	[5063]
K	Henson	[7201]
Hanna	Hessling	[6135]
Gordon	Hewlett	[6012]
Kate	Hicks	[6498]
Kevin	Higgs	[7628]
Kevin	Higgs	[5760]
Kim	Higgs	[5802]
D	Hilditch	[6453]
Peter	Hill	[6841]
Ian	Hill	[7399]
J	Hiller	[7450]
Linda	Hilton	[6150]
A	Hinkin	[7211]
Richard	Hinton	[5994]
Joy	Hoare	[6783]
Paul	Hodgkinson	[6429]
Louise	Hodgkinson	[6430]
Angela	Hodgson	[459]
Alan	Hodgson	[5900]
Keith	Hodgson	[5865]
Georgina	Hofer	[6903]
Pat	Holder	[7485]
Richard	Holder	[7484]
Simon	Holder	[6576]
Jean	Hollylee	[5122]
Roger	Hollylee	[6615]
Tom	Hollylee	[7499]
Steven	Hollyman	[6817]
Ann	Holt	[7517]
Ian	Holt	[7521]
Michael	Holway	[6392]
Tim	Holway	[6391]
Lois	Holway	[5954]
Madeleine	Holway	[6076]
Sue	Holway	[6390]
Chris	Homewood	[6802]
John	Hopton	[7327]
P	Hopton	[5975]
Andrea	Horner	[7406]
Joe	Horsley	[7633]

Sally		Hoskins		[6337]
P		Hough		[7667]
Peter		Hough		[5813]
Anne		How		[6659]
D		Howard		[6239]
Gary		Howard		[6725]
M		Howard		[6582]
Sandra		Howard		[6118]
Michael		Howarth		[5049]
Antoinette		Howarth		[6047]
Kirsty		Howden		[6103]
Alastair		Howe	Alastair Howe Architects	[3351]
Janet		Howes	Redeemer Lutheran Church	[464]
Ian		Hudson	Copyzone Archiving Ltd	[5684]
David		Hughes		[6980]
Marcus		Hughes		[6048]
Margaret		Hughes		[5105]
Sylvia		Hughes		[6600]
Margaret		Hulcoop		[65]
David		Hunt		[6972]
Susan	& David	Hunt		[6824]
Susan		Hunt		[6958]
Daniel		Hurst		[7236]
Claire		Hutchinson	PWLL Consortium	[7644]
Jacqueline		Hutchinson		[7291]
Jennifer		Hutchinson		[6731]
M		Hutchinson		[6286]
Margaret		Hutt		[6859]
Janice		Hyde		[7424]
Chris		Hyland		[7139]
G		Hyland		[6757]
Jutta		Ignatiou		[6016]
Eleftherios		Ignatiou		[6015]
Veronica		Iliffe		[7366]
C		Ings		[7466]
Zeana		Instance		[7400]
Carl		Inwood		[7161]
Barbara		Ireland		[6158]
David		Irons		[6577]
Graham		Irwin		[7275]
R		Irwin		[7445]
B		Jaafar		[7091]
E		Jaafar		[7090]
J		Jaafar		[7089]
M		Jaafar		[7088]
Charles		Jackson		[6100]
S		Jacobs		[7209]
Adrian		James		[7354]
David		James		[6924]
Trevor		James		[6562]
Alexandra		Jane		[6877]
Eleanor		Jane		[7487]
Flora		Jane		[7372]
Peter		Jarman		[7337]
Pru		Jarman		[7336]
R	A	Jarvis		[6747]
S	A	Jarvis		[6748]
Mr		Jay		[7595]
Gary		Jeffery		[7423]
Barbara		Jeffrey		[6520]

R		Jenkins	[7515]
Clare		Jenkins	[5988]
Sam		Jenkins	[6064]
Teresa		Jenkins	[6790]
Ashley		Jennings	[6666]
John		Jewell	[6168]
Paul		Joghee	[6476]
Laurie		John	[5896]
Andrew		John	[7533]
Christopher		Johnson	[6324]
Gloria		Johnson	[7432]
Andrew		Johnston	[7549]
M		Jolley	[7371]
David		Jolley	[6415]
B	T	Jones	[6418]
Catherine		Jones	[7026]
Cathleen		Jones	[6701]
Gillian		Jones	[7072]
Glyn		Jones	[7019]
Joan		Jones	[5892]
Moir		Jones	[5031]
Paul		Jones	[6354]
Trevor		Jones	[6365]
Emily		Jones	[7611]
Emmer		Jones	[6382]
Jane		Jones	[6383]
Melanie		Jones	[6381]
Simon		Jones	[6993]
B		Jordan	[6542]
Keith		Jordan	[7111]
Emily		Jordan-Wilson	[5971]
Sarah		Jowett	[6053]
Lee		Joyce	[6138]
Emma		Juniper	[7374]
Michael		Jury	[6178]
Marcus		Karn	[5965]
Madeleine		Karn	[5930]
Caroline		Karsten	[7567]
Edward		Karsten	[7561]
Peter		Karsten	[7559]
Robert		Karsten	[7560]
Jean		Kay	[6261]
Ray		Keane	[6805]
James		Keir	[5830]
Roger		Keith	[6573]
M		Kelly	[5935]
John		Kelly	[7367]
Peter		Kelsey	[7292]
Peter		Kelsey	[6718]
Barbara		Kemmett	[6051]
Suzanne		Kennard	[7233]
Shirley		Kenworthy	[6595]
Stan		Kenworthy	[6496]
A		Kilbee	[7546]
K		Kilbee	[7548]
Aileen		Kilbee	[7547]
Stephanie		Kimble	[5831]
Peter		King	[6025]
David		King	[6778]
David		King	[6789]

Essex Electrical Contracts

Joanna		King	[6320]
Judy		King	[6307]
Margot		King	[6248]
Samantha		King	[6050]
Paul		Kirkby	[5772]
P		Kitchen	[7349]
David		Kitching	[6224]
Chris		Kitts	[6668]
Vassilios		Kladaras	[6809]
Stephanie		Klidaras	[6524]
Daniel		Knight	[6130]
Esther		Knight	[7174]
Frankie		Knight	[6129]
Gillian		Knight	[6029]
Gracie		Knight	[7041]
Lauren		Knight	[6642]
Matthew		Knight	[6206]
Ritchie		Knight	[6641]
Rosie		Knight	[6205]
Angela		Kurton	[5811]
Marek		Kwiecinski	[5937]
Peter		Lainson	[92]
D		Lake	[7316]
Jean		Lambert	[6033]
John		Lambie	[6911]
Sue		Landon	[6760]
David		Langhelt	[6443]
M		Langman	[6849]
Roy		Langman	[6270]
O		Langman	[6884]
R		Langman	[6885]
S		Langman	[6886]
Steven		Langman	[6186]
Tony	& Jackie	Langsdale	[6621]
Christine		Lapidge	[5923]
Roger		Lapidge	[6115]
Natalie		Larkin	[7551]
Jacqui		Law	[6946]
Joan		Law	[7049]
Michael		Law	[6643]
Philip		Law	[6241]
Nick		Law	[6836]
Maurice		Lawrance	[7528]
M		Lawrancee	[7141]
David		Lawson	[6177]
Jennifer		Lazell	[7605]
Christine		Le	[6952]
Alan		Le	[6317]
Nick		Lee	[7639]
Barry		Lee	[7258]
Heather		Lee	[6724]
P		Lee	[6683]
J		Lee	[6493]
Joanne		Lee	[6242]
Patricia		Lee	[7402]
Judith		Leigh	[7147]
Roger		Leigh	[7165]
Patrick		Leng	[6863]
Barbara		Leslie	[6409]
Martyn		Lewington	[7280]

Harlow Area Access Group

Dooba Investments VI Ltd

Thomas		Lewington		[7602]
Katherine		Lewington		[7601]
Sylvia		Lewis		[7008]
Corinne		Lewis		[6413]
Paul		Lewis		[7012]
M		Lilley		[7050]
A	E	Linnit		[7636]
Dawn		Lloyd	Environment Agency	[7604]
John		Lloyd		[5885]
Pauline		Lloyd		[5858]
A		Locke		[7301]
Michael		Lodge		[6226]
E		Lodge		[6302]
Janet		Lodge		[6296]
Georgina		Loftus		[7154]
Mike		Loftus		[7036]
Maxine		Loftus		[7355]
Claire		Lomax		[5872]
Harry		Long		[7153]
Rhona		Long		[7152]
Steve		Long		[7149]
Yvette		Lord		[6923]
Ellie		Louise		[7342]
Adam		Lowe		[6104]
Treena		Lowe		[6228]
Lesley		Lowers		[6308]
R		Lowers		[6210]
Frances		Luck		[7222]
Peter		Luck		[6310]
Karen		Lydia		[6850]
R		Mabey		[6329]
Barbara		Mackay		[6277]
Terry		Mackay		[6279]
Cameron		Mackenzie		[6806]
Stephanie		Madsen		[6774]
Jill		Maher		[7021]
Paul		Maher		[5058]
Paul		Maison	British Waterways	[146]
Janice		Makin		[7206]
John		Makin		[6610]
Richard		Makin		[5962]
Lisa		Makin		[5963]
Rebecca		Makin		[7566]
The		Manager	Apollo Specialist Engineering	[3383]
The		Manager	Edmonson & Fountain	[6678]
The		Manager	Residents Orchard House	[6934]
Paul		Manley		[7332]
P		Mann		[7056]
C	S	Mansbridge		[6439]
Neil		Mantell	Redrow Homes	[7655]
Andrew		Mark		[6752]
Revd		Mark		[7422]
Gordon		Marks		[6740]
John		Marks		[6020]
Toby		Marks		[6629]
W		Marks		[6831]
Wenna		Marks		[6140]
Nicholas		Marks		[7460]
Toby		Marks		[7459]
Caroline		Marsh		[6893]

Muriel		Marshall		[7386]
Caroline		Marston		[7382]
Colin		Marston		[7383]
Jim		Martin		[7137]
Richard		Martin		[6417]
Sheila		Martin		[7156]
Luigi		Martini		[6218]
N		Mascall		[7009]
Wendy		Maskell		[7486]
David		Mason		[7063]
Leann		Mason		[6559]
Danielle		Mason		[6247]
Diane		Matt		[7627]
Diane		Matt		[5806]
Elias		Mavrommati		[6567]
Edward	& Ethel	Mawdsley		[6009]
Toni		Max		[7281]
Gillian		May		[6742]
Hilda		May		[6021]
Regina		May		[6679]
Joyce		May		[6148]
Janet		Mayes		[7417]
Henry		Mayes		[7200]
Jemima		Mayes		[7197]
Lydia		Mayes		[7198]
Sarah		Mayes		[7199]
Brian		Mayhew	Dale Insurance Services	[5895]
Patricia		Mayhew		[5810]
Robin		McCartney	Churchgate Street Residents Association	[5539]
Ken		Mcdonald		[7204]
S		Mcdonald		[6693]
G		Mcdonald		[6703]
M		Mcdonald		[6695]
M		Mcdonald		[6702]
I		Mcfayden		[6779]
Matthew		Mcgill		[7314]
Jo		Mcgill		[7183]
Graham		Mcisaac		[7375]
Paula		McManus		[6293]
Hugh		Mcmanus		[7392]
Nicola		Mcmanus		[6793]
Neil		McManus		[6290]
John		Mcmillan		[6238]
Scott		Mcnamee		[7469]
Leighanne		Mcnaught		[6880]
Hazel		Mead		[6899]
John		Mead		[6035]
Claudia		Mead		[7405]
Margaret		Mead		[6155]
Jean		Meakin		[6616]
Andy		Medhurst		[7387]
Caroline		Meehan		[6917]
D		Meehan		[6913]
C		Meehan		[7497]
Adam		Meldrum		[6636]
Bernard		Mella		[5913]
Jacqueline		Mella		[5914]
A	D	Mella		[6454]
Gillian		Melling		[6087]
Fiona		Menzies		[5832]

Jeannette	Mercer	[6134]
Sean	Mercer	[6133]
Jacqueline	Mermoud	[5926]
Steven	Meshner	[6342]
Jan	Metcalf	[6654]
Francesca	Micheli	[6359]
M	Michelson	[6691]
H	Michelson	[6700]
	Middlebrook	[7272]
Amanda	Middleton	[6669]
Andrea	Middleton	[6712]
Laura	Middleton	[6709]
Megan	Middleton	[6710]
C	Middleton	[7046]
D	Middleton	[7190]
Harry	Middleton	[6711]
C	Middleton	[7189]
Annmaria	Miechielsens	[7598]
Christopher	Millard	[7495]
Kim	Millard	[7518]
Ray	Millard	[7249]
Nigel	Miller	[6041]
Simon	Miller	[6557]
Faith	Mills	[6146]
Malcolm	Mills	[6149]
Craig	Milosh	[6348]
Nebojsa	Milovanovic	[6267]
Joseph	Mishan	[6867]
Nina	Mistry	[6219]
Francis	Mitchell	[6591]
Madeleine	Mitchell	[5966]
Olivia	Mitchell	[5931]
Helen	Mitchell	[5927]
S	Mitchell	[6681]
Jennie	Moncur	[7142]
Lorna	Montgomerie	[6276]
Nick	Moore	[7318]
Steph	Moore	[7016]
Stevie	Morden	[5221]
Danny	Morgan	[7044]
Jacqueline	Morgan	[6339]
Keith	Morgan	[7328]
Dianne	Morgan	[6667]
Esther	Morgan	[7306]
Ronald	Morgan	[7537]
Suzanne	Morgan	[7553]
Alan	Morley	[7102]
Sheila	Morley	[6672]
Blaise	Morris	[6108]
Mark	Morris	[7278]
Melanie	Morris	[6956]
Felix	Morris	[6477]
Gwyn	Morris	[5185]
Jemima	Morris	[6478]
Kathleen	Morris	[5080]
Susanna	Morris	[6237]
Philip	Morris	[6955]
Lucy	Morris-Eyton	[7409]
Brenda	Morrison	[6941]
John	Morrison	[6940]

Keira		Morrison	[6019]
John		Morrison	[6704]
Mr		Morrison	[7253]
Robert		Morrison	[6393]
B		Morrison	[6784]
Mrs		Morrison	[7254]
Colleen		Morrison	[5674]
David		Morton	[6139]
Jamie		Morton	[7323]
Jeremy		Morton	[6736]
J		Morton	[6833]
J		Moseley	[6608]
Ian		Moss	[7188]
Marion		Moss	[6222]
Rodney		Munday	[6511]
Nicola		Munday	[7505]
Richard		Munday	[7155]
Katherine		Munro	[7698]
Andrew		Munro	[6777]
Brian		Munro	[6540]
Deborah		Munro	[6846]
Philip		Murphy	[7657]
Becca		Murphy	[6868]
Alison		Murray	[7599]
John		Mustafa	[5016]
John		Mustafa	[5678]
B		Mutter	[7329]
Juliet		Nabavi	[7017]
Gordana		Najdanovic	[6265]
Jackie		Nash	[6142]
Jane		Nathan	[5989]
Alan		Naughton	[7011]
Carmel		Naughton	[7010]
Alan		Naughton	[6795]
Sally		Naylor	[5259]
David		Needham	[7396]
Suzanne		Neville	[7070]
Graham		Newell	[6974]
Arthur	Stanley	Newens	[5917]
Sandra		Newens	[5918]
Thomas		Newens	[5899]
M		Newitt	[6601]
Amanda		Newman	[7434]
Lorraine		Newman	[6585]
Ben		Newman	[6245]
Rachel		Newman	[5934]
Tina		Newman	[6246]
Pamela		Newman	[6176]
Victoria		Newman	[7584]
Mike		Newton	[7646]
Hedley		Newton	[7506]
Linda		Newton	[6166]
Marco		Newton	[7297]
Kay		Newton	[5942]
Paul		Newton	[5871]
Virginia		Newton	[7461]
J		Nicholls	[6243]
Charles		Nicholson	[6406]
M		Nicholson	[7300]
Diana		Nicholson	[6343]

Esther		Nicklin		[6396]
Edward		Nightingale		[7568]
Kaye		Nightingale		[7570]
Eric		Nimalan		[6264]
Cedric		Nimmo		[6957]
Edward		Noakes		[6988]
Ruth		Noakes		[6814]
Barbara		Noble		[5680]
Bryan		Norman		[6485]
Sandra		Norris		[7114]
Sara		Norris		[7115]
Robert		Norris		[5852]
S		Norris		[7113]
G		Norris		[7112]
Sandra		Norris		[5851]
Carly		Norton		[6145]
Lynn		Norton		[6180]
Andrew		Noton		[5860]
Iain		Nuttall		[6193]
Mrs & Mrs		Nuttall		[6266]
Caroline	& Neile	Oakley		[6173]
Zhanine		Oates	Essex County Council	[5406]
Suzanne		O'Brien		[6773]
Anthony		O'Connor	Moat Homes	[5737]
Anthony		O'Connor		[6660]
Glenda		O'Dowd		[7479]
Richard		O'Dowd		[7472]
Abigail		O'Dowd		[7390]
Emily		O'Dowd		[7404]
Shaun		O'Dowd		[5077]
Jake		O'Gorman		[6432]
Natalie		O'Leary		[6189]
Amanda		Olsen		[6676]
Jill		O'Neill		[6285]
Kevin		O'Neill		[6023]
James		Ord		[6686]
Hugh		O'Reilly		[6504]
Luke		O'Reilly		[6622]
Margaret		O'Reilly		[6503]
Peter		O'Reilly		[6136]
Michael		Orsbourn		[5821]
Mark		Orson	Eastwick and Gilston Parish Council	[7610]
Mark		Orson		[5979]
Christina		Orson		[5982]
Sarah		Orson		[7477]
Jackie		Osborne		[6598]
Clare		O'Shea		[6692]
Frank		O'Shea		[6106]
Matthew		O'Shea		[6283]
Karen		Osterley		[7373]
Robin		Osterley		[7468]
Wil		Overton		[7408]
B		Oxenbridge		[7094]
D		Oxenbridge		[7096]
Emma		Oxenbridge		[7097]
F		Oxenbridge		[7093]
J		Oxenbridge		[7092]
Max		Oxenbridge		[7274]
Oliver		Oxenbridge		[7098]
S		Oxenbridge		[7095]

Seb		Oxenbridge	[7273]
Melvyn		Page	[6589]
Thomas		Page	[6840]
Trevor		Paice	[6095]
Agnes		Pain	[6275]
Martin		Paine	[5682]
Howard		Palmer	[7478]
Ruth		Palmer	[7631]
Arthur		Pape	[7068]
Brenda		Pape	[7066]
Sa		Papworth	[7138]
Douglas		Parfett	[6109]
Jane		Parfitt	[7129]
Jordan		Parfitt	[7146]
Poppy		Parfitt	[7128]
Stuart		Parfitt	[7130]
Anthony		Parish	[6860]
Martin		Parker	[6754]
Matthew		Parker	[6755]
Michael	& Jeffery	Parker	[7672]
Stephen		Parker	[5827]
Rebecca		Parker	[5826]
Holly		Parker	[6756]
David		Parkin	[7003]
J		Parkinson	[7410]
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Sarah		Phillipps	[7475]
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East Herts. District Council

Graham	Phillips	[5888]
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Maurice	Phillips	[7171]
Carolyn	Phillips	[5807]
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Ed	Sayer	[6550]
Gillian	Sayer	[6916]

Hunsdon Parish Council

Persimmon, Taylor Wimpey & Martin Grant Homes

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J	I	Scally	[6128]
Nick		Scarr	[7401]
J		Schlenker	[7407]
Peter		Schroeder	[6515]
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Rod		Seivewright	[5928]
Bob		Sellwood	[7647]
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Michael		Shaw	[7550]
Kimberley-			
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Bea		Smith	[7411]
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Christine		Smith	[7391]

Crest Strategic Projects

Etty		Smith		[7133]
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Vera		Soley		[6244]
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Mrs		Stickler		[5940]
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Janice	Trant	A-Eleven Publications	[5903]
Mark	Trant	M. T. Garden Services	[5906]
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Val	Whitbread		[7431]
Ian	White	Epping Forest District Council	[4665]
Patricia	White		[5887]
Catherine	Whitehead	Natural England	[4942]
Paul	Whitehead		[7051]
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Nicola		Wilkinson	The Roydon Society	[27]
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David		Wright	Memorial University of Newfoundland - Harlow Campus	[6014]
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Valerie	Wyman	[5936]
Ems	Wynn	[7135]
Da	Wynn	[7134]
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Roy	Young	[6399]
Lewis		[7597]
Lina		[7596]
Belinda		[6745]
Deborah		[6094]

How would YOU plan Harlow's future?

Have your say!



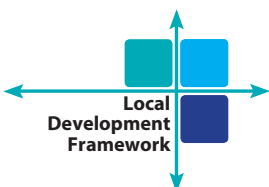
Core Strategy Issues and Options Consultation

Summary Leaflet

Consultation ends 5pm
on Friday 28 January 2011

www.harlow.gov.uk/issuesandoptions

HARLOW - see something **different**



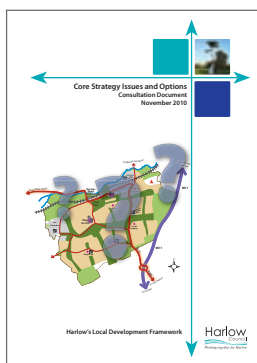
What is the Core Strategy?

Harlow Council is preparing a new plan for Harlow called the Local Development Framework (LDF). The Core Strategy will be the main planning document in Harlow's emerging LDF which will guide development in the district to 2026 and beyond.

The Core Strategy will set out the location of:

- New housing
- Employment areas
- Shops
- Schools
- Community and leisure facilities
- Green spaces
- Transport improvements

The Council is now consulting on the first stage of Harlow's Core Strategy called "Issues and Options". This sets out the key issues that need addressing in Harlow and proposes possible options for planning the town's future.



This summary leaflet provides a brief outline of the 'Issues and Options' consultation document. The full version of the consultation document and questionnaire can be viewed online at www.harlow.gov.uk/issuesandoptions

Give your views on how Harlow should develop!

The Government has stated its intention to formally abolish the Regional Plan which set out the development strategy and requirements for Harlow. This is called the East of England Plan. This will mean decision-making powers in planning and housing will be returned to local authorities and Harlow will be able to determine how Harlow should change in the future.

This consultation is your opportunity to have your say on this first stage of preparing and developing the future plan for Harlow.

The Vision for Harlow

The Core Strategy will be based on the vision and priorities in the Community Strategy, the Harlow 2020 Vision. The 2020 Vision sets the overall vision for the district which is as follows:

"A clean, safe, sustainable and healthy town with good educational prospects for its citizens, a variety of homes and jobs to meet local needs, and a range of sporting, leisure and cultural opportunities contributing to a higher quality of life."

The Core Strategy provides the "spatial planning framework" (the location for new development) to put this vision into practice. This will be achieved by developing key themes and strategic objectives that will help to address the issues that have been identified so far affecting Harlow.

Five core themes have been set out to help develop the new plan:

- **Placeshaping** - Enhancing the quality of the built and natural environment
- **Housing** - Delivering housing at the right scale, of the right type and in the right location to meet the needs of the whole community
- **Prosperity** - Securing economic growth and regeneration in order to improve employment and educational opportunities in the town and reflect its strategic role
- **Infrastructure** - Ensuring growth and regeneration is supported by appropriate levels of infrastructure provision
- **Lifestyles** - Meeting the leisure, recreational and cultural requirements of the community in a sustainable manner

26 strategic objectives have also been identified which will form the basis of the policies and proposals to deliver the vision for Harlow.

Your comments on the vision, themes and strategic objectives are needed as they will be the basis of Harlow's Core Strategy.

See Part 4 of the full consultation document for more details.

What are the Issues?

In each theme there are a number of common issues affecting Harlow. These issues have been identified through informal consultations and evidence that has been gathered over the past couple of years. The issues you consider are important will be taken forward into the Core Strategy.

Placeshaping

- The quality of green spaces should be maintained and protected
- The New Town principles are important
- High quality sustainable architecture and design should be promoted
- Brownfield land should be developed before Greenfield
- The Green Wedges should be strengthened in order to improve aesthetic appeal, sense of place and links to the countryside



Housing

- A range of house types and tenures is required to meet the needs of all the community
- Some housing densities are too high
- Extra care housing is needed
- About 35% of new dwellings should be affordable



Prosperity

- The town centre should be more attractive and vibrant
- Education, training and skills base needs to be improved in the town
- The choice of shops in the town and neighbourhood centres needs to be improved
- Harlow has below average provision of convenience and service units and high quality retailers compared with competing centres



Infrastructure

- Road and other infrastructure must be provided to accommodate growth
- Traffic congestion in the town needs to be addressed
- Cycleway and footpath connections in the town need to be improved
- Children's centres and youth facilities will be needed to support the new communities



Lifestyles

- Recreational facilities should be protected and enhanced
- Crime, safety and anti-social behaviour in the town should be addressed
- Policies should raise the levels of aspiration within the town
- Quality green spaces for public health and leisure use should be protected and maintained
- Theatre provision for Harlow and the wider area should be improved
- The River Stort and its floodplain should be promoted as areas for recreational use



Do you think all the issues have been identified? Or are there any other issues that you think should be addressed by the Core Strategy?

You can get more details about the issues in Part 2 of the full consultation document.

What are the Options?

Guiding future development

To meet Harlow's current and future needs, the town needs to regenerate. To do this requires new housing and economic growth, alongside associated infrastructure improvements.

But how much new development is required, and what principles should guide growth?

The level of growth

The Core Strategy will need to ensure that the issues and future development needs of the community are met.

The evidence that supported the East of England Plan shows that the provision of 16,000 new homes and approximately 8,000 jobs in the Harlow area would help to address Harlow's issues by stimulating the regeneration and renewal of the town.

The Council believes that this level of growth will not only meet the needs of the existing community but also help address the other issues affecting Harlow's future prosperity.

Do you agree that the community needs should be met and the regeneration of Harlow secured through this scale of growth?

See Part 3 of the consultation document for more information.



Regeneration at Clifton Hatch



What principles should guide growth?

The Council believes that new development should support regeneration and be sustainable. This will ensure that the new plan delivers the Community Strategy vision and strategic objectives for Harlow.

In order to achieve this, the opportunities for development within the urban area boundary will be examined before land in other locations such as the Green Belt. This will ensure that there are close links between where people live, work and spend their leisure time and the services they require.

Options that could achieve new development are set out below:

- Increasing the density of development at appropriate locations within the urban area of Harlow
- Examining the opportunities for development on undeveloped land
- Examining the development potential on unused or underused open spaces
- Appraising the function and effectiveness of Harlow's Green Wedges to ensure they meet current expectations

If the additional development needed to meet the community's future needs cannot be achieved through these options, the role and location of urban extensions will be considered.

Additional issues that also need considering are:

- The ability of existing employment sites to meet current and future employment needs
- The role and function of the town's shopping centres (from the Town Centre down to Hatches)

What do you think about the suggested principles and options for directing regeneration and growth?

These issues are covered in detail in Part 5 of the full consultation document.

Consultant's suggested growth options

A level of growth of 16,000 new homes was proposed in the East of England Plan to secure the regeneration of the town. An independent assessment was undertaken to review possible growth options proposing 5,000 in the built up area of the town and 11,000 in other locations.

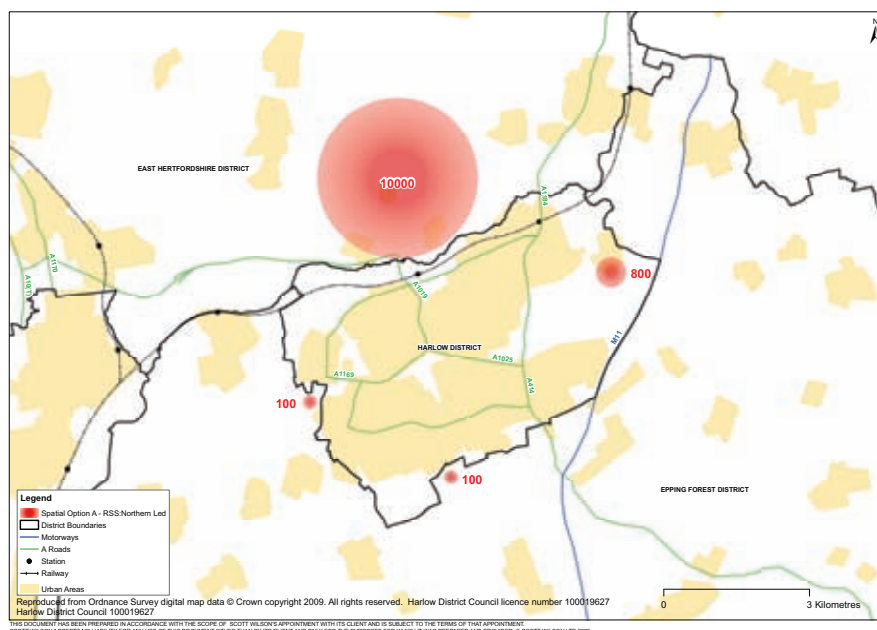
Although the East of England Plan is likely to be withdrawn, the Council believes the assessment remains relevant for examining a range of possible options for growth that may be required around Harlow. **View the report: www.harlow.gov.uk/ldf (following the link to 'LDF Evidence Base')**

Option A - Regional Spatial Strategy: Northern-led

This approach is based on the policy in the East of England Plan. This placed the bulk of growth to the north of Harlow, with some growth to the east and smaller growth to the south and west.

The consultant suggested that this is not a reasonable option as there is an unacceptable risk that the development would not be delivered during the plan period.

For a full summary of this approach and the consultant's recommendation see Part 6, sections 6.7.2 and 6.7.3 in the full consultation document.

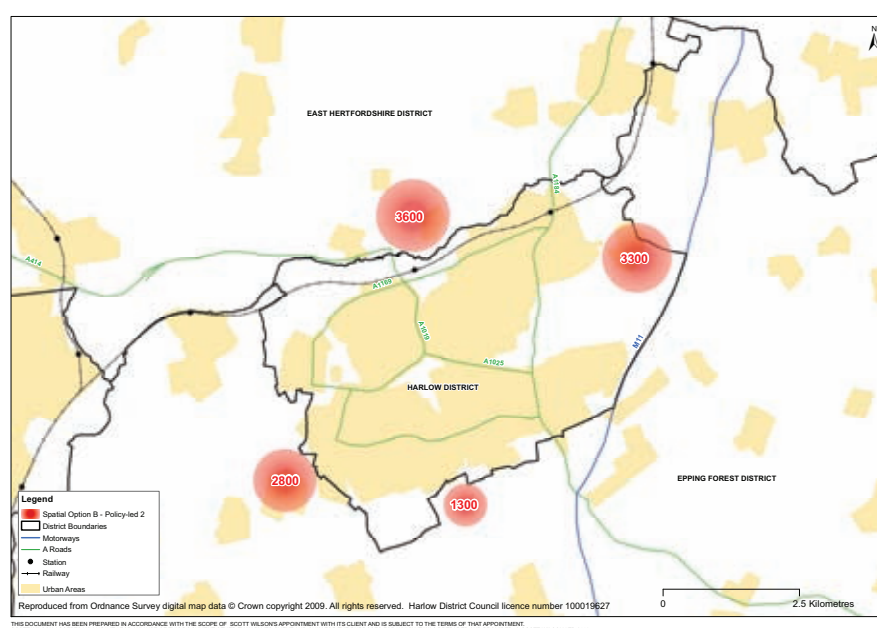


Option B - Policy led 2

This approach reflects the broad directional and distributional elements of the growth requirements set out in the East of England Plan, but does not focus the bulk of the new housing provision to the north of Harlow.

The consultant felt this would be a reasonable option if lower levels of housing growth were proposed for the area west of Harlow with greater growth explored to the east and south.

For a full summary of this approach and the consultant's recommendation see Part 6, sections 6.7.4 - 6.7.6 in the full consultation document.



Option C – Combined criteria led

This approach is based on an assessment of Green Belt, landscape sensitivity, flood zones, regeneration objectives and transport accessibility, but ignores the specific strategic directions for growth set out in the East of England Plan.

The consultant concluded that situating significant numbers of new dwellings close to Junction 7 of the M11 would encourage private car use within an area unable to cope with increased traffic without a southern bypass. Growth to the south could affect the ridgeline that provides a southern edge and setting for the town.

For a full summary of this approach and the consultant's recommendation see Part 6, sections 6.7.8 - 6.7.11 in the full consultation document.

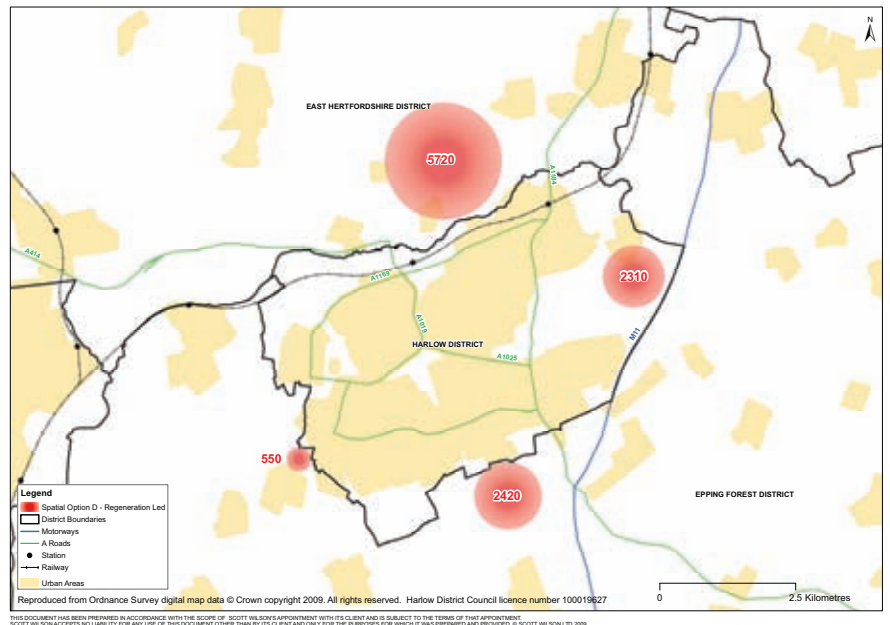


Option D – Regeneration led

An alternative approach examined the identification of areas of search and distribution of new housing based upon securing the greatest potential regeneration benefits for locations within Harlow.

The consultant suggested that this option is not considered a reasonable option due to transport and sewerage constraints associated with high levels of development to the north.

For a full summary of this approach and the consultant's recommendation see Part 6, sections 6.7.12 - 6.7.16 in the full consultation document.



The Delivery Strategy

Finally, the Core Strategy will need to identify a delivery and implementation strategy and the key infrastructure required to support future development in Harlow. Infrastructure includes transport but also the range of other facilities necessary to support the needs of the community.

Part 7 of the full consultation document sets out the key infrastructure needed to support new development.

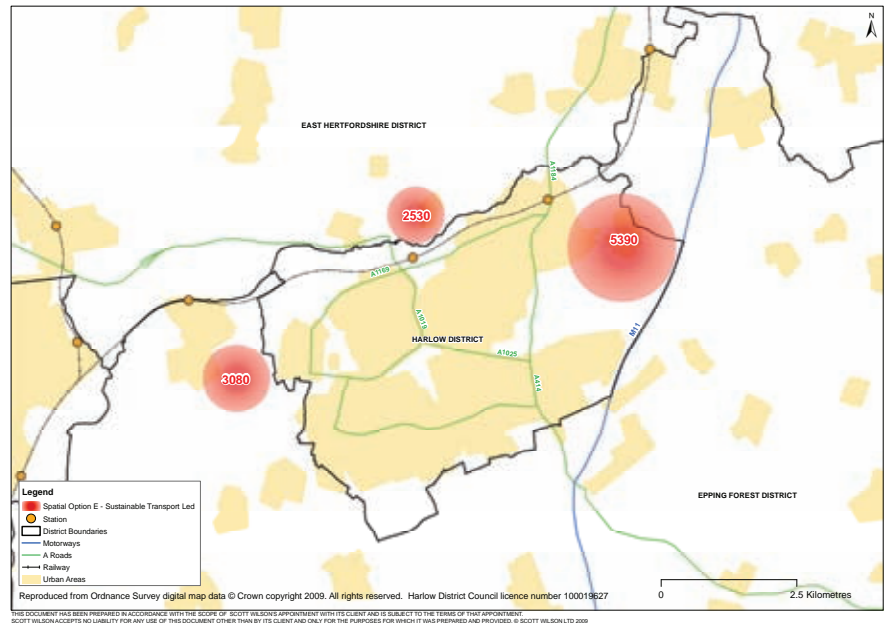


Option E – Sustainable Transport-led

This approach is based on broad locations for new housing and that can benefit from existing or enhanced transport provision.

The consultant suggested that this option is not a reasonable option primarily in light of transport and sewerage constraints associated with high levels of development allocated to urban extensions in the northern half of Harlow.

For a full summary of this approach and the consultant's recommendation see Part 6, sections 6.7.17 and 6.7.19 in the full consultation document.

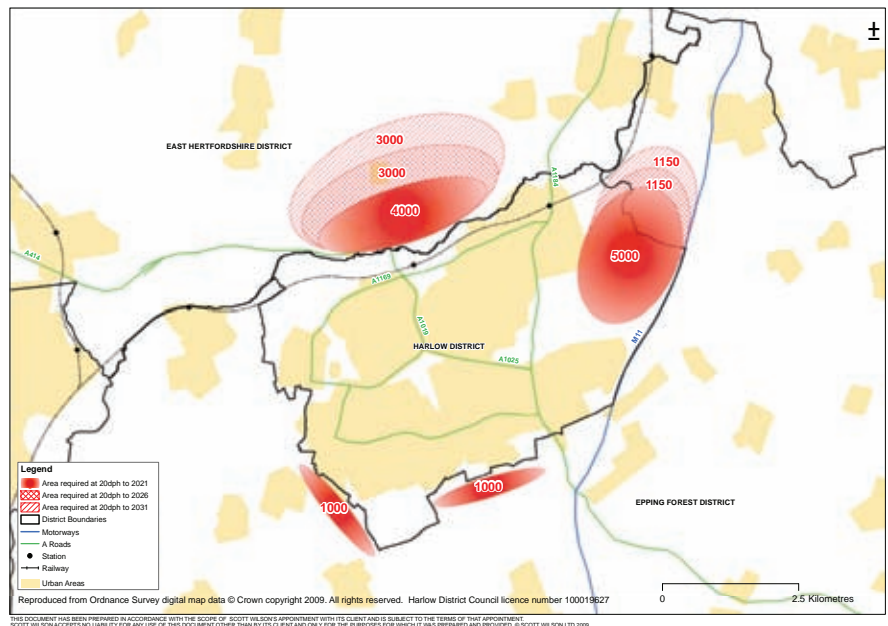


The Consultant's Suggested Spatial Approach

Following examination of the range of potential options described above, and an assessment of their impact on the town, the consultant suggested the following areas to accommodate housing growth around the town:

For a full summary of the consultant's Suggested Approach see Part 6, sections 6.7.20 -6.7.22 in the full consultation document.

What do you think about the recommendations of the Consultant including their "Suggested Spatial Approach" to growth around Harlow?



Do you think all of the key elements of infrastructure have been identified? If not, what additional infrastructure do you think will be needed to support the emerging Core Strategy?

Consultant's suggested growth options

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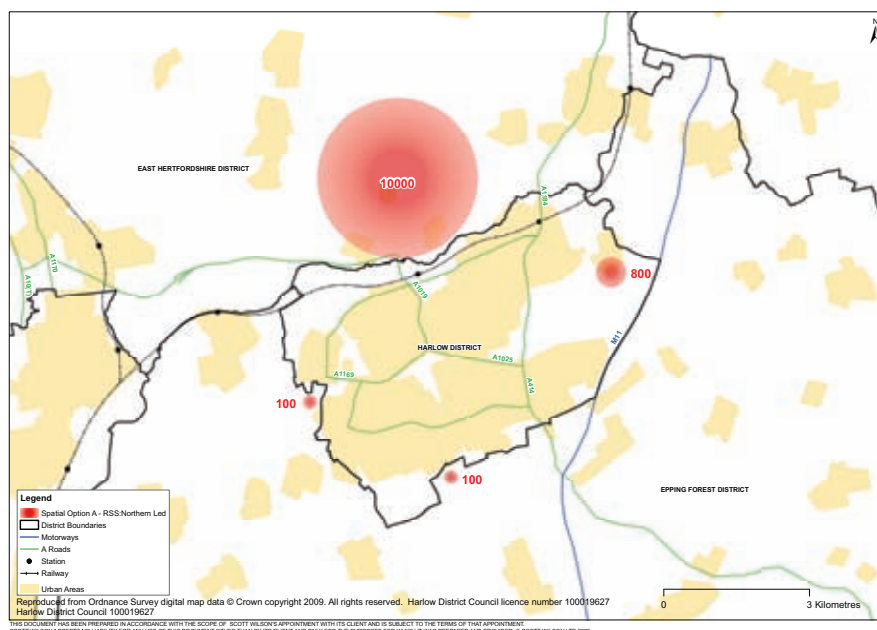
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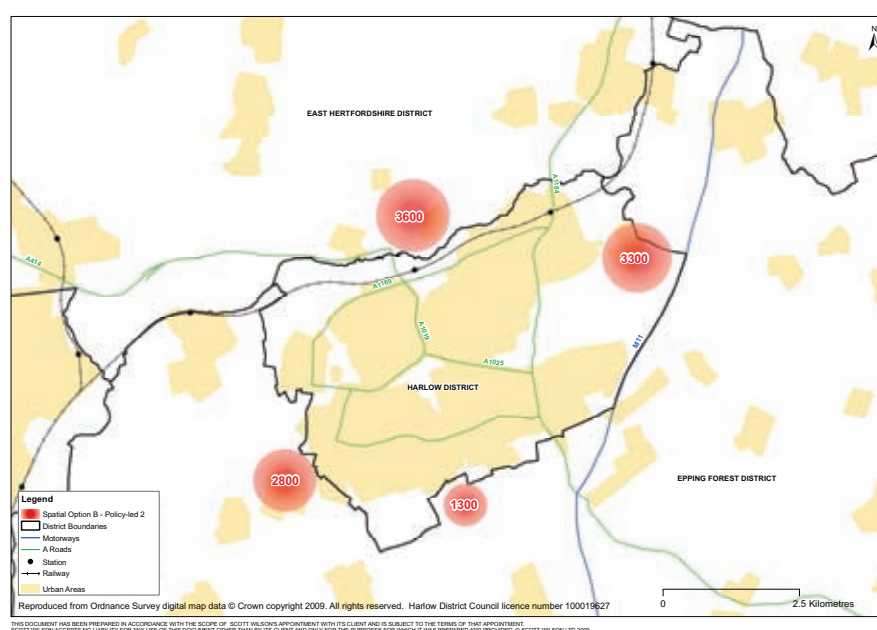


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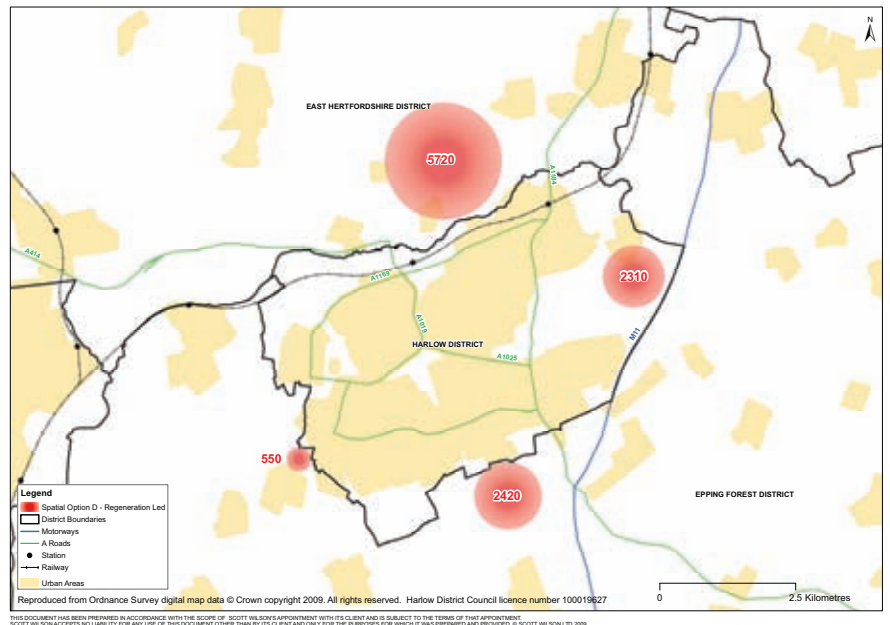


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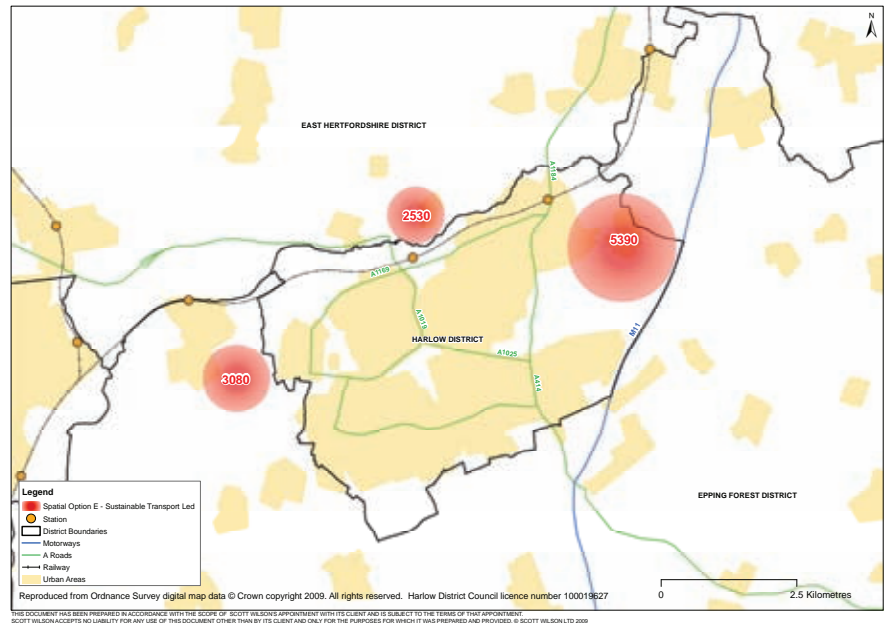
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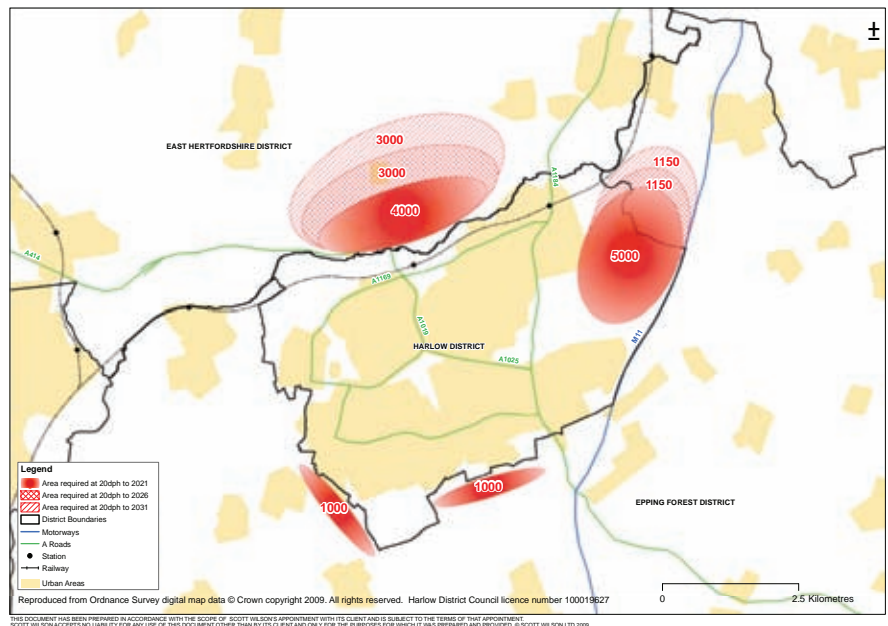


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What do you think about the recommendations of the Consultant including their "Suggested Spatial Approach" to growth around Harlow?



Do you think all of the key elements of infrastructure have been identified? If not, what additional infrastructure do you think will be needed to support the emerging Core Strategy?

Harlow's Core Strategy Issues and Options consultation

Questionnaire

Harlow Council would like to know your views on the Core Strategy Issues and Options consultation document. Your feedback will help to prepare Harlow's final Core Strategy. The Core Strategy is the main planning document in Harlow's emerging Local Development Framework which will guide development in Harlow to 2026 and beyond. For more information about the Core Strategy, please refer to Part 1, sections 1.1 to 1.2 in the consultation document.

Please read the Issues and Options consultation document before responding to the questions.

Where can I view the consultation document?

The Issues and Options consultation document can be viewed online at **www.harlow.gov.uk/issuesandoptions**

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

Copies of the consultation document can be obtained on CD-Rom by emailing **myharlow@harlow.gov.uk** or calling the Forward Planning Team on (01279) 446028.

If you would like this questionnaire in a different language or format please call Contact Harlow on 01279 446655 or email **myharlow@harlow.gov.uk**

Council Officers will be available to help you with this questionnaire if required.

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

COMPLETING THE QUESTIONS

Please answer the questions by putting a cross in the appropriate box or using the space provided to write your comments. If you need extra space for comments, please use additional paper, clearly number your responses, and attach to your questionnaire using a staple.



The Issues

Question 1 Do you think the Council has identified all the relevant issues that need to be addressed by the Core Strategy? *(Refer to Part 2 of the consultation document)*

Yes ☐ No ☐

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

The Approach

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? *(Refer to Part 3 of the consultation document)*

Strongly Agree	Agree	Neutral	Disagree	Strongly Disagree
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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?

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? *(Refer to Part 4 of the consultation document)*

Strongly Agree

Agree

Neutral

Disagree

Strongly Disagree

☐

☐

☐

☐

☐

Question 6

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

Question 7

Do you think the Core Strategy Themes cover the range of planning issues in Harlow? *(Refer to Part 4, section 4.3 to 4.4)*

Strongly Agree

Agree

Neutral

Disagree

Strongly Disagree

☐

☐

☐

☐

☐

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?

Question 9

Do the Strategic Objectives provide the necessary framework to deliver the regeneration of Harlow? *(Refer to Part 4, section 4.5)*

Strongly Agree

Agree

Neutral

Disagree

Strongly Disagree

☐

☐

☐

☐

☐

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

Question 11 Do you think the policy areas identified cover the range of issues that are relevant to the regeneration of Harlow? *(Refer to Part 4, section 4.7)*

Strongly Agree	Agree	Neutral	Disagree	Strongly Disagree
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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

Development Principles

Question 13 Do you agree that new development should be directed to areas that will maximise regeneration of the town? *(Refer to Part 5, sections 5.1 to 5.2)*

Strongly Agree	Agree	Neutral	Disagree	Strongly Disagree
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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) *(Refer to Part 5, section 5.4 in the consultation document)*

Around public transport hubs (railway station, bus station and bus stops)	<input type="text"/>	Hatches	<input type="text"/>
		Neighbourhood Centres	<input type="text"/>
At appropriate locations within neighbourhood areas	<input type="text"/>	Within the Town Centre	<input type="text"/>

Question 15 Should the Council consider underused open spaces and other undeveloped land for development before considering releasing land in the Green Belt? *(Refer to Part 5, section 5.5 and Appendix 1 in the consultation document)*

Strongly Agree	Agree	Neutral	Disagree	Strongly Disagree
<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>

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? *(Refer to Part 5, section 5.6 in the consultation document)*

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) *(Refer to Part 5 in the consultation document)*

Areas with good access to public transport and other services and facilities	<input type="text"/>
Developing underused green spaces	<input type="text"/>
Maximising the use of previously developed land	<input type="text"/>
Meeting regeneration goals	<input type="text"/>
Protecting Green Wedges	<input type="text"/>
Protecting important landscapes	<input type="text"/>
Protecting the Green Belt	<input type="text"/>
Where there is existing infrastructure capacity	<input type="text"/>

Question 18 Do the existing employment areas meet current and future employment needs? *(Refer to Part 5, section 5.9 in the consultation document)*

Strongly Agree	Agree	Neutral	Disagree	Strongly Disagree
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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

Question 20 How do you think Harlow Council should shape future shopping development within the Town? *(Refer to Part 5, section 5.10 in the consultation document)*

Spatial Options for Growth Around Harlow

Question 21 What is your view on the consultant’s recommendations regarding Option A? *(Refer to Part 6 in the consultation document)*

Strongly Agree	Agree	Neutral	Disagree	Strongly Disagree
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Any further comments?

Question 22 What is your view on the consultant's recommendations regarding Option B? (Refer to Part 6 in the consultation document)

Strongly Agree	Agree	Neutral	Disagree	Strongly Disagree
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Any further comments?

Question 23 What is your view on the consultant's recommendations regarding Option C? (Refer to Part 6 in the consultation document)

Strongly Agree	Agree	Neutral	Disagree	Strongly Disagree
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Any further comments?

Question 24 What is your view on the consultant's recommendations regarding Option D? (Refer to Part 6 in the consultation document)

Strongly Agree	Agree	Neutral	Disagree	Strongly Disagree
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Any further comments?

Question 25 What is your view on the consultant's recommendations regarding Option E? (*Refer to Part 6 in the consultation document*)

Strongly Agree

☐

Agree

☐

Neutral

☐

Disagree

☐

Strongly Disagree

☐

Any further comments?

Question 26 What is your view on the consultant's Suggested Approach to accommodating growth around Harlow? (*Refer to Part 6 in the consultation document*)

Strongly Agree

☐

Agree

☐

Neutral

☐

Disagree

☐

Strongly Disagree

☐

Any further comments?

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

Question 28 Do you think all the key elements of infrastructure necessary to support the emerging Core Strategy have been identified? *(Refer to Part 7 of the consultation document)*

Yes☐

No☐

Question 29 If no, what additional infrastructure do you think is needed to support the emerging 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) *(Refer to Part 7 in the consultation document)*

Encourage use of public transport for work and leisure (Travel Planning)	<input type="checkbox"/>
Improve access to the town centre by sustainable modes of transport (cycle / bus)	<input type="checkbox"/>
Improve connections from Harlow to the Strategic Road Network (M11, A414)	<input type="checkbox"/>
Improve walking and cycling routes within the town	<input type="checkbox"/>
Manage future parking provision across the town	<input type="checkbox"/>
Measures to improve traffic flow along strategic routes and at roundabouts within the town	<input type="checkbox"/>
Public transport improvements	<input type="checkbox"/>
Rail enhancements	<input type="checkbox"/>
Other (please state below)	<input type="checkbox"/>
.....	

Question 31 Do you have any further comments to make, at this stage, on how Harlow should be developed? (Please use a continuation sheet if necessary)

This image shows a completely blank white page. It is surrounded by a thin, solid black rectangular border. There are no markings, text, or illustrations on the page itself.

Your Contact Details

Please provide your full contact details (if not, your responses may not be considered).

Organisation / Company Name (if appropriate)

Job Title (if appropriate)

Title **First Name** **Surname**

Address

Post Code **Agent (Yes/No)**

Telephone **Email (Preferable)**

Harlow Council would like to add you to Harlow's Local Development Framework (LDF) Database. The Council can then keep you informed about future consultations on Harlow's emerging LDF and other planning policy documents.

If you do not wish to be added to the Council's LDF Database, please tick the opt-out box.

☐

Privacy Notice

The purpose of the LDF Database is to collect information about interested people and organisations who would like to be informed or consulted on Harlow's LDF and any other planning policy documents prepared by Harlow Council. By providing your contact details on this questionnaire you are happy for your personal data being transferred on to Harlow's LDF Database. It may be used to contact you in future to participate as part of the LDF process. The data may be held for the duration of this LDF up to and probably beyond 2021.

How to return your completed questionnaire:

You can hand deliver your completed questionnaire at the Civic Centre reception or post it to:

Issues and Options Consultation
Forward Planning Team - Harlow Council
Civic Centre
The Water Gardens
Harlow CM20 1WG

Alternatively, submit your responses via the online consultation portal: <http://harlow.jdi-consult.net/ldf/>

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.

Responses must be returned to the Council by 5pm on 28 January 2011.

Harlow's Core Strategy Issues and Options consultation

Equalities Monitoring Form (optional)

The Equality Act 2010 requires Harlow Council to carry out its equality duty. All public bodies must think about treating people from different groups fairly and equally.

Harlow Council has to consider the needs of:

- People of different ages
- Lesbian, gay and bisexual people
- People who have changed their sex or are in the process of doing so
- People with a religion or belief, and without a religion or belief
- Women having a baby, and women just after they have had a baby, including breastfeeding
- People of different race
- People of different gender
- People with disabilities
- People of socio-economic disadvantage

Harlow Council would like you to volunteer your personal information to ensure that people from all groups have been included in Harlow's Core Strategy Issues and Options consultation.

Confidentiality

Please help the Council by volunteering your equalities monitoring data on this monitoring form.

The purpose of this monitoring form is to obtain statistical data that will enable the Council to assess how representative of the community Harlow's Core Strategy Issues and Options consultation has been.

All equality and diversity monitoring data is anonymous and will only be used only for statistical analysis.

- Information provided is confidential under Data Protection legislation.
- Information is not passed on to anyone else and is not used to check nationality or citizenship status.
- You are not obliged to provide this information - but it is the Council's duty to ask questions!

Diversity is a key strength in any community or organisation. By knowing the community better Harlow Council is able to ensure equal access to services.

Gender, Age and Gender Orientation monitoring

Are you?

Female

☐

Male

☐

Transgender

☐

To which age group do you belong?

Under 18

☐

35-44

☐

65-74

☐

18-24

☐

45-54

☐

75-85

☐

25-34

☐

55-64

☐

86 and over

☐

Marriage and Civil Partnership monitoring

Are you?

Single

☐

Married

☐

Civil Partner

☐

Race and Ethnicity monitoring

What is your ethnicity?

(Classification of ethnic groups from Census 2001)

White - British

☐

Asian or Asian British - Indian

White - Irish

☐

Asian or Asian British - Pakistani

☐

Other White background

☐

Asian or Asian British - Bangladeshi

☐

Mixed - White and Black Caribbean

☐

Other Asian background

☐

Mixed - White and Black African

☐

Black or Black British - Caribbean

☐

Mixed - White and Asian

☐

Black or Black British - African

☐

Other Mixed background

☐

Chinese

☐

Other Ethnic background

☐

Other Black background

☐

Prefer not to reply

☐

If other, please specify

.....

Gender Orientation monitoring

How would you describe yourself as?

Heterosexual (straight)

☐

Homosexual (gay)

☐

Lesbian

☐

Bi-sexual

☐

Disability Monitoring Self Description

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

Yes ☐ No ☐

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

Yes ☐ No ☐

Religion and Belief monitoring

What is your religion?

Buddhist	<input type="checkbox"/>	Sikh	<input type="checkbox"/>
Christian	<input type="checkbox"/>	None	<input type="checkbox"/>
Hindu	<input type="checkbox"/>	Other religion or belief	<input type="checkbox"/>
Jewish	<input type="checkbox"/>	Prefer not to say	<input type="checkbox"/>
Muslim	<input type="checkbox"/>		

If other, please specify

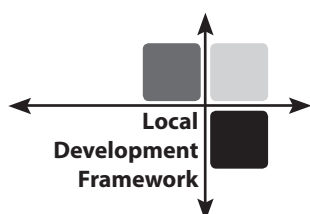
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How to return your completed Equalities Monitoring Form:

Please seal your completed form in the envelope provided and place it in the dedicated Issues and Options Consultation box at the Civic Centre reception or post it to:

Issues and Options Consultation
Forward Planning Team - Harlow Council
Civic Centre
The Water Gardens
Harlow
CM20 1WG

Please return your completed form to the Council by 5pm on 28 January 2011.



HARLOW-see something **different**

Harlow
Council
Working together for Harlow

How would YOU plan Harlow's future?

Have your say!

Harlow Council is preparing a new plan, the Core Strategy, which will shape how Harlow is developed over the next 15 years.

The Council is now consulting on the first stage of Harlow's Core Strategy and we want to hear your views on the key issues affecting Harlow and options for planning the town's future.

To find out more visit the exhibition in the Civic Centre reception or come to one of the exhibitions below.



Housing



Placeshaping



Lifestyles



Infrastructure



Prosperity

Harlow Town Railway Station Tuesday, 23 November 2010 7am - 10am and 4.30pm - 7pm	The Latton Bush Centre Wednesday, 24 November 2010 6pm - 9pm	Summers 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 - Friday 31 December 2010 Static exhibition display during normal library opening times	
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

Consultation ends 5pm on 28 January 2011



www.harlow.gov.uk/issuesandoptions

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Harlow commuters have their say on future of the town

Commuters at Harlow Town station have been given the chance to say how they would improve the town as a more viable place to work as well as live.

Nearly 15,000 people commute out the town according to Harlow Council, which has begun a 10-week consultation on the future development of the town.

"We don't want to be a dormitory town," the Conservative council leader Andrew Johnson told BBC Essex.

"We want people to take part in the whole life of the town."

People waiting for their trains on Tuesday, 23 November were given an eight-page leaflet about the future development of the town.

As part of the authority's 'Issues and Options' strategy, the people of Harlow are being asked how they think the town's housing, employment and infrastructure could be improved over the next 15 years.

In particular, it is keen to discover what type of jobs people travelling to London and Cambridge do.

"About 2000 people leave each day to work elsewhere," said Cllr Johnson.

"So we're particularly interested to hear what they think could be done to improve the town in terms of employment, in terms of infrastructure and housing growth.

The council is also looking to make the town more attractive to businesses from outside the area.

"We want to know where they would put those employment areas and where they would put the additional infrastructure to support those employment areas," he said.

"There's the possibility that by being close to London we could provide a better environment for companies who don't want to be in the hustle and bustle," he said.

"We are an attractive place, we're close to the M11, in between London and Stansted Airport so have very good transport links.

"We want to know where they would put those employment areas and where they would put the additional infrastructure to support them."

More information on the consultation can be found on the [Harlow Council website](#).



A number of consultation road shows will be held between now until January

“ By being close to London we could provide a better environment for companies who don't want to be in the hustle and bustle ”

Cllr Andrew Johnson, leader of Harlow Council

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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 www.harlow.gov.uk/issuesandoptions.

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 'open-ended' 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.



Additional Commentary Box

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.

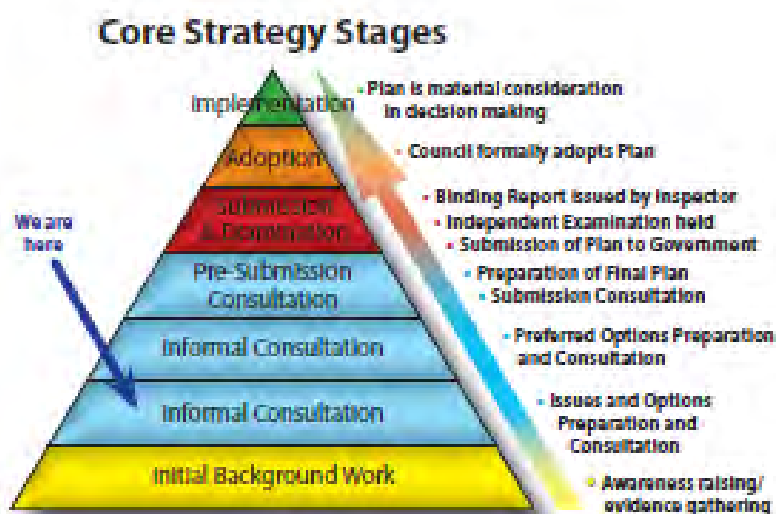
1.0 Core Strategy Issues and Options Consultation Document

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 www.harlow.gov.uk/ldf

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 www.harlow.gov.uk/ldf (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 www.harlow.gov.uk/ldf (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 <http://harlow.jdi-consult.net/ldf/> 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: http://www.harlow.gov.uk/about_the_council/council_services/environment/planning/forward_planning/local_development_framework/core_strategy/issues_and_options/ldf_media_coverage.aspx
- 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

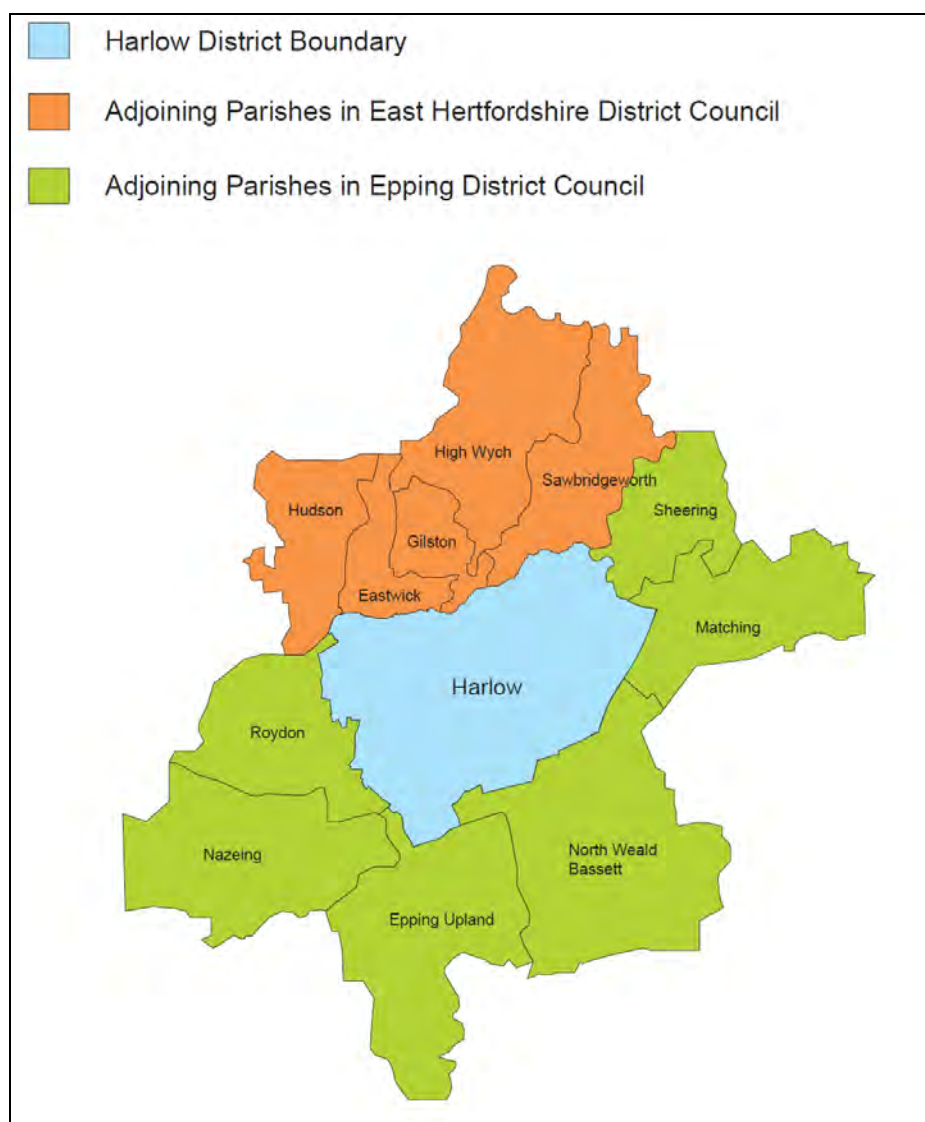
Table 1 presents a breakdown of the private individuals included within each group:

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

*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).

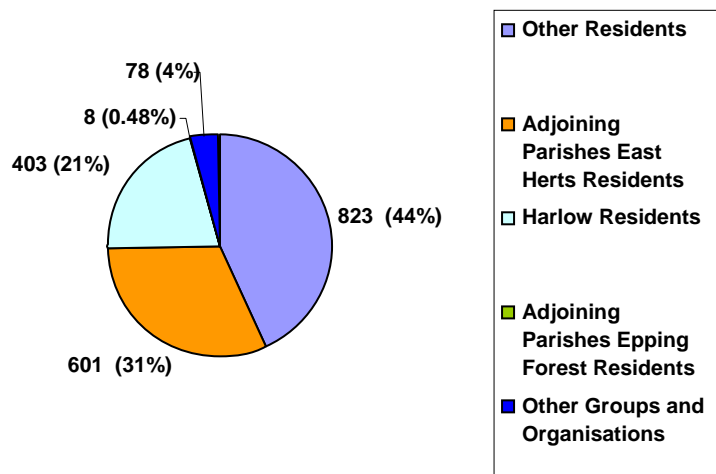
Map 1: Harlow District Boundary in relation to its neighbouring parishes in East Hertfordshire and Epping Forest Districts



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 1 on 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

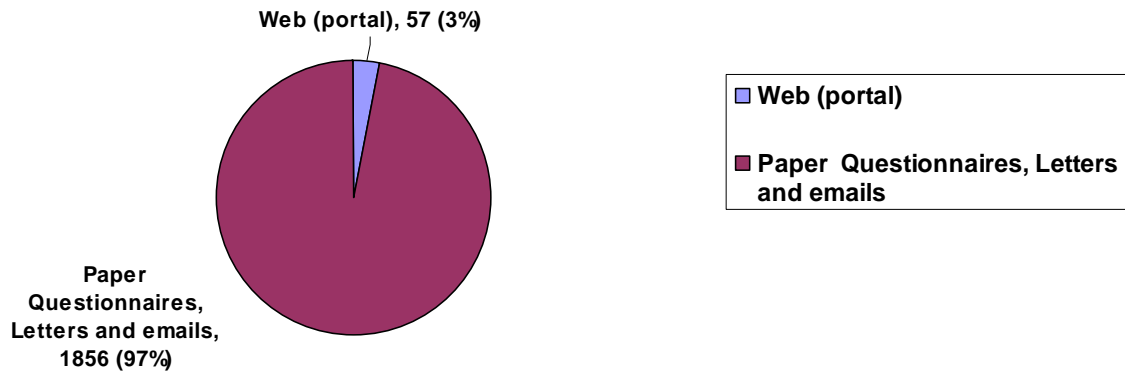
The Issues and Options consultation coincided with developers undertaking a consultation in connection with a planning application on land to the north of Gilden Way. 127 identical responses were received from private individuals who may have seen the consultation as an opportunity to make comments on 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.

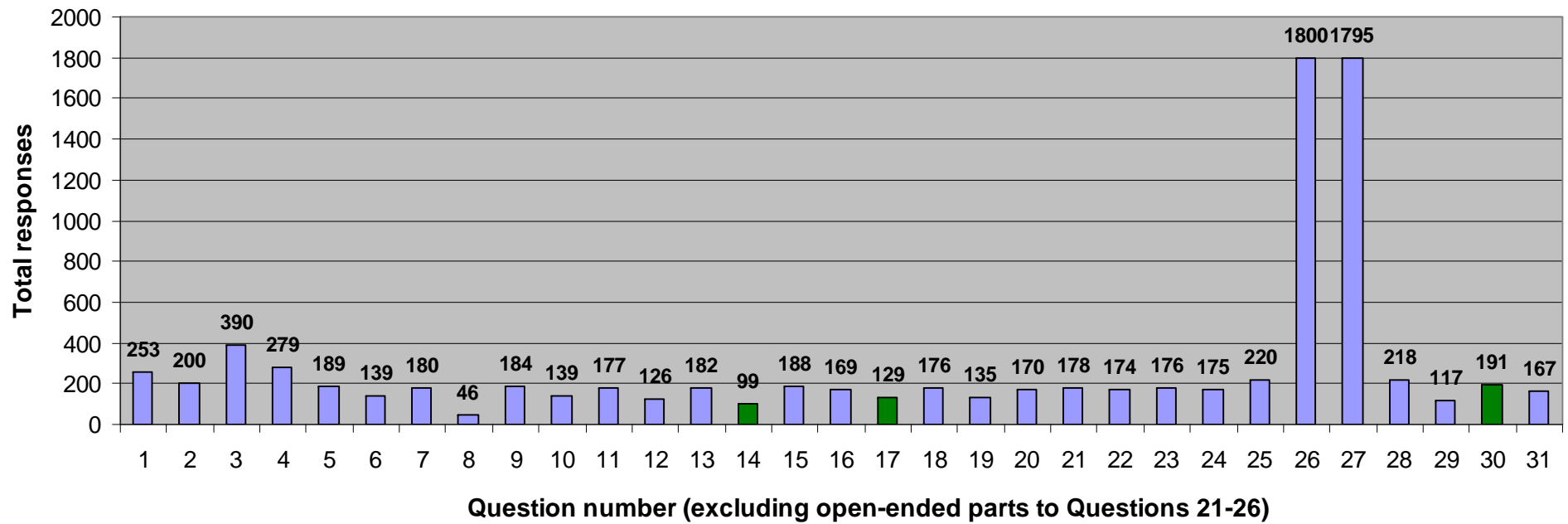
A more detailed statistical analysis of the responses to the closed questions has also been undertaken whereby the overall results have been refined into four sub-groups (as set out in Table 2) to enable a more detailed breakdown of the nature of the respondents. This more detailed analysis, along with 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 style="list-style-type: none"> • Harlow Residents • Resident/Community Groups
Sub-Group 2 – Statutory Consultees + Local Groups and Organisations	<ul style="list-style-type: none"> • Local Authorities, Parish Councils and County Councils • Government Agencies and Departments • Infrastructure and Utility Providers • Faith Groups • Local Groups and Organisations • Partner Agencies • Disability Groups • Environmental Groups • Ethnic Minority Groups • Other groups
Sub-Group 3 – Adjoining Parishes Residents + Other residents	<ul style="list-style-type: none"> • Adjoining Parishes (East Herts) Residents • Adjoining Parishes (Epping Forest) Residents • Other Residents
Sub-Group 4 – Local Developers and Agents	<ul style="list-style-type: none"> • Local Developers • Planning Consultancies/Agents

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

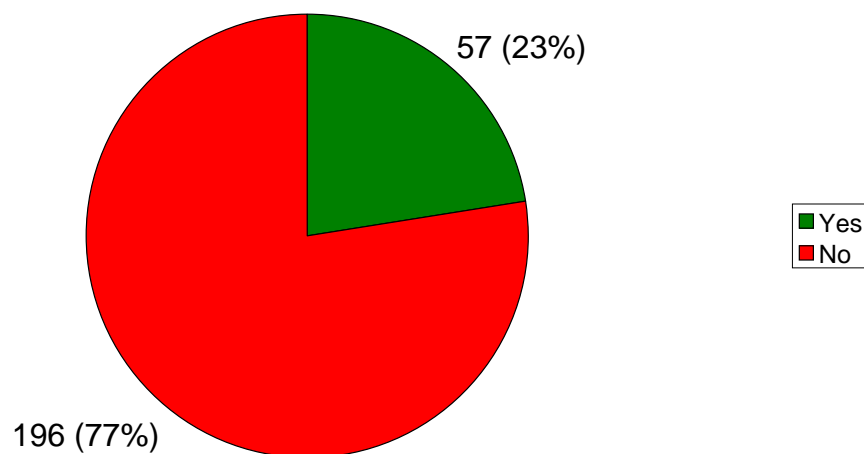


Questions 26 and 27 were responded to by STOP Harlow North Campaign.
Items in **green** denote rank order questions for which only approximate response numbers are given.

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 <http://harlow.jdi-consult.net/ldf/> 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:

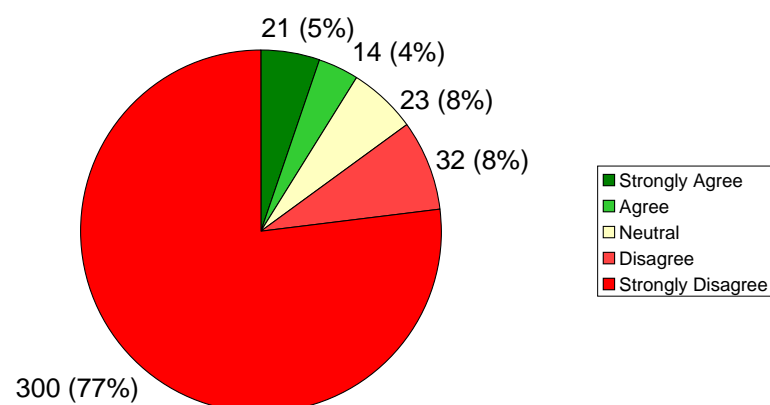
- Climate change mitigation and adaptation
- The development needs of faith groups
- The development needs of Harlow's ageing population

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.

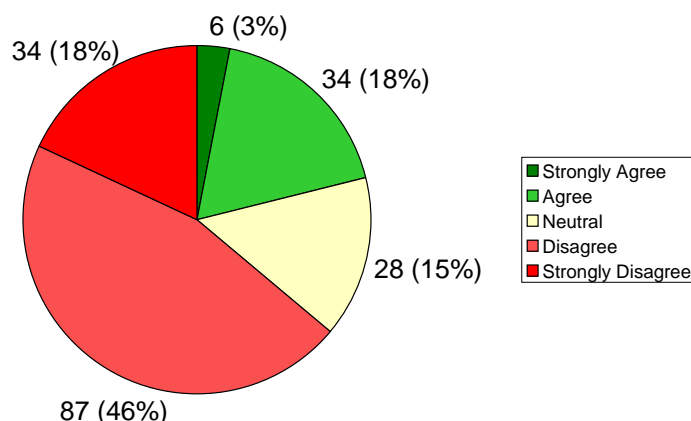
Part of this review will help identify the future housing requirements of the town. In considering the housing needs identified the Council will be also examining the infrastructure benefits that will accrue with different levels of growth. This will take into account the infrastructure provision that 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.

Question 6 – If you disagree/strongly disagree, what do you think the vision for the Core 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.

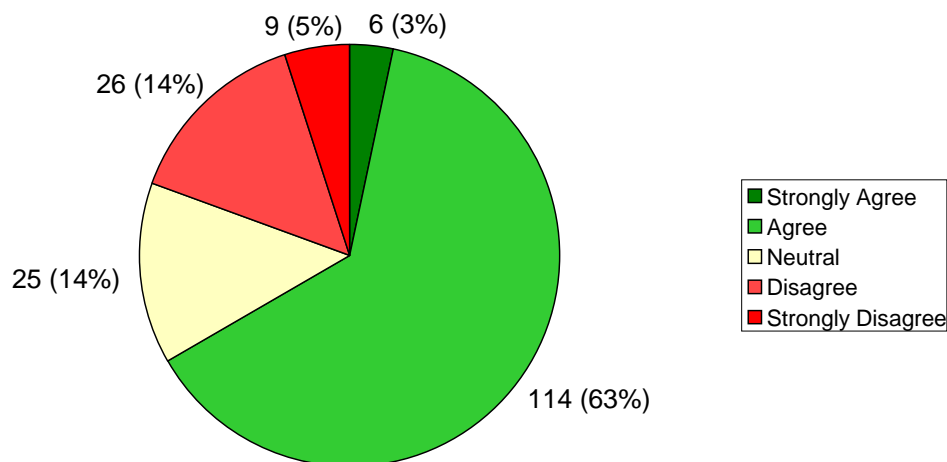
Comments were made that the current vision for Harlow (based on the Community Strategy) is inadequate, that the vision needs to be more ambitious, locally distinctive, and be in no doubt where the town is heading. Comments were also made that the vision should include wider issues that will seek to facilitate 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.

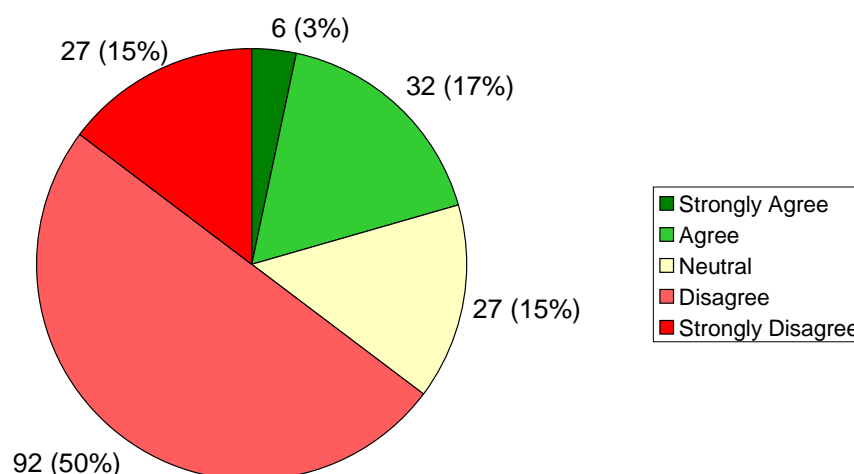
The following matters were also raised: appreciation of the regional purpose of the Green Belt; (the need to contain growth within the bowl of the Stort Valley, protecting the southern ridge line; more prominent and positive support for sustainable construction, carbon reduction and the use of renewable 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.

Question 9 – Do the strategic objectives provide the necessary framework to deliver the regeneration of Harlow?



**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 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.

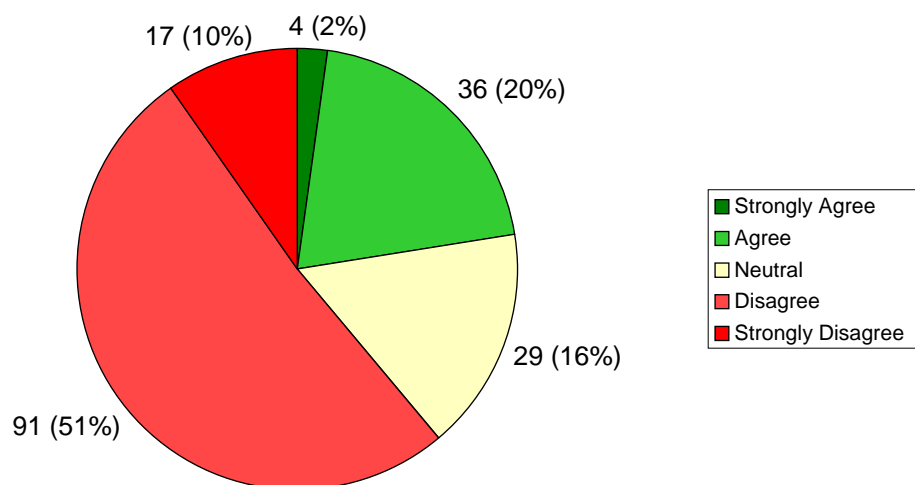
It was commented that joint or co-operative working should be a theme of the Core Strategy, with related objectives, given the regeneration agenda. Others questioned whether there is adequate evidence underpinning the objectives particularly where growth affects adjoining districts. A more detailed summary 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).



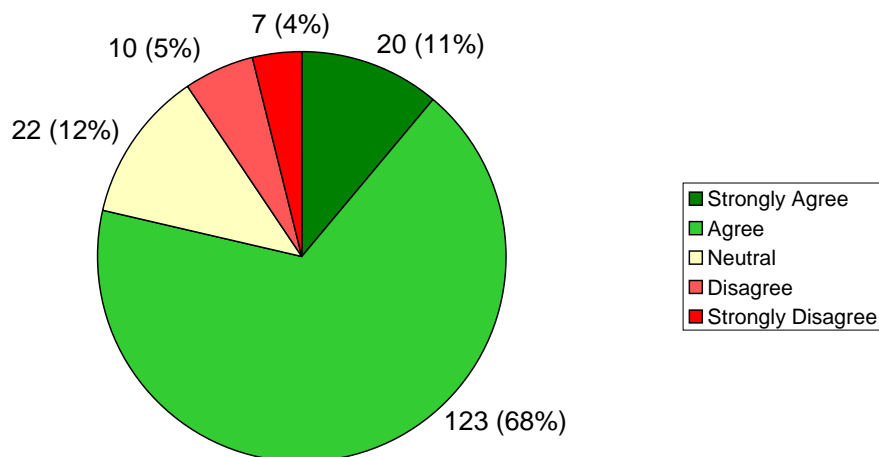
There was general support for the existing policy areas although the majority considered the range of issues that are relevant to regeneration had not been identified. However only policies for dealing with climate change and the urban fringe were identified as missing. Other respondents suggested that 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)

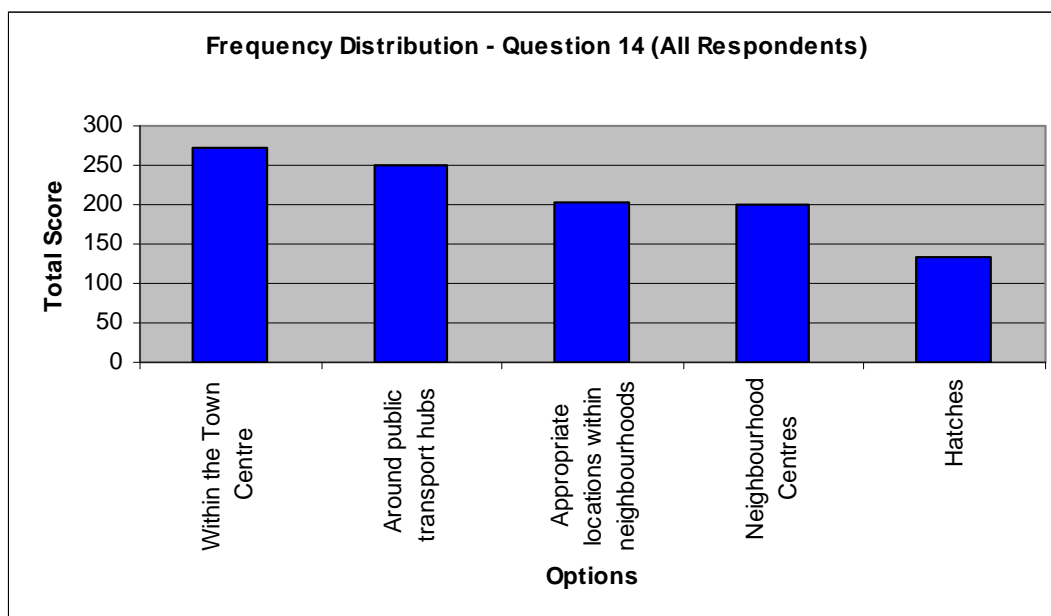
Overall, there was strong support (79% of respondents) for the adoption of regeneration as the guiding principle for directing development across the District. Appendix 1 (page 71) provides a more detailed statistical analysis of the responses to Question 13.



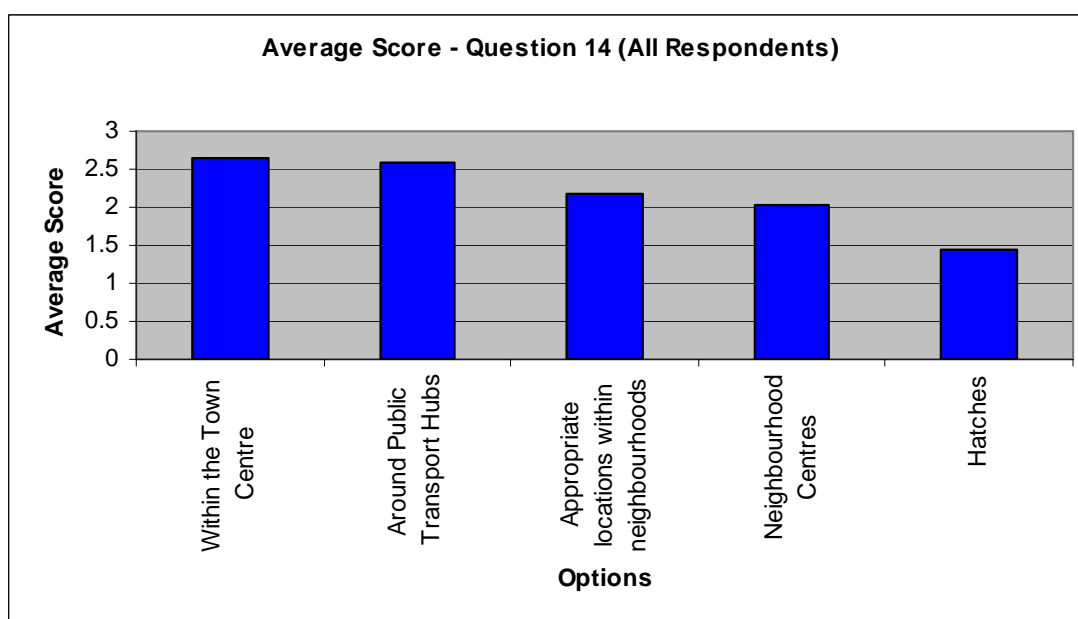
Although there is support for directing new development and housing growth towards areas that will maximise the overall regeneration benefits to the District, it was not considered a high priority when directing growth in and around Harlow in Question 17.

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).

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.

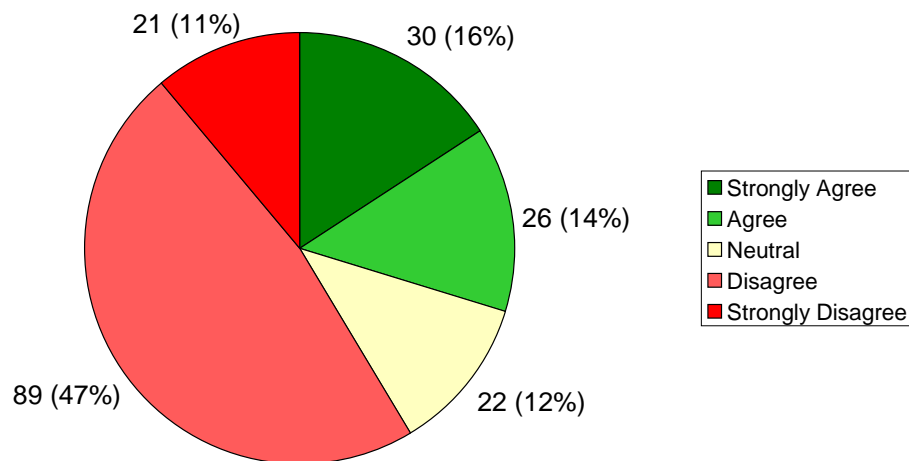


The second chart shows the 'average score' for each option. This was calculated to remove any bias that may have been caused as a result of any single option receiving a disproportionately large number of responses (i.e. some respondents may have only scored one option rather than all five).



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).

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



**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.

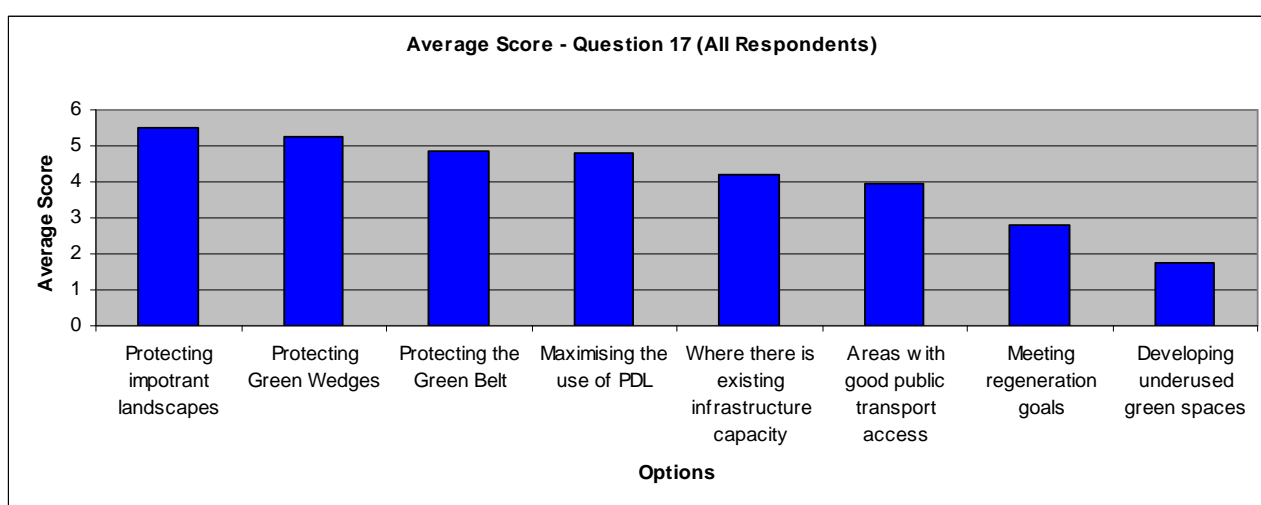
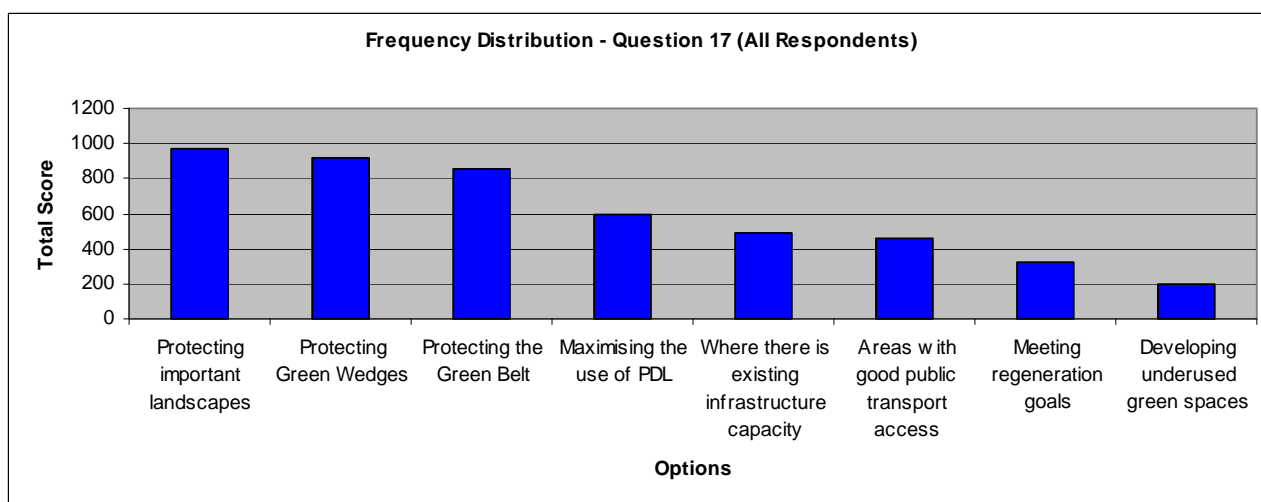
A number of respondents gave more qualified support for a review of Green Wedges. Four considered they should be reviewed where new Green Wedges are required to serve new urban extensions, and three supported a review in order to build things that would benefit neighbourhoods such as schools, leisure 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.

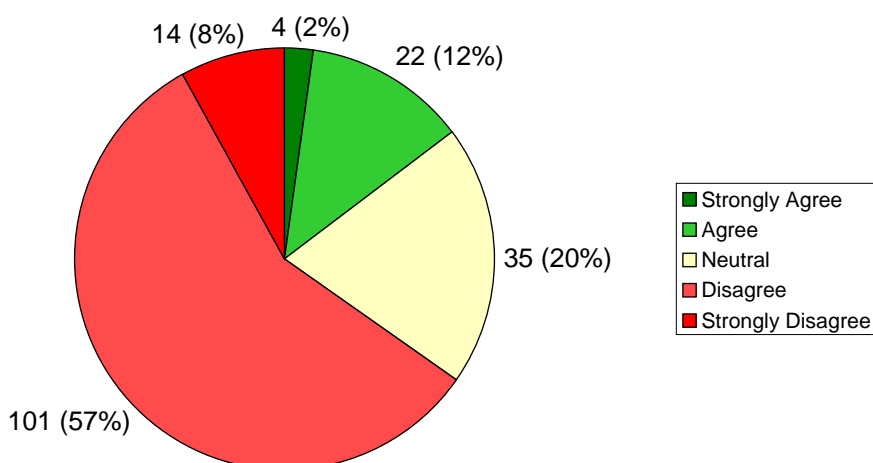


Both charts reveal that respondents value Harlow's natural landscapes, Green Belt land and Green Wedges and want to protect these from development. 'Previously Developed Land' (PDL) and areas with existing infrastructure and good public transport links were ranked by respondents as their third, fourth 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.

Question 18 – Do the existing employment areas meet current and future employment needs?



**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.

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

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

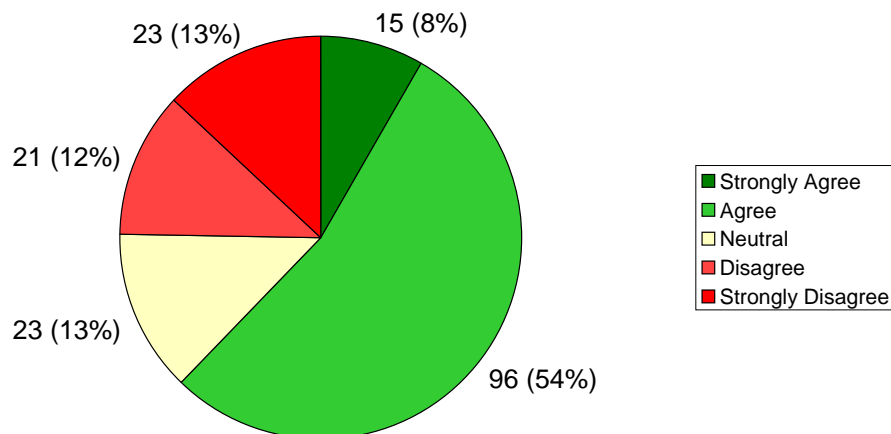
Chapter 6 focussed on the issue of growth around Harlow. Policy HA1 of the East of England Plan designated Harlow as a major regional housing growth point, with 16,000 new houses to be delivered within the 'Harlow area' by 2021. The Plan specifically added that this new housing should be provided in 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

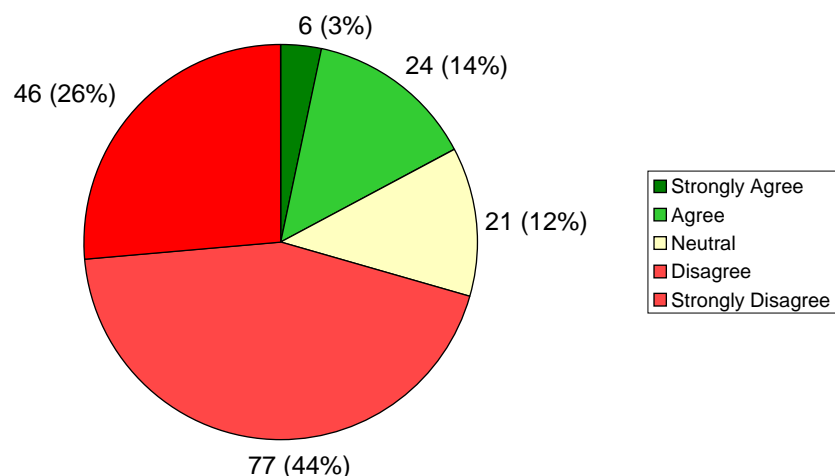
constrained option for growth. For these reasons, the low level of development put forward in this Option in East Harlow was questioned.

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.

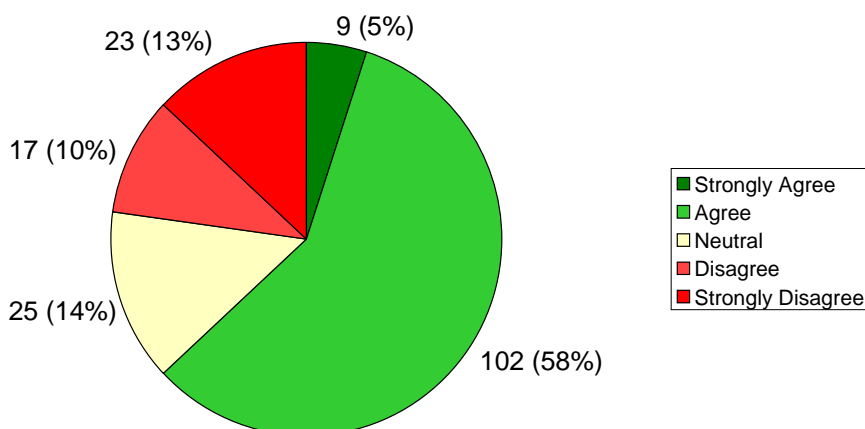
A number of respondents stated that it was unclear how this spread of developments would assist in regenerating deprived neighbourhoods in Harlow. A number of respondents felt that development in the south should be in conjunction with the redevelopment of existing deprived areas.

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 C?

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.

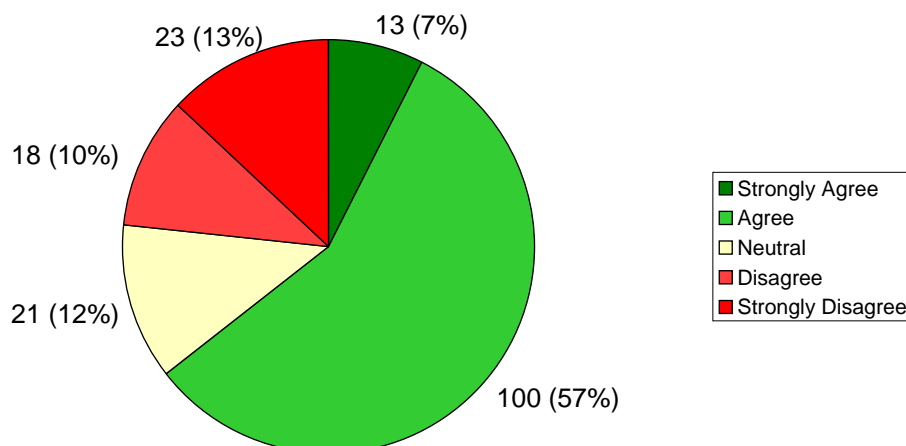
It was pointed out that Water Cycle Strategies and Strategic Flood Risk Assessments should inform the scale and location of development. Concerns were raised about the sewerage infrastructure required to serve new development and the need for upgrades to the Rye Meads Sewerage Treatment Works.

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.

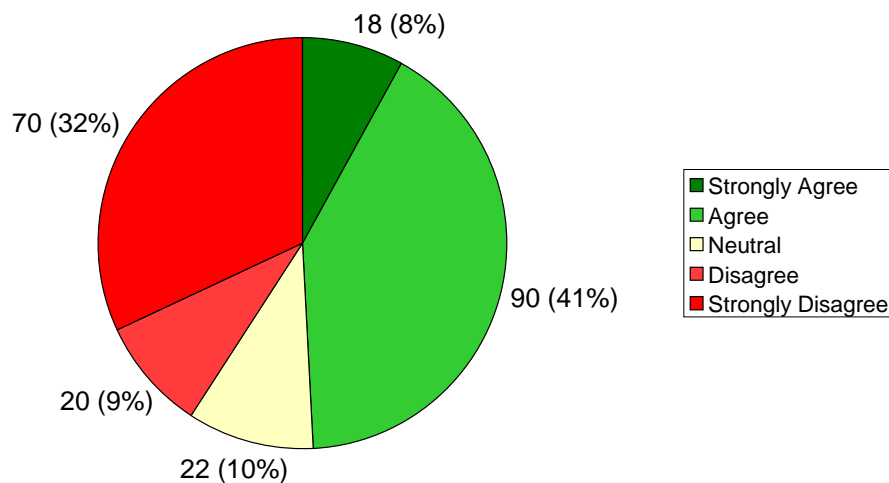
Respondents questioned Scott Wilson's approach to assessing the impact on the regeneration of Harlow. Methodological concerns were raised about the way in which consultants scored different land areas, which was not seen to mirror the reality on the ground in Harlow. Respondents also drew attention to 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).

Question 25 – What is your view on the consultants' recommendations regarding option E?

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.

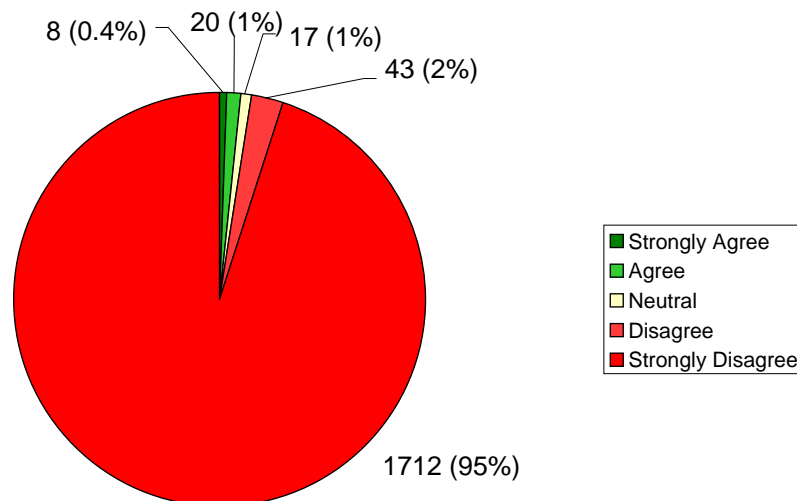
However, concerns were expressed about coalescence with Roydon, Sawbridgeworth and Sheering. Respondents felt that development on land north of Gilden Way would be inappropriate due to the potential impact on sensitive landscapes and archaeological areas, traffic congestion and flooding. However, other 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).

Question 26 – What is your view on the consultants’ suggested approach to accommodating growth around Harlow?

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 were 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 particular 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).

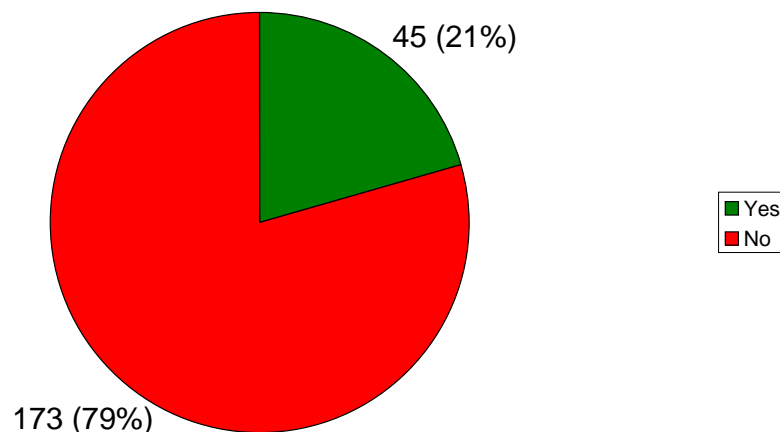


A range of comments were made which will be considered against the background of the changes being made by the Government to the planning system. There was opposition to development north of Harlow but the responses that were received in relation to this question were mostly from residents outside the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

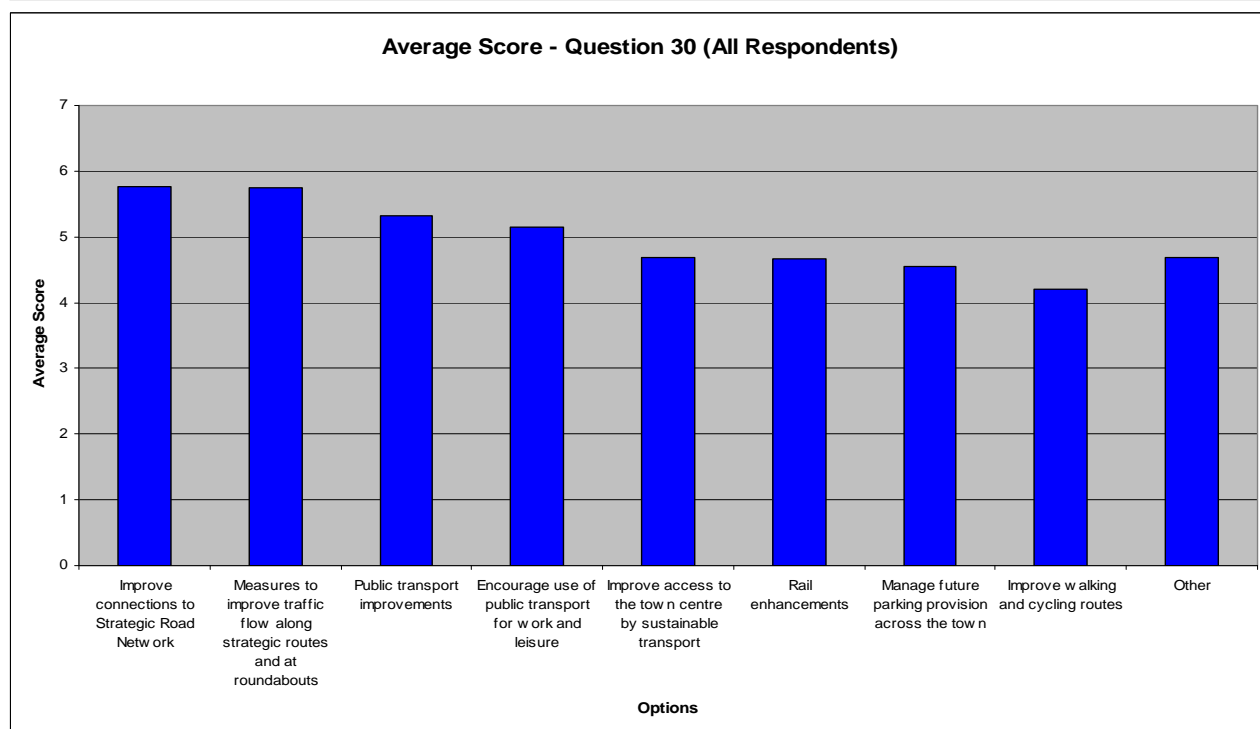
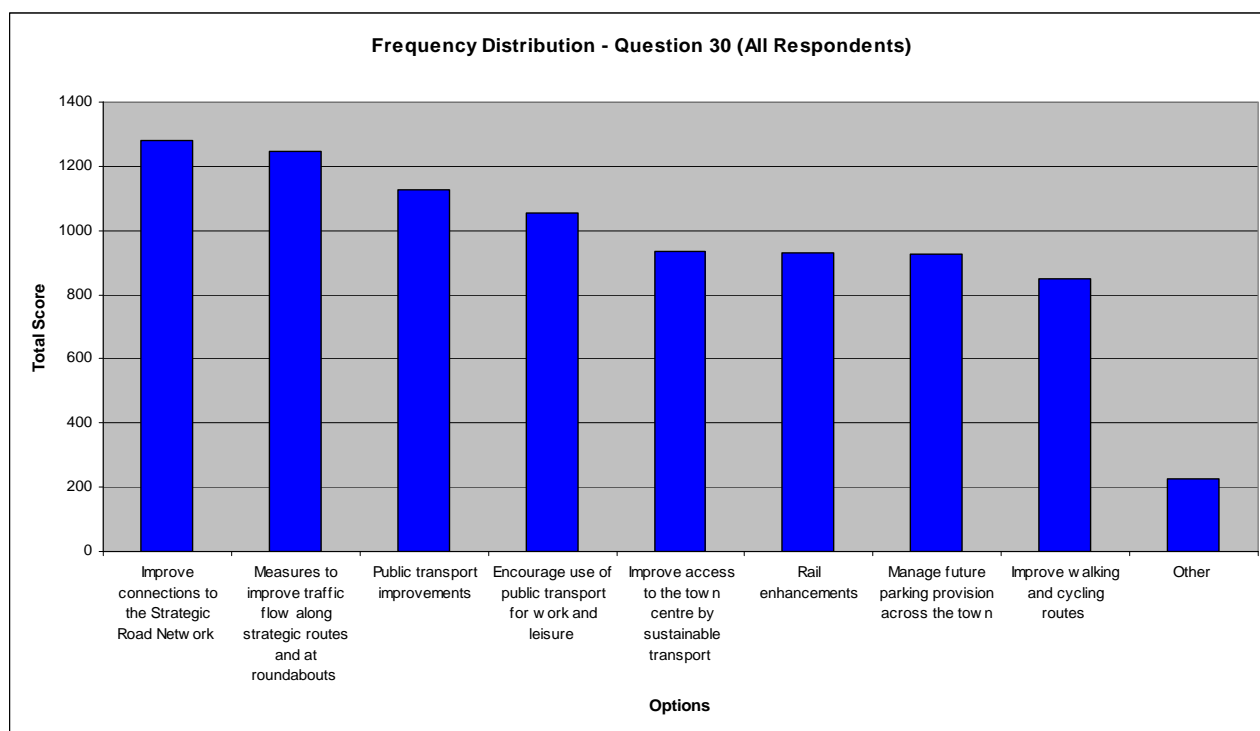
A number of respondents urged the Council to be realistic about car use, stressing the limitations and cost of public transport and people's inclination to drive. Other respondents stressed the effectiveness of Travel Planning. Respondents were concerned that sewerage and drainage infrastructure is overloaded 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.

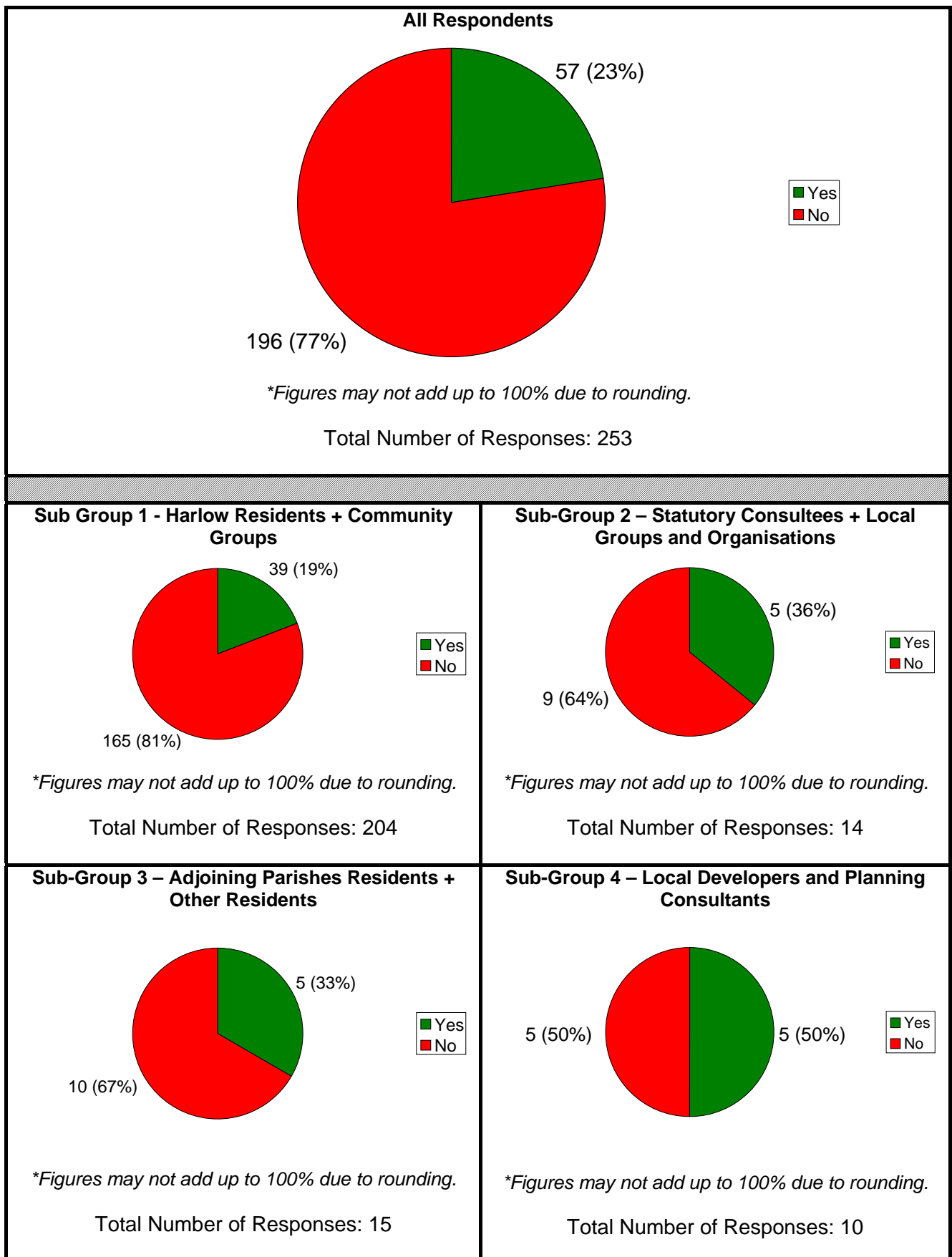
Since the completion of the consultation the Government's Localism Bill was enacted in November 2011. In addition the Government has now published the draft National Planning Policy Framework. This sets out the Government's economic, environmental and social planning policies and articulates its strategy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

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



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 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 Katherine's, 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.

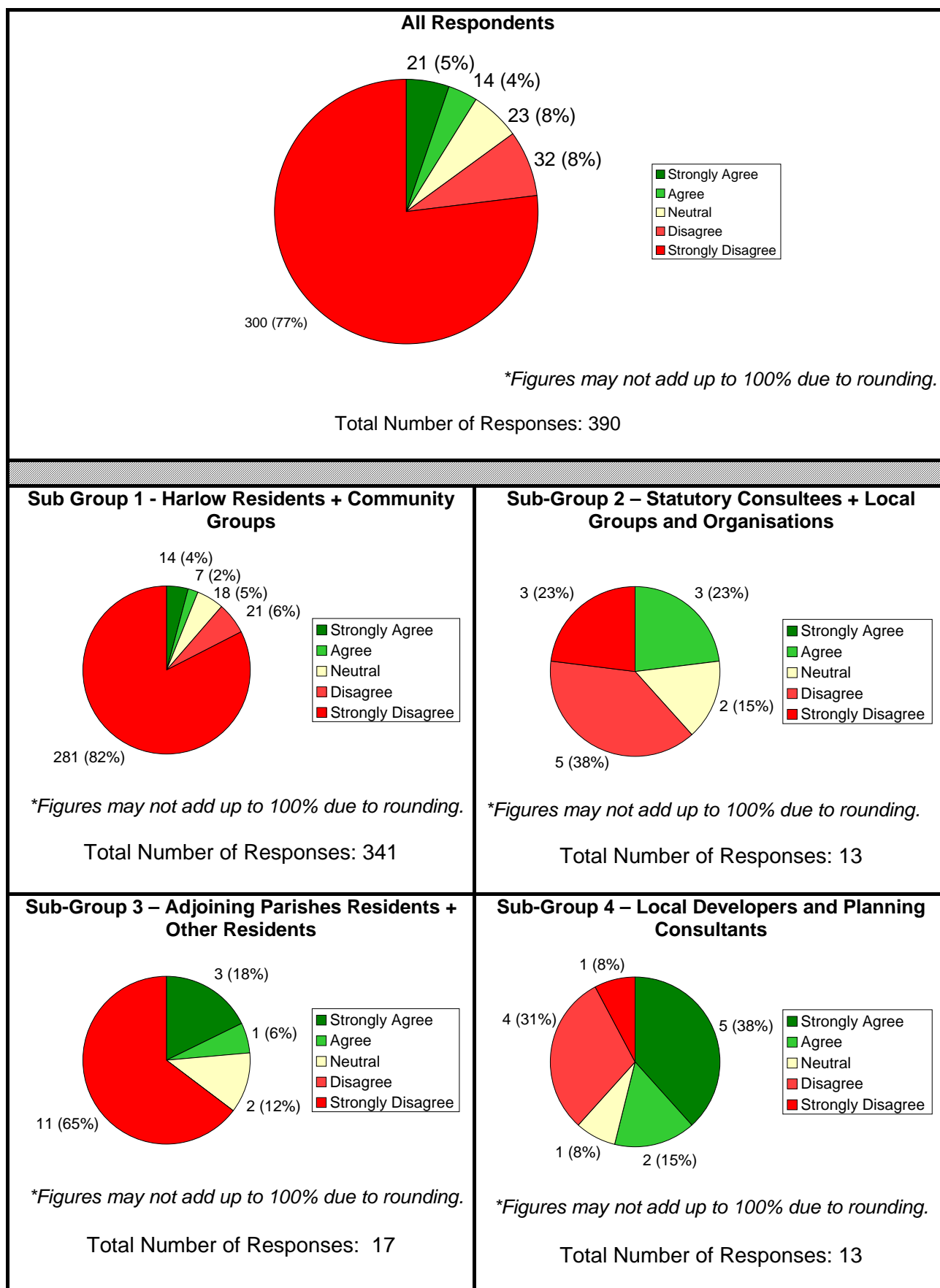
- Extension of the Central Line (Underground) to Harlow is a requirement.
- Traffic congestion is a major problem and access to the M11 from the north side of the town is essential.
- Lack of sufficient infrastructure improvements.
- Rail and road links, congestion, waste supply and sewerage disposal, 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:
 - There is no reference to groundwater protection.
 - There is no reference to contaminated land or implications of redeveloping land affected by contamination.
 - The Water Framework Directive has not been mentioned at all.
 - 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 to 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?



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)

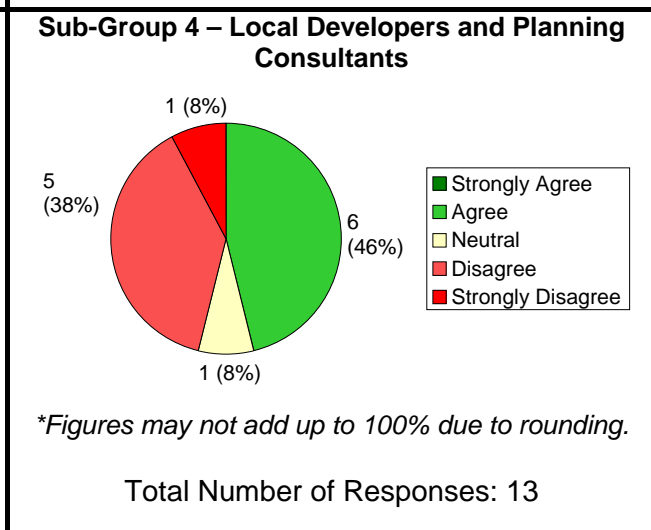
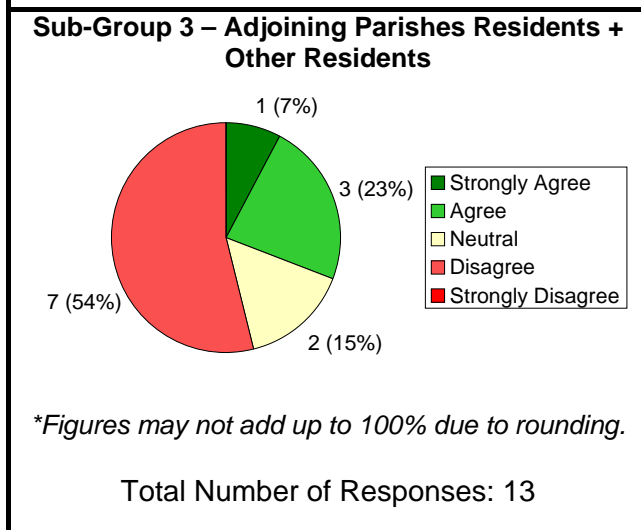
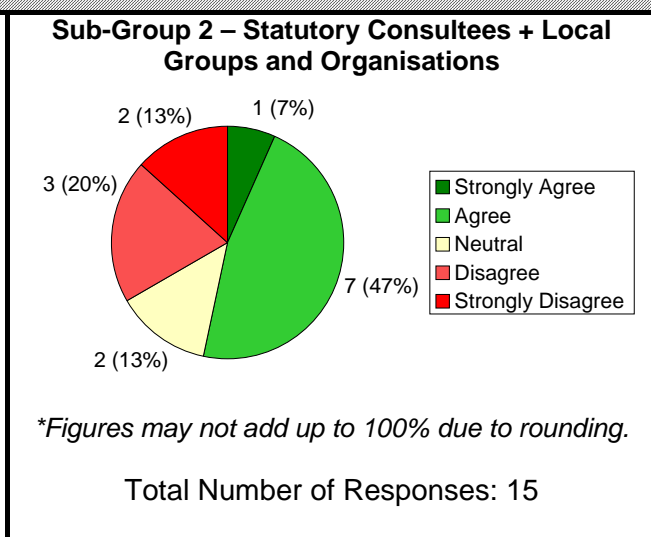
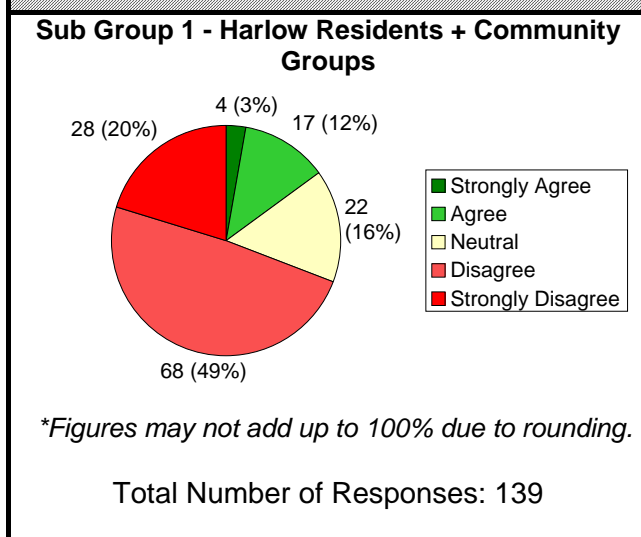
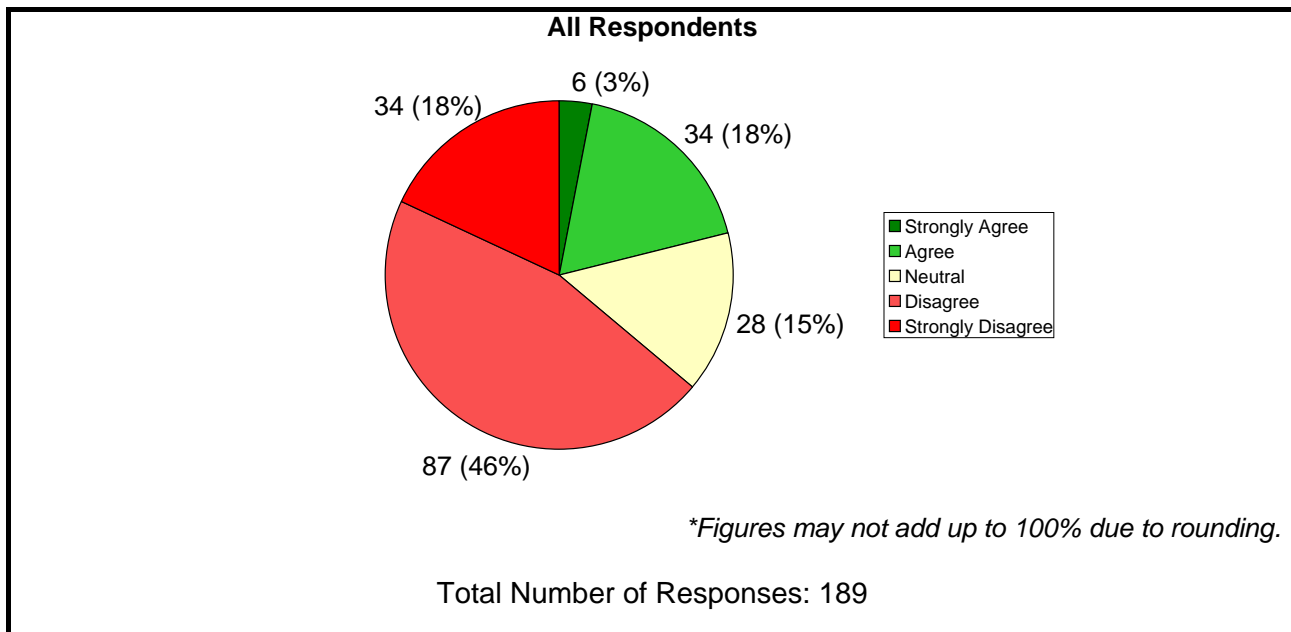
Question 4 - What do you think the scale of growth should be, ensuring that the Core Strategy addresses the particular issues facing Harlow?

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?



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)

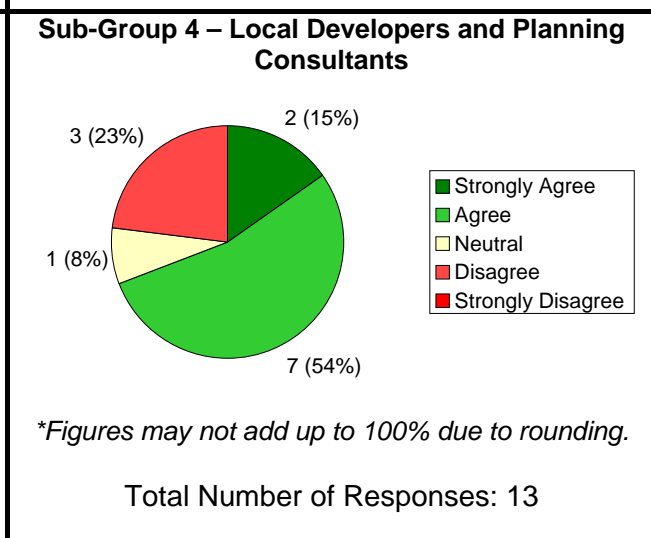
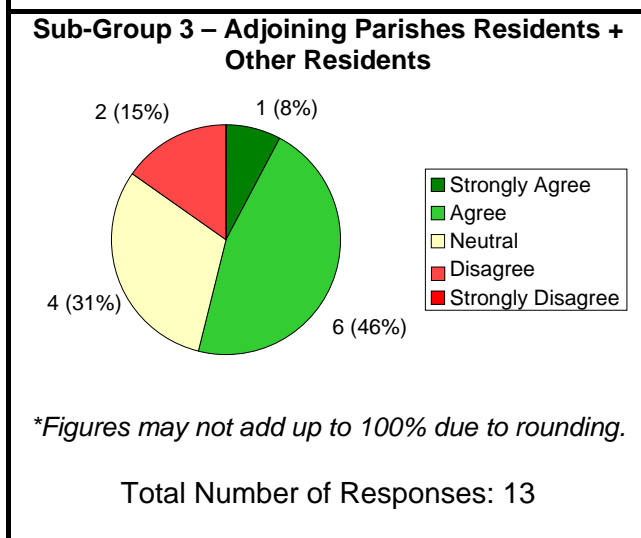
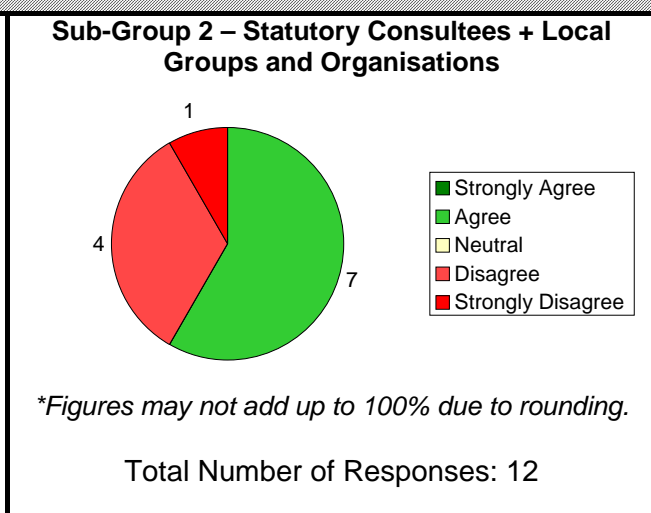
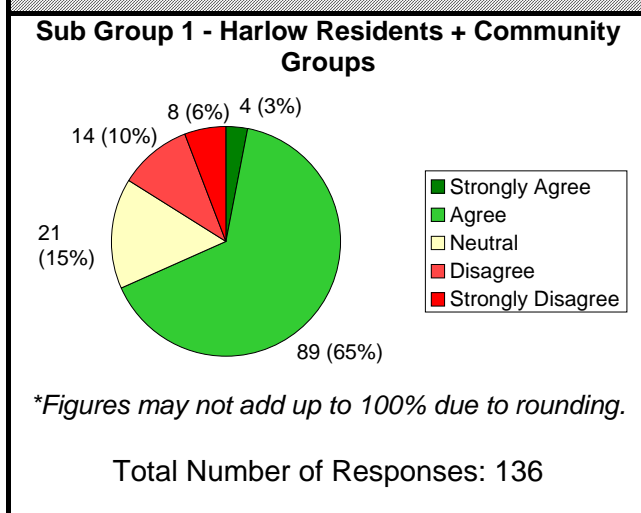
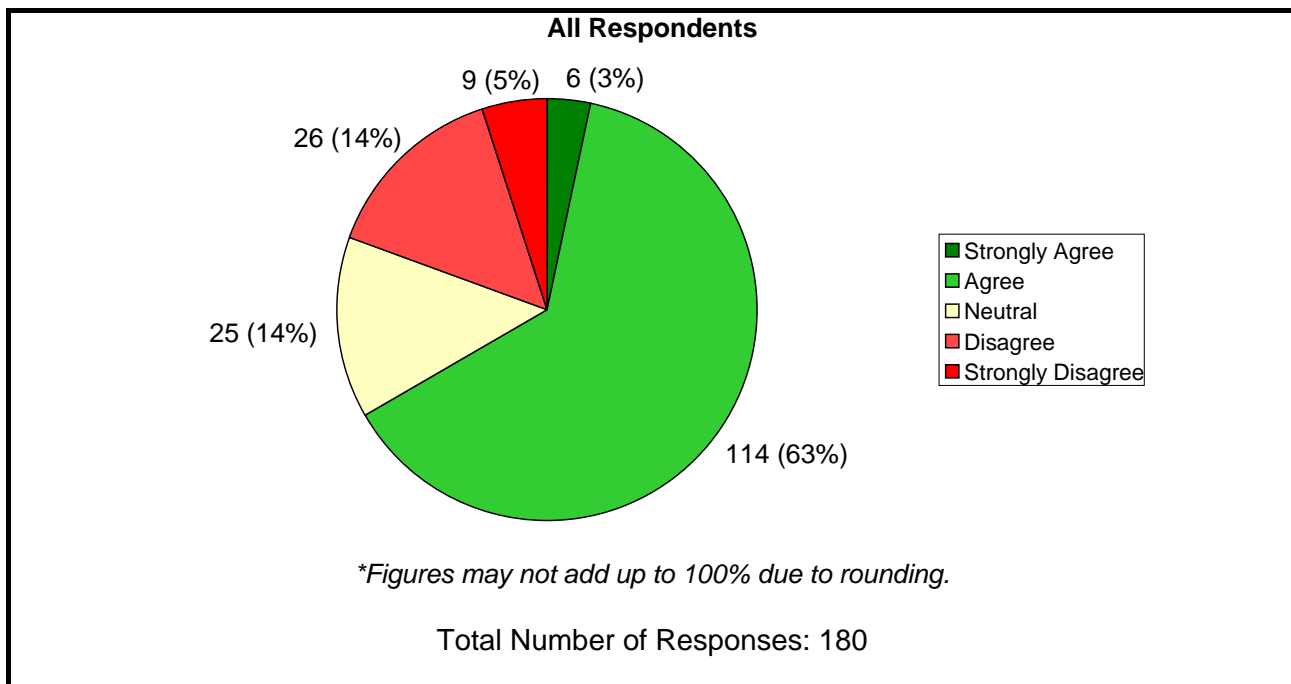
Question 6 If you disagree/strongly disagree, what do you think the vision for the Core Strategy should be based on?

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?



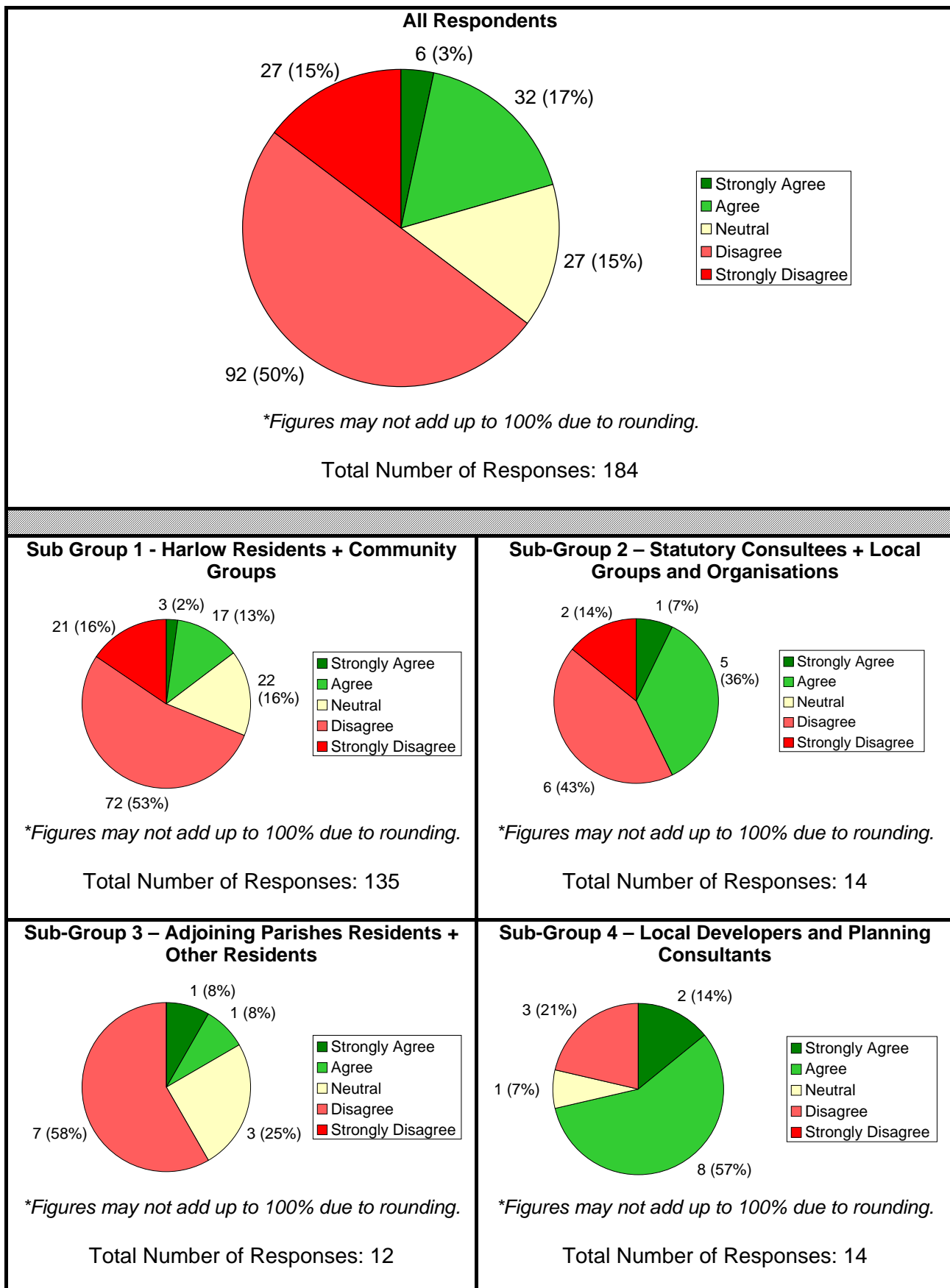
The top chart shows the overall response to this question. The four charts underneath show the responses to this question broken down into the four sub-groups defined in Table 2 (Chapter 2)

Question 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, co-ordination 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)

Question 9 - Do the Strategic Objectives provide the necessary framework to deliver the regeneration of Harlow?



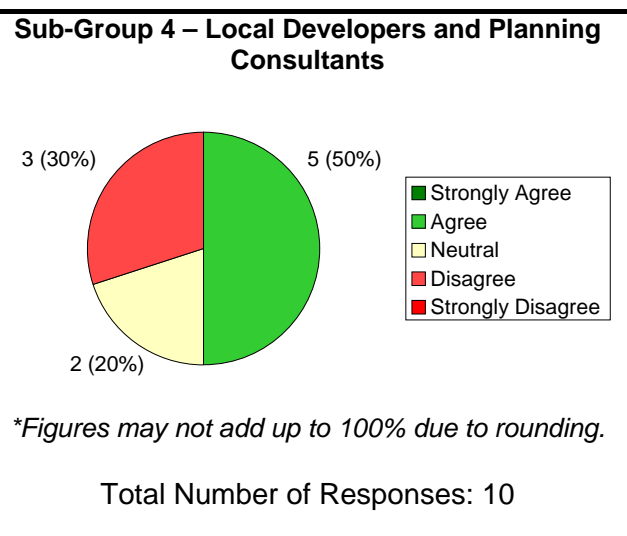
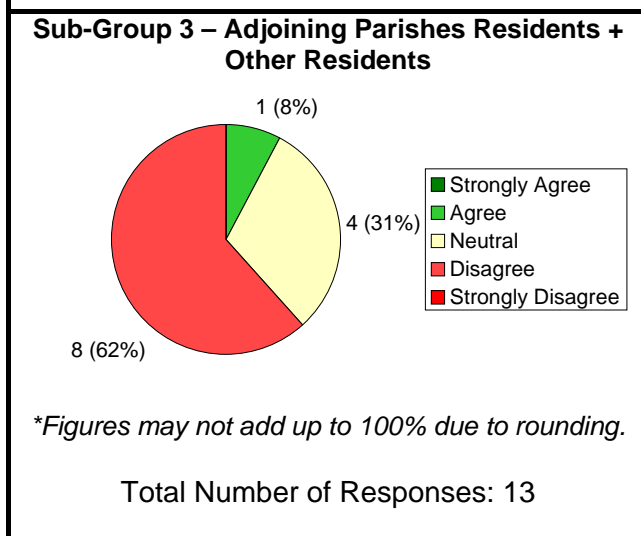
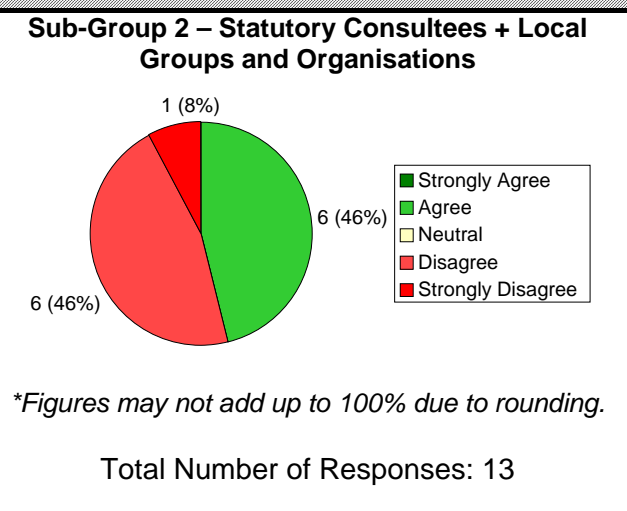
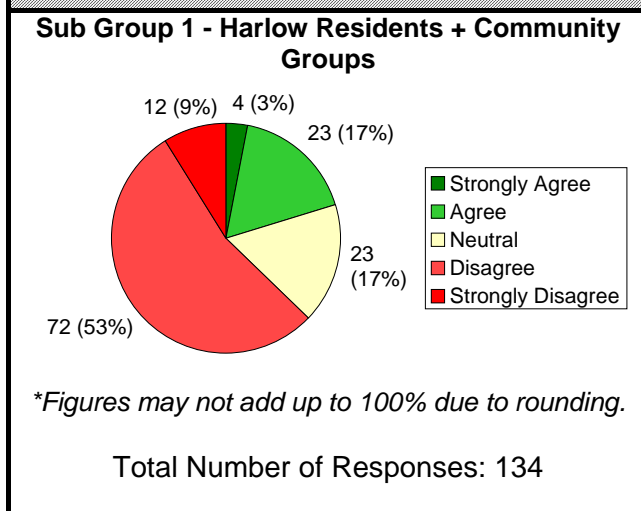
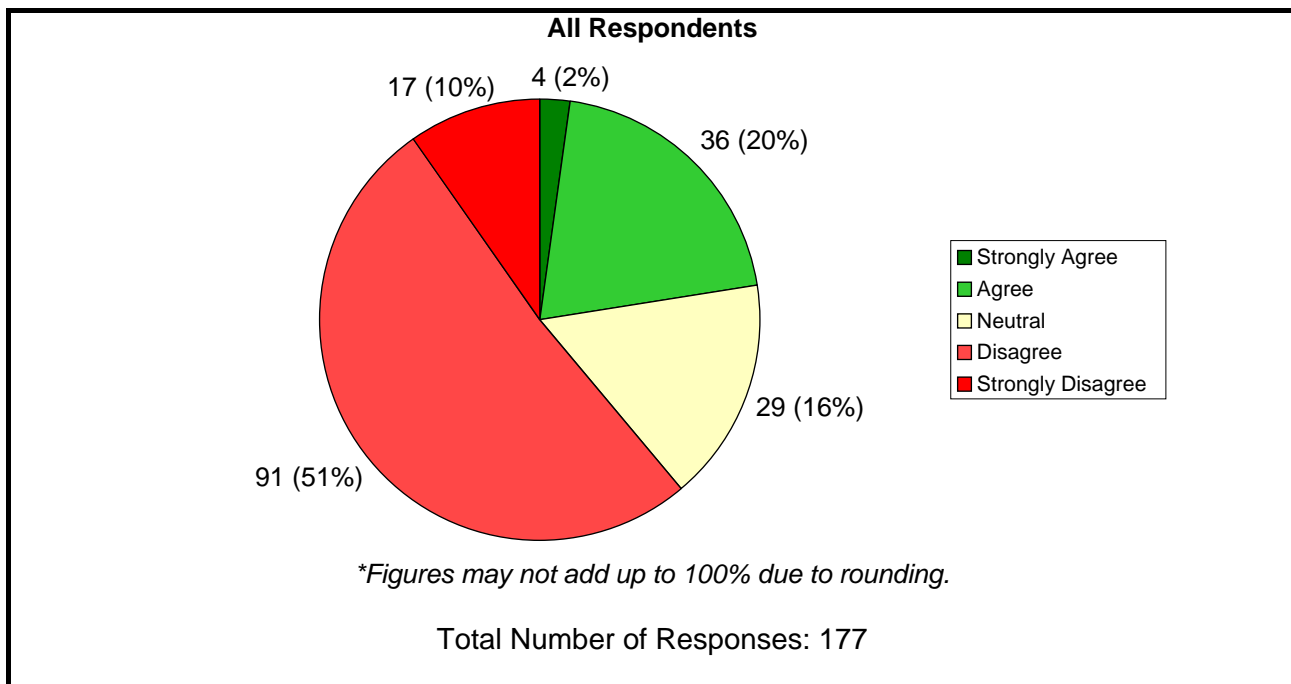
The top chart shows the overall response to this question. The four charts underneath show the responses to this question broken down into the four sub-groups defined in Table 2 (Chapter 2)

Question 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 in 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?



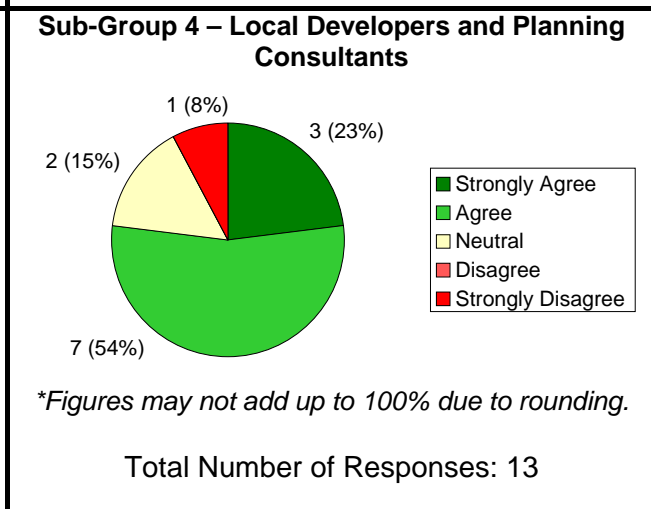
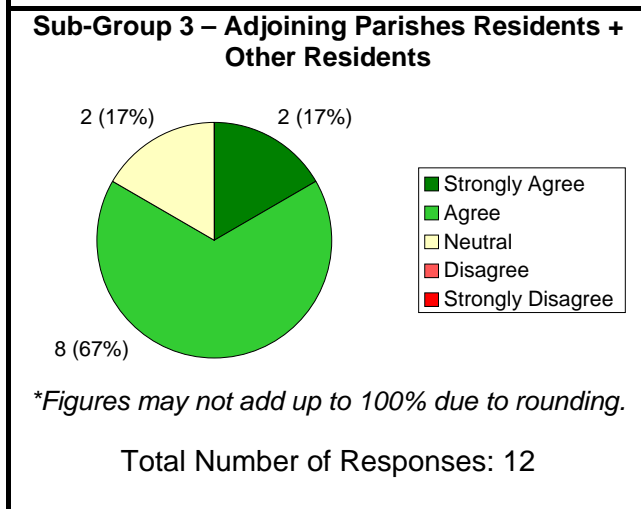
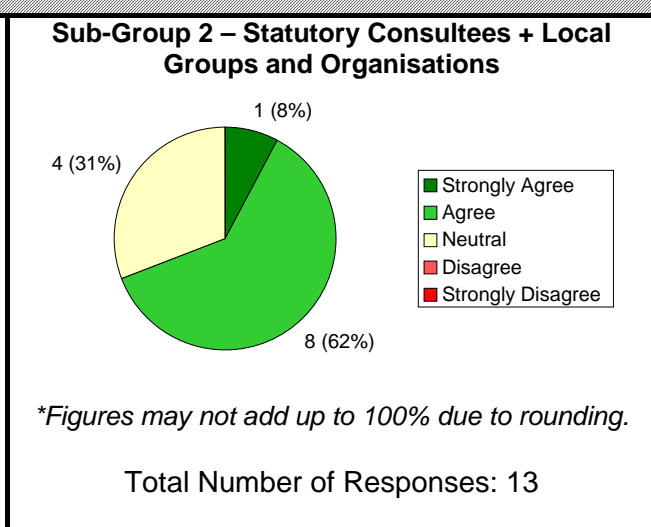
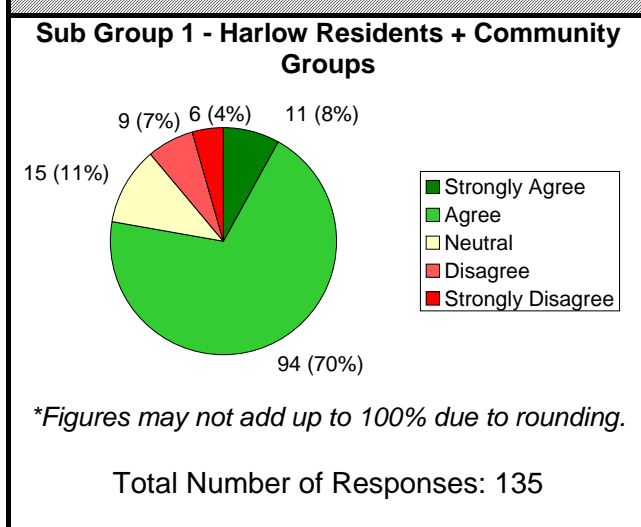
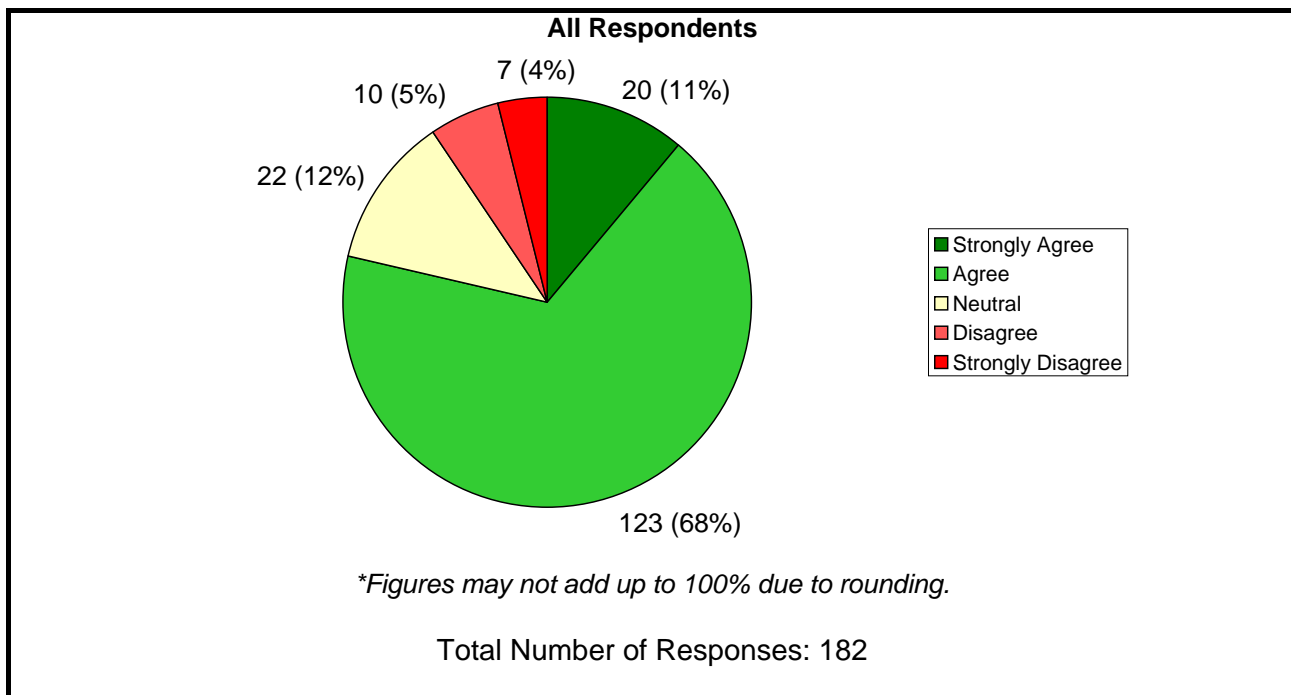
The top chart shows the overall response to this question. The four charts underneath show the responses to this question broken down into the four sub-groups defined in Table 2 (Chapter 2)

Question 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.

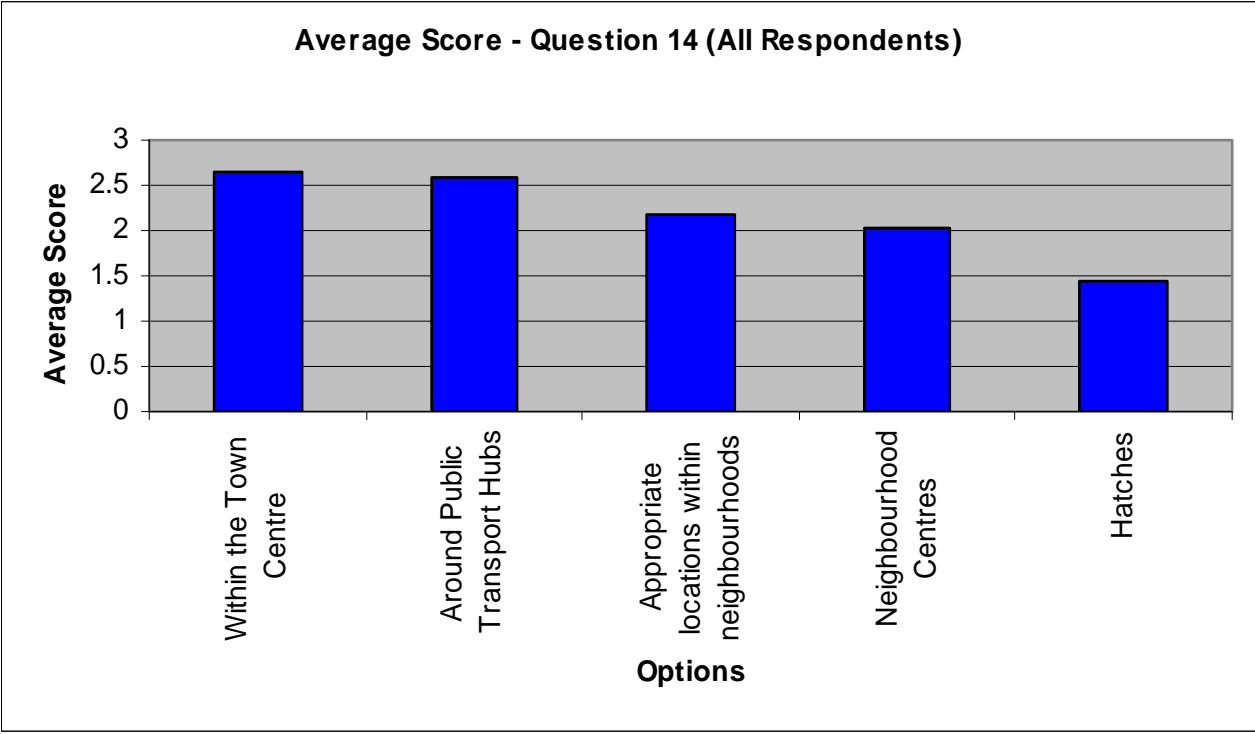
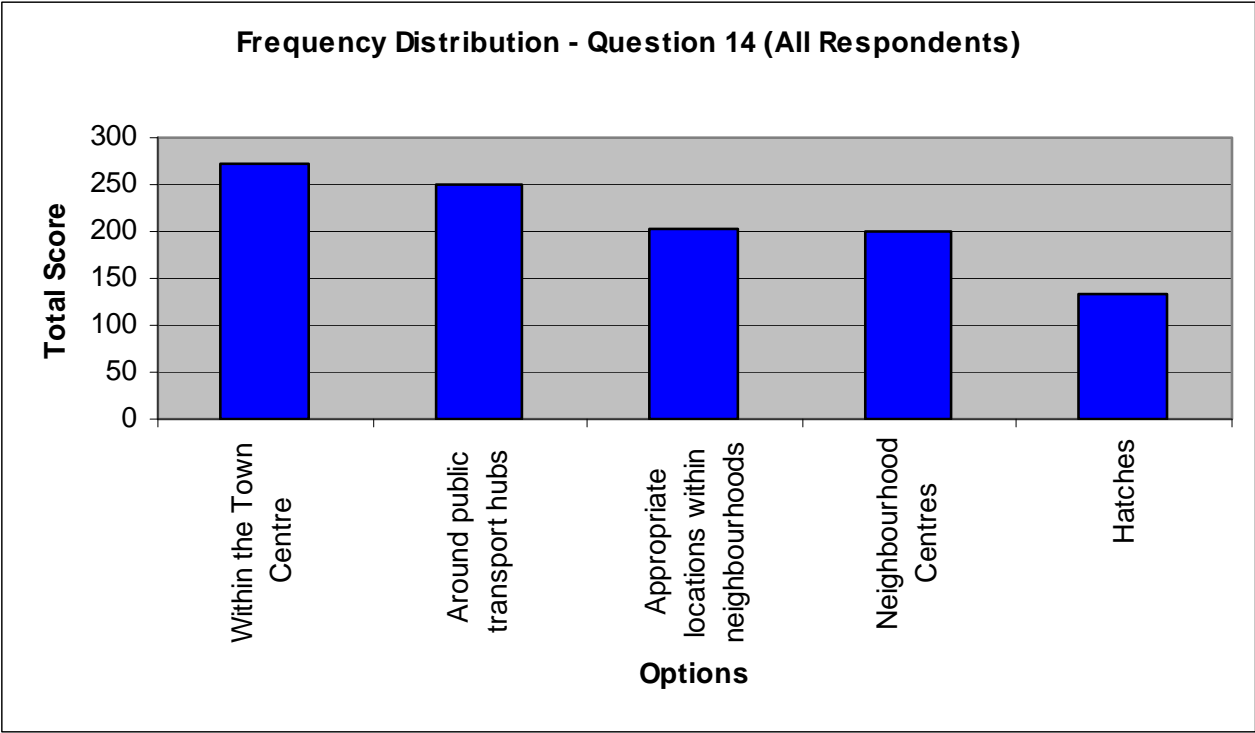
Question 13 - Do you agree that new development should be directed to areas that will maximise regeneration of the town?



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)

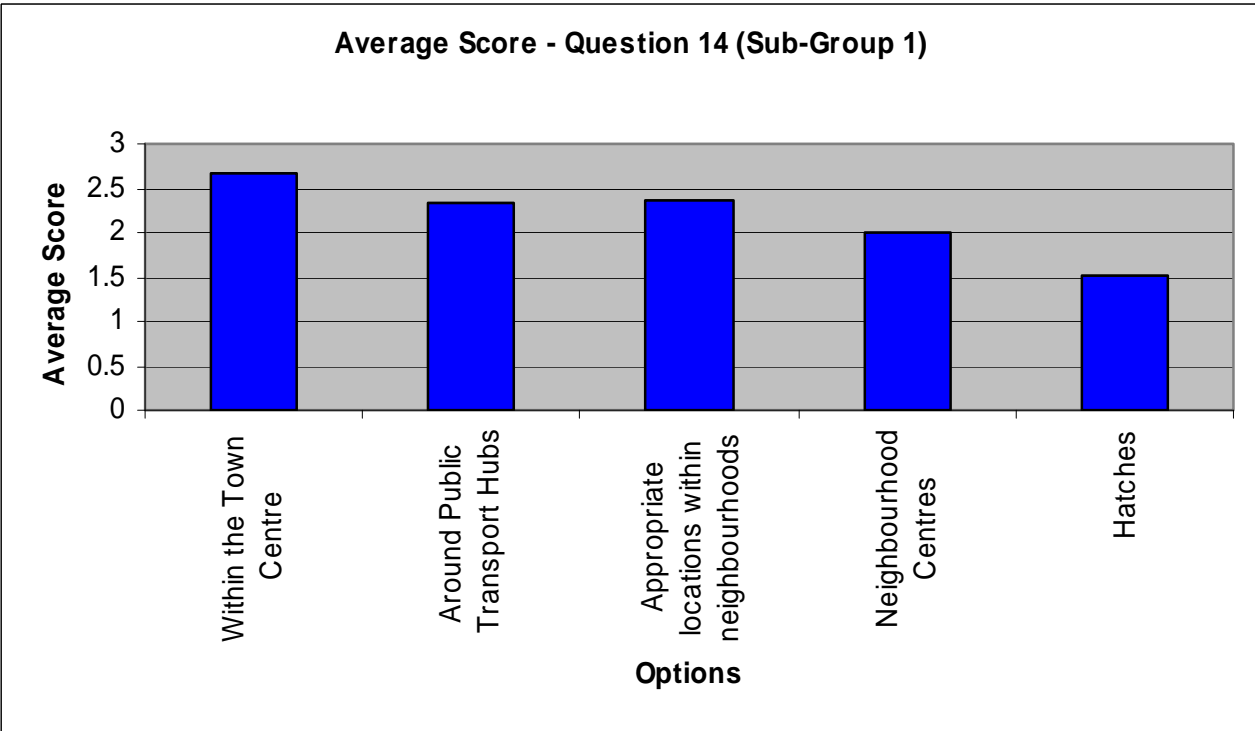
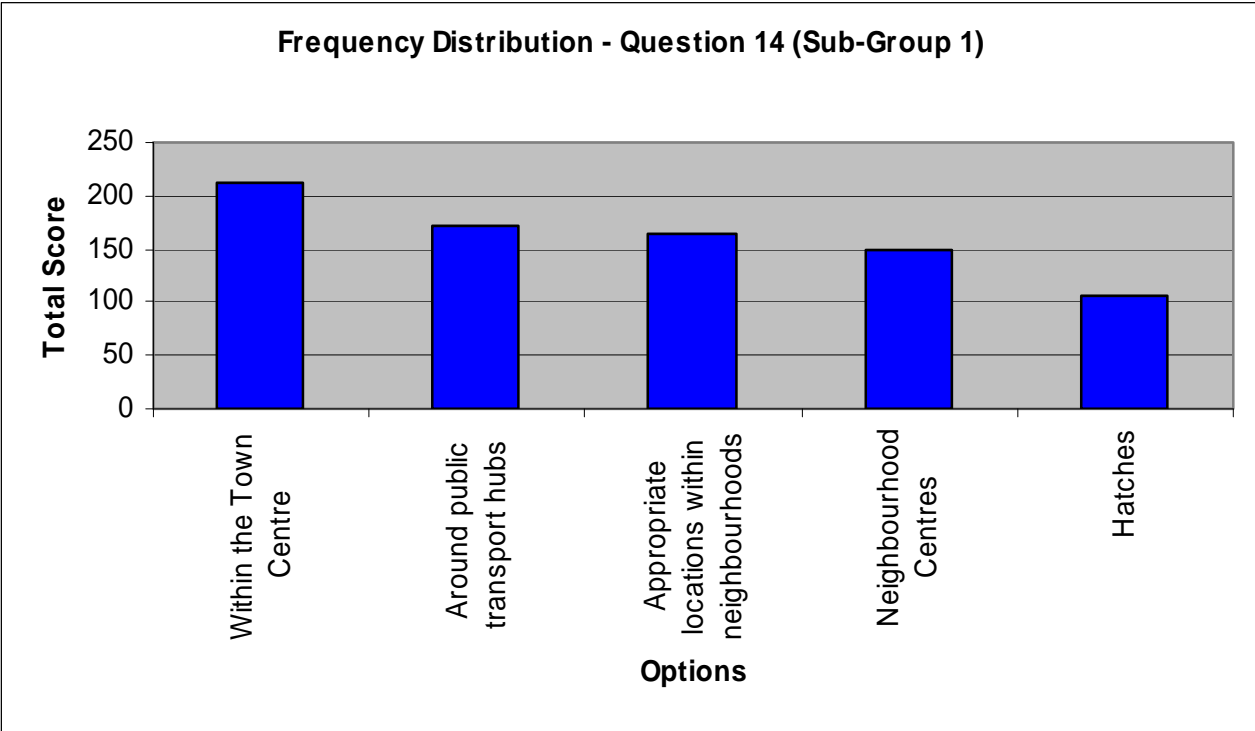
Question 14 - Please rank, in order of priority, where you think higher densities of development should go within the District (1 = highest priority, 5 = lowest priority)

All Respondents



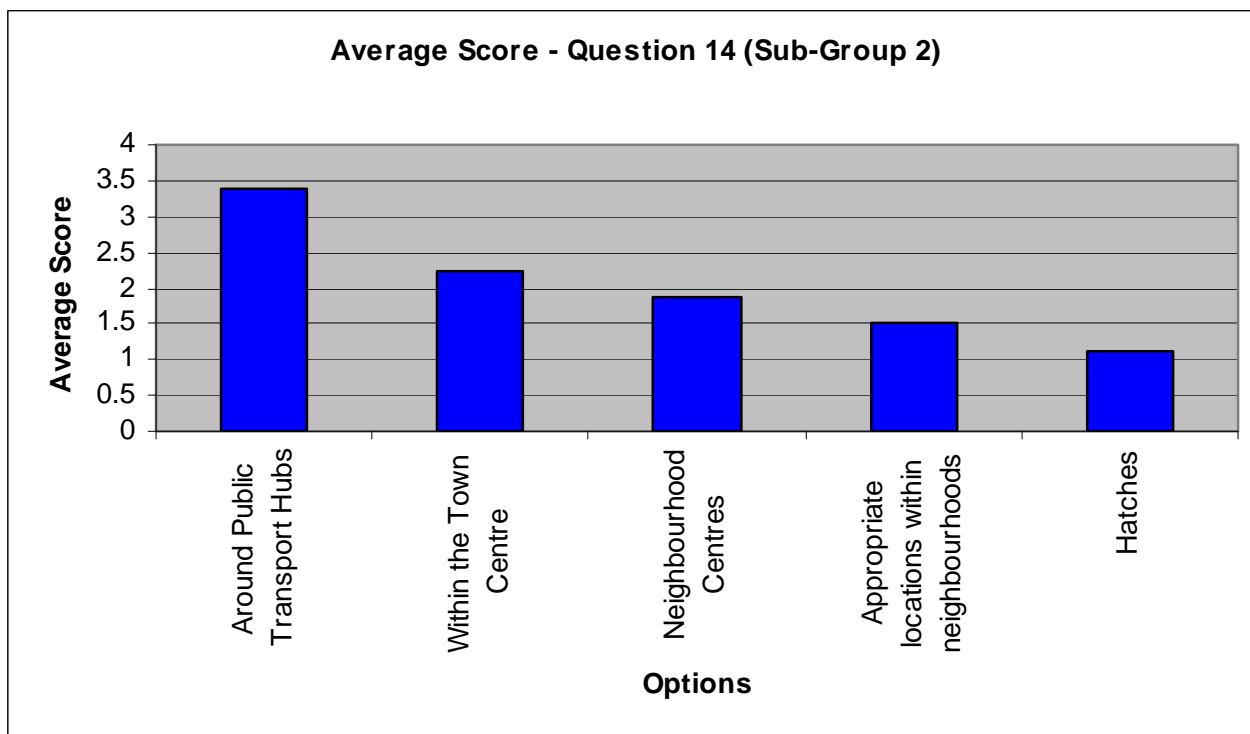
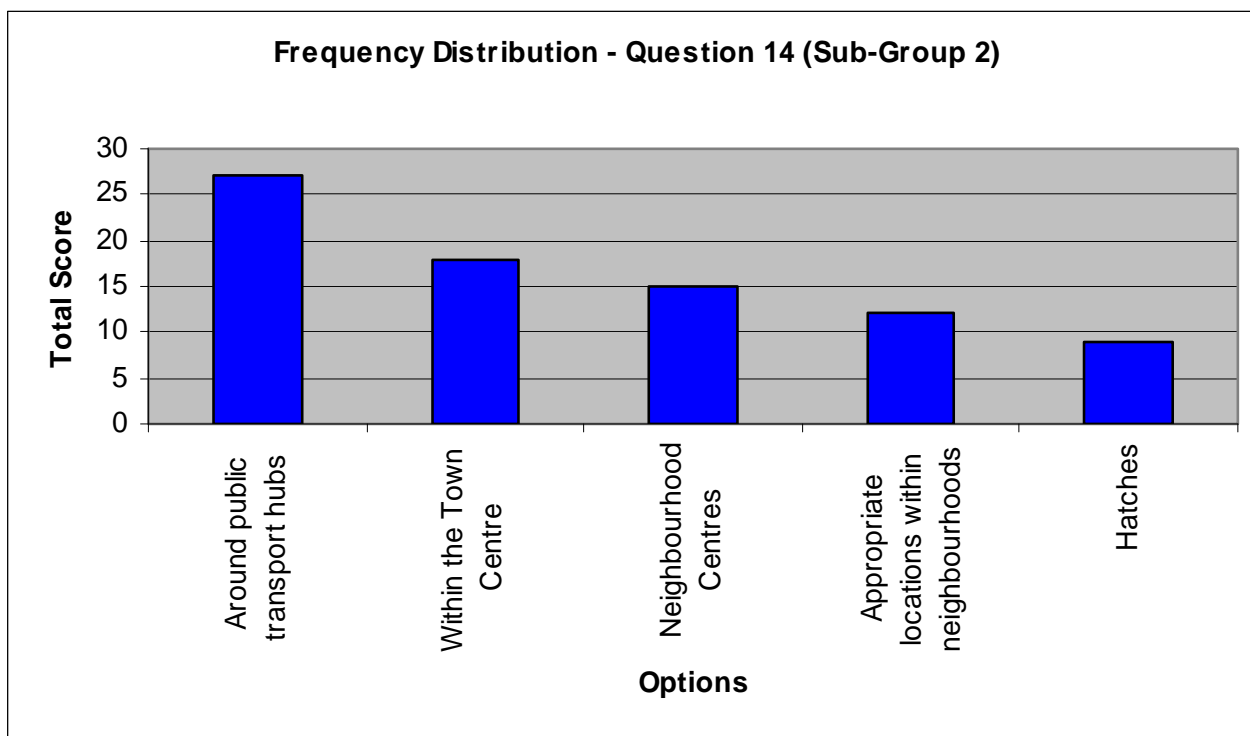
Question 14 - Please rank, in order of priority, where you think higher densities of development should go within the District (1 = highest priority, 5 = lowest priority)

Sub-Group 1 – Harlow Residents + Community Groups



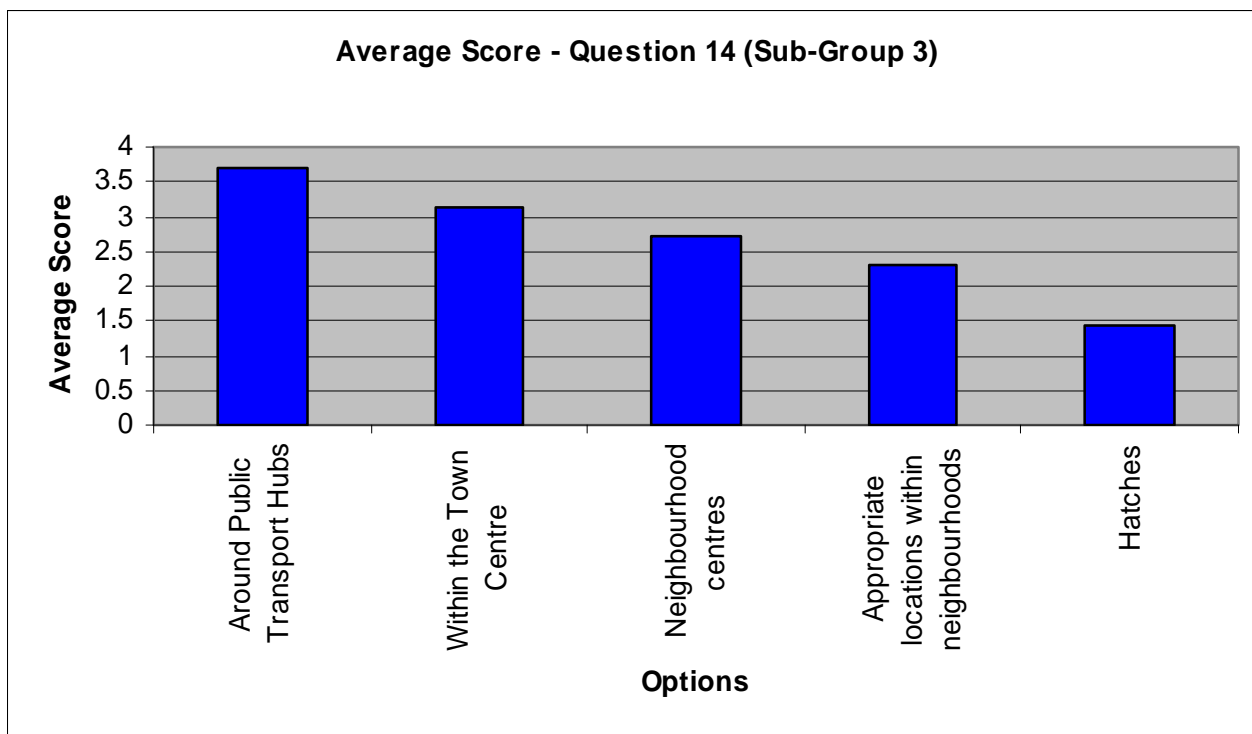
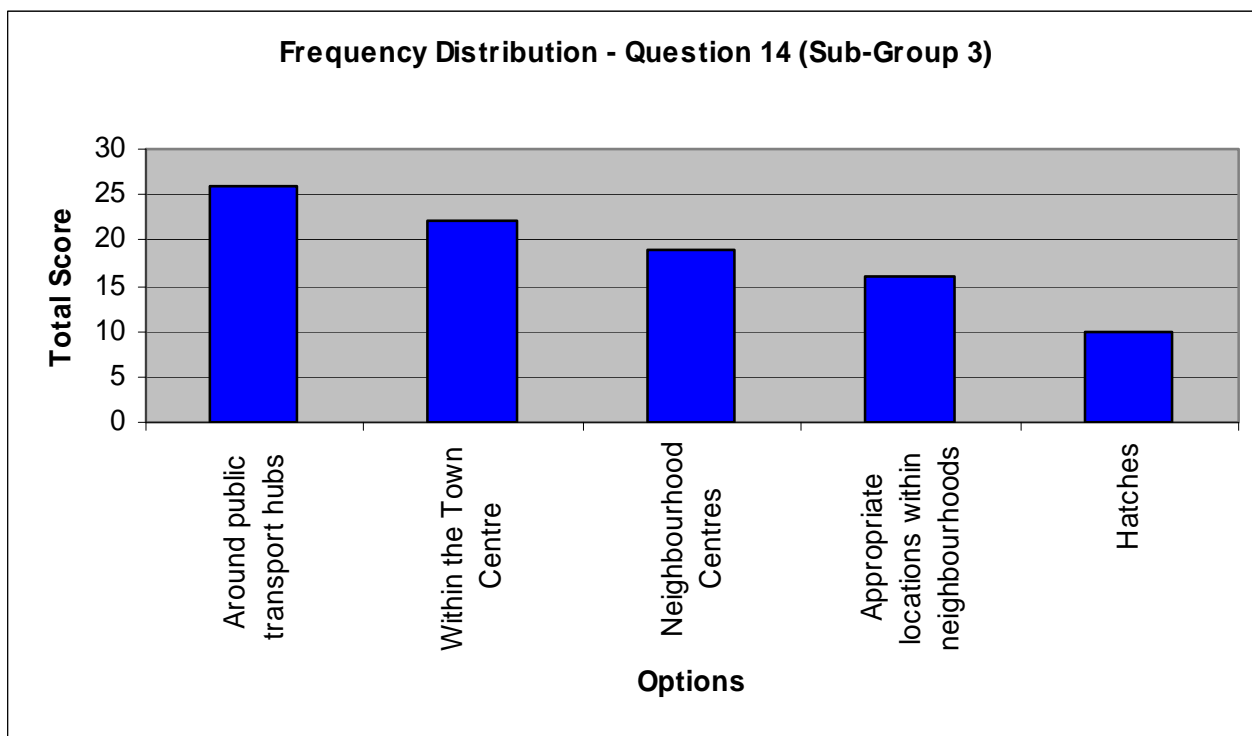
Question 14 - Please rank, in order of priority, where you think higher densities of development should go within the District (1 = highest priority, 5 = lowest priority)

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



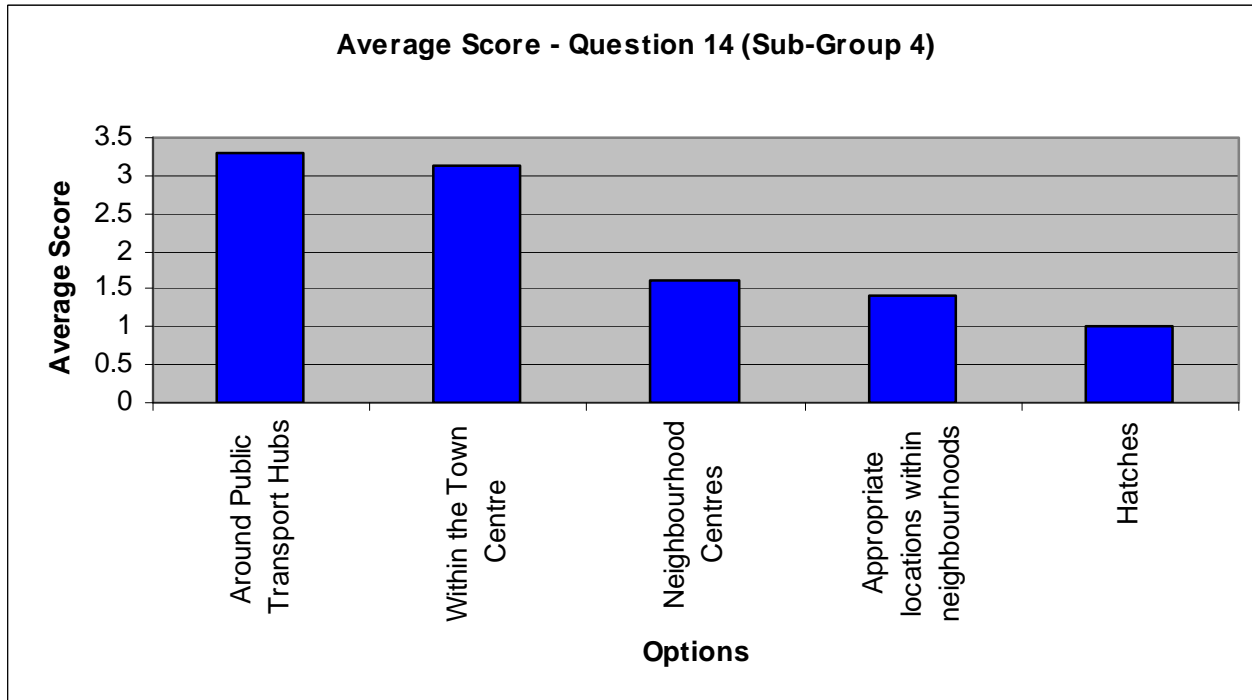
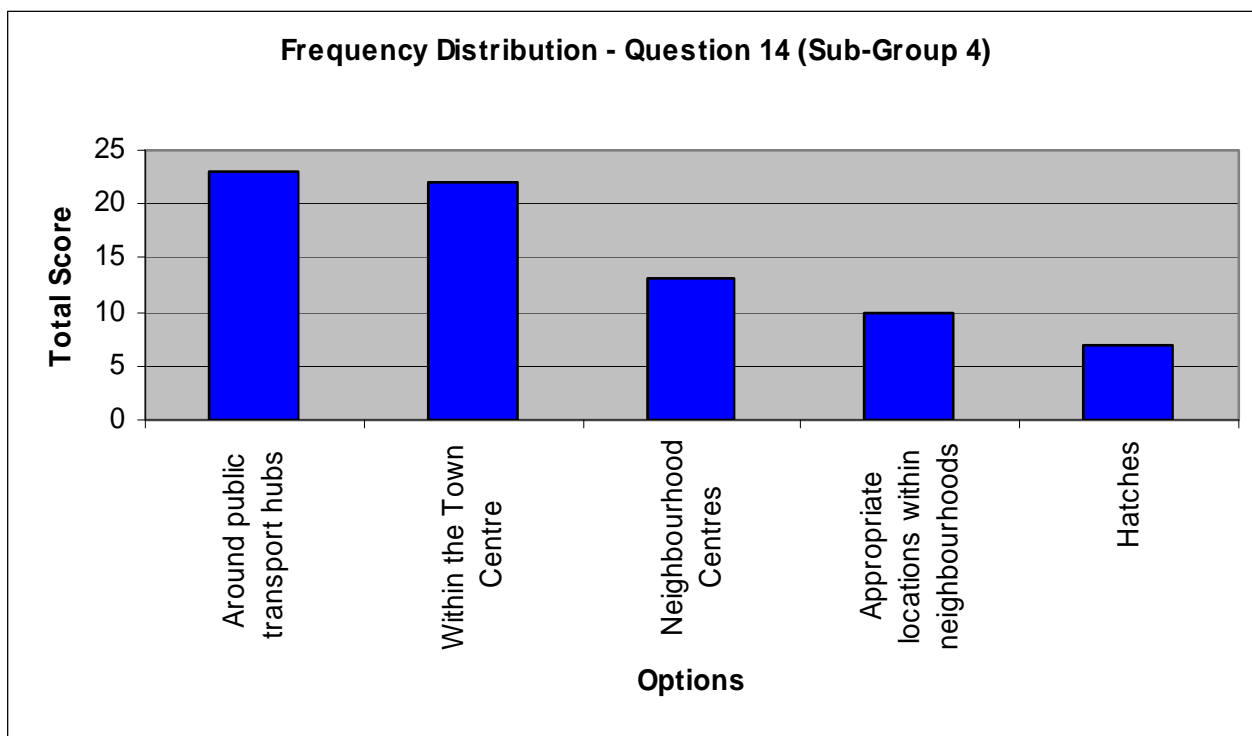
Question 14 - Please rank, in order of priority, where you think higher densities of development should go within the District (1 = highest priority, 5 = lowest priority)

Sub-Group 3 – Adjoining Parishes Residents + Other Residents

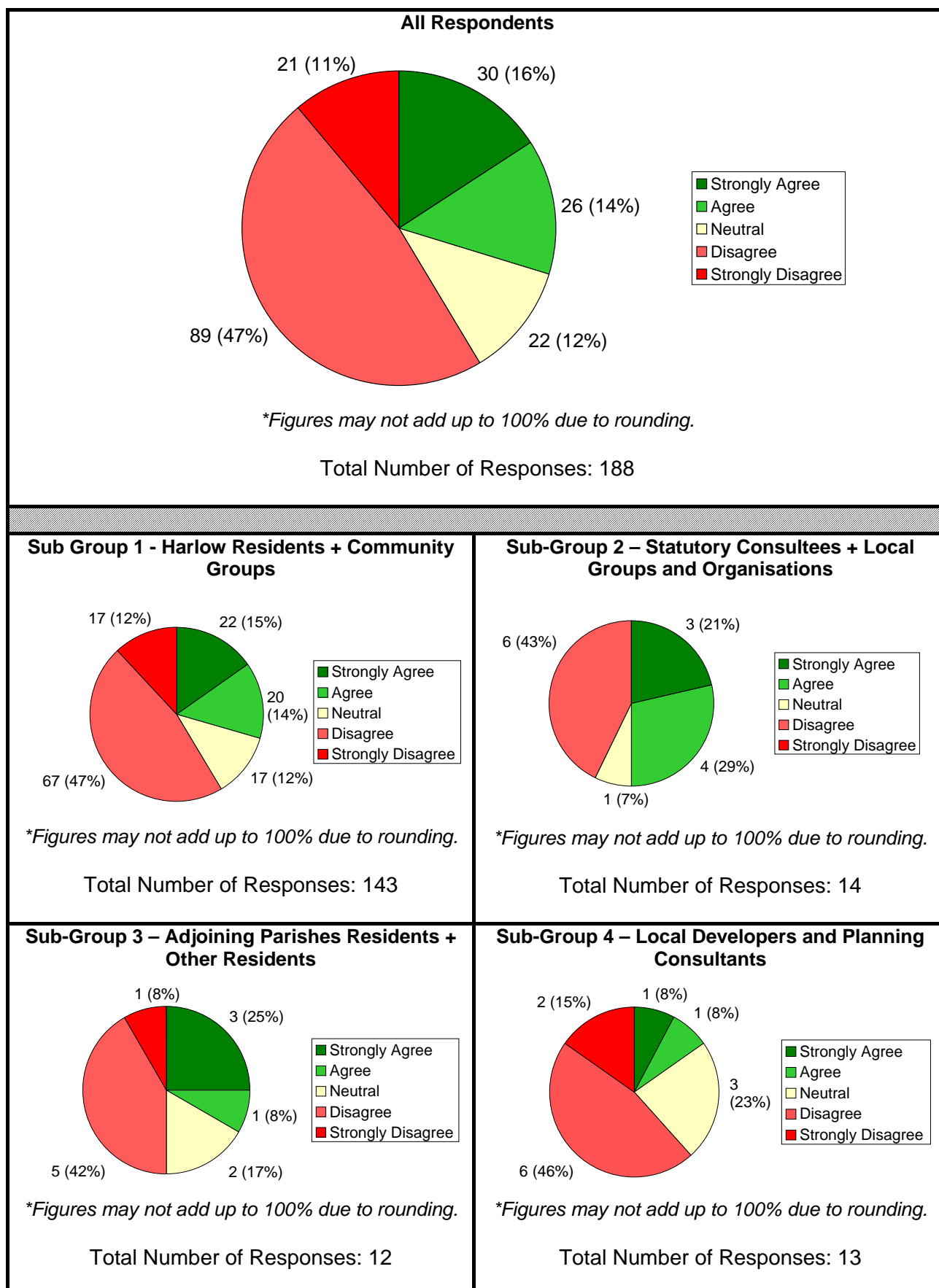


Question 14 - Please rank, in order of priority, where you think higher densities of development should go within the District (1 = highest priority, 5 = lowest priority)

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?



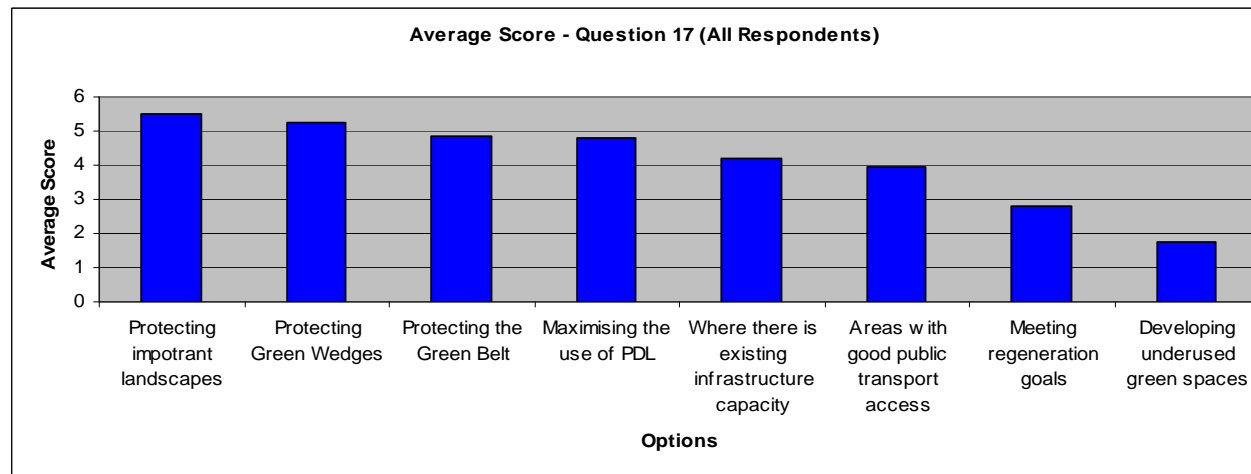
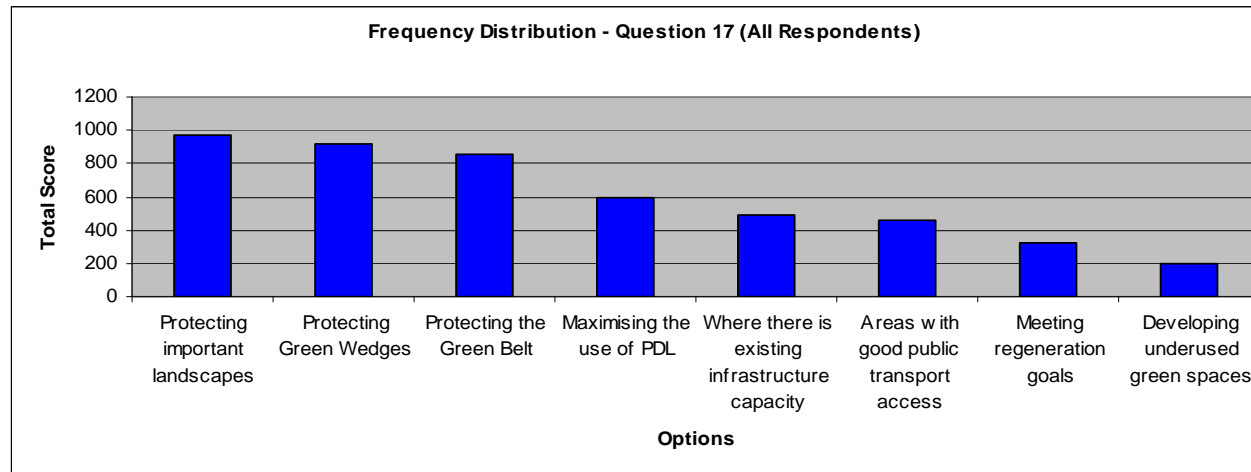
The top chart shows the overall response to this question. The four charts underneath show the responses to this question broken down into the four sub-groups defined in Table 2 (Chapter 2)

Question 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)

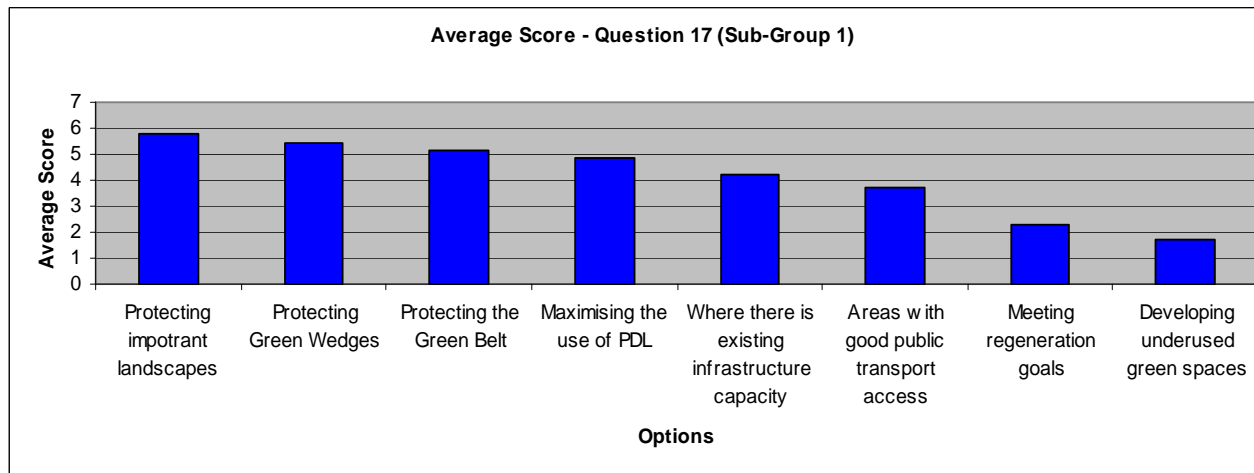
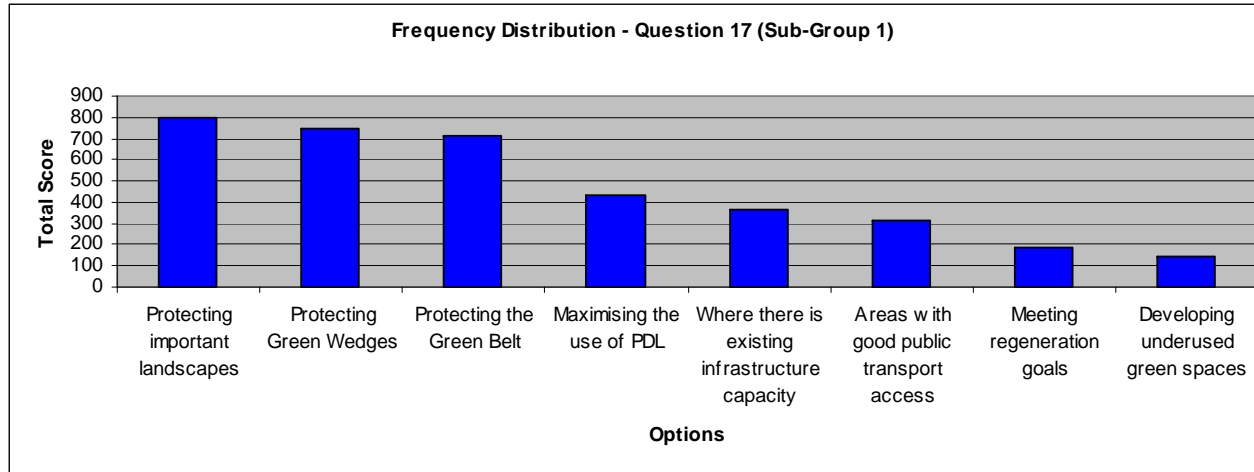
Question 17 - Please rank, in order of priority, the most important things that you think should direct new development in and around Harlow (1 = highest priority, 8 = lowest priority)

All Respondents



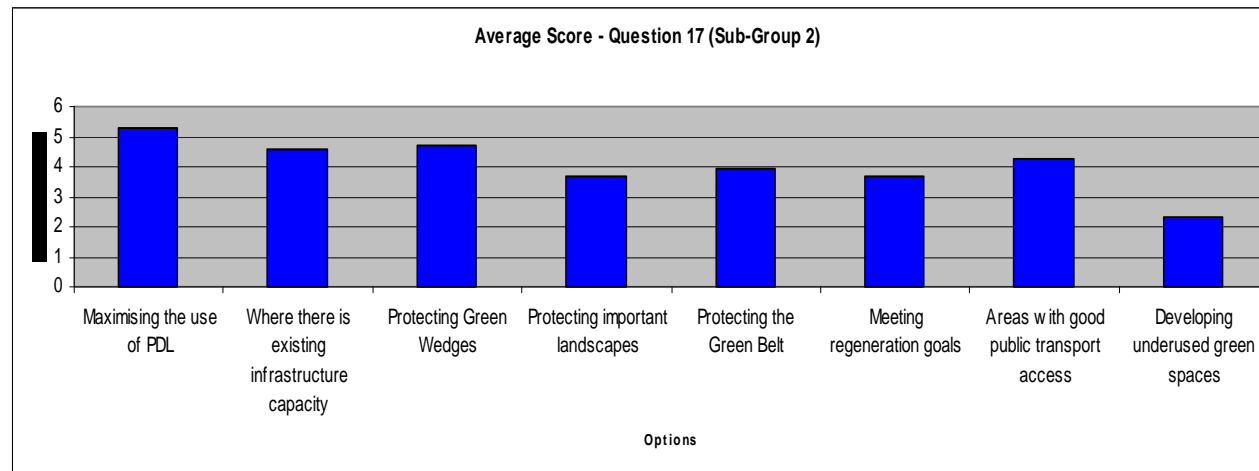
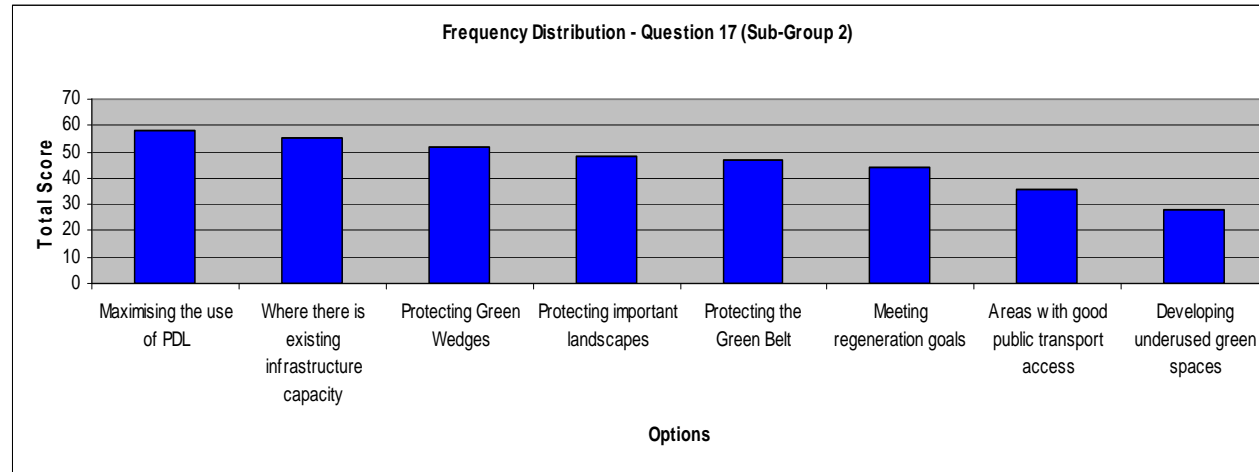
Question 17 - Please rank, in order of priority, the most important things that you think should direct new development in and around Harlow (1 = highest priority, 8 = lowest priority)

Sub-Group 1 – Harlow Residents + Community Groups



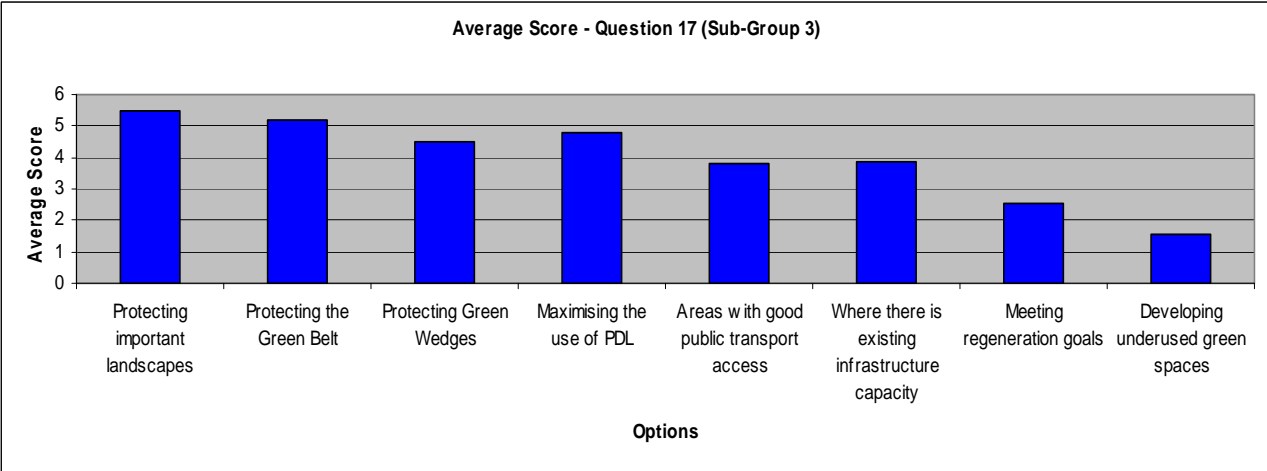
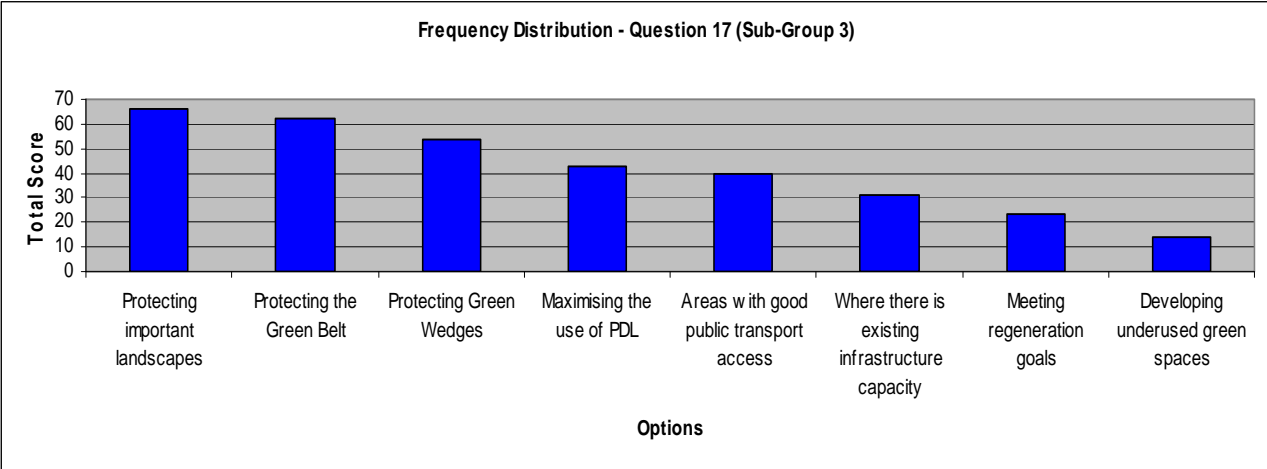
Question 17 - Please rank, in order of priority, the most important things that you think should direct new development in and around Harlow (1 = highest priority, 8 = lowest priority)

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



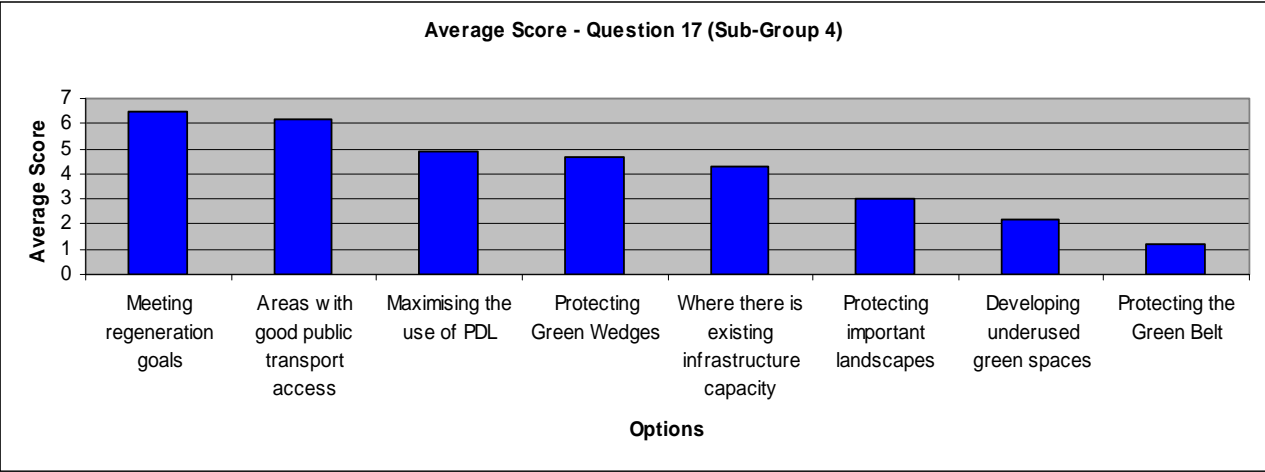
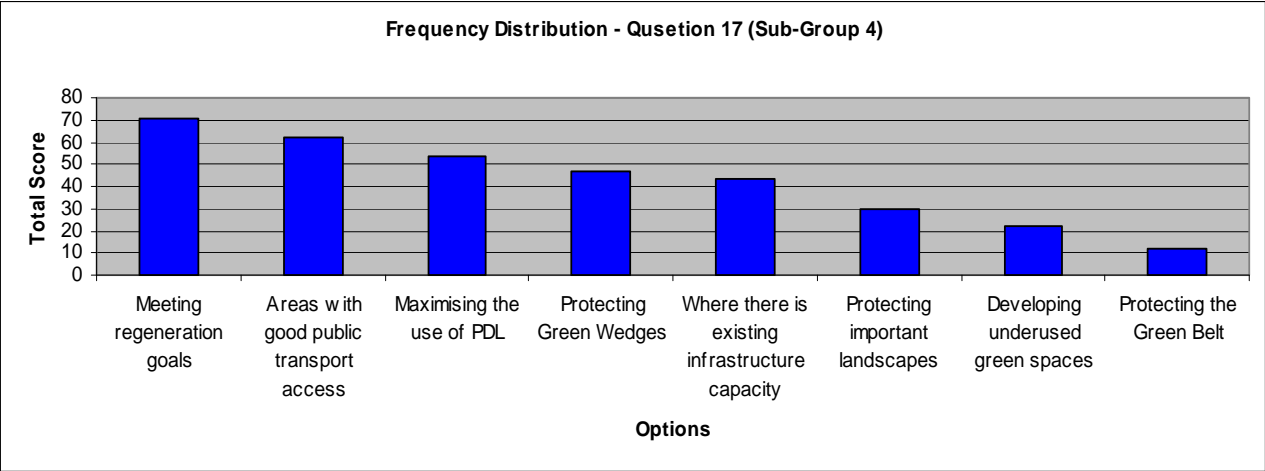
Question 17 - Please rank, in order of priority, the most important things that you think should direct new development in and around Harlow (1 = highest priority, 8 = lowest priority)

Sub-Group 3 – Adjoining Parishes Residents + Other Residents

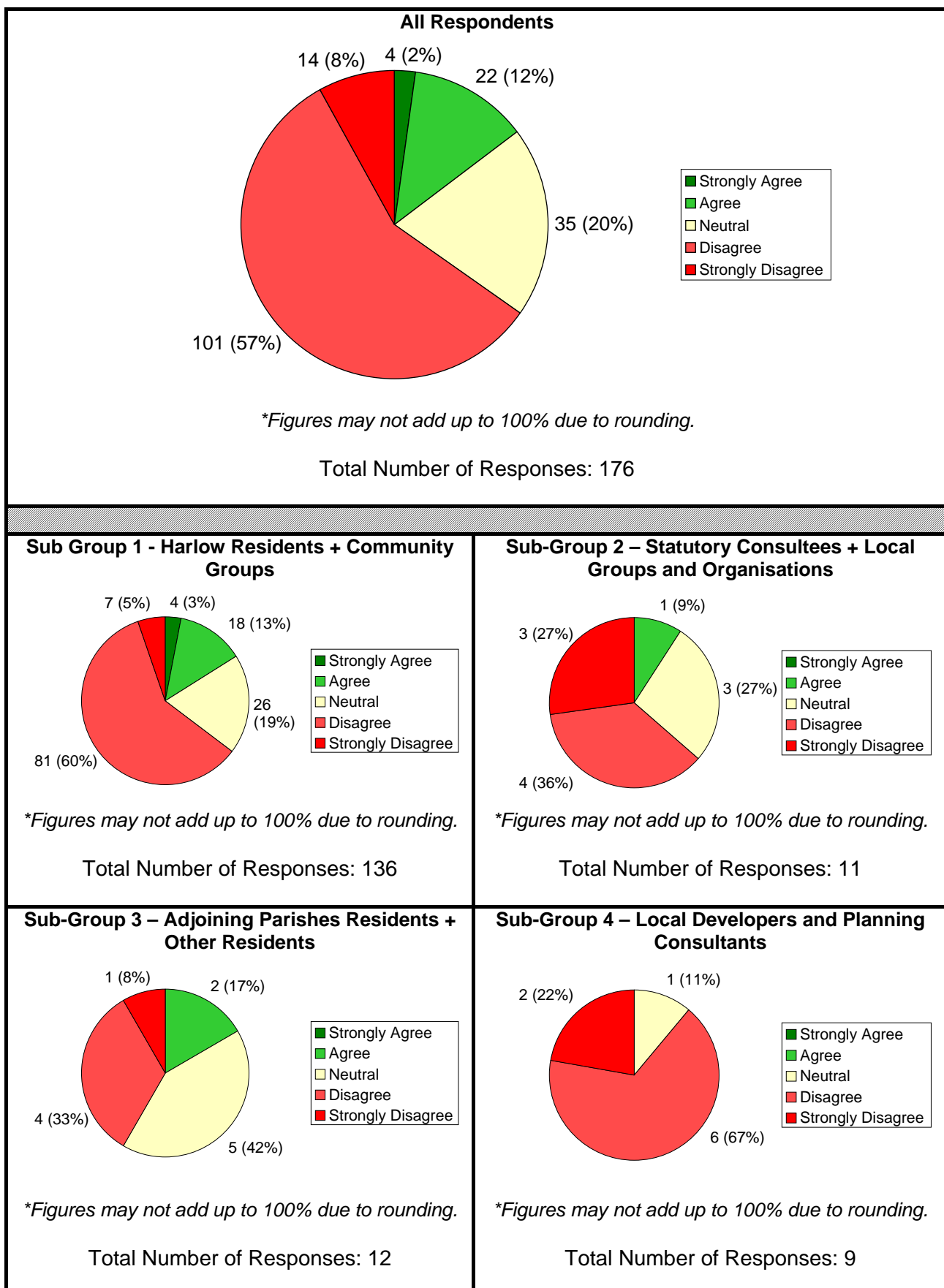


Question 17 - Please rank, in order of priority, the most important things that you think should direct new development in and around Harlow (1 = highest priority, 8 = lowest priority)

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



Question 18 - Do the existing employment areas meet current and future employment needs?



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 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
 - 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
 - Employment areas should be re-developed.
 - Some existing buildings need to be revamped.
 - Existing employment areas need regenerating.
 - Industrial areas need to be redeveloped.
 - 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.
 - Improve linkages between employment areas and the Town Centre.
 - 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.
- 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
 - Fringe areas of employment land may be better suited for residential use.
 - 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 home-based 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.
 - Existing employment areas should provide jobs for Harlow people.
 - 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.
 - 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.
 - Tackle traffic congestion in The Pinnacles.
- Improve public transport to employment sites
 - Improve public transport links to Edinburgh Way and The Pinnacles.
 - Better access to public transport.
 - Improve public transport links to The Pinnacles.
 - 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.
 - 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
 - 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?

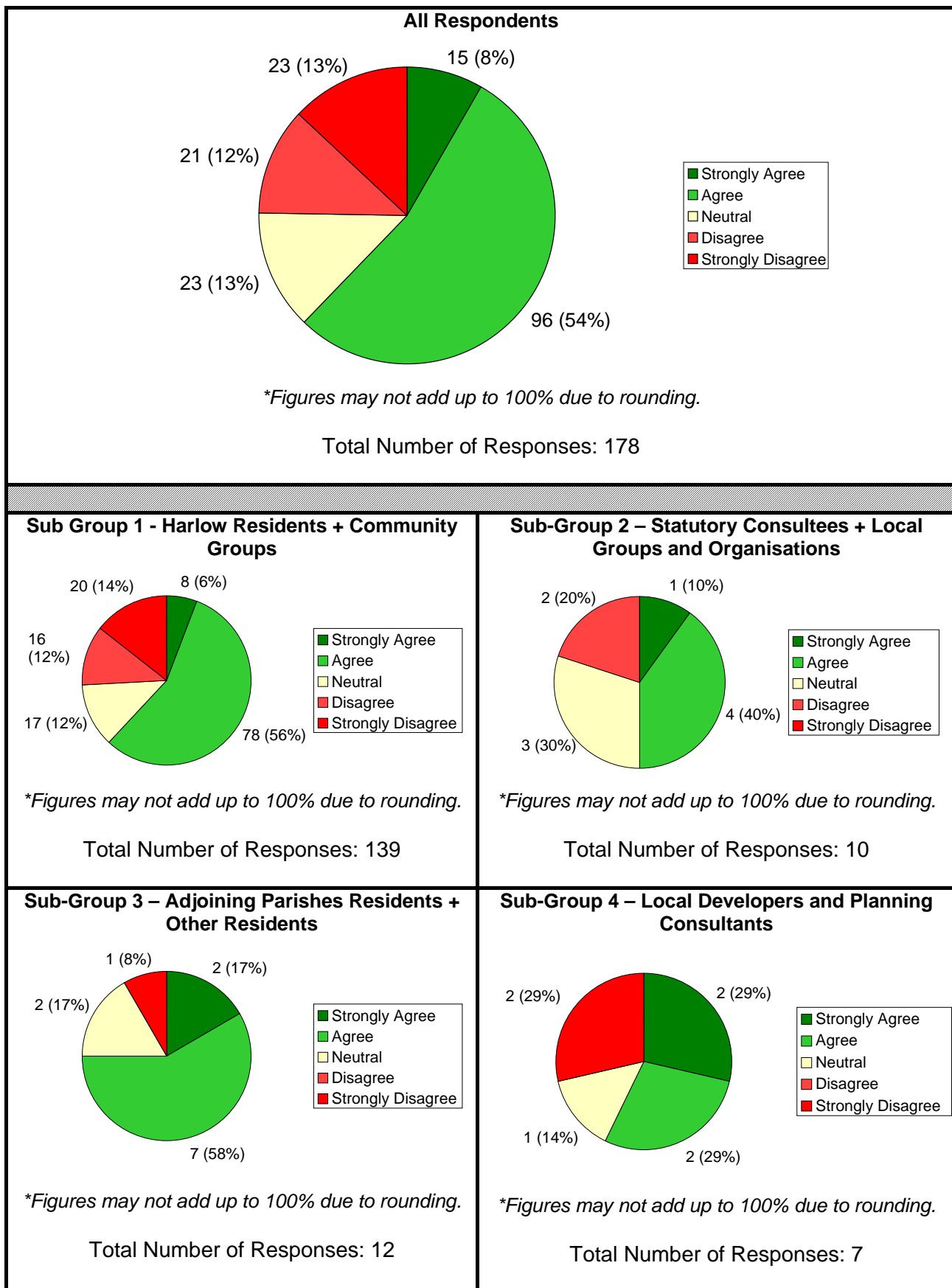
Set out below is a summary of the key issues raised by respondents in relation to this question:

- 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
 - A greater or lesser extent of growth in retail floorspace
 - Extent of growth in supporting uses: including leisure and recreation, culture, employment and residential
 - Redevelopment confined to Local Plan boundaries or wider
 - Single developer partnership redeveloping comprehensively or a collective of individual landowners/developers
 - 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:
 - Trade "leaks" to other retail centres
 - Decline in rental values and high vacancy rates
 - Primary catchment area less affluent than the secondary one
 - 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?



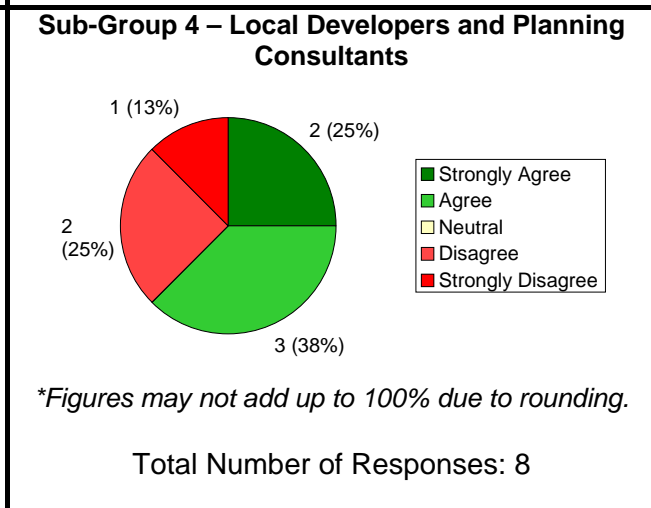
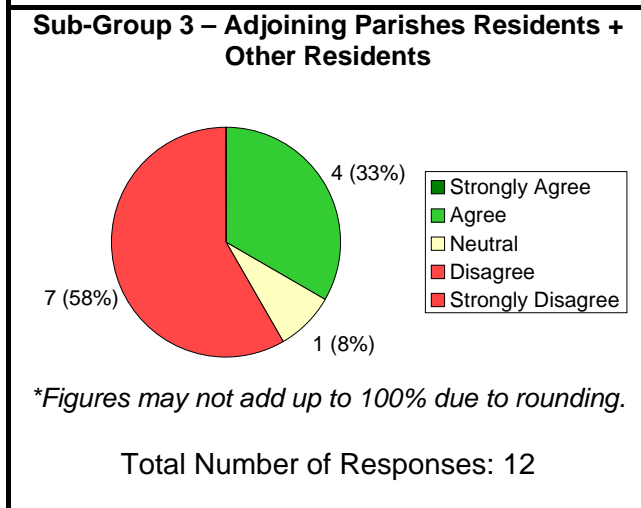
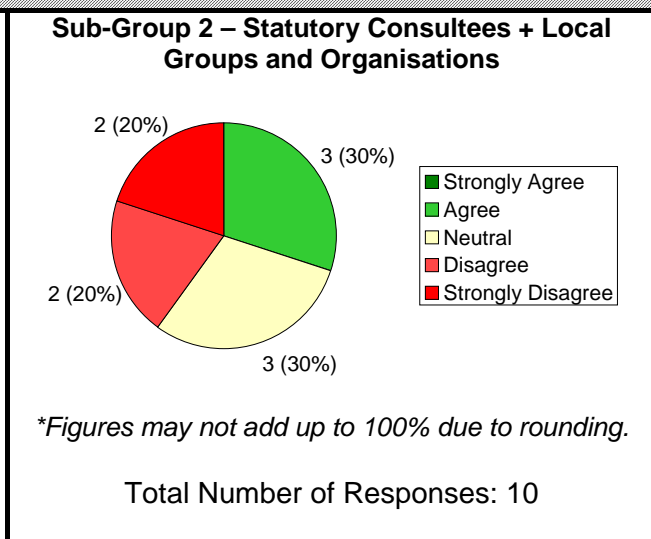
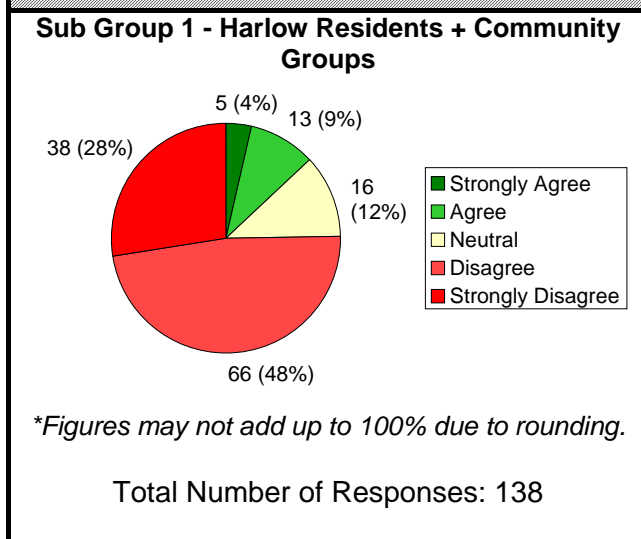
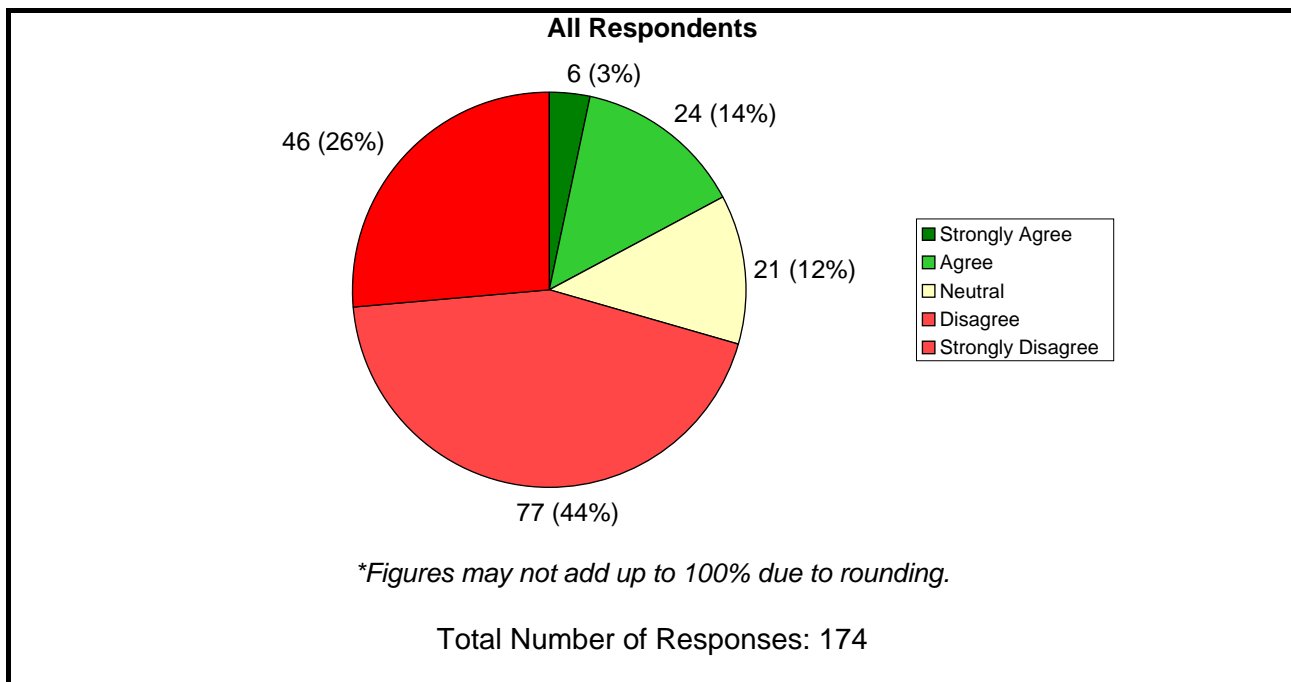
The top chart shows the overall response to this question. The four charts underneath show the responses to this question broken down into the four sub-groups defined in Table 2 (Chapter 2)

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?



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)

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.
 - 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.
 - 3,600 dwellings to the north would be a missed opportunity.
 - 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.

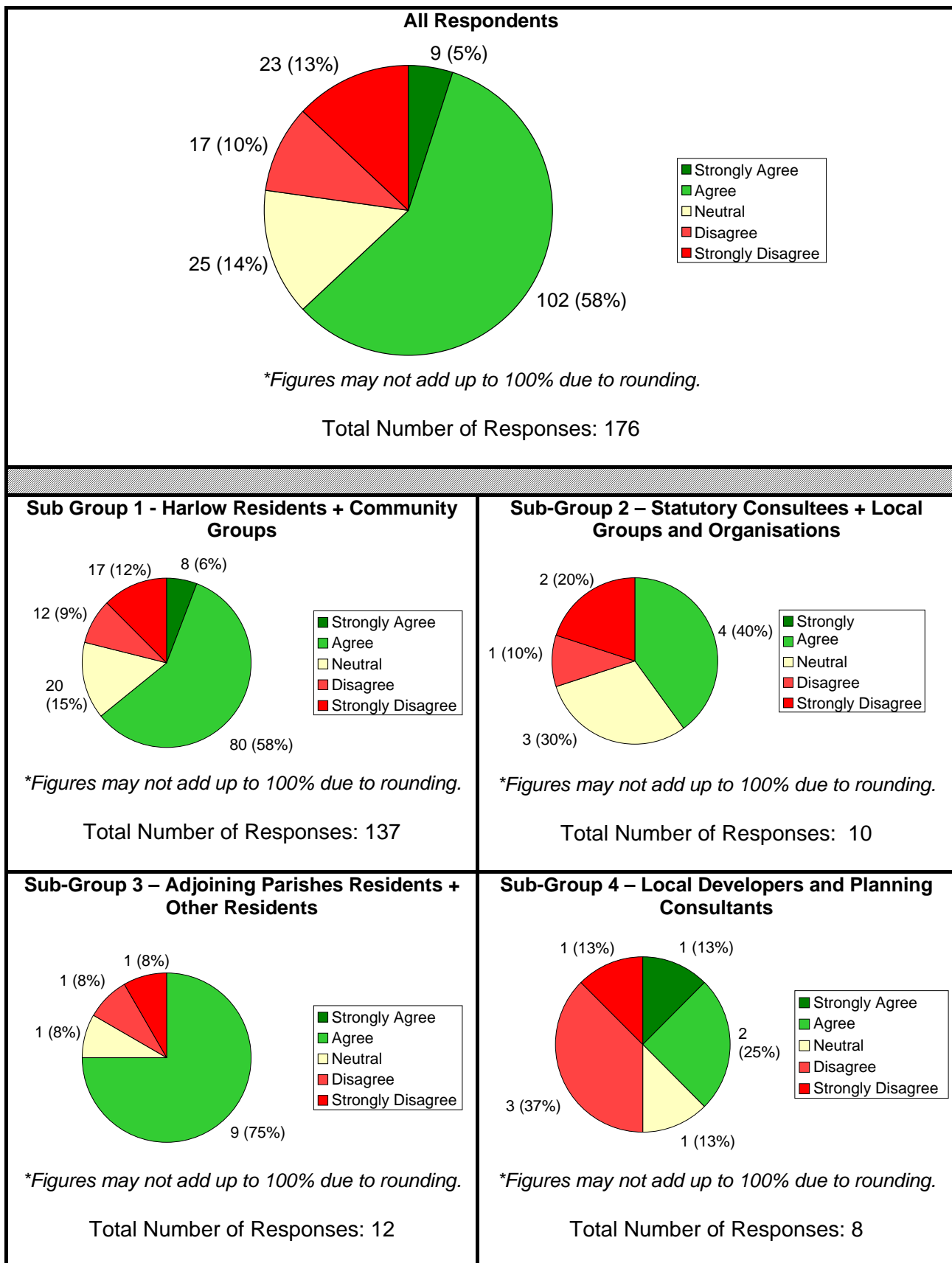
- Harlow north is better related to transport and town centre, employment areas.
- Water Cycle Strategies need to inform the level of water infrastructure required to serve developments.
- Strategic Flood Risk Assessments be used, along with the sequential test approach to determine the location of growth.
- 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
 - 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.
 - 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.
 - Growth to the north and east of Harlow would infringe areas of natural wildlife, historic habitats and unspoilt countryside.
 - There should be no development on the Green Belt.
 - Development to the east of Harlow would be environmentally undesirable.
 - It is environmentally unacceptable to develop the north.
 - 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
 - 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.
 - 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?



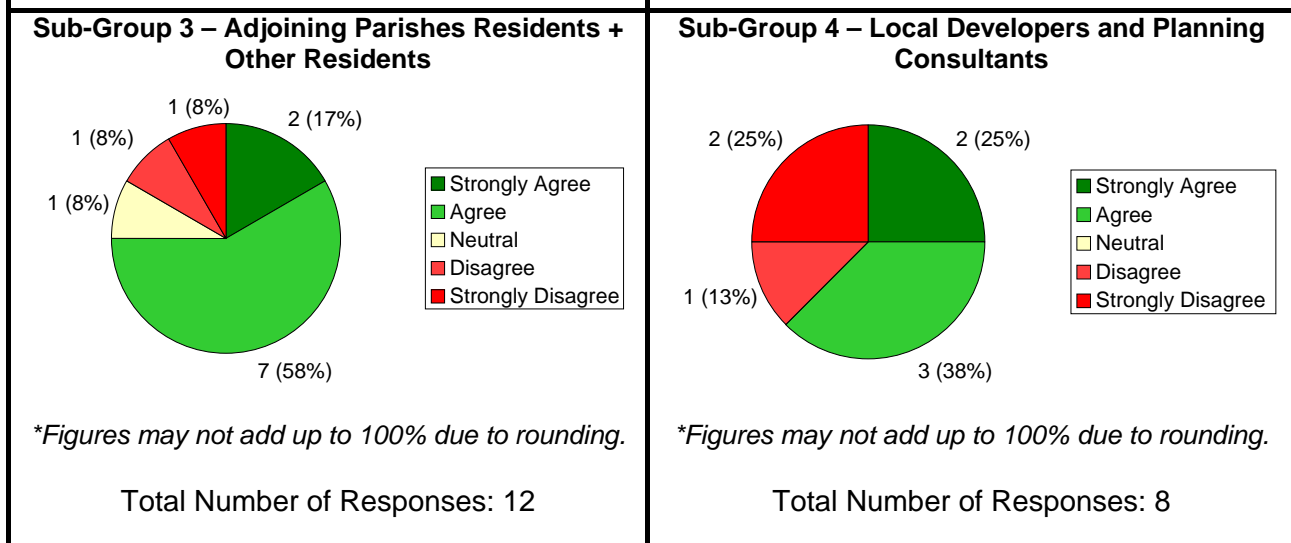
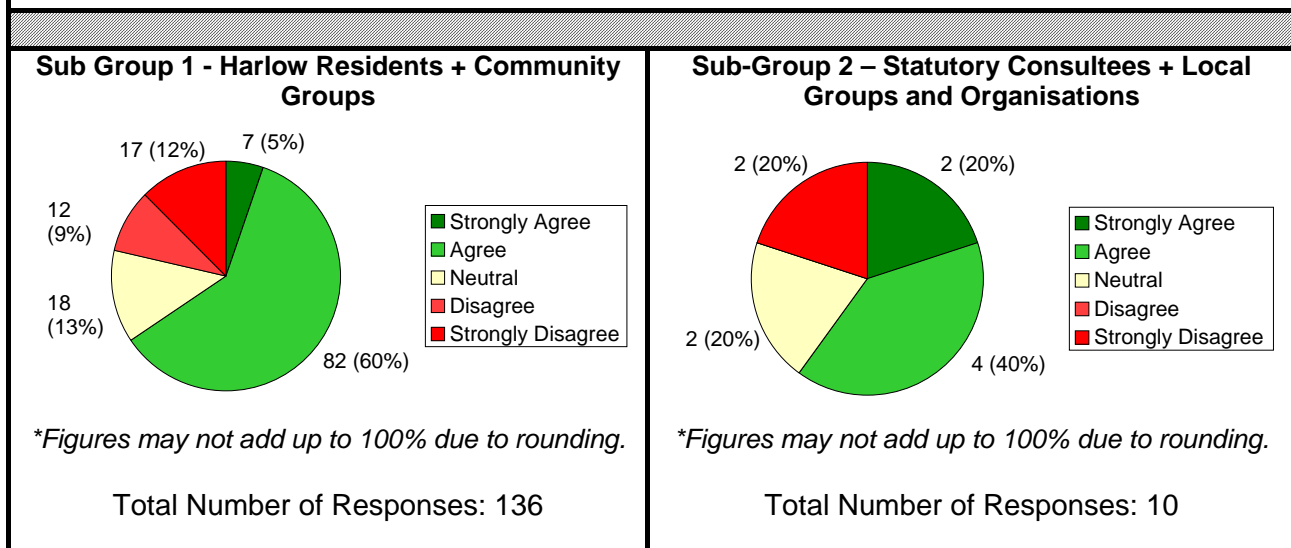
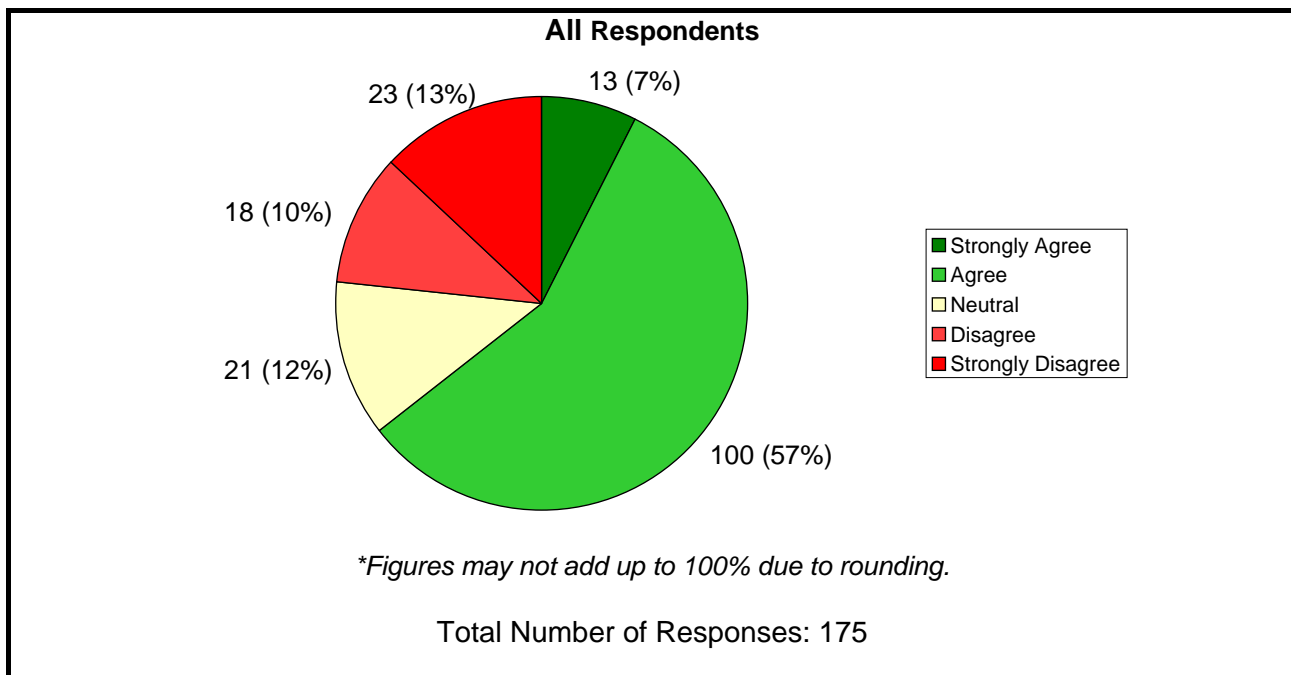
The top chart shows the overall response to this question. The four charts underneath show the responses to this question broken down into the four sub-groups defined in Table 2 (Chapter 2)

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 an 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?



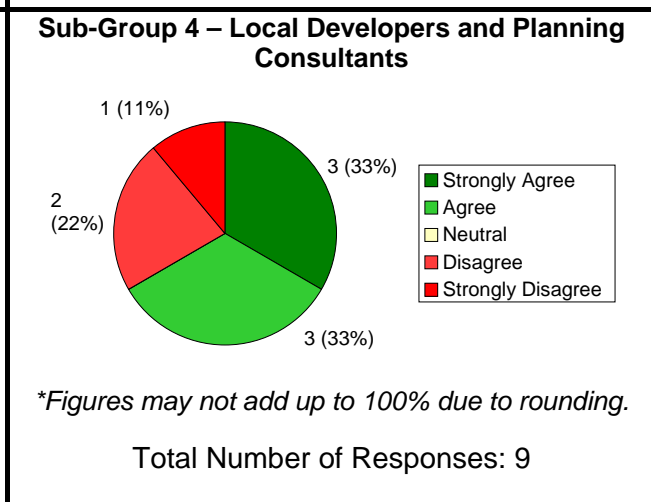
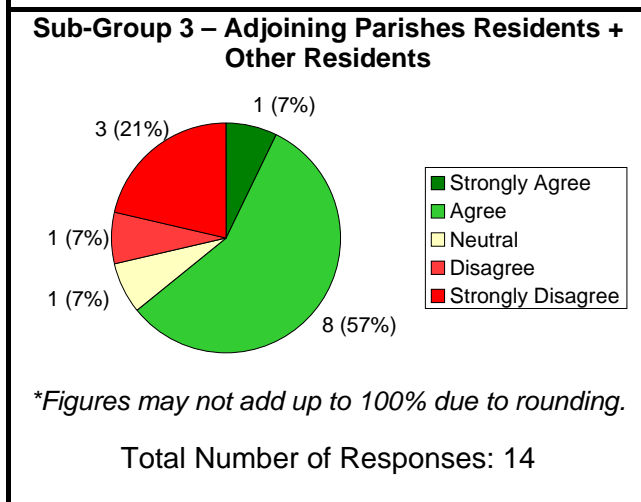
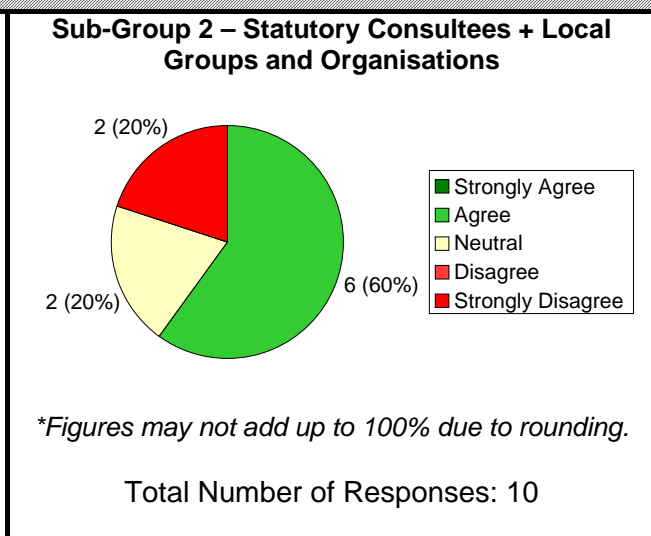
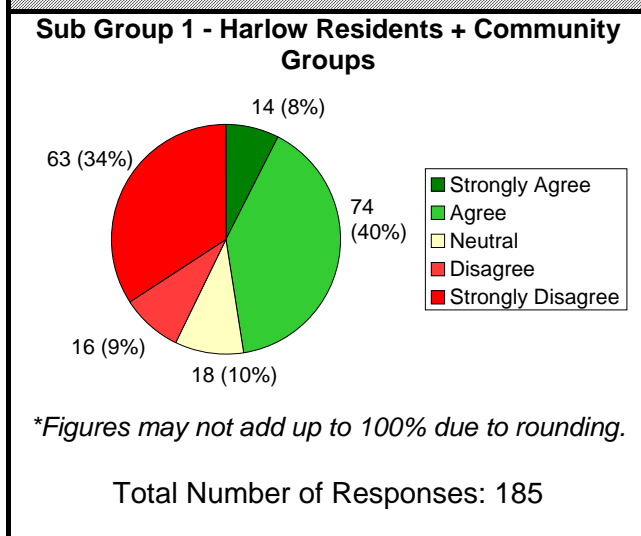
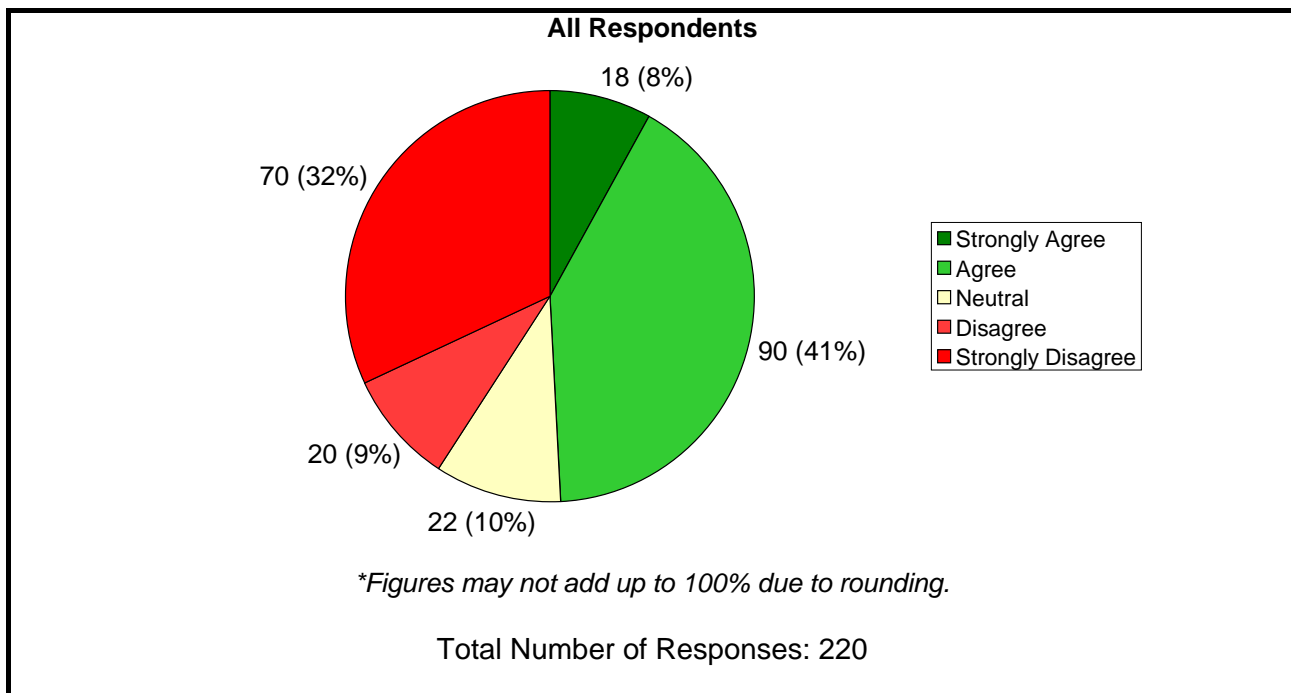
The top chart shows the overall response to this question. The four charts underneath show the responses to this question broken down into the four sub-groups defined in Table 2 (Chapter 2)

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 regeneration-led 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?



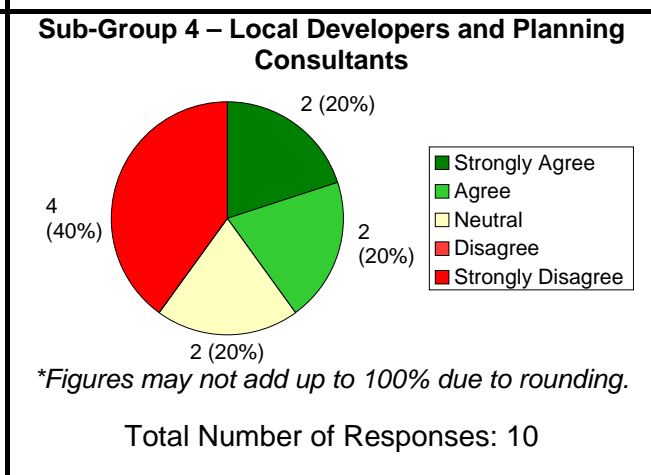
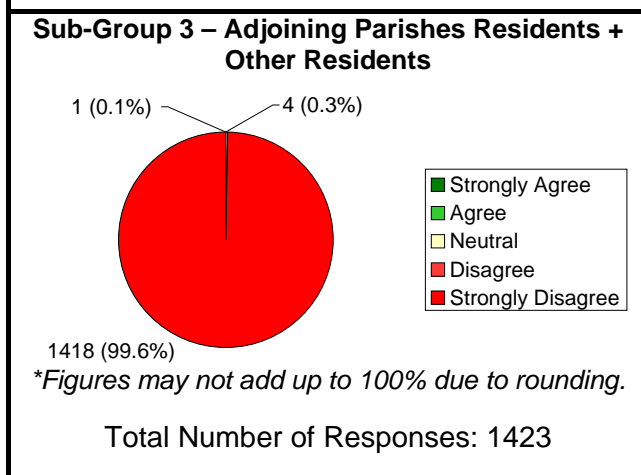
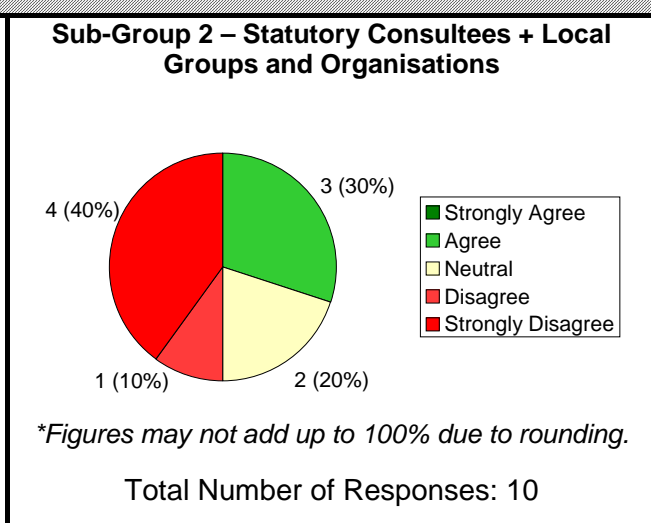
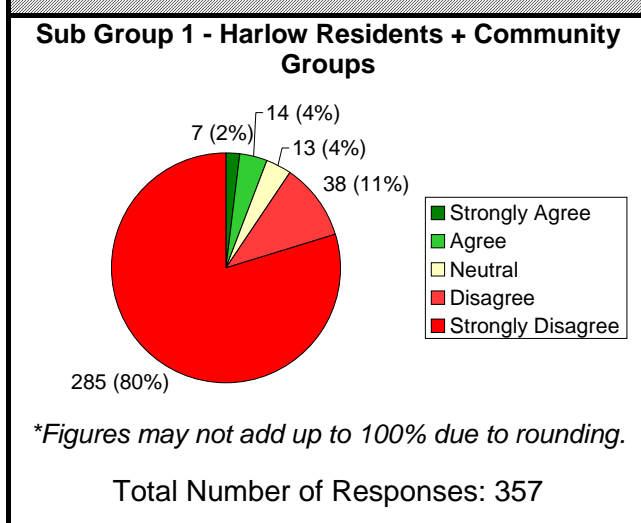
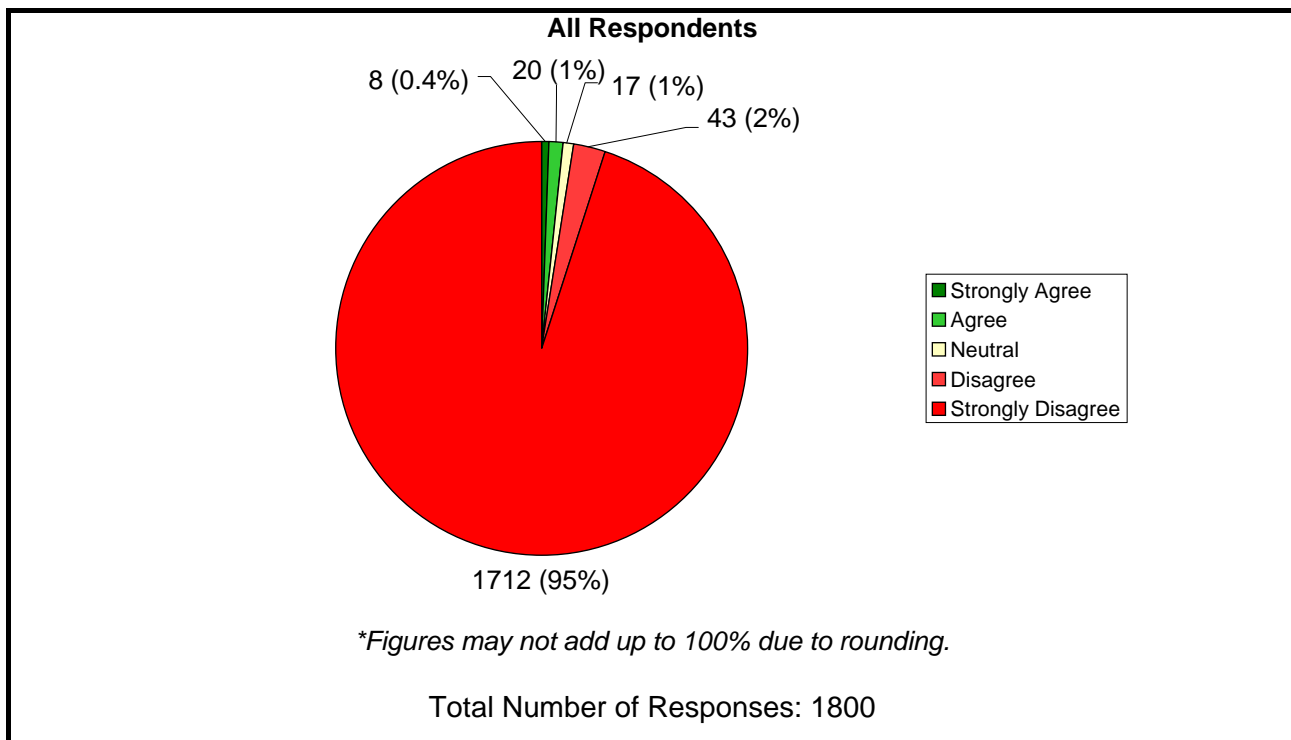
The top chart shows the overall response to this question. The four charts underneath show the responses to this question broken down into the four sub-groups defined in Table 2 (Chapter 2)

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.

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



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)

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 solve 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 from 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.

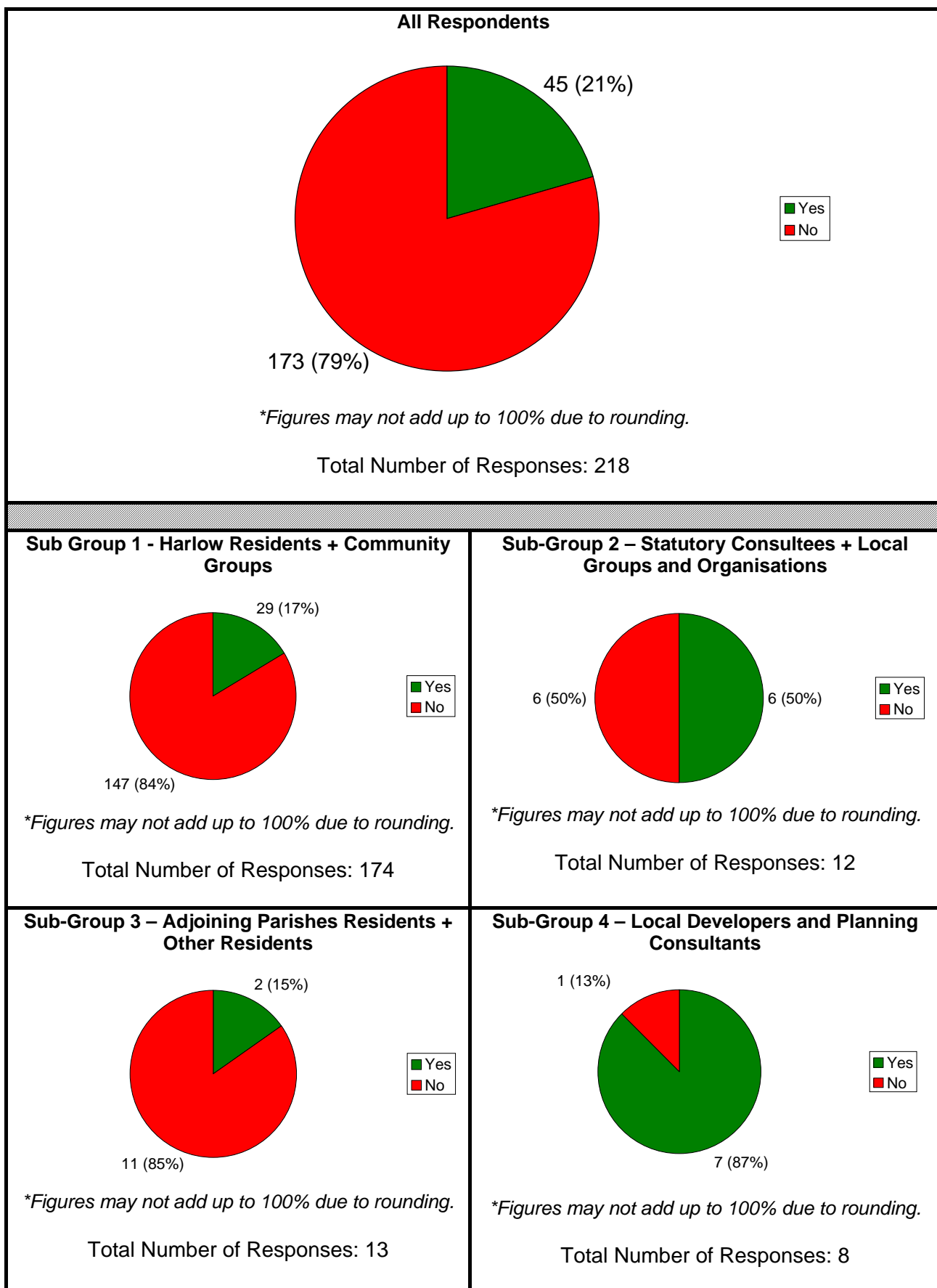
Question 27: Do you have any other comments on the approach to growth around Harlow?

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 the 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.

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



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:

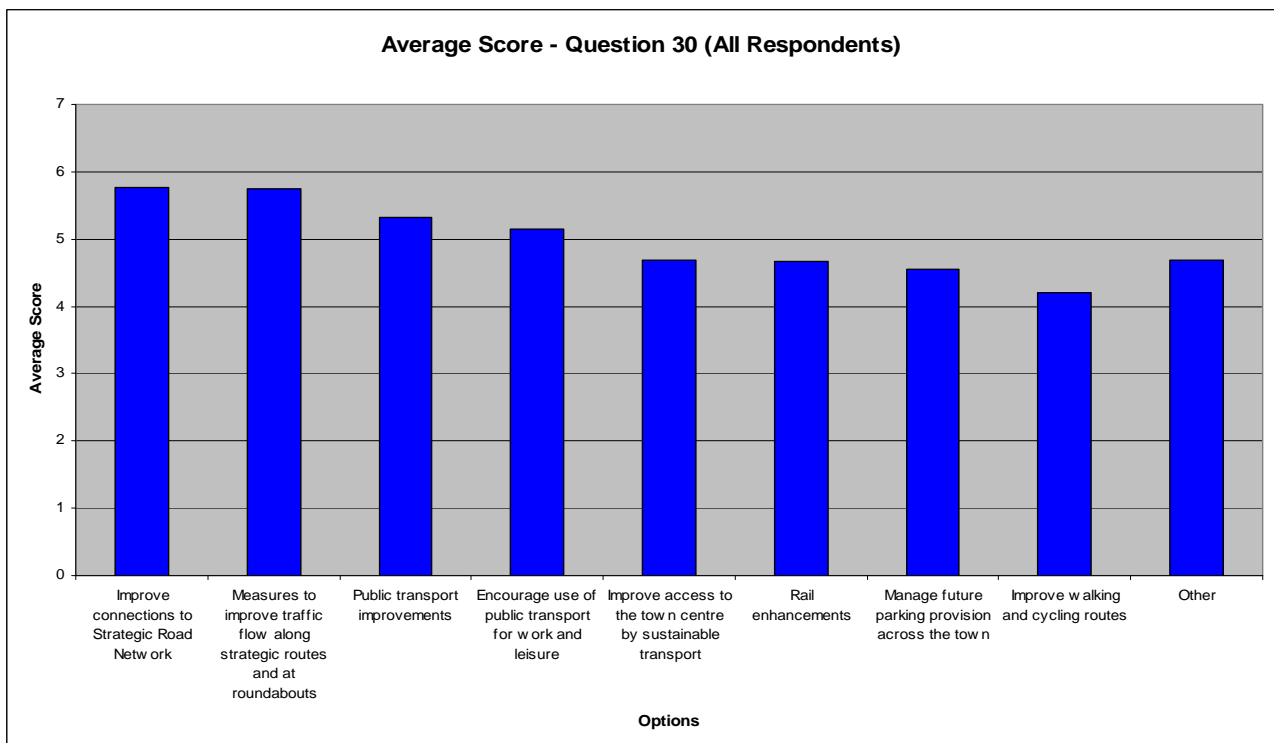
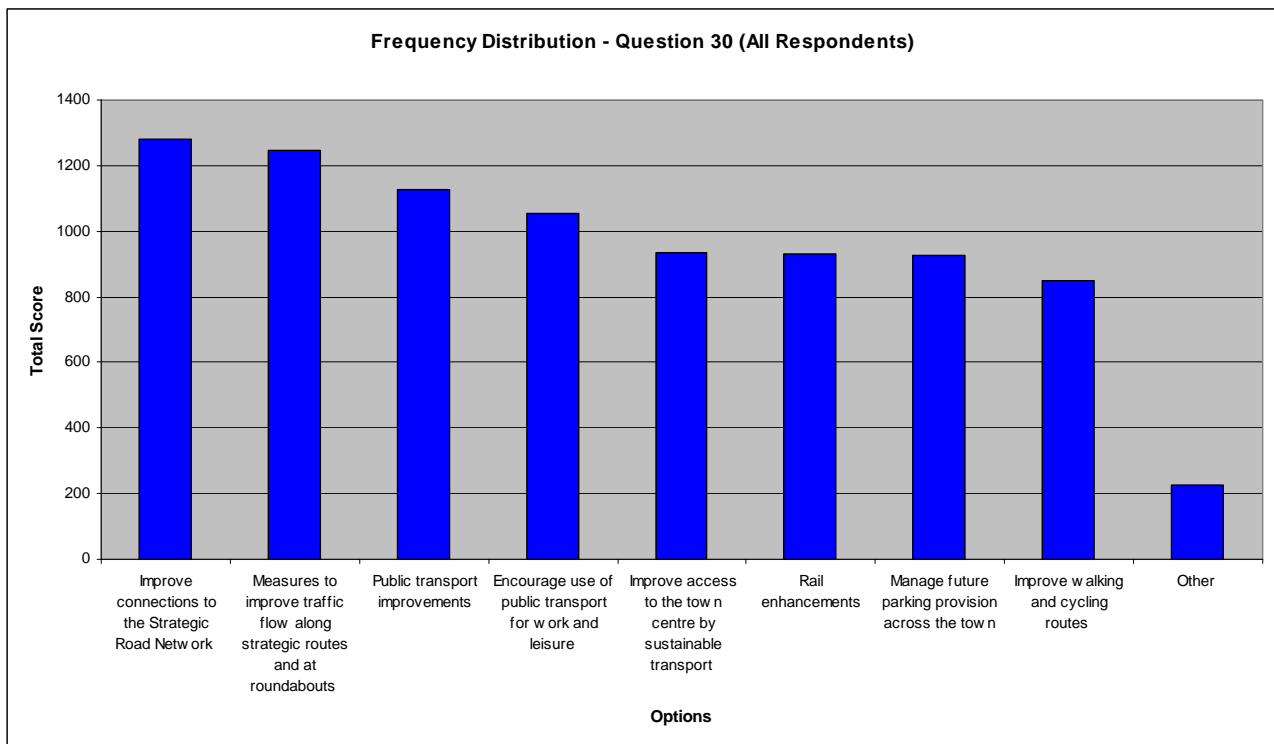
- Funding and Delivery of Infrastructure
 - Unless firm commitments are made to invest in Harlow's road, water and sewerage infrastructure, further development of Harlow cannot be justified and shouldn't be started.
 - Development not supported by appropriate infrastructure should not be supported.
 - 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.
 - 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).
 - 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.
 - 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.
 - Proposals are simply going to exacerbate the problem.
 - 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
 - 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.
 - 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.
 - There are parts of Old Harlow with no bus service.
 - Public transport needs to be more convenient and better value.
 - For many destinations, no direct bus routes are available (needing to change at Town Centre). This makes buses unattractive compared to the car.
 - Commuters coming into Harlow for employment purposes need a reliable public transport service.
 - 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.
 - 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
 - Cycle ways and footpaths and green infrastructure need to be considered.
 - 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.
 - Road traffic is the elephant in the room in respect of housing development.
 - 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.
 - Improved housing and heating design upgrades.
 - 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.
 - 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.

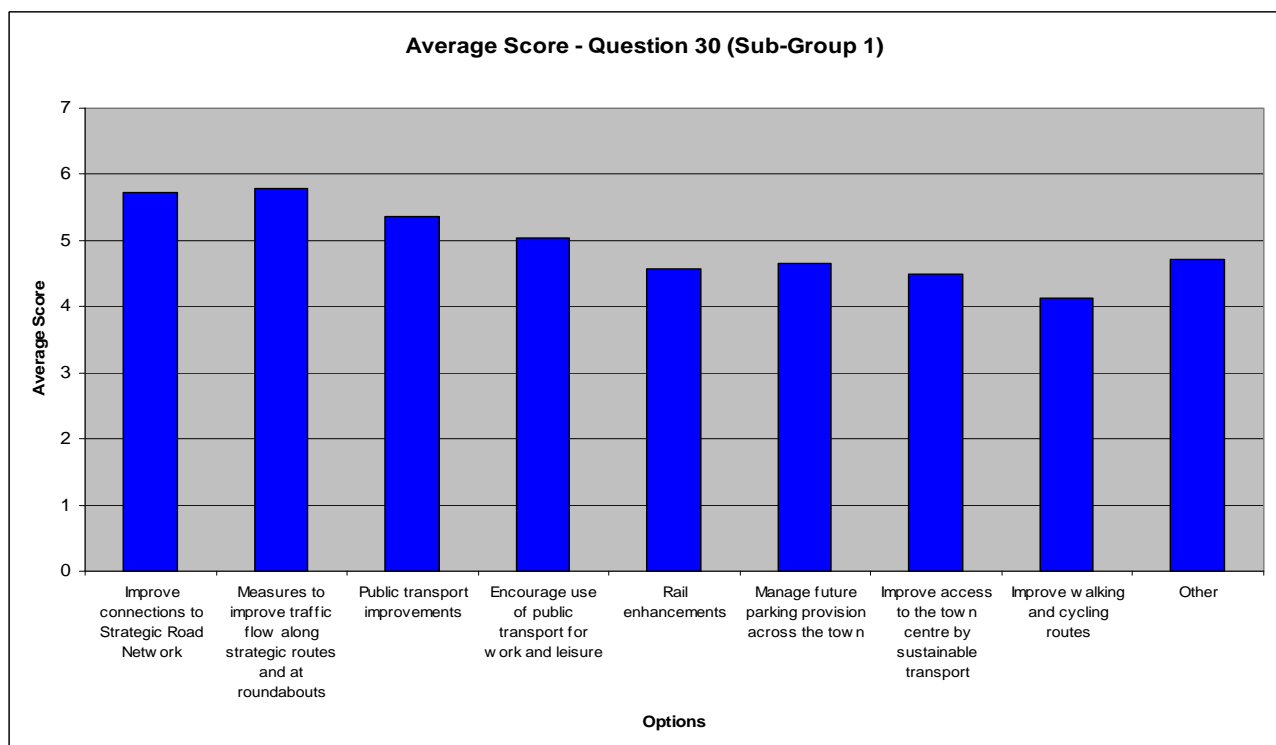
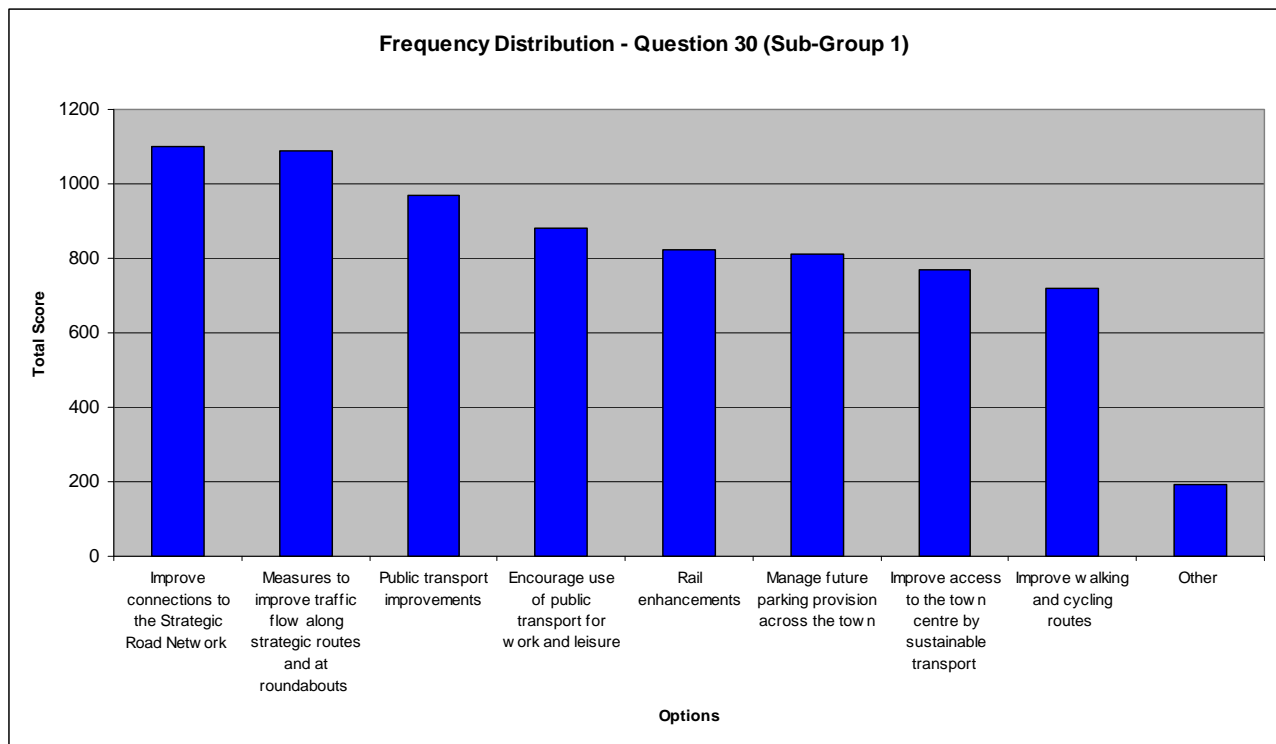
Question 30 - Please rank, in order of priority, how Harlow Council should tackle Harlow's congestion problems (1 = highest priority, 9 = lowest priority)

All Respondents



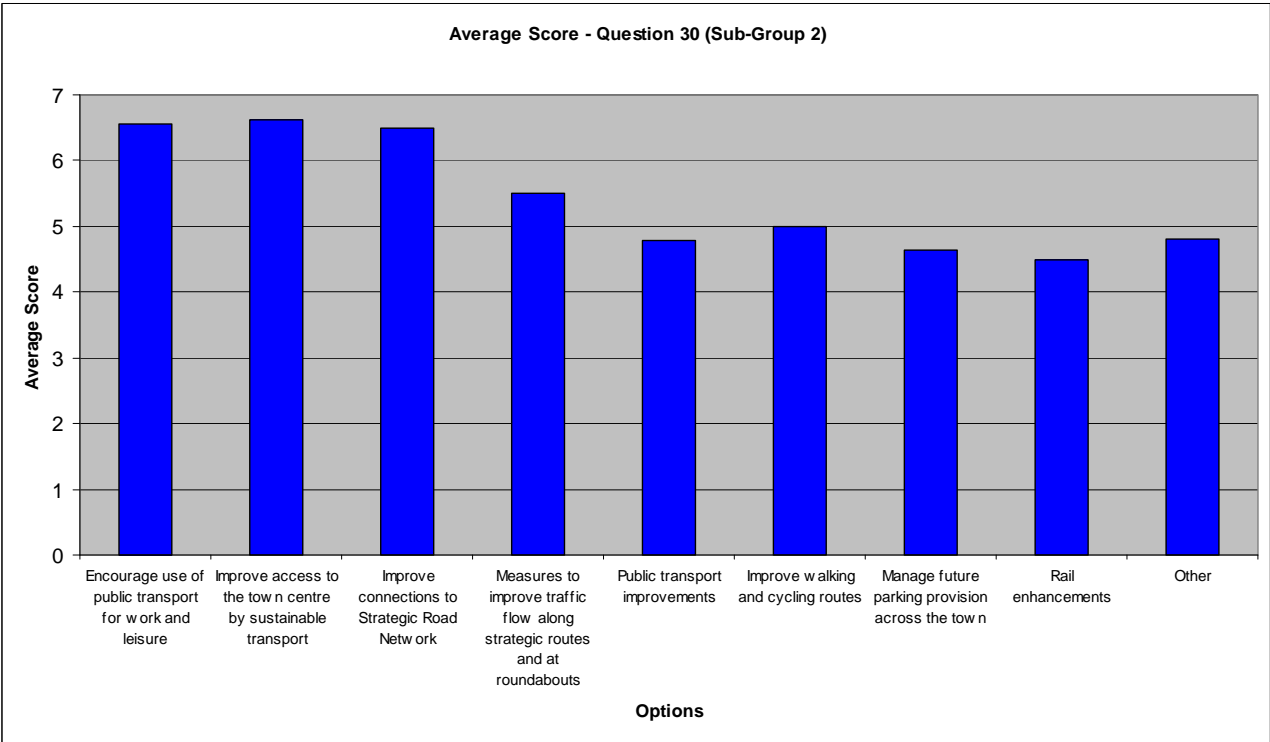
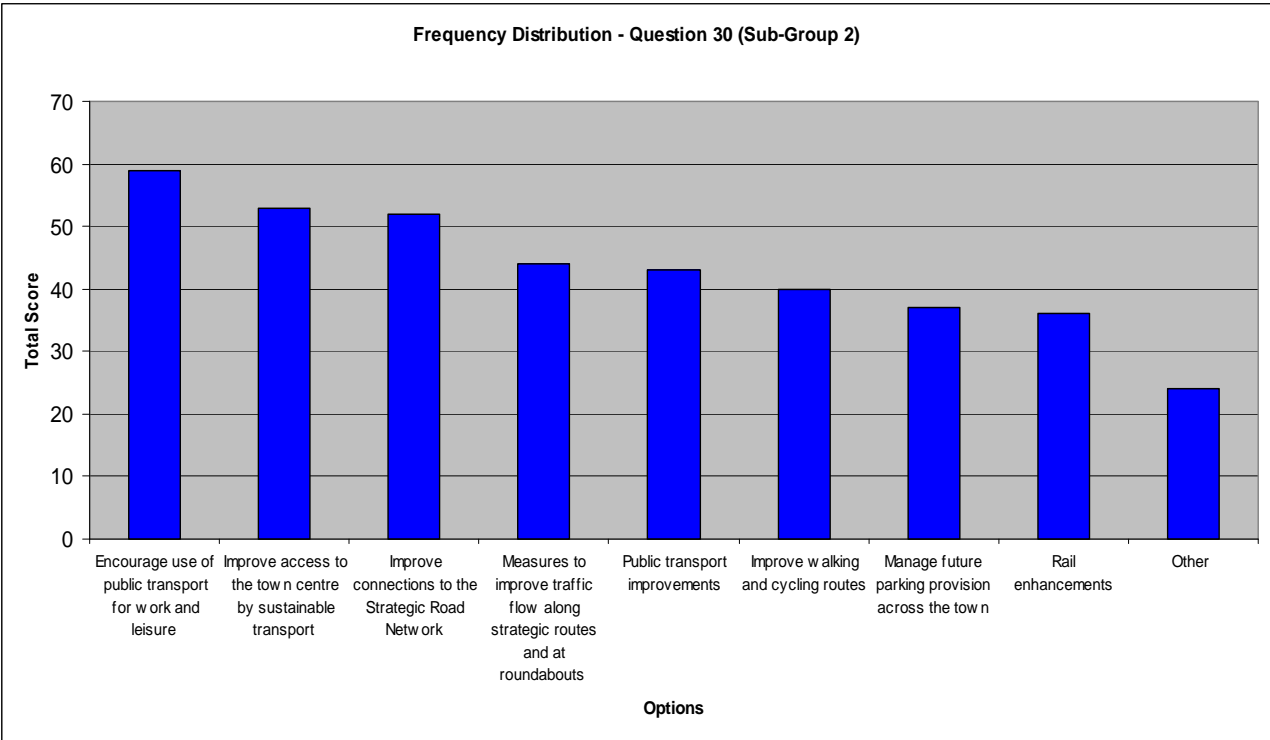
Question 30 - Please rank, in order of priority, how Harlow Council should tackle Harlow's congestion problems (1 = highest priority, 9 = lowest priority)

Sub-Group 1 – Harlow Residents + Community Groups



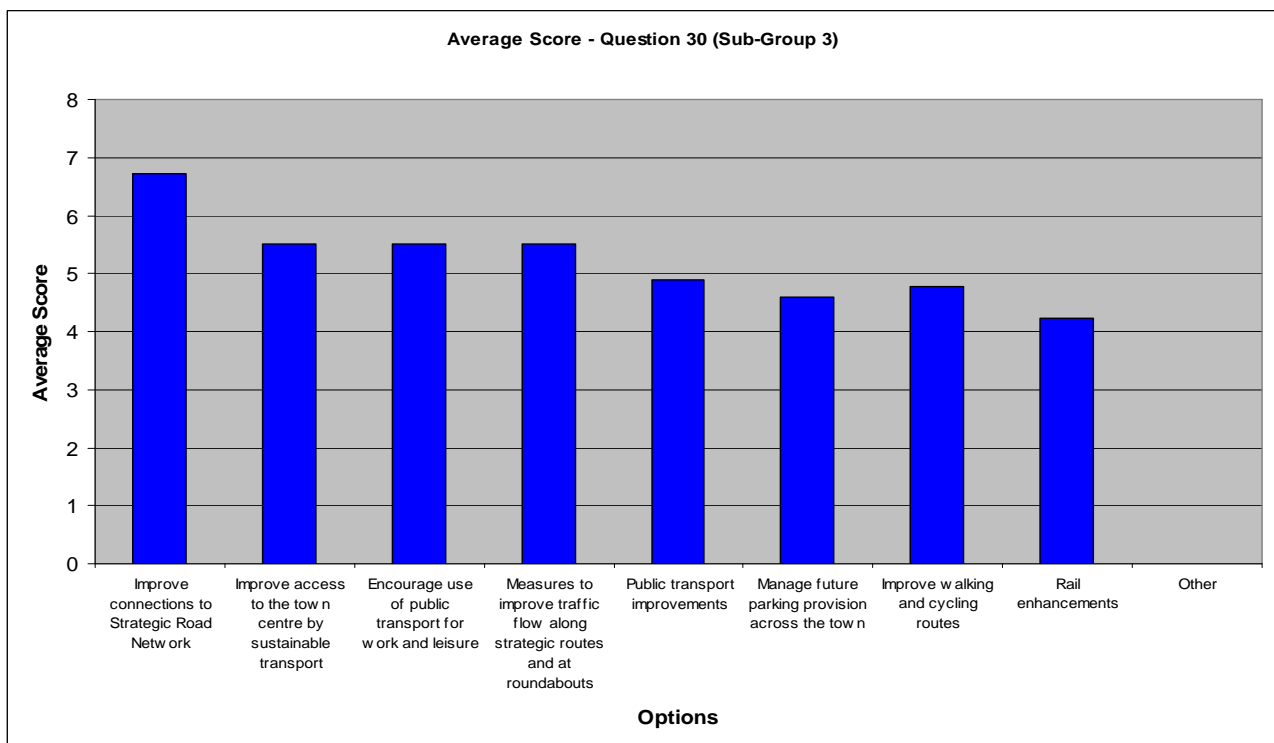
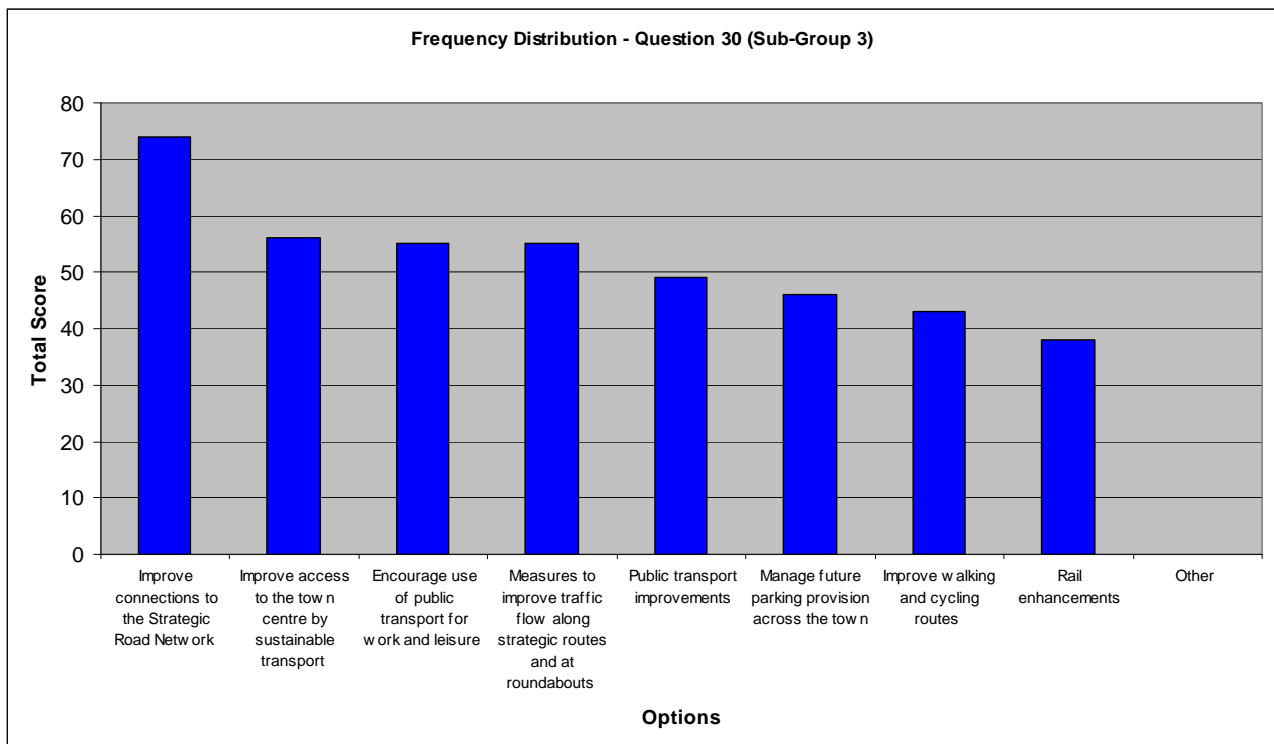
Question 30 - Please rank, in order of priority, how Harlow Council should tackle Harlow’s congestion problems (1 = highest priority, 9 = lowest priority)

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



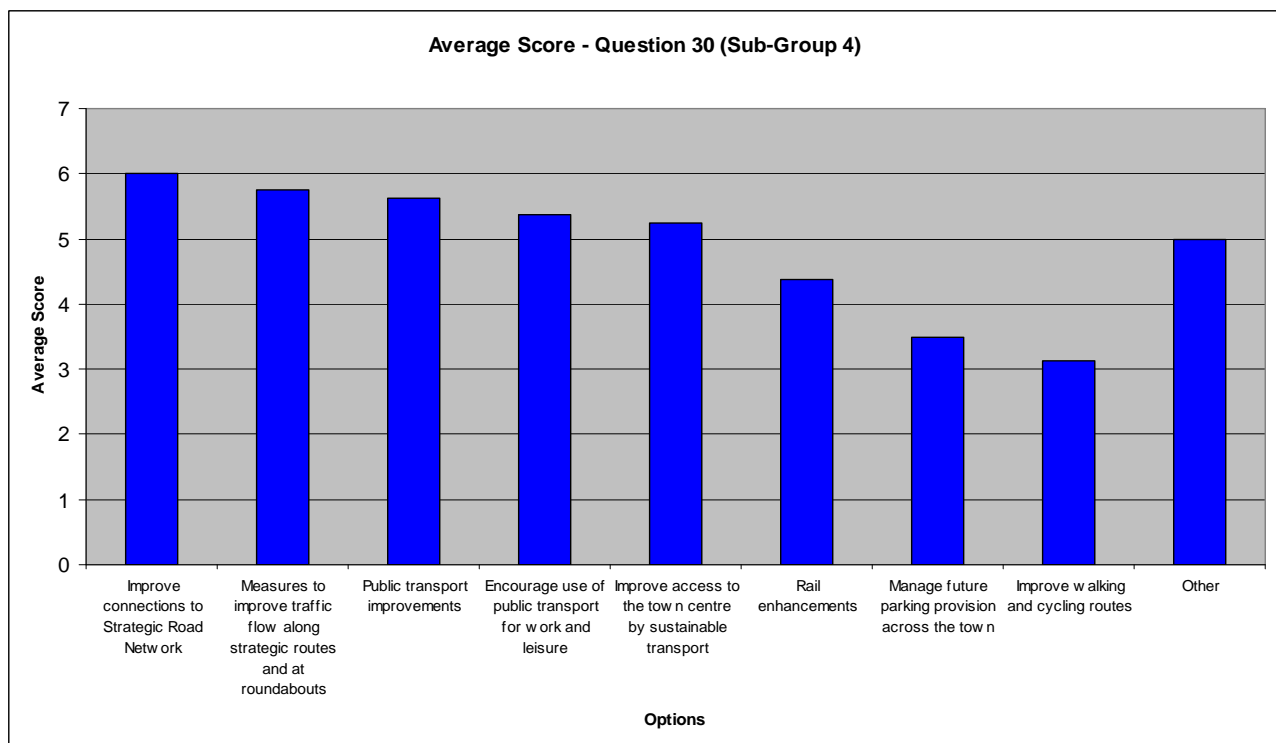
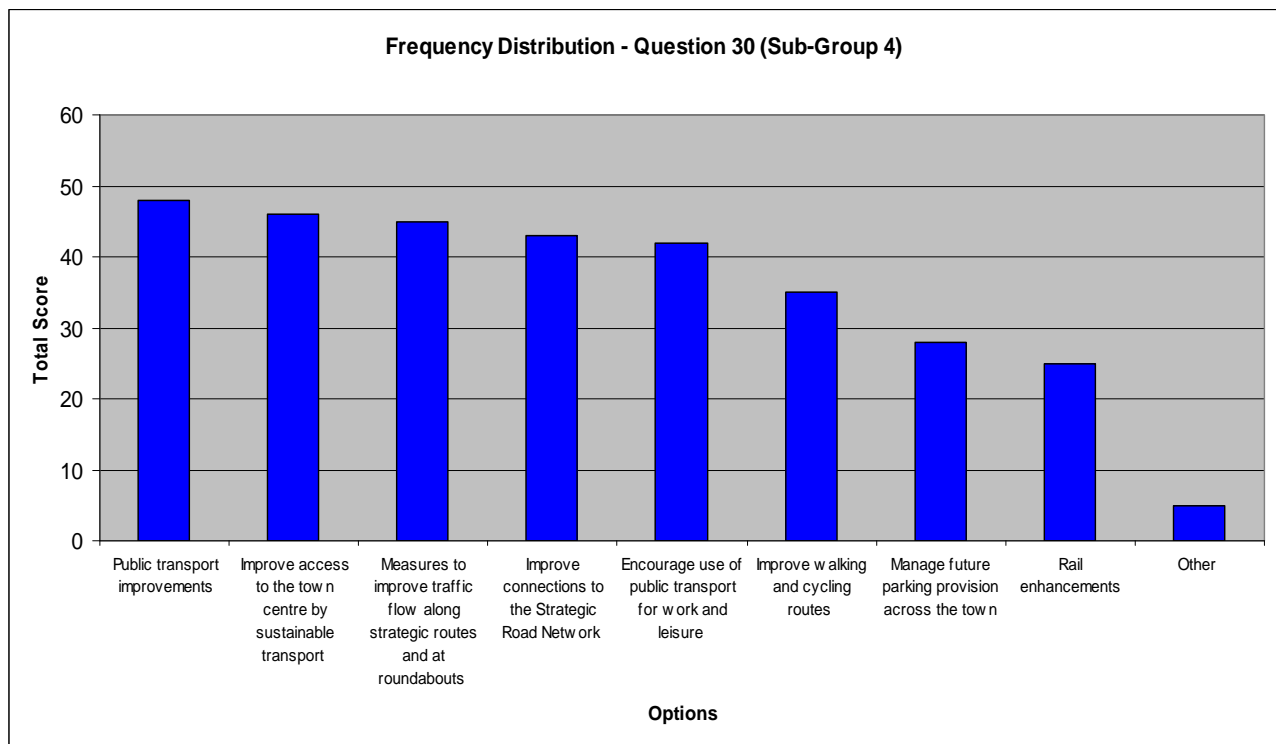
Question 30 - Please rank, in order of priority, how Harlow Council should tackle Harlow's congestion problems (1 = highest priority, 9 = lowest priority)

Sub-Group 3 – Adjoining Parishes Residents + Other Residents



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

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:

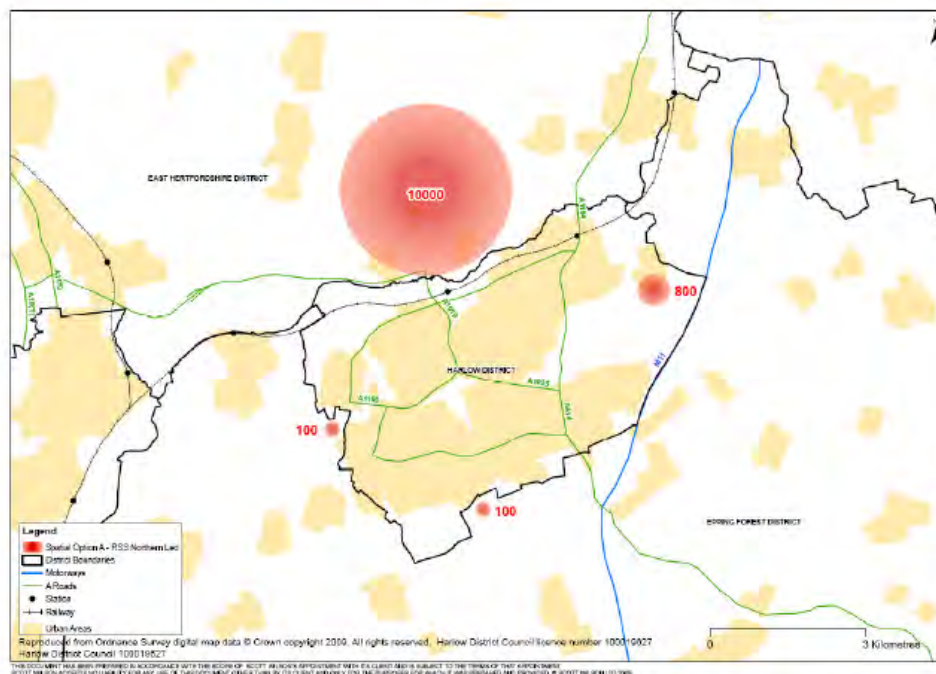
- Strategic issues
 - The implication of the revocation of the East of England Plan and the Localism Bill needs to be considered.
 - If the East of England Plan is revoked much of the evidence remains valid.
 - The Cala Homes judgement means the East of England Plan is still a material consideration.
 - 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.
 - 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.
 - 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.
 - Development should take place in other towns rather than Harlow.
 - There is not enough space in Harlow to accommodate more people.
 - Regeneration is a top priority.
 - There is no clear mechanism to achieve regeneration.
- Cross Boundary issues
 - Harlow cannot allocate land outside its administrative boundaries
 - 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.
 - 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

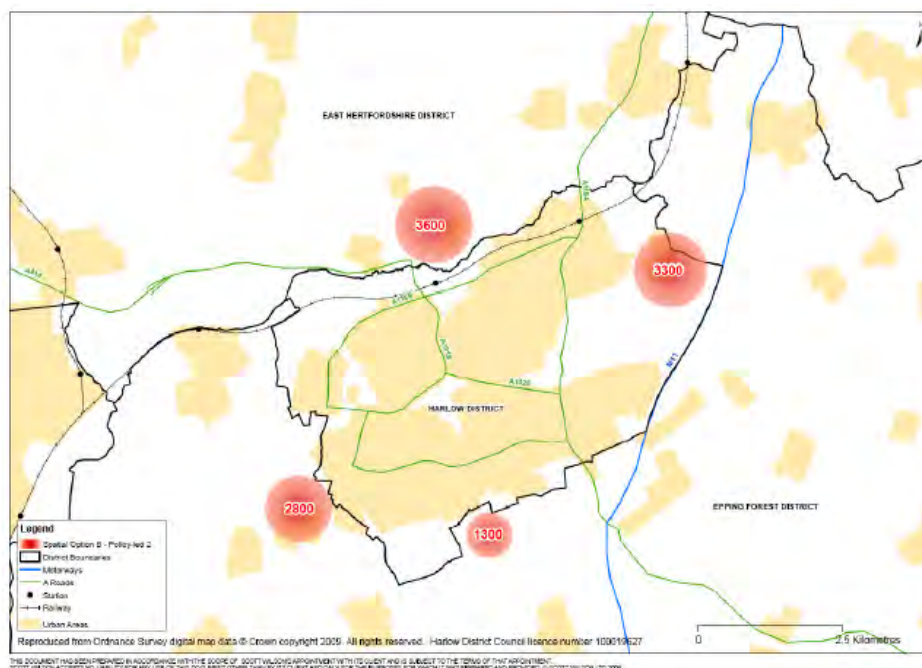
The consultant, Scott Wilson, tested five growth options. The full report can be viewed online at www.harlow.gov.uk/ldf (follow the link to 'LDF Evidence Base').

Option A – RSS: Northern-Led



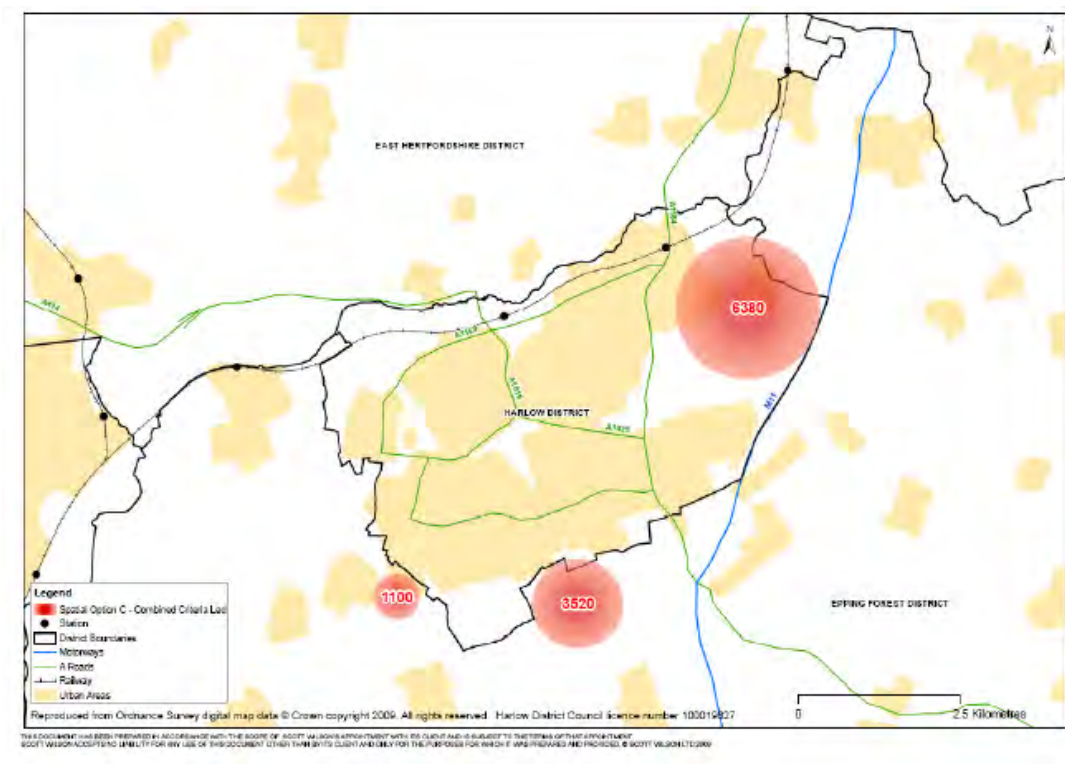
please note: distributions of development are purely illustrative and do not represent fixed boundaries. The specific location of new development will be identified at subsequent stages of the planning process

Option B – Policy-Led 2

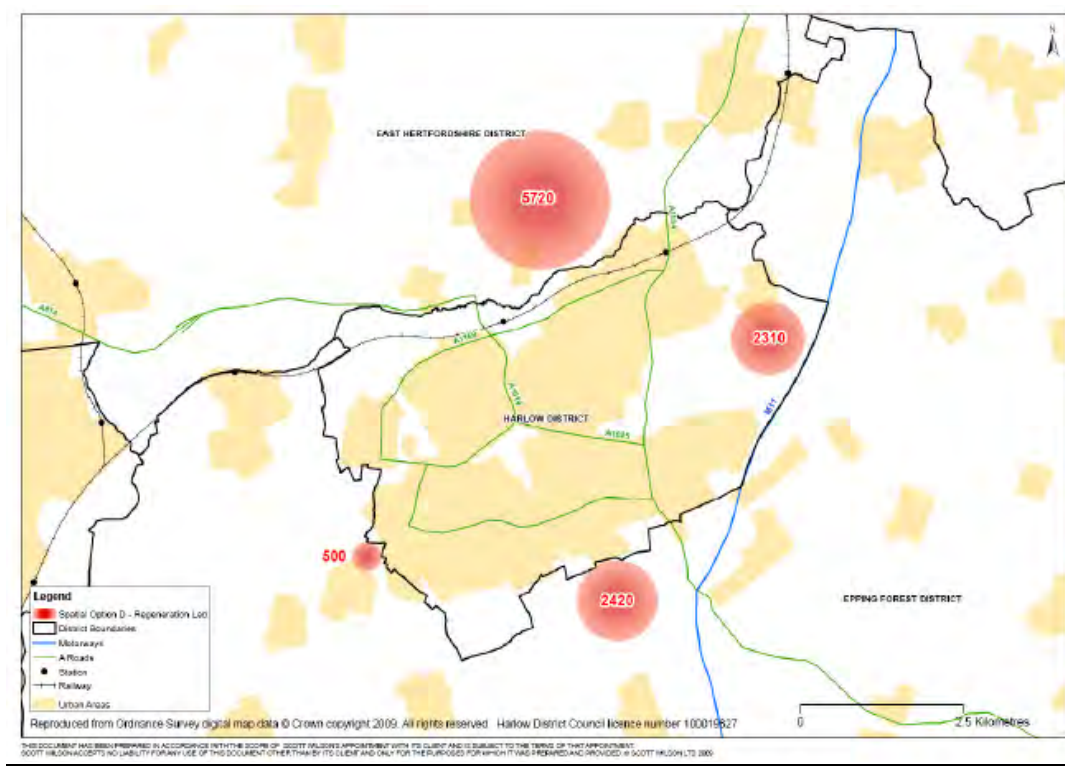


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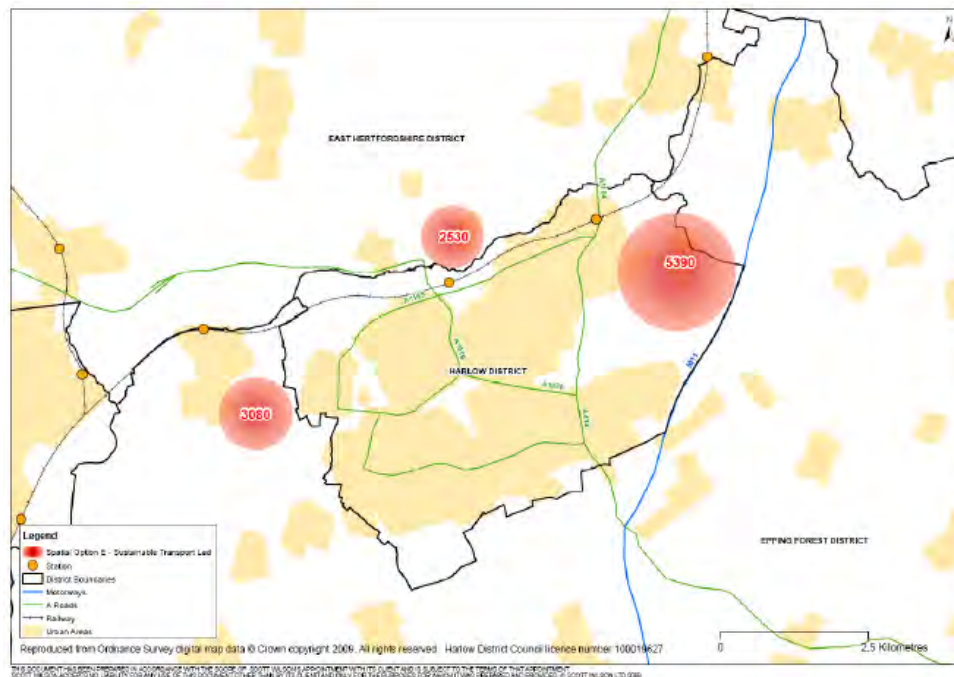
Option C: Combined Criteria-Led



Option D: Regeneration-Led

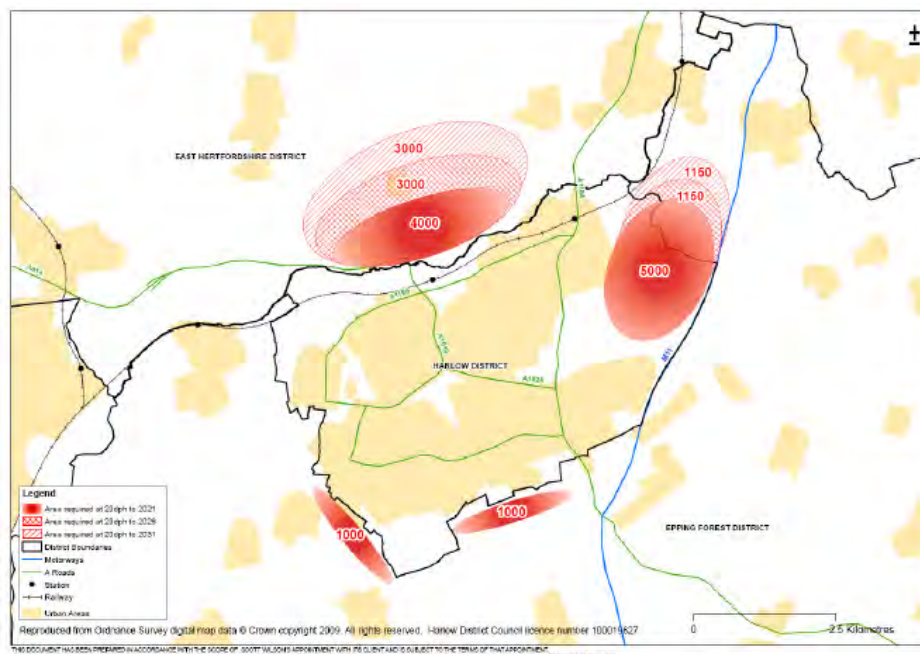


Option E: Sustainable Transport-Led



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 <http://harlow-jdi.consult.net/ldf>

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
1. East of England Development Agency
2. East Hertfordshire District Council
3. Eastwick and Gilston Parish Council
4. English Heritage
5. Environment Agency
6. Epping Forest District Council
7. Epping Upland Parish Council
8. Essex County Council (Environment, Sustainability and Highways)
9. 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.
 2. 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;
 - undesignated neighbourhoods and their landscape settings; and
 - 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.
 - There's no mention of climate change mitigation and adaptation.
 - There's no reference to groundwater protection;
 - There's no reference to contaminated land or implications of redeveloping land affected by contamination.
 - The Water Framework Directive has not been mentioned at all.
 - 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:
 - character and appearance;
 - Recreational and biodiversity value;
 - 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:
 - Evidence of need; and
 - 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, all 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.

Green Wedges / Green Infrastructure:

- 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.
- WEPCCT 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 WEPCCT's programmes.
- Objective 23 - This policy area should not impinge on WEPCCT'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
 - There is good evidence that exposure to nature and a natural environment promotes positive mental health.
 - 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.

Directing new development in Harlow:

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
 - 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, all 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 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.
- Whilst 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		Allard		[6592]
Elaine		Allen		[6031]
Michael		Allen		[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		Austin		[7203]
P	N	Austin		[6188]
Steve		Avis		[7339]
Anna		Avis		[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	[5434]
Derek	Bandy	[6673]
Irene	Bannister	[6708]
Steven	Barker	[7665]
Ellen	Barker	[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	[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]
A	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	[470]
Jenny	Bennett	[6204]
Maureen	Bennett	[7166]
M	Bennett	[6975]
Tony	Bennett	[6675]
Michael	Bentley	[6707]
R	Best	[7237]
T	Best	[7240]
B	Beverley	[6039]
B	Beverley	[6038]

Roydon Parish Council

H C Leach

Briggens Estate

St James Church

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]
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]
M		Blundell		[7419]
Catherine		Boaden		[6235]
A		Bond		[6280]
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]
Vanessa		Bowerman		[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]
C		Brentnall		[6563]
Giles		Brentnall		[6268]
Ian		Brett		[7490]
Virginia		Brett		[7489]
Leslie		Brewster		[6299]
Pauline		Brewster		[6298]
Jean		Brian		[6838]
Stephen		Brickwood		[7569]
Susan		Brickwood		[7586]
Richard		Brickwood		[7458]
Moir		Bridge		[6400]
Colin		Bridgeman		[6572]
Gina		Bridgman		[7271]
Chris		Bridle		[7305]
Geoff		Bridle		[7302]
Jeff		Bridle		[7304]

Paul	Bridle	[7309]
Zoe	Bridle	[7303]
Neil	Bridle	[6584]
Sue	Bridle	[6548]
Linda	Brierly	[7030]
Bob	Bright	[6516]
Ian	Brinham	[6347]
Lilian	Brinham	[6278]
G	Brinkley	[6804]
B	Brinkley	[7447]
V	Brinkley	[7448]
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]
N	Brown	[6807]
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	Bryant	[6071]
Sharon	Bryant	[6623]
Janine	Bryant	[6070]
Lucy	Buckland	[7453]
Josh	Buckland	[7452]
K	Buckland	[7451]
Andrew	Buckle	[6364]
Ann	Buckle	[5964]
Eric	Buckmaster	[6373]
Francesca	Buckmaster	[6379]
Louisa	Buckmaster	[6374]
Ruth	Buckmaster	[6378]
Helen	Buckworth	[6590]
Nick	Buckworth	[6263]
Teresa	Bulloch	[7042]
Barbara	Burge	[5093]
Alan	Burgess	[26]
Anthony	Burgess	[7312]
Mark	Burgess	[6869]
Clare	Burkett	[6469]
Wayne	Burlingham	[7578]
Mr	Burnay	[7210]
Ria	Burns	[6212]
Andrew	Burtenshaw	[6368]
Gerald	Burtenshaw	[6072]
Dawn	Burtenshaw	[6068]
Keely	Burtenshaw	[7609]

Protection of Roydon Area PORA

Keith		Busby		[6240]
Thomas		Busby		[6844]
Marion		Busby		[6848]
D	C	Butler		[7574]
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		[7229]
Janet		Carter		[7230]
Ben		Carter		[6099]
Lilli-May		Carter		[6044]
Sarah		Carter		[6499]
B		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]
C		Casey		[7187]
I		Casey		[7186]
Mr		Cash		[6079]
Mrs		Cash		[6080]
Thomas	& Audrey	Castle		[6191]
Hugh		Cater		[6425]
M		Cavalier	Cavalier Land Co	[5717]
P		Chad		[7116]
Peggy		Chad		[6762]
David		Chalk		[5889]
Margaret		Chalk		[7666]
Mike		Chapman		[6852]

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	[6962]
Karen		Cherry	[6960]
Martin		Chown	[5853]
N		Chrimes	[6433]
Brenda		Church	[6346]
David		Clapham	[6834]
Nigel		Clark	[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]
T		Clark	[7289]
Judith		Clark	[7397]
M		Clark	[7288]
Karen		Clark	[6435]
Paul		Clark	[6922]
Rachel		Clark	[6512]
Sam		Clark	[5722]
Matt		Clarke	[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	[5721]
Janet		Clemmett	[5874]
Michael		Clemmett	[6022]
Dean		Clemmett	[6027]
Brian		Clenshaw	[6458]
Philip		Clewes-Garner	[7020]
George		Clifton	[7015]
James		Clifton	[7556]
Revd		Clive	[7577]
J		Cobby	[6861]
Charles		Cochrane	[5891]
Paul		Cochrane	[6355]
Adrian		Coggins	[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	[7127]
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]
Ian	Cooper	[7158]
Louise	Cooper	[5759]
Kristiina	Cooper	[5960]
Nicholas	Cooper	[7221]
D	Coote	[7307]
Ryan	Copping	[6303]
E	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	[7470]
Jennifer	Cummins	[6682]

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	[7032]
E	Day	[6546]
Robert	Day	[6122]
A	De	[6843]
E	De	[6089]
Gwenda	Deal	[6857]
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]
Faye	Dixon	[5946]
Paul	Dixon	[7007]

Stanley	Dixon	[7415]
Stephanie	Dodd	[6537]
Barbara	Doherty	[7057]
P	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]
Patrick	Dudley	[7284]
Sheena	Duigenan	[6617]
Ian	Duncan	[5848]
Michael	Dunlea	[6179]
Alan	Dunnage	[6698]
L	Dunnage	[6688]
John	Dunne	[7476]
Judy	Dunne	[5051]
Liam	Dunne	[7474]
Claire	Dunstan	[7239]
Jo	Dunstan	[7243]
Kath	Dunstan	[6733]
Paul	Dunstan	[7244]
Ken	Dunstan	[6587]
Jordan	Durber	[6505]
Philip	Durber	[6619]
Jennie	Durber	[6618]
Christopher	Durman	[7119]
Jack	Durman	[7121]
Molly	Durman	[7120]
Lucy	Durman	[6340]
Nat	Durman	[7122]
Giuseppe	D'Urso	[7283]
P	Dyball	[7541]
Peter	Dyble	[6830]
E	Eastwood	[5972]
James	Eastwood	[7040]
L	Eastwood	[6604]
Noel	Eastwood	[5968]
Rupert	Eastwood	[7004]
Fiona	Eaton	[7376]
James	Eaton	[7378]
John	Eaton	[7377]
Tracy	Eaton	[6965]
Sarah	Edmonds	[6442]
B	Edwards	[6495]
D	Edwards	[6632]
Gruff	Edwards	[6037]
Margaret	Edwards	[7170]
Mary	Edwards	[7248]
Michael	Edwards	[6564]
Anthony	Edwards	[6770]

David	Edwards	[6758]
Stephen	Edwards	[6494]
Beryl	Edwards	[6772]
Edna	Edwards	[6311]
Roy	Edwards	[6986]
Kim	Elaine	[7436]
Ottoline	Elbishlawi	[7607]
Mrs	Elfick-Wood	[6594]
Katharine	Elliot	[6514]
Elizabeth	Elliot	[6854]
Alan	Elliott	[6117]
Susan	Elliott	[6163]
Sarah	Elliott	[6985]
Jon	Ellis	[7527]
Brian	Ellis	[6606]
Joan	Ellis	[6371]
W	Ellis	[7185]
Brian	Elms	[6637]
Guy	Elms	[6749]
Andrew	Elsdon	[6042]
Nina	Elsdon	[7516]
Gareth	Emanuel	[7290]
Linda	Emanuel	[5958]
Muriel	Emanuel	[5957]
Dominic	Emery	[6901]
Keren	Emery	[7335]
Dawn	Emery	[5740]
John	Ensell	[5755]
Richard	Epworth	[6963]
A	Etter	[6096]
Peter	Etter	[5226]
Tony	Evans	[5664]
Adrian	Evans	[7498]
Maureen	Evans	[7442]
Michael	Evans	[6356]
Susan	Evans	[7184]
Laura	Fabiani	[6171]
Laura	Fabiani	[6466]
Derek	Farley	[6853]
Suzanne	Farmer	[7421]
David	Farningham	[5042]
Ken	Faux	[7380]
Michael	Fearn	[7654]
Helen	Feeney	[6706]
Christine	Fells	[6217]
Angela	Felstead	[6721]
John	Felstead	[6528]
Kealy	Felstead	[6722]
Ian	Felstead	[6250]
June	Felstead	[6328]
Elaine	Ferguson	[5991]
J	Field-Bibb	[6387]
Victoria	Fifield	[6253]
Chris	Finch	[6699]
D	Findlay	[7101]
Peter	Findlay	[6508]
P	Finlay	[6763]
Lorraine	Firth	[6750]
Julia	Fisher	[6813]
Pauline	Fitch	[6959]

Harlow Civic Society

RAMCO (Harlow) Ltd

Rebecca		Fitch		[6553]
Ciaran		Fitzgerald		[7105]
Niamh		Fitzgerald		[7104]
Sean		Fitzgerald		[7106]
Suzanne		Fitzgerald		[7107]
R		Flagg		[6551]
Katherine		Fletcher	English Heritage	[4850]
Y		Flowers		[7360]
Amanda		Fordham		[5922]
Craig		Fordham		[5919]
Doris	Evelyn	Fordham		[6182]
Michael		Fordham		[5996]
Ian		Foreman		[6788]
Mrs		Foreman		[6782]
S		Forsyth		[7109]
Diane		Fossey		[7384]
David		Foster		[6882]
John		Foster		[7296]
Terry		Foster		[5955]
Samantha		Foster		[6889]
Nicola		Foster		[6459]
Skye		Foster		[6881]
Harrison		Foster-Butters		[6891]
Bethany		Foster-Butters		[6890]
Matthew		Fowell		[6764]
Robert		Fowell		[6767]
Hannah		Fowell		[6765]
Sally		Fowell		[6766]
Chris		Fox		[6990]
Matthew		Fox		[6914]
Jonathan	& Nina	Fox		[6081]
Julie		Fox		[6352]
Katherine		Fox		[6353]
Rob		Francis		[5812]
Rob		Francis		[7668]
Diane		Franzman		[7433]
Michael		Franzman		[7464]
Rose		Freeman	The Theatres Trust	[216]
Cathy		Freeman		[7252]
Carl		French		[6403]
S		Freshwater		[6808]
Betty		Fricker		[7581]
Michelle		Frost		[6295]
Mauro		Fugazza		[5158]
Diana		Fullbrook		[6900]
Elaine		Furness		[6574]
Andy		Furze		[5688]
Bob		Gabriel		[6919]
Roger		Gaitley		[6153]
Andrew		Gale		[7054]
David		Gale		[5859]
David		Gale		[6533]
J		Gallantree		[6065]
Ian		Gallantree		[6061]
B		Gallantree		[6062]
P		Galoppi		[6221]
Gina		Galoppi		[6284]
Adam		Garwood	Historic Environment Branch	[215]
Robert		Garwood		[7276]
Susan		Garwood		[7277]

Pamela	Gates	[7320]
Paul	Gates	[7440]
Alan	Gatland	[5880]
Janet	Gatland	[5879]
Angus	Gauld	[7564]
Denise	Gauld	[7565]
Finlay	Gauld	[7563]
Matt	Geddes	[6411]
Richard	Geddes	[6851]
Jackie	Geddes	[6876]
Tim	Geddes	[6697]
Rachel	Geller	[7247]
Simon	Geller	[6912]
Victoria	George	[7235]
D	Ghadami	[6424]
Jeremy	Gibb	[6090]
Phillip	Gibb	[5725]
David	Gibbs	[7572]
Linda	Gibbs	[7573]
Emma	Gibson	[7471]
Helen	Giles	[7325]
Ian	Gill	[7494]
Ann	Gillanders	[6402]
B	Gillespie	[5932]
Roy	Gillman	[7293]
Jacqueline	Gillman	[7589]
Kerry	Girolami	[7255]
Mark	Girolami	[7256]
Phil	Gladman	[7576]
Laura	Gleed	[7043]
Kevin	Gleeson	[7160]
D	Goggin	[7315]
Duncan	Goldsby	[5916]
Ian	Goldsmith	[6920]
Ruth	Gonzalez	[6327]
Chris	Gooch	[7295]
Judy	Gooch	[7294]
Doreen	Goodall	[5805]
Christopher	Goodbody	[6870]
Denise	Goodchild	[6609]
Trevor	Goodey	[7217]
Paul	Goodman	[6132]
Juliette	Goodwin	[6558]
Sean	Goodwin	[7282]
T	Goody	[6826]
Robin	Goodyear	[6829]
David	Gould	[5901]
David	Graham	[5886]
Ann-Marie	Grant	[4896]
Mark	Grant	[6405]
Robert	Grant	[6120]
Karen	Graves	[6728]
Richard	Greaves	[5555]
Angela	Green	[6734]
Ava	Greenwell	[6541]
John	Greenwood	[6650]
M	Greenwood	[6657]
Jennifer	Greenwood	[6674]
Julia	Gregory	[4726]
John	Gregory	[6164]

West Essex Primary Care Trust

Stansted Airport Limited

T	Gregory	[6141]
L	Gregory	[6187]
Philip	Greswell	[7510]
Kevin	Griffin	[6744]
Ian	Griffiths	[7579]
Paul	Griffiths	[6945]
Doreen	Grocott	[6645]
Michael	Grocott	[6656]
Rhoda	Grocott	[6335]
Tiziana	Groom	[5700]
Robert	Groves	[5840]
Kevin	Growden	[6483]
Ramesh	Gulrajani	[7002]
Chris	Gurry	[6519]
Denis	Gurry	[6521]
Gary	Gurry	[6513]
Norma	Gurry	[6517]
Peter	Haagensen	[5959]
Janet	Haley	[6479]
Janet	Hall	[6202]
John	Hall	[6203]
Philippa	Hall	[6257]
Sally	Hall	[6936]
Karen	Hambro	[6301]
Thomas	Hamilton	[6593]
Roget	Hamlett	[6460]
Shaun	Hammond	[6883]
Alan	Hampton	[6367]
Patricia	Hampton	[7608]
Mark	Hancock	[6008]
H	Hancock	[7634]
K	Hancock	[7172]
Patricia	Hannaford	[7231]
Richard	Hannah	[5938]
Ian	Happe	[6671]
D	Harman	[7069]
V	Harris	[7082]
G	Harris	[6532]
Steve	Harris	[6043]
G	Harris	[6531]
Susan	Harris	[6575]
Diana	Harrison	[5980]
Sally	Hart	[6649]
Elizabeth	Harvey	[6832]
Linda	Harvey	[7317]
Kathleen	Hastings	[6225]
Allan	Hatch	[6526]
David	Hatch	[6798]
Patricia	Haupt	[6398]
Roger	Havard	[7603]
Donna	Hawkins	[7125]
Jeff	Hawkins	[6560]
Steve	Hawkins	[6935]
Treena	Hawkins	[6561]
S	Hawryski	[7228]
Ron	Hawthorne	[6112]
Helen	Hawthorne	[6111]
Vivienne	Hayes	[7180]
Carol	Hayward-Peel	[6792]
Steven	Hearn	[6630]

Harlow Citizens Advice Bureau

W	Hebblewhite	[7081]
William	Heelan	[7205]
Judy	Heilpern	[7117]
Dawn	Helder	[6416]
Linda	Helm-Manley	[7333]
Dean	Hemmings	[6333]
Jason	Hemmings	[6713]
Junko	Hemmings	[6330]
Vivienne	Hemmings	[6714]
Tony	Hemmings	[6646]
William	Henderson	[4968]
Janet	Henderson	[7118]
E	Henderson	[6605]
James	Henderson-Gibb	[6091]
Georgiana	Henderson-Gibb	[6092]
Margaret	Henderson-Tew	[6093]
Hazel	Henniker-Horn	[7216]
Caroline	Henry	[6262]
Alan	Henson	[5063]
K	Henson	[7201]
Hanna	Hessling	[6135]
Gordon	Hewlett	[6012]
Kate	Hicks	[6498]
Kevin	Higgs	[7628]
Kevin	Higgs	[5760]
Kim	Higgs	[5802]
D	Hilditch	[6453]
Peter	Hill	[6841]
Ian	Hill	[7399]
J	Hiller	[7450]
Linda	Hilton	[6150]
A	Hinkin	[7211]
Richard	Hinton	[5994]
Joy	Hoare	[6783]
Paul	Hodgkinson	[6429]
Louise	Hodgkinson	[6430]
Angela	Hodgson	[459]
Alan	Hodgson	[5900]
Keith	Hodgson	[5865]
Georgina	Hofer	[6903]
Pat	Holder	[7485]
Richard	Holder	[7484]
Simon	Holder	[6576]
Jean	Hollylee	[5122]
Roger	Hollylee	[6615]
Tom	Hollylee	[7499]
Steven	Hollyman	[6817]
Ann	Holt	[7517]
Ian	Holt	[7521]
Michael	Holway	[6392]
Tim	Holway	[6391]
Lois	Holway	[5954]
Madeleine	Holway	[6076]
Sue	Holway	[6390]
Chris	Homewood	[6802]
John	Hopton	[7327]
P	Hopton	[5975]
Andrea	Horner	[7406]
Joe	Horsley	[7633]

HOOP

Harlow Baptist Church

Sally		Hoskins		[6337]
P		Hough		[7667]
Peter		Hough		[5813]
Anne		How		[6659]
D		Howard		[6239]
Gary		Howard		[6725]
M		Howard		[6582]
Sandra		Howard		[6118]
Michael		Howarth		[5049]
Antoinette		Howarth		[6047]
Kirsty		Howden		[6103]
Alastair		Howe	Alastair Howe Architects	[3351]
Janet		Howes	Redeemer Lutheran Church	[464]
Ian		Hudson	Copyzone Archiving Ltd	[5684]
David		Hughes		[6980]
Marcus		Hughes		[6048]
Margaret		Hughes		[5105]
Sylvia		Hughes		[6600]
Margaret		Hulcoop		[65]
David		Hunt		[6972]
Susan	& David	Hunt		[6824]
Susan		Hunt		[6958]
Daniel		Hurst		[7236]
Claire		Hutchinson	PWLL Consortium	[7644]
Jacqueline		Hutchinson		[7291]
Jennifer		Hutchinson		[6731]
M		Hutchinson		[6286]
Margaret		Hutt		[6859]
Janice		Hyde		[7424]
Chris		Hyland		[7139]
G		Hyland		[6757]
Jutta		Ignatiou		[6016]
Eleftherios		Ignatiou		[6015]
Veronica		Iliffe		[7366]
C		Ings		[7466]
Zeana		Instance		[7400]
Carl		Inwood		[7161]
Barbara		Ireland		[6158]
David		Irons		[6577]
Graham		Irwin		[7275]
R		Irwin		[7445]
B		Jaafar		[7091]
E		Jaafar		[7090]
J		Jaafar		[7089]
M		Jaafar		[7088]
Charles		Jackson		[6100]
S		Jacobs		[7209]
Adrian		James		[7354]
David		James		[6924]
Trevor		James		[6562]
Alexandra		Jane		[6877]
Eleanor		Jane		[7487]
Flora		Jane		[7372]
Peter		Jarman		[7337]
Pru		Jarman		[7336]
R	A	Jarvis		[6747]
S	A	Jarvis		[6748]
Mr		Jay		[7595]
Gary		Jeffery		[7423]
Barbara		Jeffrey		[6520]

R		Jenkins	[7515]
Clare		Jenkins	[5988]
Sam		Jenkins	[6064]
Teresa		Jenkins	[6790]
Ashley		Jennings	[6666]
John		Jewell	[6168]
Paul		Joghee	[6476]
Laurie		John	[5896]
Andrew		John	[7533]
Christopher		Johnson	[6324]
Gloria		Johnson	[7432]
Andrew		Johnston	[7549]
M		Jolley	[7371]
David		Jolley	[6415]
B	T	Jones	[6418]
Catherine		Jones	[7026]
Cathleen		Jones	[6701]
Gillian		Jones	[7072]
Glyn		Jones	[7019]
Joan		Jones	[5892]
Moir		Jones	[5031]
Paul		Jones	[6354]
Trevor		Jones	[6365]
Emily		Jones	[7611]
Emmer		Jones	[6382]
Jane		Jones	[6383]
Melanie		Jones	[6381]
Simon		Jones	[6993]
B		Jordan	[6542]
Keith		Jordan	[7111]
Emily		Jordan-Wilson	[5971]
Sarah		Jowett	[6053]
Lee		Joyce	[6138]
Emma		Juniper	[7374]
Michael		Jury	[6178]
Marcus		Karn	[5965]
Madeleine		Karn	[5930]
Caroline		Karsten	[7567]
Edward		Karsten	[7561]
Peter		Karsten	[7559]
Robert		Karsten	[7560]
Jean		Kay	[6261]
Ray		Keane	[6805]
James		Keir	[5830]
Roger		Keith	[6573]
M		Kelly	[5935]
John		Kelly	[7367]
Peter		Kelsey	[7292]
Peter		Kelsey	[6718]
Barbara		Kemmett	[6051]
Suzanne		Kennard	[7233]
Shirley		Kenworthy	[6595]
Stan		Kenworthy	[6496]
A		Kilbee	[7546]
K		Kilbee	[7548]
Aileen		Kilbee	[7547]
Stephanie		Kimble	[5831]
Peter		King	[6025]
David		King	[6778]
David		King	[6789]

Essex Electrical Contracts

Joanna		King	[6320]
Judy		King	[6307]
Margot		King	[6248]
Samantha		King	[6050]
Paul		Kirkby	[5772]
P		Kitchen	[7349]
David		Kitching	[6224]
Chris		Kitts	[6668]
Vassilios		Kladaras	[6809]
Stephanie		Klidaras	[6524]
Daniel		Knight	[6130]
Esther		Knight	[7174]
Frankie		Knight	[6129]
Gillian		Knight	[6029]
Gracie		Knight	[7041]
Lauren		Knight	[6642]
Matthew		Knight	[6206]
Ritchie		Knight	[6641]
Rosie		Knight	[6205]
Angela		Kurton	[5811]
Marek		Kwiecinski	[5937]
Peter		Lainson	[92]
D		Lake	[7316]
Jean		Lambert	[6033]
John		Lambie	[6911]
Sue		Landon	[6760]
David		Langhelt	[6443]
M		Langman	[6849]
Roy		Langman	[6270]
O		Langman	[6884]
R		Langman	[6885]
S		Langman	[6886]
Steven		Langman	[6186]
Tony	& Jackie	Langsdale	[6621]
Christine		Lapidge	[5923]
Roger		Lapidge	[6115]
Natalie		Larkin	[7551]
Jacqui		Law	[6946]
Joan		Law	[7049]
Michael		Law	[6643]
Philip		Law	[6241]
Nick		Law	[6836]
Maurice		Lawrance	[7528]
M		Lawrancee	[7141]
David		Lawson	[6177]
Jennifer		Lazell	[7605]
Christine		Le	[6952]
Alan		Le	[6317]
Nick		Lee	[7639]
Barry		Lee	[7258]
Heather		Lee	[6724]
P		Lee	[6683]
J		Lee	[6493]
Joanne		Lee	[6242]
Patricia		Lee	[7402]
Judith		Leigh	[7147]
Roger		Leigh	[7165]
Patrick		Leng	[6863]
Barbara		Leslie	[6409]
Martyn		Lewington	[7280]

Harlow Area Access Group

Dooba Investments VI Ltd

Thomas		Lewington		[7602]
Katherine		Lewington		[7601]
Sylvia		Lewis		[7008]
Corinne		Lewis		[6413]
Paul		Lewis		[7012]
M		Lilley		[7050]
A	E	Linnit		[7636]
Dawn		Lloyd	Environment Agency	[7604]
John		Lloyd		[5885]
Pauline		Lloyd		[5858]
A		Locke		[7301]
Michael		Lodge		[6226]
E		Lodge		[6302]
Janet		Lodge		[6296]
Georgina		Loftus		[7154]
Mike		Loftus		[7036]
Maxine		Loftus		[7355]
Claire		Lomax		[5872]
Harry		Long		[7153]
Rhona		Long		[7152]
Steve		Long		[7149]
Yvette		Lord		[6923]
Ellie		Louise		[7342]
Adam		Lowe		[6104]
Treena		Lowe		[6228]
Lesley		Lowers		[6308]
R		Lowers		[6210]
Frances		Luck		[7222]
Peter		Luck		[6310]
Karen		Lydia		[6850]
R		Mabey		[6329]
Barbara		Mackay		[6277]
Terry		Mackay		[6279]
Cameron		Mackenzie		[6806]
Stephanie		Madsen		[6774]
Jill		Maher		[7021]
Paul		Maher		[5058]
Paul		Maison	British Waterways	[146]
Janice		Makin		[7206]
John		Makin		[6610]
Richard		Makin		[5962]
Lisa		Makin		[5963]
Rebecca		Makin		[7566]
The		Manager	Apollo Specialist Engineering	[3383]
The		Manager	Edmonson & Fountain	[6678]
The		Manager	Residents Orchard House	[6934]
Paul		Manley		[7332]
P		Mann		[7056]
C	S	Mansbridge		[6439]
Neil		Mantell	Redrow Homes	[7655]
Andrew		Mark		[6752]
Revd		Mark		[7422]
Gordon		Marks		[6740]
John		Marks		[6020]
Toby		Marks		[6629]
W		Marks		[6831]
Wenna		Marks		[6140]
Nicholas		Marks		[7460]
Toby		Marks		[7459]
Caroline		Marsh		[6893]

Muriel		Marshall		[7386]
Caroline		Marston		[7382]
Colin		Marston		[7383]
Jim		Martin		[7137]
Richard		Martin		[6417]
Sheila		Martin		[7156]
Luigi		Martini		[6218]
N		Mascall		[7009]
Wendy		Maskell		[7486]
David		Mason		[7063]
Leann		Mason		[6559]
Danielle		Mason		[6247]
Diane		Matt		[7627]
Diane		Matt		[5806]
Elias		Mavrommati		[6567]
Edward	& Ethel	Mawdsley		[6009]
Toni		Max		[7281]
Gillian		May		[6742]
Hilda		May		[6021]
Regina		May		[6679]
Joyce		May		[6148]
Janet		Mayes		[7417]
Henry		Mayes		[7200]
Jemima		Mayes		[7197]
Lydia		Mayes		[7198]
Sarah		Mayes		[7199]
Brian		Mayhew	Dale Insurance Services	[5895]
Patricia		Mayhew		[5810]
Robin		McCartney	Churchgate Street Residents Association	[5539]
Ken		Mcdonald		[7204]
S		Mcdonald		[6693]
G		Mcdonald		[6703]
M		Mcdonald		[6695]
M		Mcdonald		[6702]
I		Mcfayden		[6779]
Matthew		Mcgill		[7314]
Jo		Mcgill		[7183]
Graham		Mcisaac		[7375]
Paula		McManus		[6293]
Hugh		Mcmanus		[7392]
Nicola		Mcmanus		[6793]
Neil		McManus		[6290]
John		Mcmillan		[6238]
Scott		Mcnamee		[7469]
Leighanne		Mcnaught		[6880]
Hazel		Mead		[6899]
John		Mead		[6035]
Claudia		Mead		[7405]
Margaret		Mead		[6155]
Jean		Meakin		[6616]
Andy		Medhurst		[7387]
Caroline		Meehan		[6917]
D		Meehan		[6913]
C		Meehan		[7497]
Adam		Meldrum		[6636]
Bernard		Mella		[5913]
Jacqueline		Mella		[5914]
A	D	Mella		[6454]
Gillian		Melling		[6087]
Fiona		Menzies		[5832]

Jeannette	Mercer	[6134]
Sean	Mercer	[6133]
Jacqueline	Mermoud	[5926]
Steven	Meshner	[6342]
Jan	Metcalf	[6654]
Francesca	Micheli	[6359]
M	Michelson	[6691]
H	Michelson	[6700]
	Middlebrook	[7272]
Amanda	Middleton	[6669]
Andrea	Middleton	[6712]
Laura	Middleton	[6709]
Megan	Middleton	[6710]
C	Middleton	[7046]
D	Middleton	[7190]
Harry	Middleton	[6711]
C	Middleton	[7189]
Annmaria	Miechielsens	[7598]
Christopher	Millard	[7495]
Kim	Millard	[7518]
Ray	Millard	[7249]
Nigel	Miller	[6041]
Simon	Miller	[6557]
Faith	Mills	[6146]
Malcolm	Mills	[6149]
Craig	Milosh	[6348]
Nebojsa	Milovanovic	[6267]
Joseph	Mishan	[6867]
Nina	Mistry	[6219]
Francis	Mitchell	[6591]
Madeleine	Mitchell	[5966]
Olivia	Mitchell	[5931]
Helen	Mitchell	[5927]
S	Mitchell	[6681]
Jennie	Moncur	[7142]
Lorna	Montgomerie	[6276]
Nick	Moore	[7318]
Steph	Moore	[7016]
Stevie	Morden	[5221]
Danny	Morgan	[7044]
Jacqueline	Morgan	[6339]
Keith	Morgan	[7328]
Dianne	Morgan	[6667]
Esther	Morgan	[7306]
Ronald	Morgan	[7537]
Suzanne	Morgan	[7553]
Alan	Morley	[7102]
Sheila	Morley	[6672]
Blaise	Morris	[6108]
Mark	Morris	[7278]
Melanie	Morris	[6956]
Felix	Morris	[6477]
Gwyn	Morris	[5185]
Jemima	Morris	[6478]
Kathleen	Morris	[5080]
Susanna	Morris	[6237]
Philip	Morris	[6955]
Lucy	Morris-Eyton	[7409]
Brenda	Morrison	[6941]
John	Morrison	[6940]

Keira		Morrison	[6019]
John		Morrison	[6704]
Mr		Morrison	[7253]
Robert		Morrison	[6393]
B		Morrison	[6784]
Mrs		Morrison	[7254]
Colleen		Morrison	[5674]
David		Morton	[6139]
Jamie		Morton	[7323]
Jeremy		Morton	[6736]
J		Morton	[6833]
J		Moseley	[6608]
Ian		Moss	[7188]
Marion		Moss	[6222]
Rodney		Munday	[6511]
Nicola		Munday	[7505]
Richard		Munday	[7155]
Katherine		Munro	[7698]
Andrew		Munro	[6777]
Brian		Munro	[6540]
Deborah		Munro	[6846]
Philip		Murphy	[7657]
Becca		Murphy	[6868]
Alison		Murray	[7599]
John		Mustafa	[5016]
John		Mustafa	[5678]
B		Mutter	[7329]
Juliet		Nabavi	[7017]
Gordana		Najdanovic	[6265]
Jackie		Nash	[6142]
Jane		Nathan	[5989]
Alan		Naughton	[7011]
Carmel		Naughton	[7010]
Alan		Naughton	[6795]
Sally		Naylor	[5259]
David		Needham	[7396]
Suzanne		Neville	[7070]
Graham		Newell	[6974]
Arthur	Stanley	Newens	[5917]
Sandra		Newens	[5918]
Thomas		Newens	[5899]
M		Newitt	[6601]
Amanda		Newman	[7434]
Lorraine		Newman	[6585]
Ben		Newman	[6245]
Rachel		Newman	[5934]
Tina		Newman	[6246]
Pamela		Newman	[6176]
Victoria		Newman	[7584]
Mike		Newton	[7646]
Hedley		Newton	[7506]
Linda		Newton	[6166]
Marco		Newton	[7297]
Kay		Newton	[5942]
Paul		Newton	[5871]
Virginia		Newton	[7461]
J		Nicholls	[6243]
Charles		Nicholson	[6406]
M		Nicholson	[7300]
Diana		Nicholson	[6343]

Esther		Nicklin		[6396]
Edward		Nightingale		[7568]
Kaye		Nightingale		[7570]
Eric		Nimalan		[6264]
Cedric		Nimmo		[6957]
Edward		Noakes		[6988]
Ruth		Noakes		[6814]
Barbara		Noble		[5680]
Bryan		Norman		[6485]
Sandra		Norris		[7114]
Sara		Norris		[7115]
Robert		Norris		[5852]
S		Norris		[7113]
G		Norris		[7112]
Sandra		Norris		[5851]
Carly		Norton		[6145]
Lynn		Norton		[6180]
Andrew		Noton		[5860]
Iain		Nuttall		[6193]
Mrs & Mrs		Nuttall		[6266]
Caroline	& Neile	Oakley		[6173]
Zhanine		Oates	Essex County Council	[5406]
Suzanne		O'Brien		[6773]
Anthony		O'Connor	Moat Homes	[5737]
Anthony		O'Connor		[6660]
Glenda		O'Dowd		[7479]
Richard		O'Dowd		[7472]
Abigail		O'Dowd		[7390]
Emily		O'Dowd		[7404]
Shaun		O'Dowd		[5077]
Jake		O'Gorman		[6432]
Natalie		O'Leary		[6189]
Amanda		Olsen		[6676]
Jill		O'Neill		[6285]
Kevin		O'Neill		[6023]
James		Ord		[6686]
Hugh		O'Reilly		[6504]
Luke		O'Reilly		[6622]
Margaret		O'Reilly		[6503]
Peter		O'Reilly		[6136]
Michael		Orsbourn		[5821]
Mark		Orson	Eastwick and Gilston Parish Council	[7610]
Mark		Orson		[5979]
Christina		Orson		[5982]
Sarah		Orson		[7477]
Jackie		Osborne		[6598]
Clare		O'Shea		[6692]
Frank		O'Shea		[6106]
Matthew		O'Shea		[6283]
Karen		Osterley		[7373]
Robin		Osterley		[7468]
Wil		Overton		[7408]
B		Oxenbridge		[7094]
D		Oxenbridge		[7096]
Emma		Oxenbridge		[7097]
F		Oxenbridge		[7093]
J		Oxenbridge		[7092]
Max		Oxenbridge		[7274]
Oliver		Oxenbridge		[7098]
S		Oxenbridge		[7095]

Seb		Oxenbridge	[7273]
Melvyn		Page	[6589]
Thomas		Page	[6840]
Trevor		Paice	[6095]
Agnes		Pain	[6275]
Martin		Paine	[5682]
Howard		Palmer	[7478]
Ruth		Palmer	[7631]
Arthur		Pape	[7068]
Brenda		Pape	[7066]
Sa		Papworth	[7138]
Douglas		Parfett	[6109]
Jane		Parfitt	[7129]
Jordan		Parfitt	[7146]
Poppy		Parfitt	[7128]
Stuart		Parfitt	[7130]
Anthony		Parish	[6860]
Martin		Parker	[6754]
Matthew		Parker	[6755]
Michael	& Jeffery	Parker	[7672]
Stephen		Parker	[5827]
Rebecca		Parker	[5826]
Holly		Parker	[6756]
David		Parkin	[7003]
J		Parkinson	[7410]
John		Parrott	[6827]
Malcolm		Parrott	[6603]
Kelly		Parrott	[6614]
Jacqueline		Parsons	[7534]
Keith		Parsons	[7558]
Leena		Patel	[7126]
C		Patmore	[6451]
Douglas		Pattie	[7463]
Douglas		Pattie	[6759]
G		Pawle	[7519]
Alison		Peacock	[7250]
Beverley		Peacock	[6527]
Roger		Peacock	[6545]
Louise		Peake	[6554]
Derke		Peasey	[6086]
J		Peasey	[7600]
Peter		Pegram	[7298]
Robert		Pegram	[6874]
Teresa		Pegram	[7299]
Jacqueline		Pegram	[6875]
Ann		Pegrum	[6034]
Mr		Pegrum	[7430]
Mrs		Pegrum	[7429]
Donald		Pendrill	[6786]
A		Pendrill	[6785]
Brian		Penn	[7365]
Sofie		Penn-Slater	[6197]
Gill		Perkin	[6634]
Steven		Perrin	[5751]
Anne		Perry	[5911]
Roger		Perry	[5909]
Chrissie		Peters	[7522]
Ann		Petherick	[6720]
Sarah		Phillipps	[7475]
Alice		Phillips	[6208]

East Herts. District Council

Graham	Phillips	[5888]
Graham	Phillips	[6464]
Maurice	Phillips	[7171]
Carolyn	Phillips	[5807]
C	Phipps	[6662]
C	Phipps	[7159]
Patricia	Phipps	[7257]
Trevor	Phipps	[6918]
Jeremy	Pick	[6069]
Nigel	Piggott	[5943]
Mary	Piggott	[5944]
Terry	Pike	[5757]
Jonathan	Pilkingtton	[6450]
Brenda	Pinto	[6003]
Sally	Pipe	[6892]
Andrew	Pirie	[5876]
Pepeng	Pirie	[5877]
R	Polaine	[6010]
Katherine	Porter	[6570]
Roy	Porter	[6816]
Victoria	Porter	[6948]
Vanessa	Povey	[6944]
George	Powell	[5883]
Philip	Powell	[5808]
Barbara	Preston-Barnes	[6169]
Liz	Price	[7227]
Michael	Price	[7224]
Joy	Priest	[6314]
Shirley	Prince	[6162]
Phil	Prosser	[7588]
David	Pullin	[7131]
Melanie	Pullin	[6644]
F	Pullin	[7124]
Max	Pullin	[6056]
L	Pullin	[7123]
Sophie	Pullin	[6060]
Andrew	Pummell	[7500]
Alison	Purdy	[7182]
Mick	Purdy	[6845]
Malcolm	Quinton	[5809]
Ethan	Race	[6794]
Stefan	Radajewski	[6705]
Nadine	Radford	[7234]
David	Radley	[7212]
Natalie	Radley	[7213]
Sarah	Randell	[7136]
Jamie	Rankin	[6825]
Anna	Rankin	[6895]
June	Ratty	[6157]
Albert	Rawbone	[5998]
Louise	Rawlings	[7361]
Dave	Rawlings	[7363]
Peter	Rawlings	[6046]
Brenda	Rawlings	[6045]
Peter	Reed	[7039]
Peter	Reed	[7038]
P	Reed	[6444]
Nikolas	Reeks	[6651]
David	Reid	[6151]
M	Reid	[7435]

Teresa	Reid	[5694]
Petrina	Reynolds	[6823]
Marina	Richards	[6822]
Michael	Richards	[6471]
Clive	Richardson	[6543]
Adrian	Ricketts	[5973]
Caroline	Ricketts	[5974]
John	Rider	[6227]
Terry	Ridge	[7531]
Michael	Ripsher	[6819]
Natalia	Ripsher	[7334]
A	Robarts	[6997]
Kate	Robarts	[6482]
Jenny	Roberts	[7535]
D	Roberts	[6626]
H	Roberts	[6627]
Joy	Robinette	[4678]
David	Robinette	[6943]
Joy	Robinette	[7348]
Katie	Robinette	[7544]
Colin	Robinette	[7591]
Jemma	Robinette	[6084]
Adrian	Robinson	[6549]
Paula	Robinson	[5677]
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Irene	Robson	[7427]
M	Robson	[6336]
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Peter	Robson	[7428]
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Bryan	Saunders	[6184]
Andy	Saward	[5990]
Alice	Sayer	[7022]
Ed	Sayer	[6550]
Gillian	Sayer	[6916]

Hunsdon Parish Council

Persimmon, Taylor Wimpey & Martin Grant Homes

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Nick		Scarr	[7401]
J		Schlenker	[7407]
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Malcolm		Seeney	[6214]
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Otilie		Sefton	[5952]
Rod		Seivewright	[5928]
Bob		Sellwood	[7647]
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Shareen		Sharp	[6602]
Michael		Shaw	[7550]
Kimberley-			
Jane		Shawe	[6571]
Tracey		Shawe	[6735]
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Barbara		Short	[6768]
Peter		Shrubb	[6655]
Ben		Siegmund	[6058]
Mr & Mrs		Simon	[7346]
Van		Simone	[7473]
Paul		Simons	[6690]
Sheila		Simons	[6689]
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Matthew		Simpson	[6500]
S		Simpson	[6588]
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Andrew		Sinclair	[6121]
Jane		Skinner	[6862]
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Nancy		Slark	[5867]
T		Slater	[5884]
Marcia		Slaughter	[7571]
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Molly		Sleigh	[6131]
Tom		Sleigh	[6580]
David		Smailes	[7001]
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I		Small	[7457]
A		Small	[6272]
John		Smiddy	[6322]
Bea		Smith	[7411]
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Crest Strategic Projects

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Mrs		Stickler		[5940]
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Robert		Tanner	[6456]
Geoff		Tansley	[6101]
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Peter		Toll	[6929]
Robert		Toll	[7343]
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R		Traer	[6866]
Graham		Trant	[5904]

A-Eleven Publications

Janice	Trant	A-Eleven Publications	[5903]
Mark	Trant	M. T. Garden Services	[5906]
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Damien	Turley		[5690]
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Claire		Wren		[7196]
Lee		Wren		[7232]
Marjorie		Wren		[6144]
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M	J	Wright		[6211]

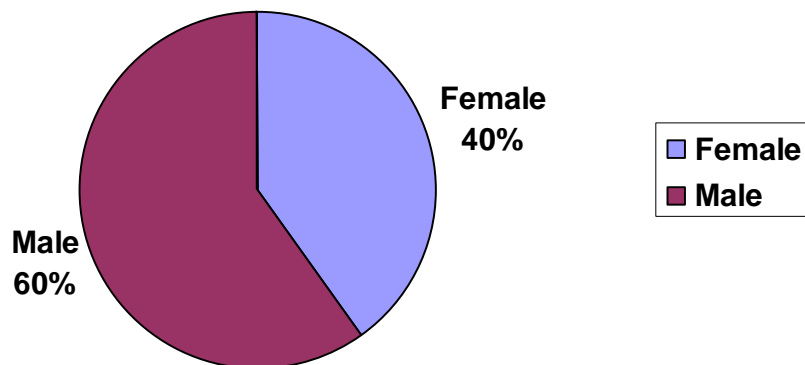
Celia	Wright	[6385]
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Roy	Young	[6399]
Lewis		[7597]
Lina		[7596]
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Deborah		[6094]

Appendix 5 - Demographic Monitoring Results

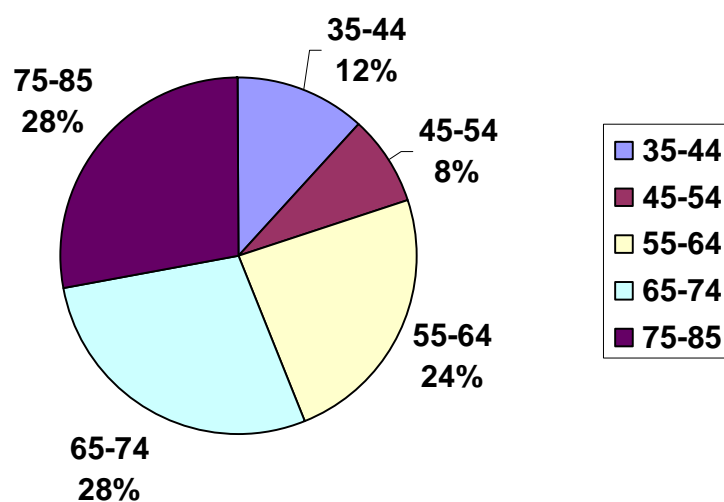
Appendix 5.0 Demographic Monitoring results

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.

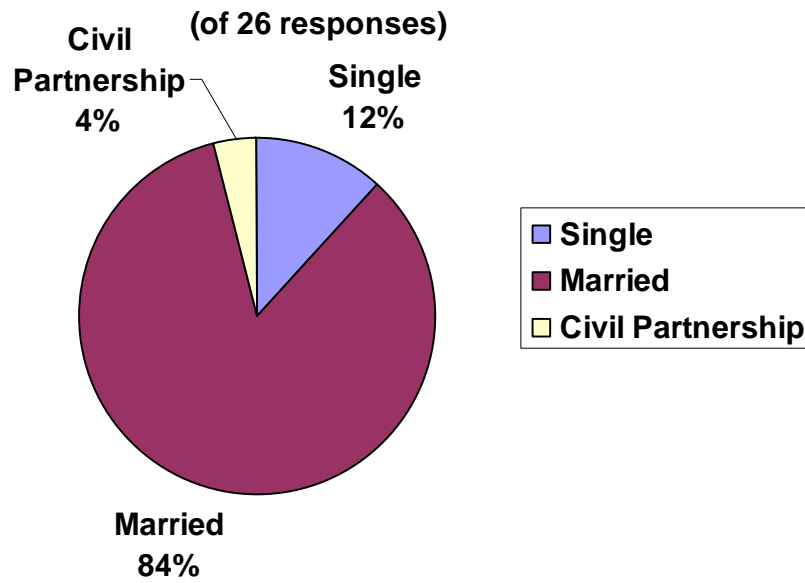
Are you Male or Female? (of 26 responses)



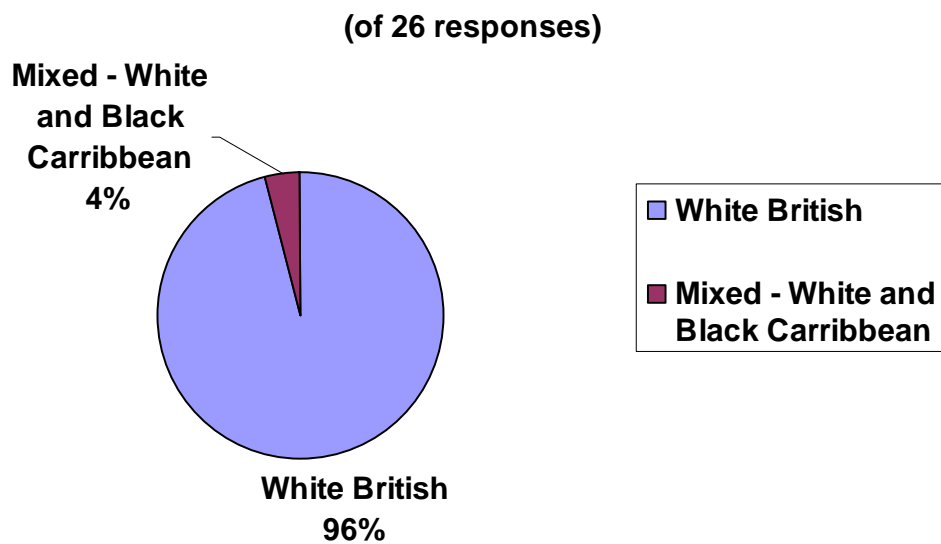
Which age group do you belong to? (of 26 responses)



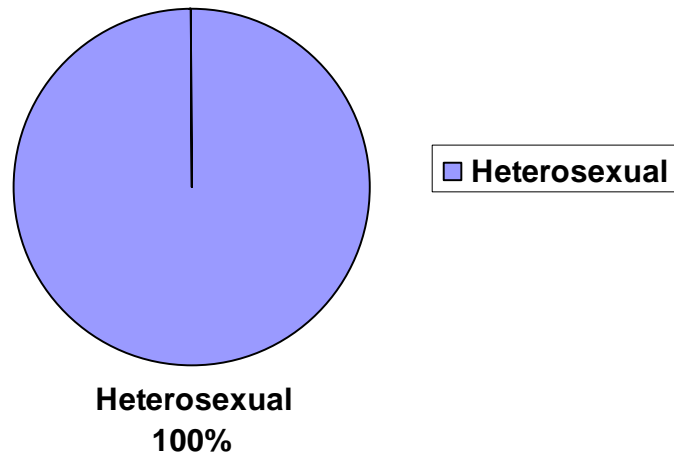
What if your Marital Status?



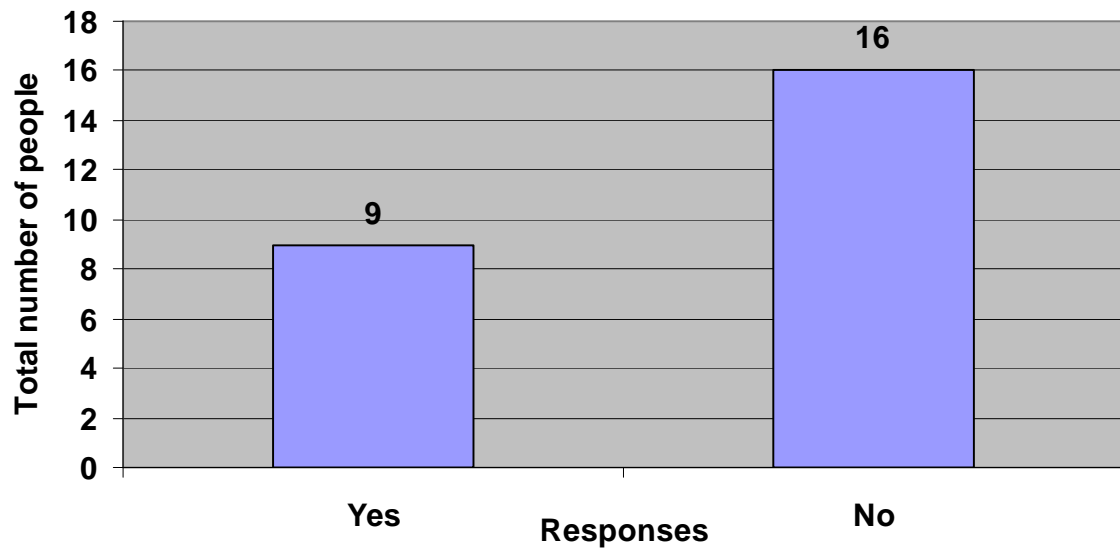
How would you describe your race/ethnicity?



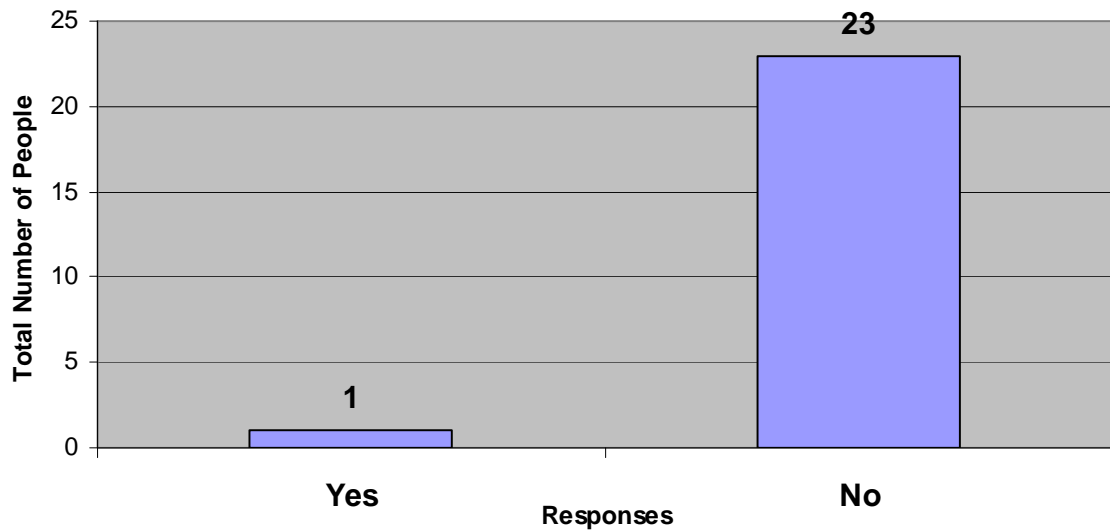
How would you describe yourself?
(of 26 responses)



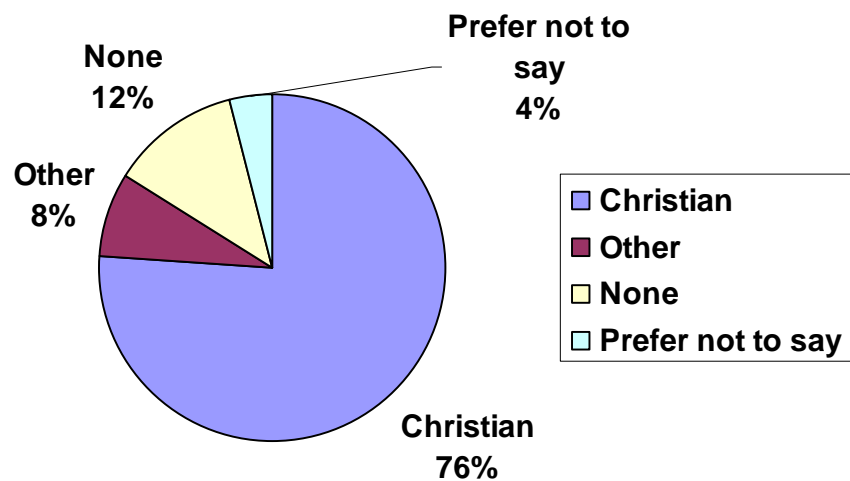
Do you consider yourself to have a physical or sensory impairment or disability?
(of 26 responses)



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

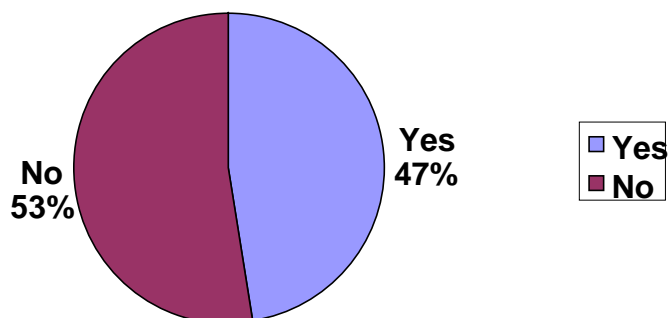
The aim of the Youth Council Workshop was to gather young people's views on a range of issues related to the questions that were contained in the Issues and Options consultation document. Whilst the feedback received from the workshop cannot be formally taken into account as part of the Issues and Options 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.

Workshop results

Question 1 – Do you like living in Harlow?

Question 1: Do you like living in Harlow?
(19 responses)

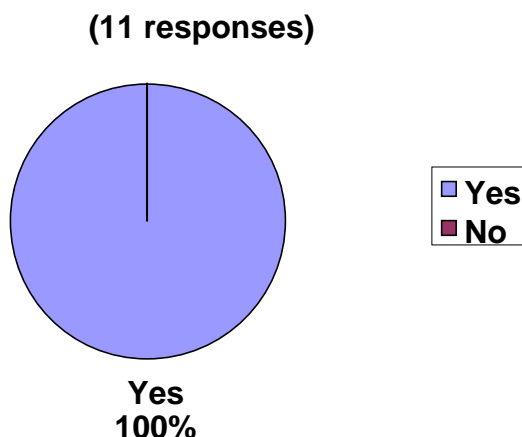


19 Youth Councillors answered this question. Nine stated that they liked living in Harlow compared to ten who stated they did not. The reasons given by those who stated that they liked/disliked living in Harlow are given below:

Reasons given for why Harlow is a good place to live	Reasons given for why Harlow is a bad place to live
<ul style="list-style-type: none"> • Good reputation • Good location • Good schools • Convenient for shopping • Useful green space • Their friends live in the town 	<ul style="list-style-type: none"> • Bad reputation • Economically deprived • Boring • Pollution • Litter • Teenage pregnancy

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?



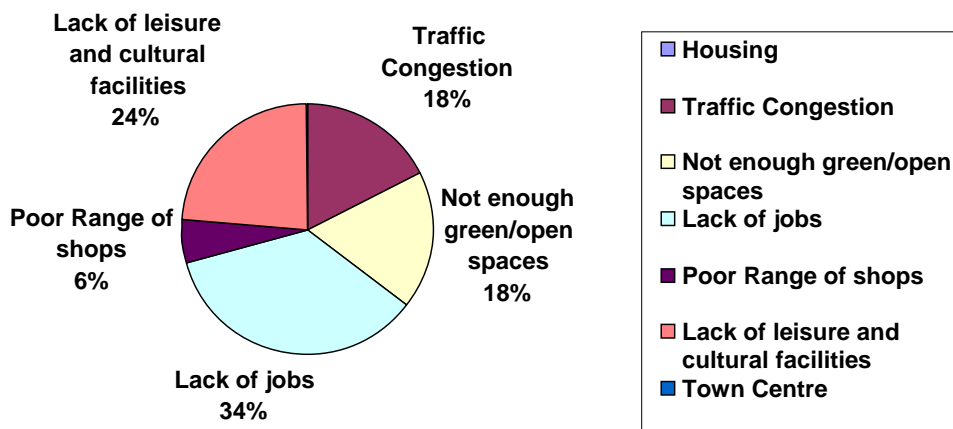
The 11 Youth Councillors who responded to this question all stated they would like to live in Harlow in the future. Reasons given for this included 'family', 'familiarity' and 'commuting'. The Youth Councillors also felt that Harlow offers more employment opportunities than elsewhere and less 'hustle 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.

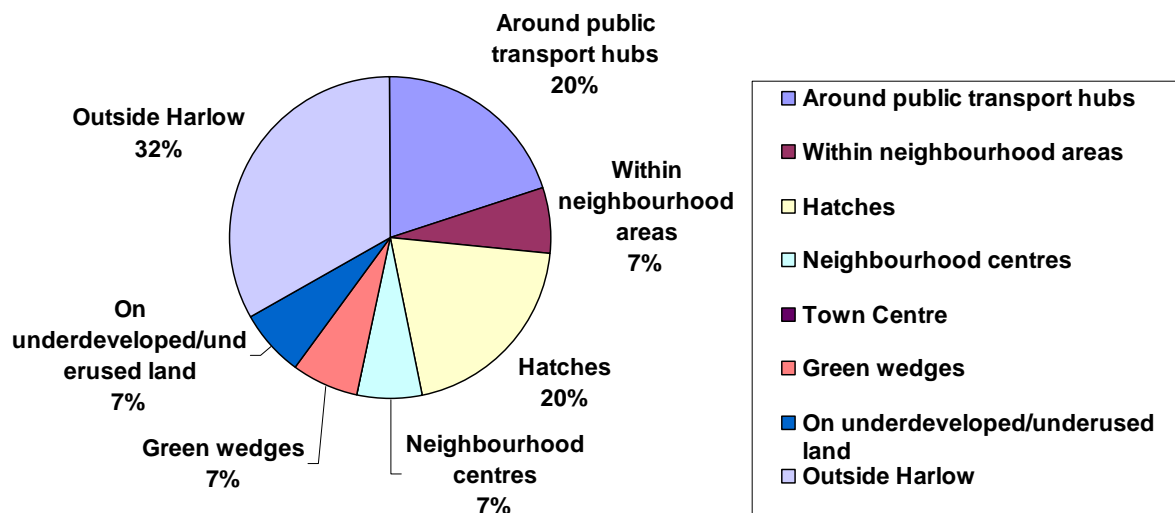
'Lack of jobs' (5) and 'lack of leisure and cultural facilities' (4) received the most votes followed by 'traffic congestion' and 'lack of green spaces' which each received 3 votes. Only one Youth Councillor voted for 'poor range of shops' whilst 'housing' did not receive any votes.

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?

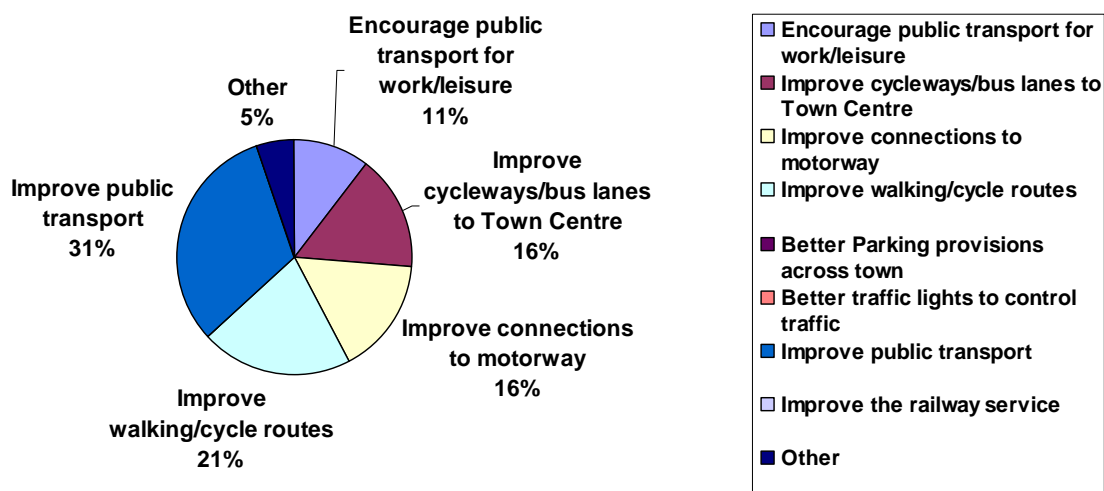
Question 4: If new homes are needed, where should they be built?
(15 responses)



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?

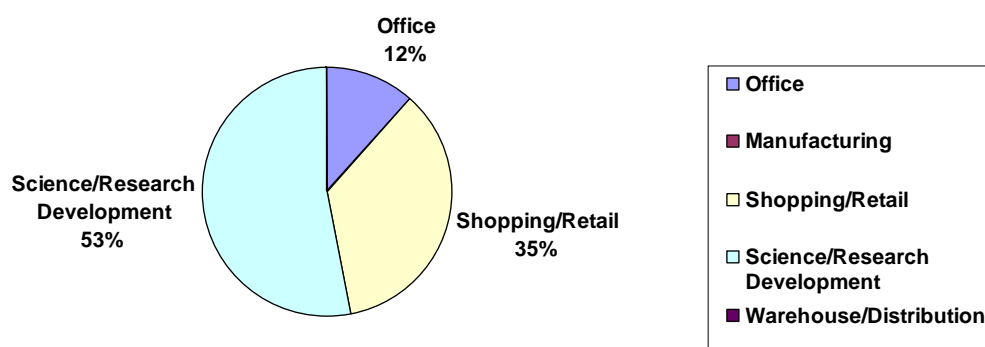
Question 5: How do you think Harlow's congestion problems should be solved? (19 responses)



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?

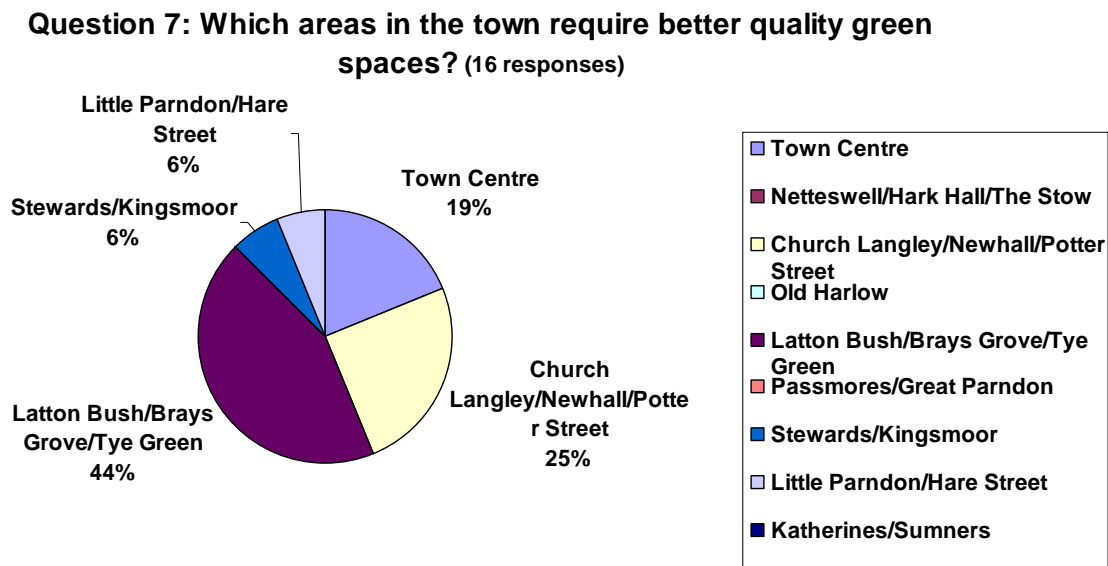
Question 6: What sort of jobs should be available in Harlow? (17 responses)



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?



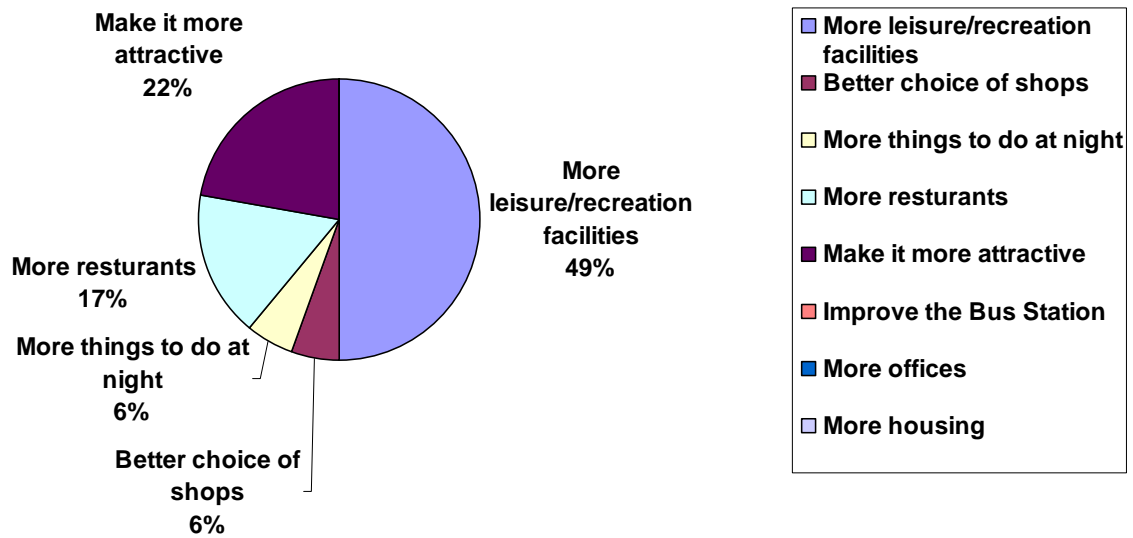
Nine locations roughly corresponding to the neighbourhood areas were presented to the Youth Councillors who were then asked to vote for which they felt most required better quality green spaces. 16 youth Councillors responded to this question. 'Latton Bush/Brays Grove/Tye Green' received the most votes (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 or 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)



Harlow's Local Development Framework

Harlow Youth Council Workshop

17 January 2011




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 **YOU!**



How long until the plan is ready?

Core Strategy Stages



Implementation

- Plan is material consideration in decision making
- Council formally adopts Plan

Adoption

- Binding Report issued by Inspector
- Independent Examination held
- Submission of Plan to Government

Submission & Examination

- Preparation of Final Plan
- Submission Consultation

Pre-Submission Consultation

- Preferred Options Preparation and Consultation

Informal Consultation

- Issues and Options Preparation and Consultation

Informal Consultation

- Awareness raising and evidence gathering

Initial Background Work



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

Shaping Now - Shaping the Future



Harlow, the story so far...



The 1952 Masterplan for Harlow



The current Adopted Local Plan (2001 - 2012)

A New Town designed by Sir Frederick Gibberd
Housing and employment areas separated by 'Green Wedges'

Harlow has many strengths:

- Near to London, Cambridge and Stansted Airport
- 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 skills need to be improved in the town



What are the key issues?

Traffic congestion
needs to addressing
in certain locations...



Cycle paths and foot
paths need to be
improved...

Harlow
Council
Working together for Harlow

What are the key issues?

Recreational facilities
should be protected
and enhanced...



Quality green spaces
for health and leisure
use should be
protected and
maintained...

Harlow
Council
Working together for Harlow



Harlow
Council
Working together for Harlow

Questions

Q1: Do you like living in Harlow?

**Q2: Would you like to live in
Harlow when you are older?**

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 offices
- More housing

Appendix 7 - Examples of consultation publicity 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 myharlow@harlow.gov.uk or calling 01279 446028.

How to respond

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

1. Submitting your responses via the Council's online Consultation Portal at <http://harlow.jdi-consult.net/ldf/>
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
- Summers 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

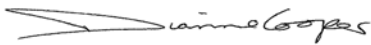
Deadline

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

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 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 www.harlow.gov.uk/issuesandoptions.

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

1. Submit responses via the Council's online Consultation Portal at <http://harlow.jdi-consult.net/ldf/>
2. Email completed questionnaires to myharlow@harlow.gov.uk;
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.

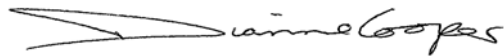
Deadline

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,

A handwritten signature in black ink, appearing to read 'Dianne Cooper', with a stylized flourish at the end.

Dianne Cooper
Planning & Building Control Manager

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 (Static Un-staffed Exhibition)	Monday 20 December - Friday 31 December 2010	Normal library opening hours
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 www.harlow.gov.uk/issuesandoptions. 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

How would YOU plan Harlow's future?

Have your say!

Harlow Council is preparing a new plan, the Core Strategy, which will shape how Harlow is developed over the next 15 years.

The Council is now consulting on the first stage of Harlow's Core Strategy and we want to hear your views on the key issues affecting Harlow and options for planning the town's future.

To find out more visit the exhibition in the Civic Centre reception or come to one of the exhibitions below.



Housing



Placeshaping



Lifestyles



Infrastructure



Prosperity

Harlow Town Railway 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 Wednesday, 15 December 2010 6pm - 9pm	Harlow Town Library Monday 20 December - Friday 31 December 2010 Static exhibition display during normal library opening times	
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

Consultation ends 5pm on 28 January 2011



www.harlow.gov.uk/issuesandoptions

HARLOW-see something different

Harlow Council
Working together for Harlow

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) 446028.

Four ways to have your say

You can comment by:

1. Submitting your responses at <http://harlow.jdi-consult.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

**How would YOU
plan Harlow's future?**

Harlow's Local Development Framework


Have your say!




**Core Strategy
Issues and Options Consultation**

**22 November 2010
to 28 January 2011**

View the consultation document, pick up
a questionnaire and see the exhibition
in the reception area, or visit
www.harlow.gov.uk/issuesandoptions



HARLOW: see something different



Appendix 7.8 Exhibition Display Panels

How would YOU plan Harlow's future?

Harlow's Local Development Framework

What is the Core Strategy?
The Council is preparing a new plan for Harlow called the Local Development Framework (LDF). It is made up of a series of documents, the most important being the Core Strategy. The Core Strategy will set out the strategic principles that will guide development in Harlow up to 2026 and beyond.

Core Strategy Stages

1. Strategic Vision
2. Core Strategy
3. Local Development Framework
4. Local Development Order
5. Local Development Scheme
6. Local Development Framework Review

The Core Strategy will set out the location of:

- New housing
- Employment areas
- Schools
- Community and leisure facilities
- Open spaces
- Transport improvements

Get Involved!
A lot of people and organisations have been taking part in the first stage of the consultation. Your views are being taken into account. The consultation ends at 5pm on Friday 28 January 2011.

Harlow, the story so far...

The Gibbard Masterplan
Harlow is a New Town designed by Sir Frederick Gibbard. The Masterplan required housing and employment areas to be green wadis, schools and leisure facilities to be located in the green wadis which bring the countryside to residents. The housing areas were designed with shopping centres, schools, health and community facilities.

Harlow Today
The Masterplan and the Local Plan have helped to shape Harlow's distinctive character. Harlow is unique:
 • It is the only town in Essex with a green wadi.
 • It is the only town in Essex with a green wadi.
 • It is the only town in Essex with a green wadi.

The Vision for Harlow

The Core Strategy Vision will be based on the vision and priorities in Harlow's Community Strategy. The vision is to create a town that is a model of sustainable development, where the needs of the community are met, and the environment is protected.

Linking the Community Strategy with the Core Strategy
The Core Strategy is the main planning document for Harlow. It sets out the strategic principles that will guide development in Harlow up to 2026 and beyond.

The Core Strategy - Themes and Objectives

There are five 'Core Themes' and 24 'Strategic Objectives' which are being used to develop the Core Strategy.

- Place-making:** Creating a sense of place and identity.
- Infrastructure:** Improving the town's infrastructure.
- Environment:** Protecting and enhancing the environment.
- Community:** Building a strong and resilient community.
- Economy:** Supporting the local economy.

What are the Key Issues?

The common issues identified so far are set out below under each of the five Core Themes.

- Place-making:** Creating a sense of place and identity.
- Infrastructure:** Improving the town's infrastructure.
- Environment:** Protecting and enhancing the environment.
- Community:** Building a strong and resilient community.
- Economy:** Supporting the local economy.

Guiding future development

To meet Harlow's current and future needs, the town needs to regenerate. To do this requires new housing and economic growth, alongside improved infrastructure and services.

How much new development is required?
The town needs to regenerate. To do this requires new housing and economic growth, alongside improved infrastructure and services.

What principles should guide growth?
New development should respect the town's character and be sustainable. It should also be in line with the town's strategic objectives.

Options for future development:
 • Option A: Regional spatial strategy.
 • Option B: Policy led.
 • Option C: Combined criteria led.
 • Option D: Regeneration led.

Online @
<http://harlow.jdi-consult.net/ldf/>

Consultant's suggested growth options

The consultant has suggested four growth options for Harlow. These are based on the town's strategic objectives and the need to regenerate the town.

Option A: Regional spatial strategy
This option is based on the strategic objectives of the LDF. It suggests that growth should be concentrated in the green wadi and the town's core.

Option B: Policy led
This option is based on the town's strategic objectives. It suggests that growth should be concentrated in the green wadi and the town's core.

Option C: Combined criteria led
This option is based on the town's strategic objectives. It suggests that growth should be concentrated in the green wadi and the town's core.

Option D: Regeneration led
This option is based on the town's strategic objectives. It suggests that growth should be concentrated in the green wadi and the town's core.

Forward Planning Team
01279 446028

Have your say!

The Issues and Options consultation ends at 5pm on Friday 28 January 2011.

Where can I view the consultation document?
 • At the LDF Centre reception.
 • At the LDF Centre reception.

How to respond:
 • Email your completed questionnaire to ldf@harlow.gov.uk.
 • Post your completed questionnaire to the LDF Centre.

What happens next?
The town's strategic objectives will be used to guide the development of the LDF. The town's strategic objectives will be used to guide the development of the LDF.

Email @
myharlow@harlow.gov.uk

Sign up for LDF newsletter @

www.harlow.gov.uk/ldf

Have your say!

The Issues and Options consultation ends at 5pm on Friday 28 January 2011.

Where can I view the consultation document?
 • At the LDF Centre reception.
 • At the LDF Centre reception.

How to respond:
 • Email your completed questionnaire to ldf@harlow.gov.uk.
 • Post your completed questionnaire to the LDF Centre.

What happens next?
The town's strategic objectives will be used to guide the development of the LDF. The town's strategic objectives will be used to guide the development of the LDF.

Harlow
Working together for Harlow

Respondents

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

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

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



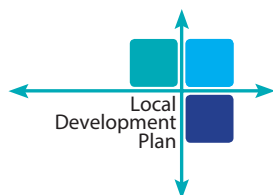
Harlow 2031 – Have your Say

The Council is currently preparing a new Local Development Plan which will cover the period 2011 to 2031. This plan sets out how many new homes and jobs are to be provided in Harlow by 2031. The plan will also include locations where development will take place. In preparation for the Local Development Plan we want your views on options for future development in Harlow which are explained in this leaflet.

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

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

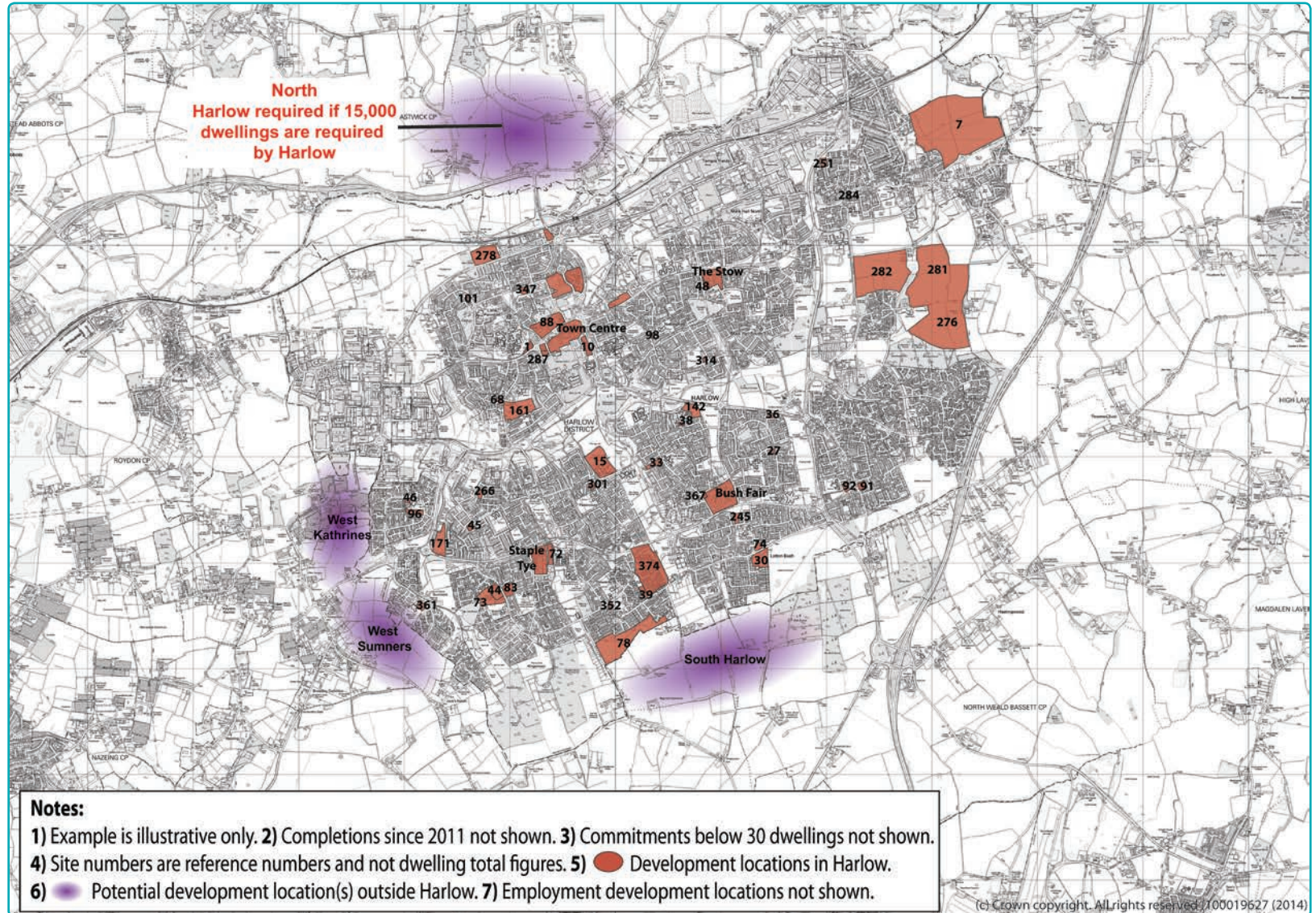
Accommodating Future Development – In Harlow 4,500 homes have planning permission so locations for a further 7,500 to 10,500 dwellings will need to be identified to meet housing need. Five examples of how future development could be provided across Harlow are proposed; each focuses on different Council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



Example 1 – Focused on Priority Regeneration Areas

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

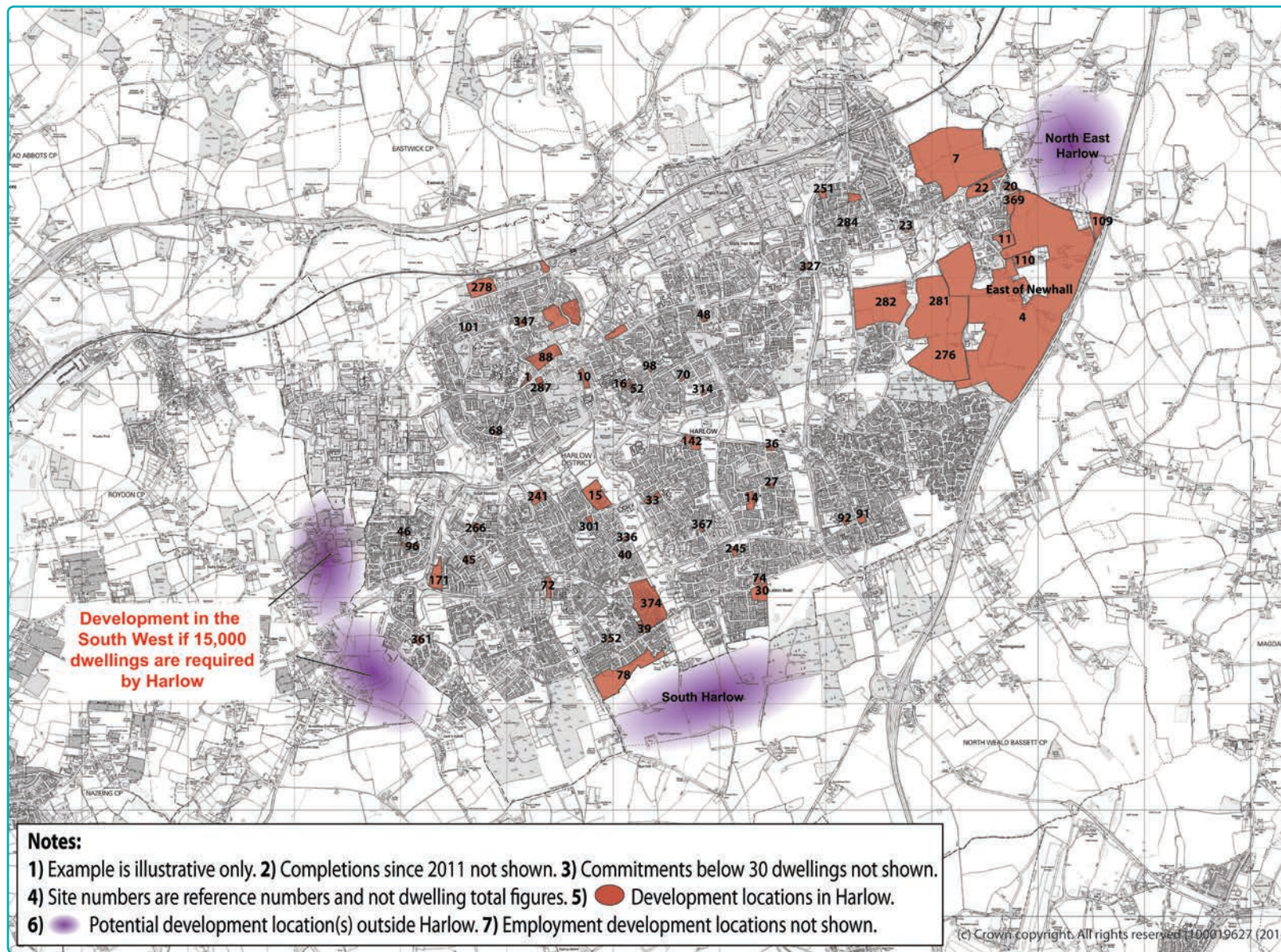
The site numbers are references and relate to the lists contained in appendix 1 of the consultation document.



Example 2 - Environmental / Landscape Led

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

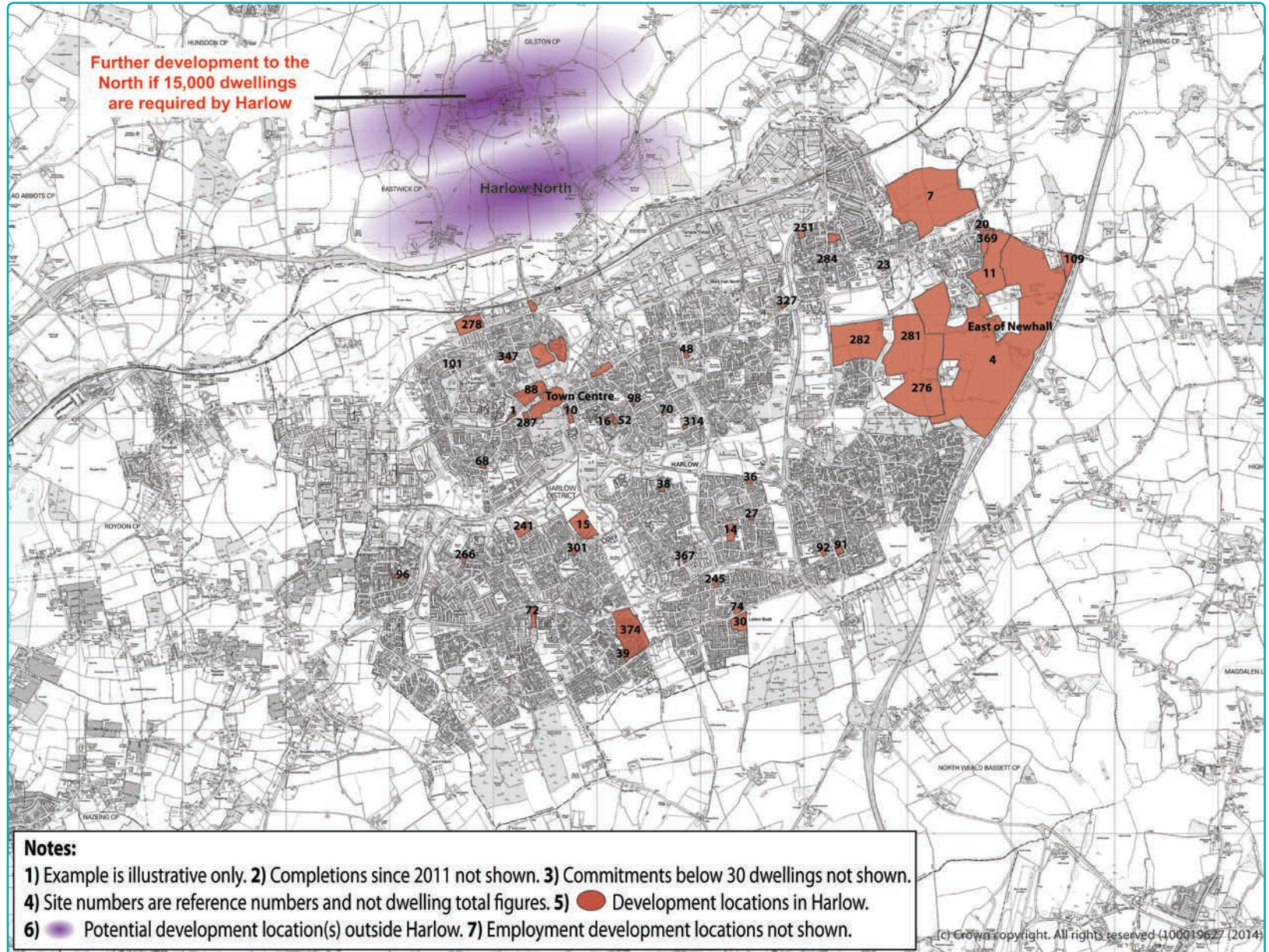
The site numbers are references and relate to the lists contained in appendix 1 of the consultation document.



Example 3 – Passenger Transport Led

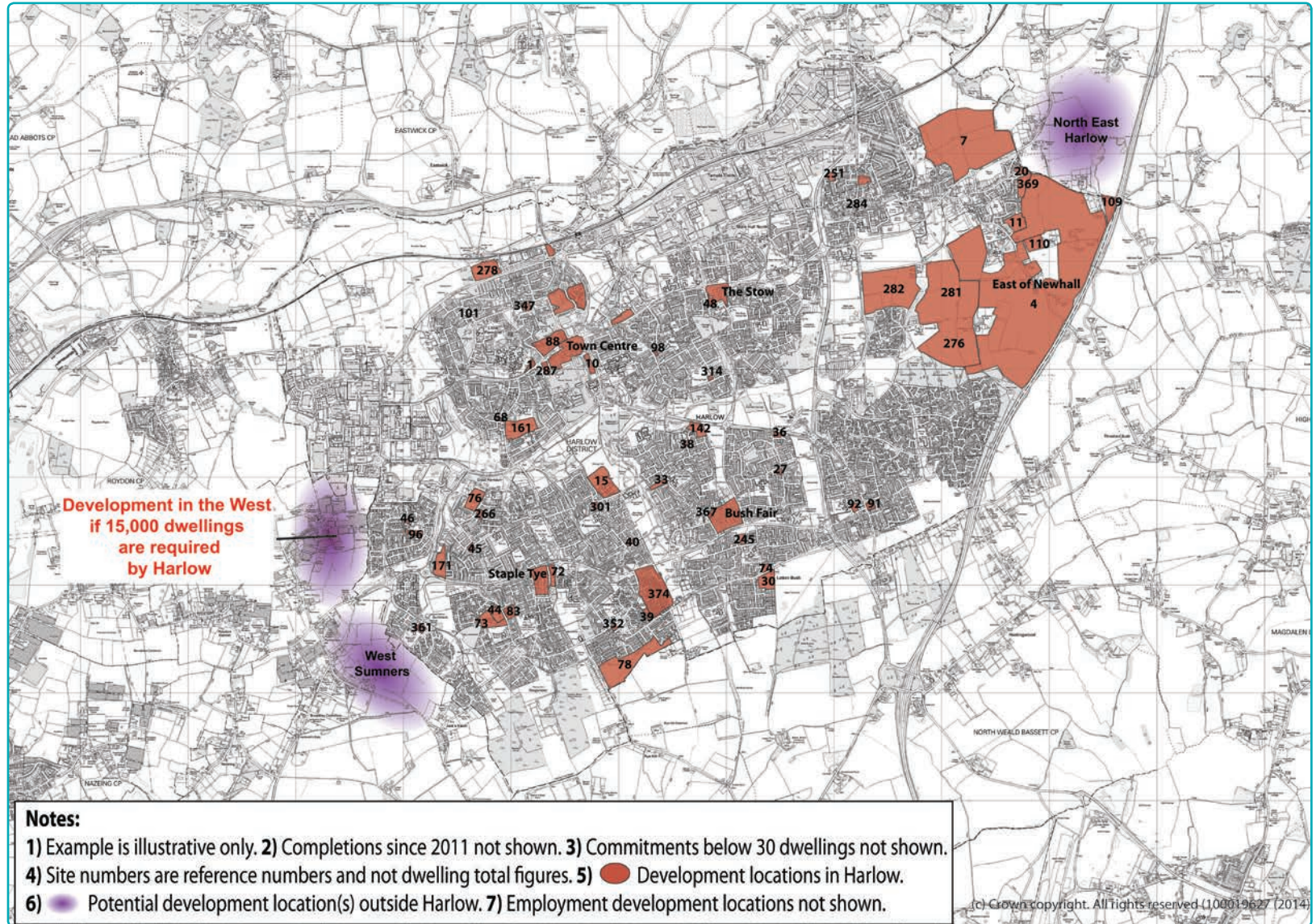
- Focusing future development within Harlow closer to passenger transport hubs such as the train stations and Town Centre bus interchange.
- Development locations in south Harlow are reduced.
- Any development required outside Harlow's boundaries is suggested to be located to north, the closest area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

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



Example 4 – Regeneration and Landscape Led

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

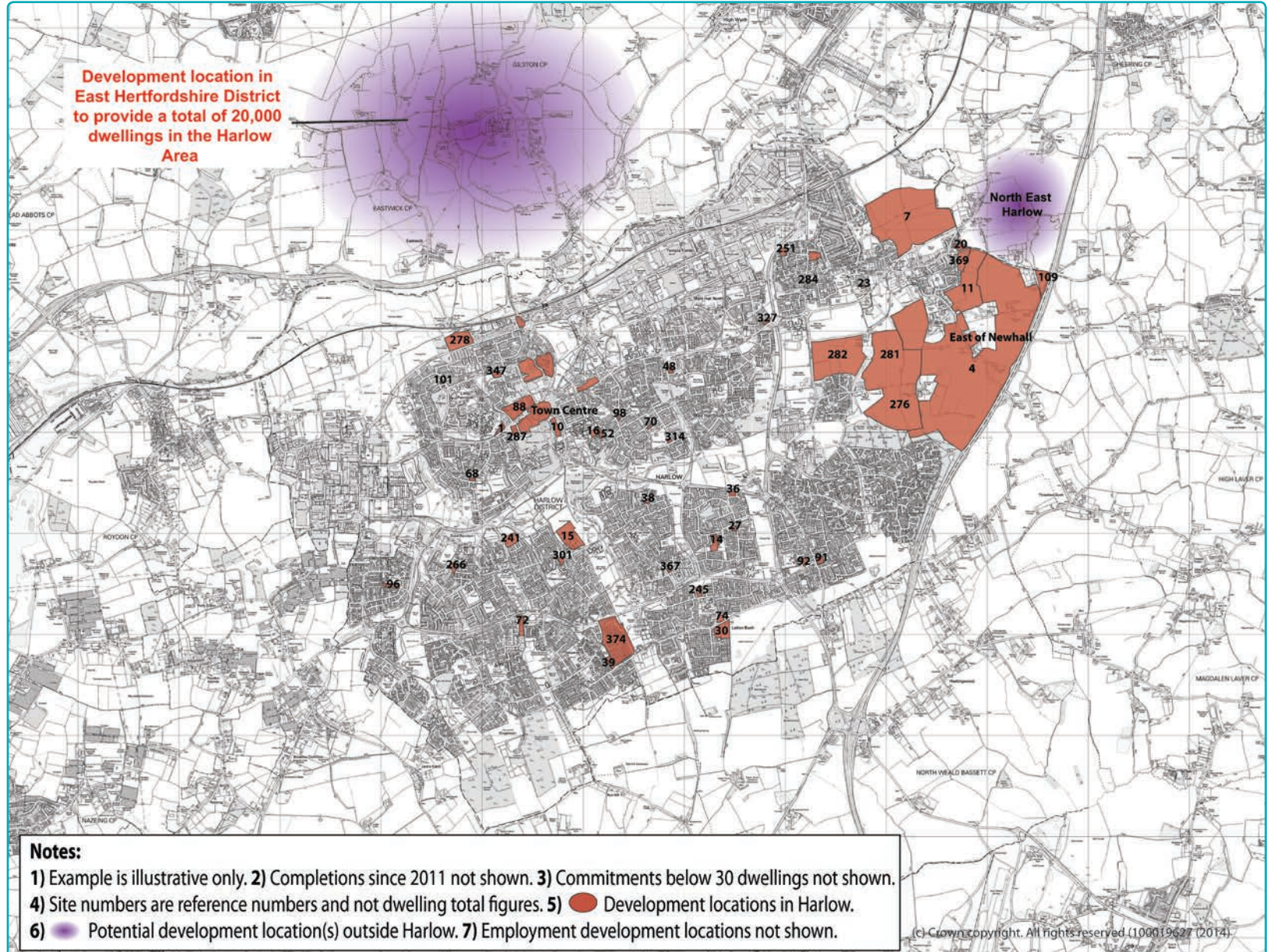


The site numbers are references and relate to the lists contained in appendix 1 of the consultation document.

Example 5 – Northern Bypass Led

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

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



The Council wants your views on the preferred level of development and the alternative examples presented. The consultation will run from **Monday 14 April to Friday 30 May 2014**. The full consultation document can be viewed online at **www.harlow.gov.uk/local-plan** or at the following locations:

- The Civic Centre
- Harlow Central Library
- Old Harlow Library

If you have any comments these should be made on the Council's online questionnaire which can be found at **www.harlow.gov.uk/local-plan**. If you wish to discuss this consultation further please contact the Forward Planning Team on **01279 446897** or via email **myharlow@harlow.gov.uk**



Harlow's Local Development Plan consultation

Questionnaire

Harlow Council would like to know your views on the Emerging Strategy and Further Options consultation document. Your feedback will help to prepare the final Harlow Local Development Plan. The Plan is the main planning document which will guide development in Harlow to 2031. For more information about the Plan, please refer to the consultation document.

Please read the consultation document before responding to the questions.

Where can I view the consultation document?

The consultation document can be viewed online at
www.harlow.gov.uk/local-plan

Paper copies of the consultation document are available for inspection during normal office hours at the Civic Centre, in Harlow Central Library and in Old Harlow Library.

If you would like this questionnaire in a different language or format please call Contact Harlow on **01279 446655** or email **myharlow@harlow.gov.uk**

Council Officers will be available to help you with this questionnaire if required.

The deadline for responding to the consultation is 30 May 2014.

COMPLETING THE QUESTIONS

Please answer the questions by putting a tick in the appropriate box or using the space provided to write your comments. If you need extra space for comments, please use additional paper, clearly number your responses, and attach to your questionnaire using a staple.



Please complete the following questions

Question 1 The Council is required by Government policy set out in the National Planning Policy Framework to boost significantly the supply of housing to meet the needs of the community. This means that 'no growth' is not an option for the Local Development Plan. Regard has also been given to the Council's key priorities which are to deliver more and better housing, regeneration and a thriving economy.

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

The level of development proposed for Harlow is set out in paragraph 4.26 (page 28) of the consultation document).

Yes ☐ No ☐

If you wish to provide additional supporting information please provide your answer in the comment box at the end of this questionnaire, quoting the question number at the beginning of your comment.

Question 2 Which example(s) do you feel come closest to delivering the Council's stated vision (page 18) and core priorities (page 20) for the Local Plan? (Please tick all that apply.)

- | | |
|--|--------------------------|
| Example 1 – Focused on Priority Regeneration Areas | <input type="checkbox"/> |
| Example 2 – Environmental/Landscape Led | <input type="checkbox"/> |
| Example 3 – Passenger Transport Led | <input type="checkbox"/> |
| Example 4 – Regeneration and Landscape Led | <input type="checkbox"/> |
| Example 5 – Northern Bypass Led | <input type="checkbox"/> |
| None of the above | <input type="checkbox"/> |

If you wish to provide additional supporting information please provide your answer in the comment box at the end of this questionnaire, quoting the question number at the beginning of your comment.

Question 3 Please rank, in order of priority (1=most important, 4=least important) how important the following principles are to you in locating future development across Harlow:

Maximising regeneration priorities ☐

Avoiding sensitive environmental/
landscape areas ☐

Facilitating access to
passenger transport facilities ☐

Supporting key infrastructure
improvements, e.g. a northern bypass
to Harlow ☐

If you wish to provide additional supporting information please provide your answer in the comment box at the end of this questionnaire, quoting the question number at the beginning of your comment.

Question 4 Do you think the locations included in the Focused on Priority Regeneration Areas Example 1 (as set out on page 38) are likely to deliver the Council's regeneration objectives set out in chapter 3?

Yes ☐ No ☐

If you wish to provide additional supporting information please provide your answer in the comment box at the end of this questionnaire, quoting the question number at the beginning of your comment.

Question 5 Do you think the locations included in the Environmental/Landscape Led Example 2 (as set out on page 43) are likely to reduce environmental/landscape impacts?

Yes ☐ No ☐

If you wish to provide additional supporting information please provide your answer in the comment box at the end of this questionnaire, quoting the question number at the beginning of your comment.

Question 6 Do you think the locations included in the Passenger Transport-Led Example 3 (set out on page 48) are likely to deliver passenger transport objectives set out in chapter 3?

Yes ☐ No ☐

If you wish to provide additional supporting information please provide your answer in the comment box at the end of this questionnaire, quoting the question number at the beginning of your comment.

Question 7 Do you think the locations included in the Regeneration and Landscape-Led Example 4 (as set out on page 53) are likely to balance regeneration and landscape objectives?

Yes ☐ No ☐

If you wish to provide additional supporting information please provide your answer in the comment box at the end of this questionnaire, quoting the question number at the beginning of your comment.

Question 8 Do you think the locations included in the Northern Bypass-Led Example 5 (as set out on page 58) are more likely to support a new northern bypass to Harlow?

Yes ☐ No ☐

If you wish to provide additional supporting information please provide your answer in the comment box at the end of this questionnaire, quoting the question number at the beginning of your comment.

Question 9 Do you think a “blend” of development examples is more appropriate for Harlow?

Yes ☐ No ☐

If you wish to provide additional supporting information please provide your answer in the comment box at the end of this questionnaire, quoting the question number at the beginning of your comment.

Comments Box: Please use the space below if you wish to make any other comments on the consultation document. (Please use continuation sheet if necessary.)

--

Your Contact Details

Please provide your full contact details (if not, your responses may not be considered).

Organisation / Company Name (if appropriate)

Job Title (if appropriate)

Title **First Name** **Surname**

Address

.....

Post Code **Agent (Yes/No)**

Telephone **Email (Preferable)**

Harlow Council would like to add you to Harlow's Local Development Plan (LDP) Database.

The Council can then keep you informed about future consultations on Harlow's emerging LDP and other planning policy documents.

If you do not wish to be added to the Council's LDP Database, please tick the opt-out box.

☐

Privacy Notice

The purpose of the LDP Database is to collect information about interested people and organisations who would like to be informed or consulted on Harlow's LDP and any other planning policy documents prepared by Harlow Council. By providing your contact details on this questionnaire you are happy for your personal data being transferred on to Harlow's LDP Database. It may be used to contact you in future to participate as part of the LDP process. The data may be held for the duration of this LDP up to and probably beyond 2031.

How to return your completed questionnaire:

You can hand deliver your completed questionnaire at the Civic Centre reception or post it to:

Forward Planning
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 name, organisation and comments may be available for others to view at the Council's offices and on the council's website; and
- * The data gathered through this consultation will be held for the duration of this LDP up to and probably beyond 2031.

Responses must be returned to the Council by 30 May 2014.

Appendix 9: Harlow Times news article (Spring 2014)

Planning Harlow's Future

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

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

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

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

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

email: star@harlowstarnews.co.uk

NEWS FOCUS Harlow Local Plan

Could Harlow become the next Cambridge by 2031?

GEMMA GARDNER
gemma.gardner@harlowstarnews.co.uk

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

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

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

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

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

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

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

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

FUTURE: Development may still take place at Harlow North



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

inquiry in public."

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

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

thing we should do."

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

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

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

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

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

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

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

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

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

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

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

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

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



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

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

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

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

Land identified as possible sites for housing until 2031

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

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

No new housing 'is not an option'

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

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

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

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

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

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

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

It should reflect the future needs of the community and

GEMMA GARDNER

gemma.gardner@hertssexnews.co.uk

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

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

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

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

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

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

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

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

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

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

The consultation closes on May 30.

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

email: star@harlowstarnews.co.uk

 Follow us on Twitter

Examples of new housing developments go on display

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

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

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

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

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

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

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

Responses to the consultation can be made via the questionnaire.

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

Exhibitions

Exhibitions displaying the five examples for how new housing development could be accommodated within Harlow and paper copies of the questionnaire and leaflet were available at the following locations:

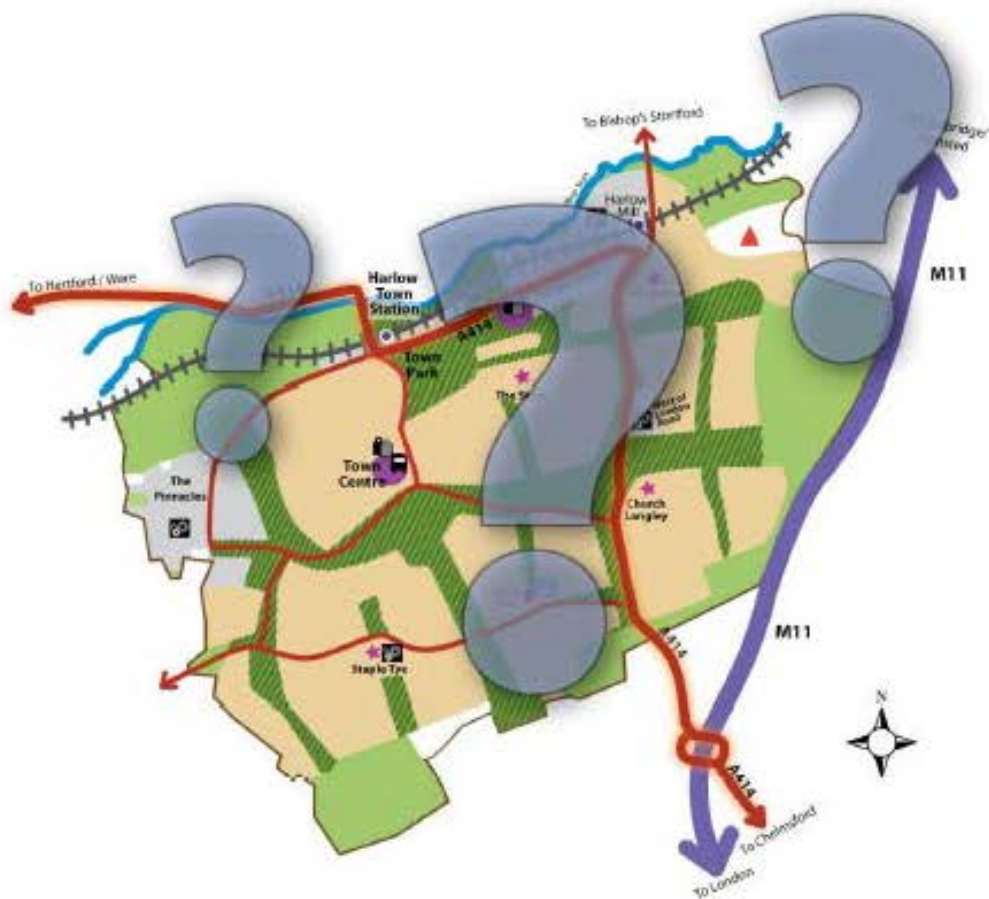
- Exhibitions staffed by Harlow Council Forward Planning Team :
 - St John's ARC, Old Harlow, Tuesday 6 May 2014, 3pm to 9pm
 - Latton Bush Centre, Wednesday 14 May 2014, 3pm to 9pm
 - The Harvey Centre, Wednesday 21 May 2014, 10am to 5pm
- Exhibitions with no staff:
 - Civic Centre Reception, Monday 14 April to Friday 30 May 2014
 - Harlow Central Library, Thursday 22 May to Friday 30 May 2014

Harlow Local Development Plan

Emerging Strategy and Further Options

Consultation Summary Report

December 2014



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1. Background

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

2. Emerging Strategy and Further Options Consultation

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

Consultation Materials

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

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

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

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

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

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

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

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

Getting involved

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

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

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

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

Notification Methodology

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

2.13. The notification emails/letters:

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

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

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

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

Public Exhibitions

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

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

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

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

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

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

Further Press and Publicity

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

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

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

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

3. Analysis of overall response

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

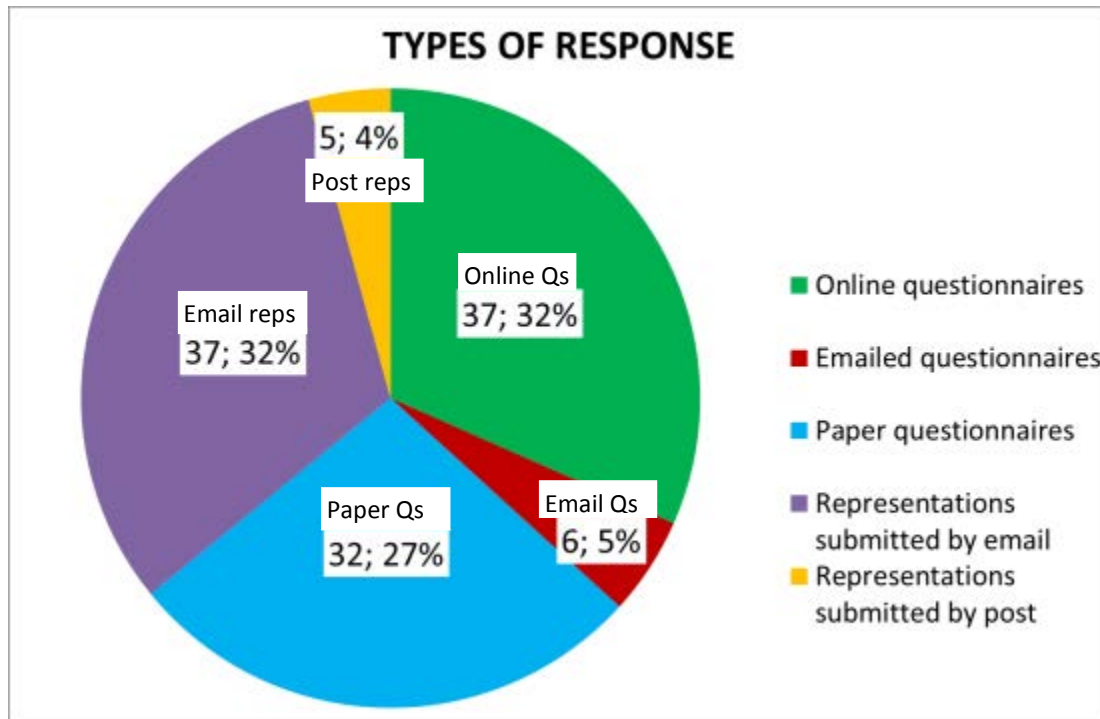


Fig. 3.1

- 3.2. A total of 101 people/organisations responded to the consultation, either by completing a questionnaire and/or submitting a representation. The number of responses is greater than the number of respondents because some respondents submitted a questionnaire and also a separate representation.
- 3.3. The respondents have been split into four sub-groups for analysis purposes, as shown below.

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

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

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

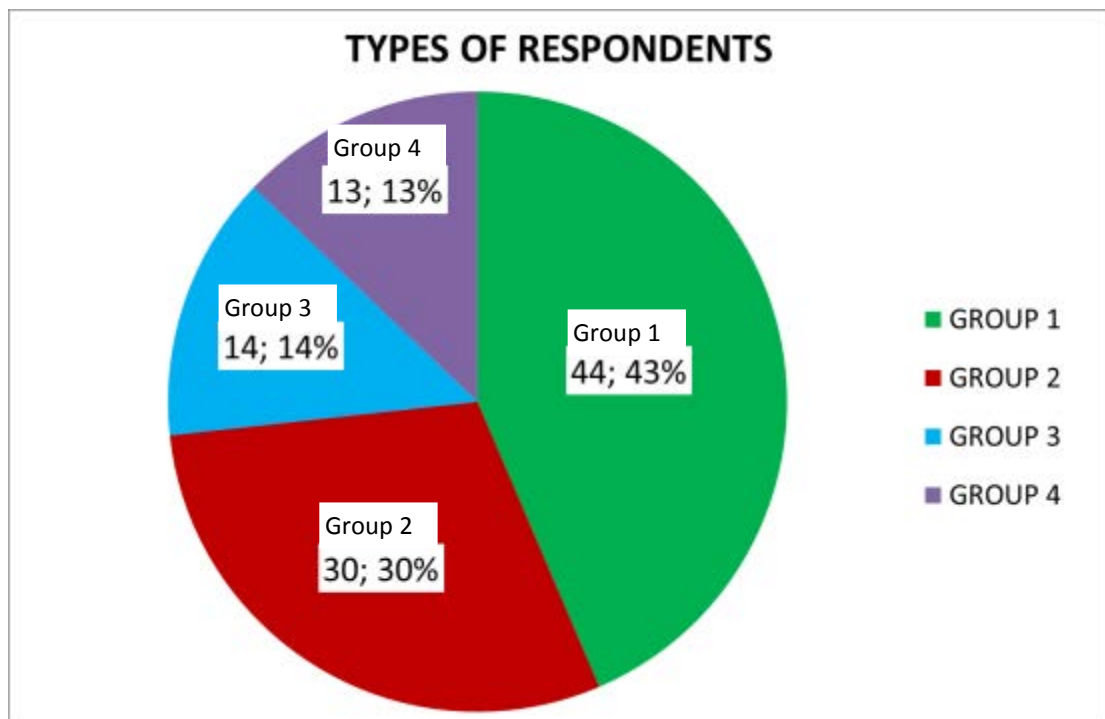


Fig. 3.2

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

4. Analysis of consultation responses

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

STOP Harlow North petition

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

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

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

Question 1

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

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

QUESTION 1: Graphical Representation of Responses

Fig. 4.1

ALL RESPONDENTS

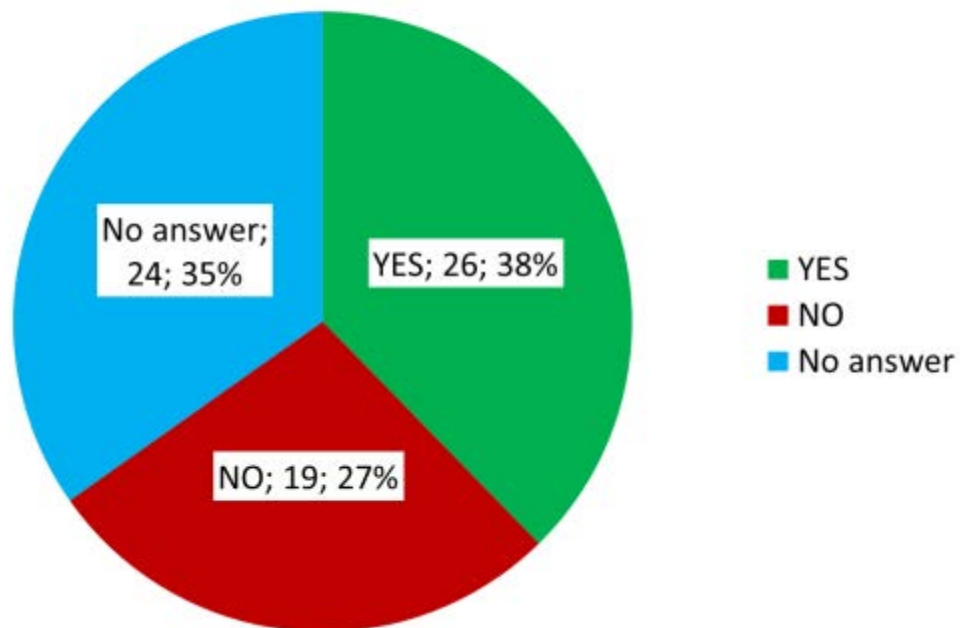


Fig. 4.2

SUB-GROUP 1 (Harlow Residents and Resident/Community Groups)

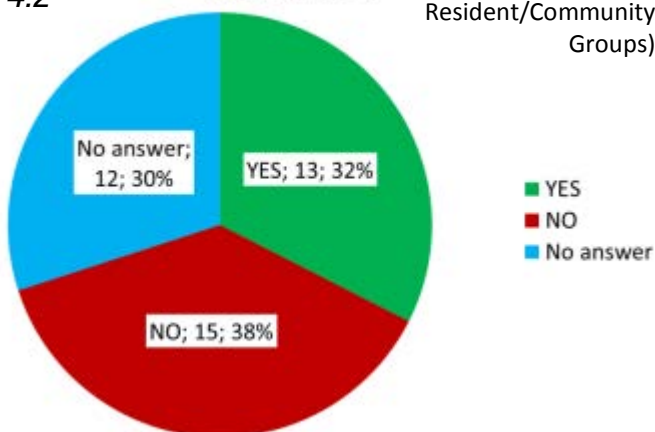


Fig. 4.3

SUB-GROUP 2 (Specific Consultees and Local Groups, Businesses & Organisations)

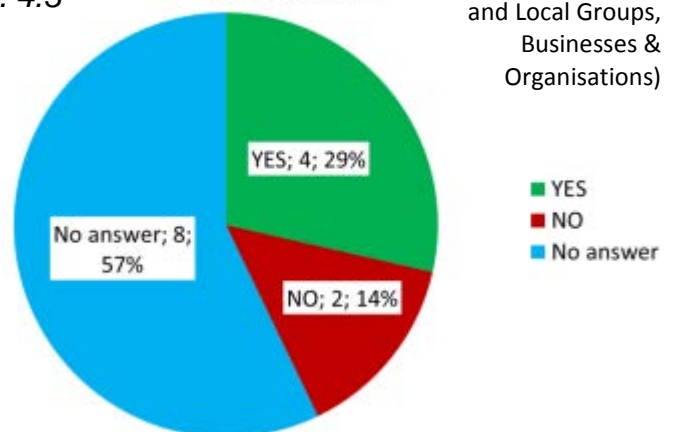


Fig. 4.4

SUB-GROUP 3 (Adjoining Parishes Residents and Other Residents)

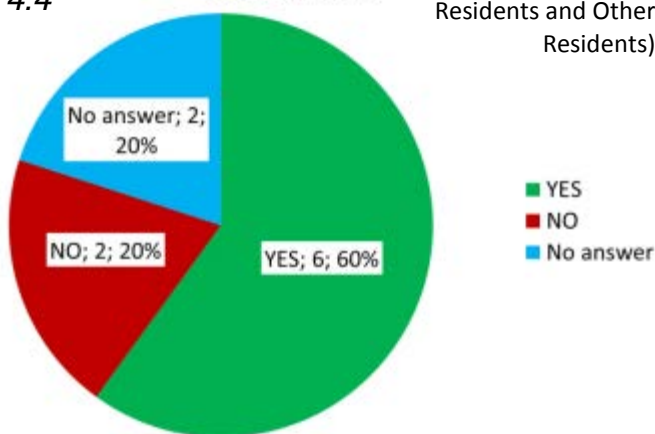
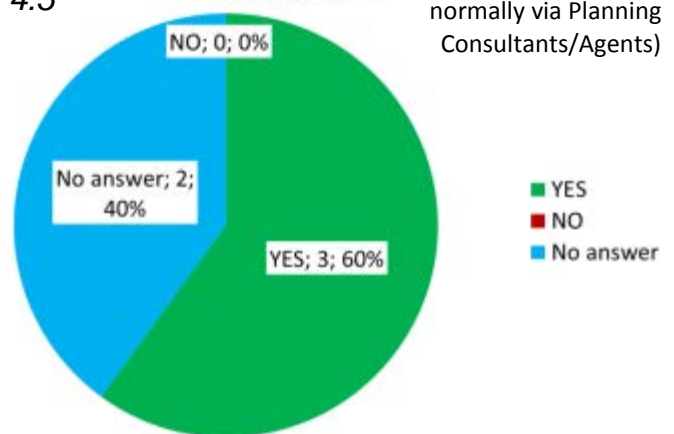


Fig. 4.5

SUB-GROUP 4 (Local Developers, normally via Planning Consultants/Agents)



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

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

Question 2

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

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

QUESTION 2: Graphical Representation of Responses

Fig. 4.6

ALL RESPONDENTS

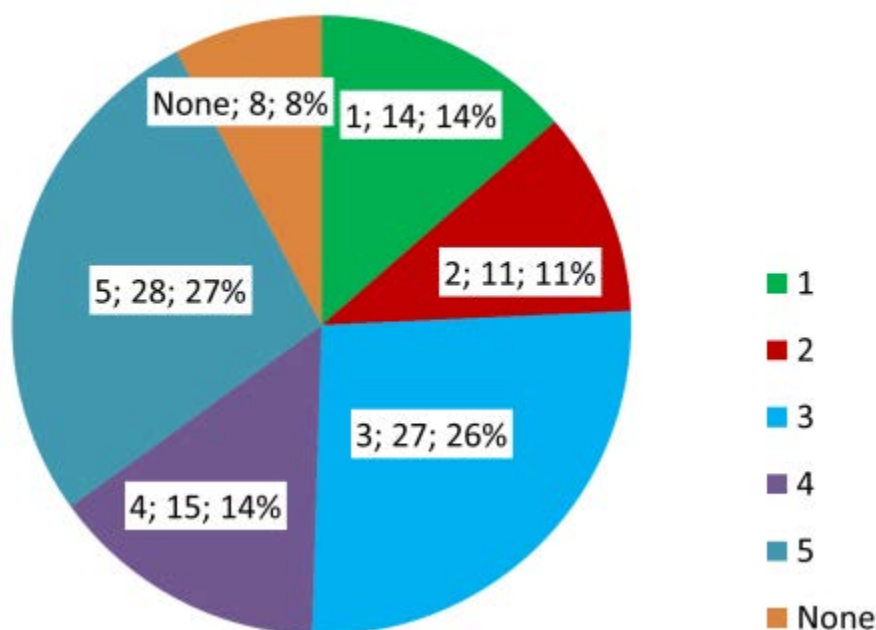


Fig. 4.7

SUB-GROUP 1 (Harlow Residents and Resident/Community Groups)

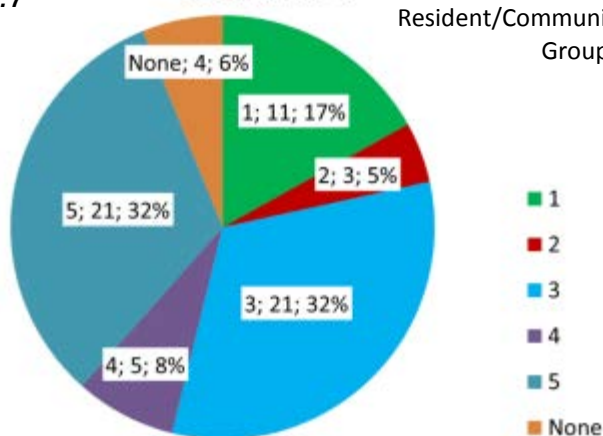


Fig. 4.8

SUB-GROUP 2 (Specific Consultees and Local Groups, Businesses & Organisations)

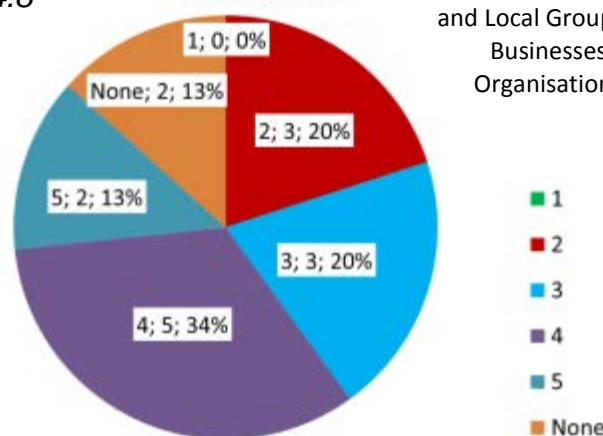


Fig. 4.9

SUB-GROUP 3 (Adjoining Parishes Residents and Other Residents)

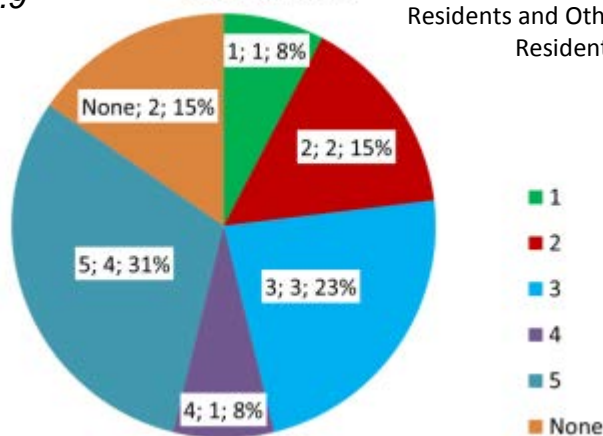
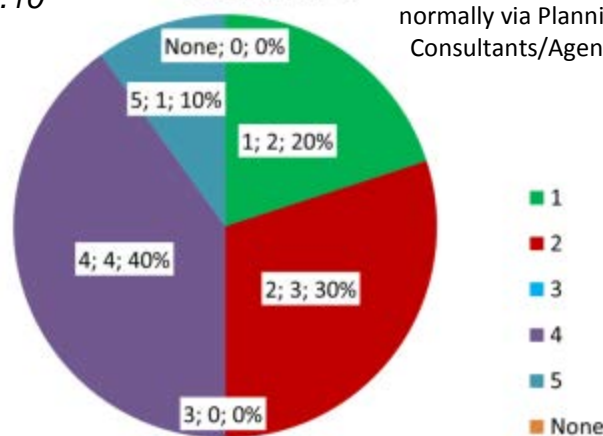


Fig. 4.10

SUB-GROUP 4 (Local Developers, normally via Planning Consultants/Agents)



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

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

Question 3

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

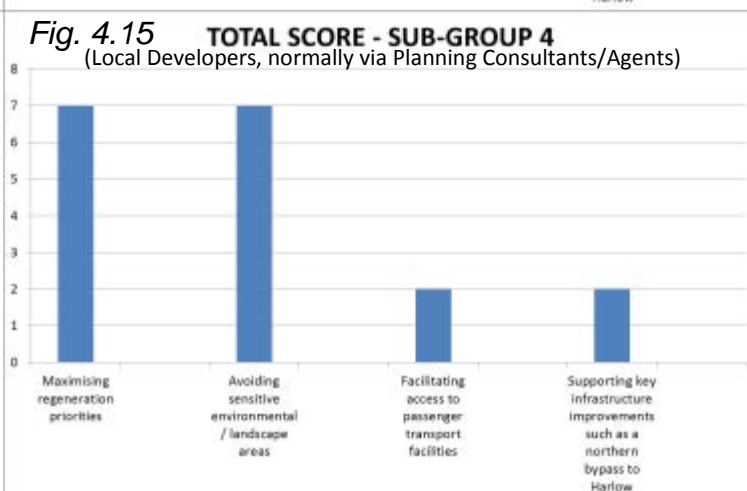
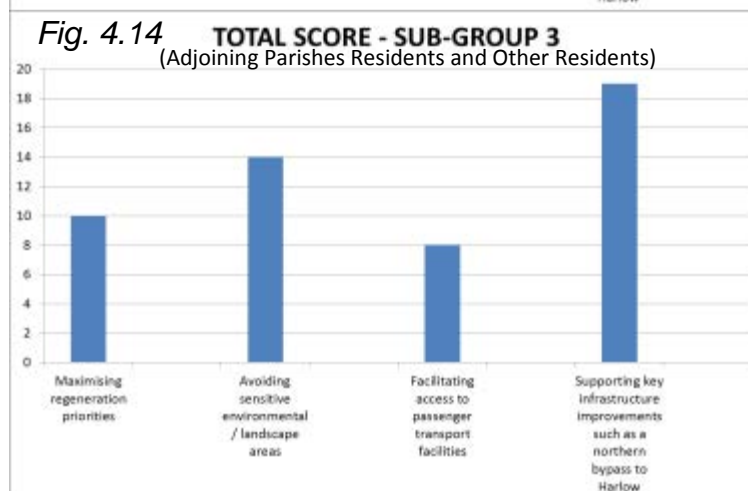
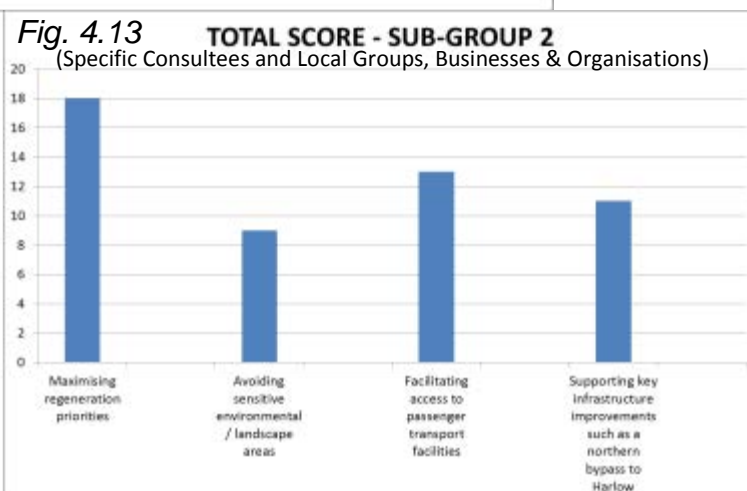
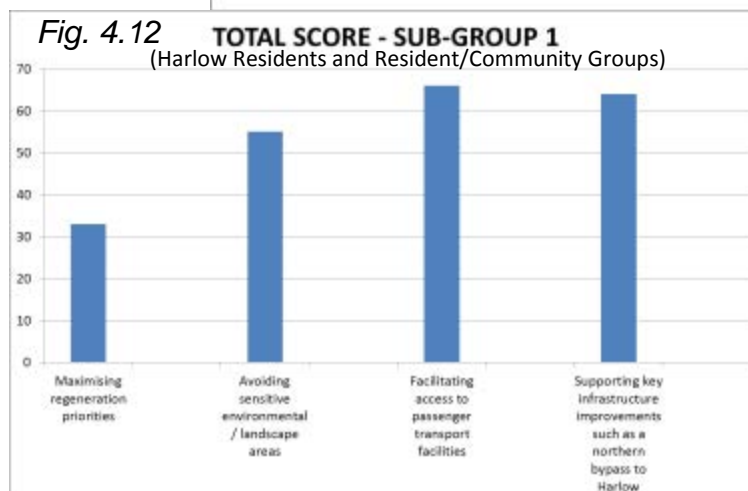
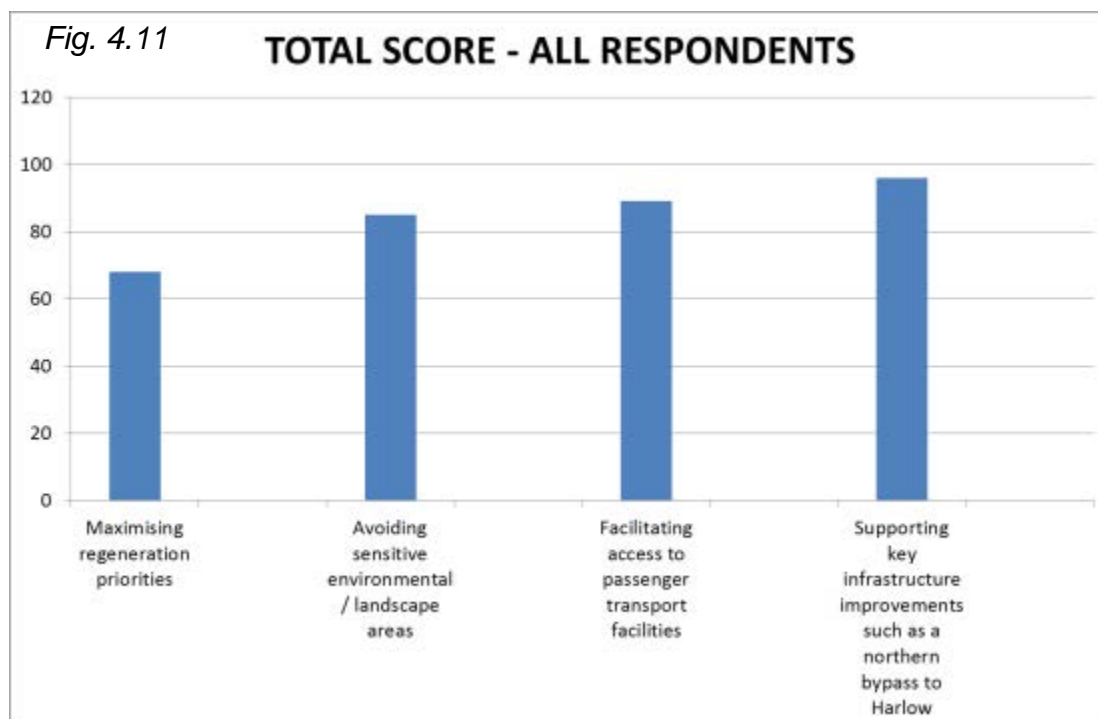
- *Maximising regeneration priorities*
- *Avoiding sensitive environmental/landscape areas*
- *Facilitating access to passenger transport facilities*
- *Supporting key infrastructure improvements, e.g. a northern bypass to Harlow*

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

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

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

QUESTION 3: Graphical Representation of Responses (1)



QUESTION 3: Graphical Representation of Responses (2)

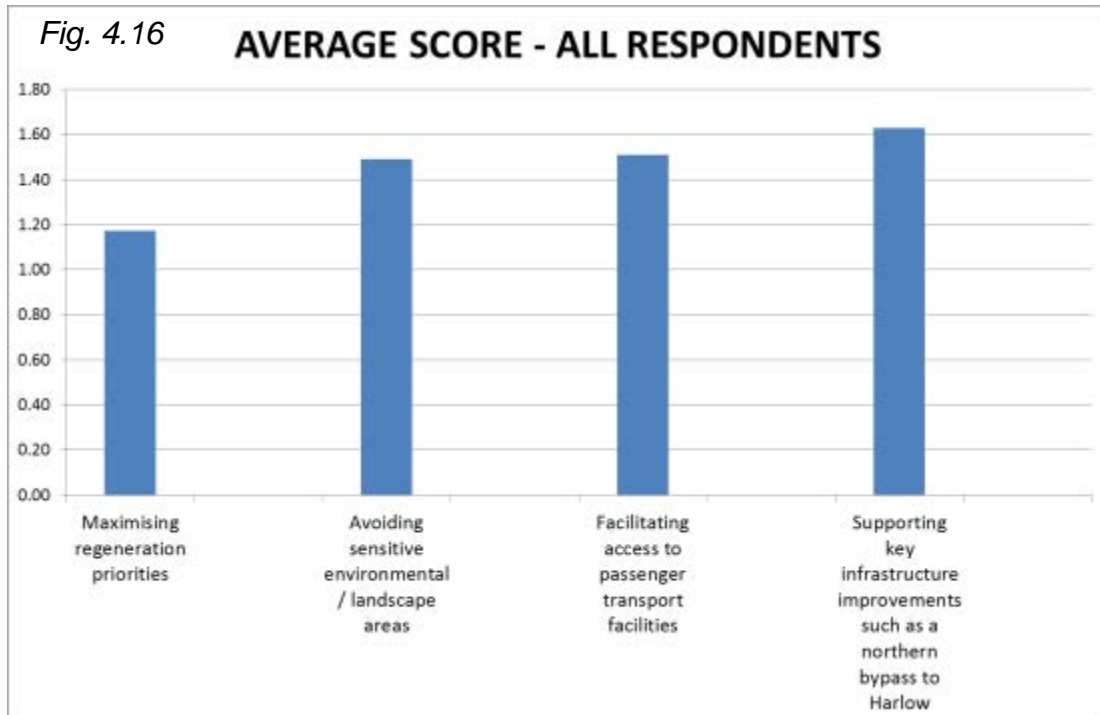


Fig. 4.17 AVERAGE SCORE - SUB-GROUP 1
(Harlow Residents and Resident/Community Groups)

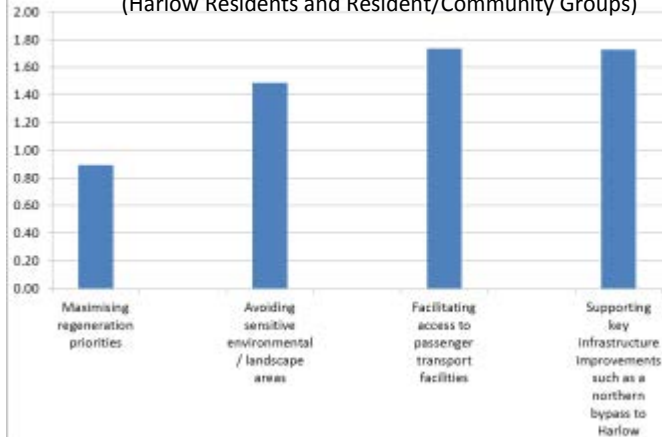


Fig. 4.18 AVERAGE SCORE - SUB-GROUP 2
(Specific Consultees and Local Groups, Businesses & Organisations)

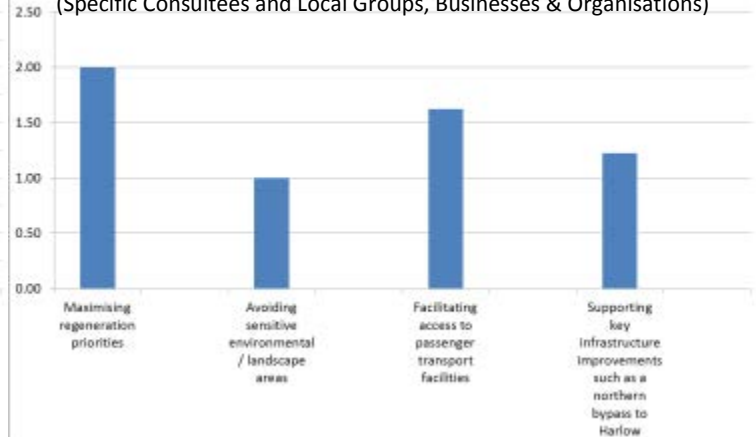


Fig. 4.19 AVERAGE SCORE - SUB-GROUP 3
(Adjoining Parishes Residents and Other Residents)

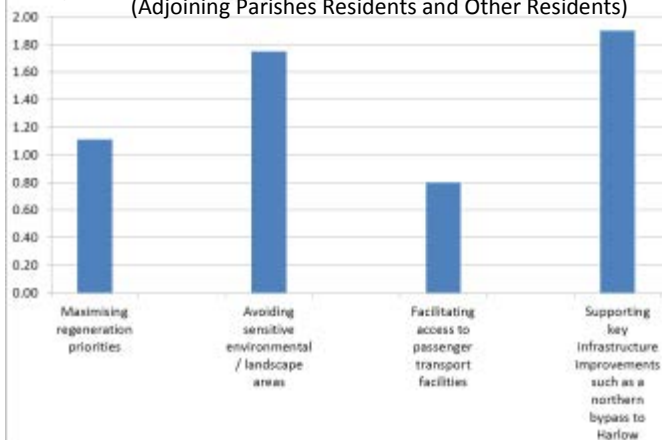
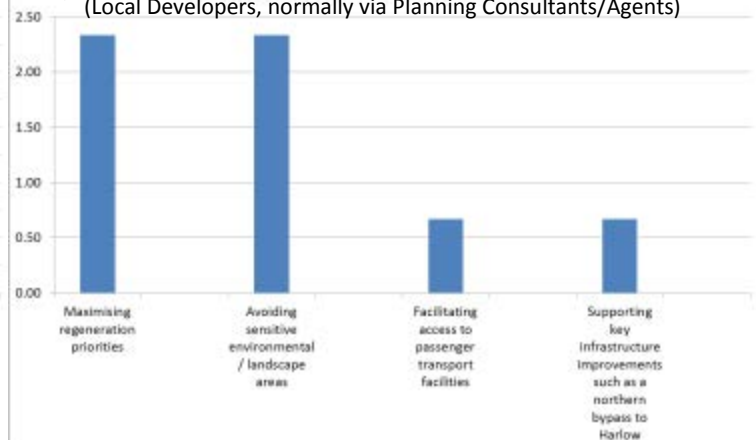


Fig. 4.20 AVERAGE SCORE - SUB-GROUP 4
(Local Developers, normally via Planning Consultants/Agents)



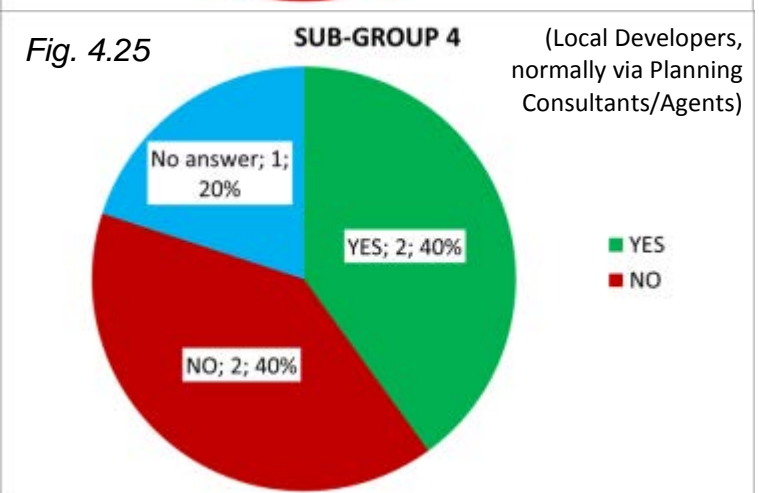
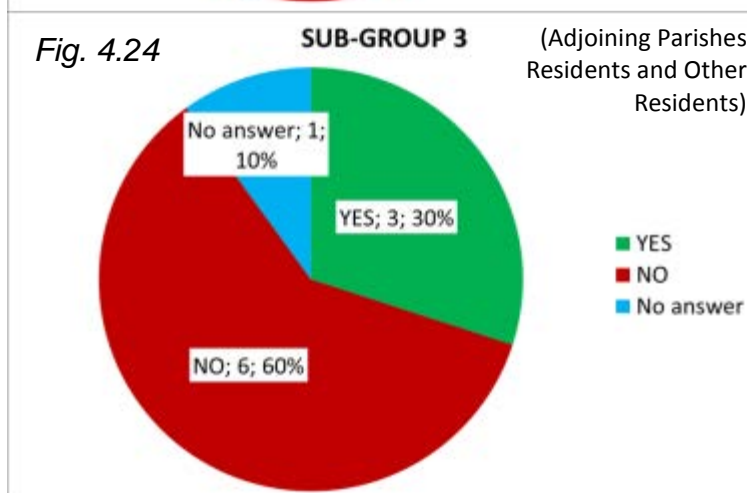
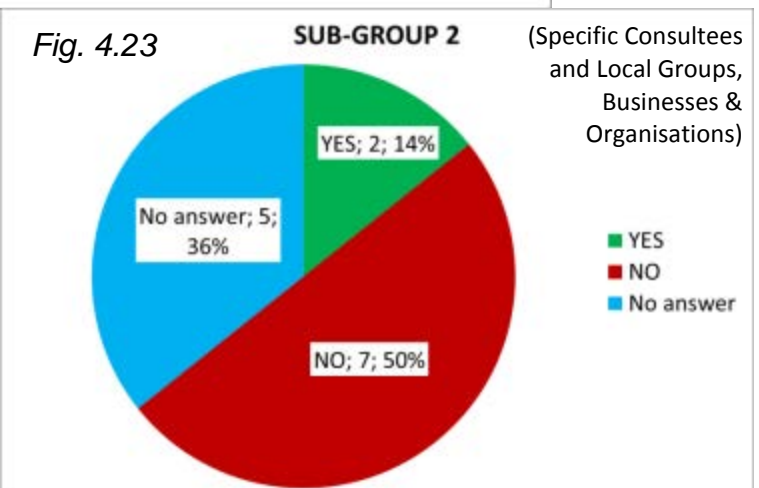
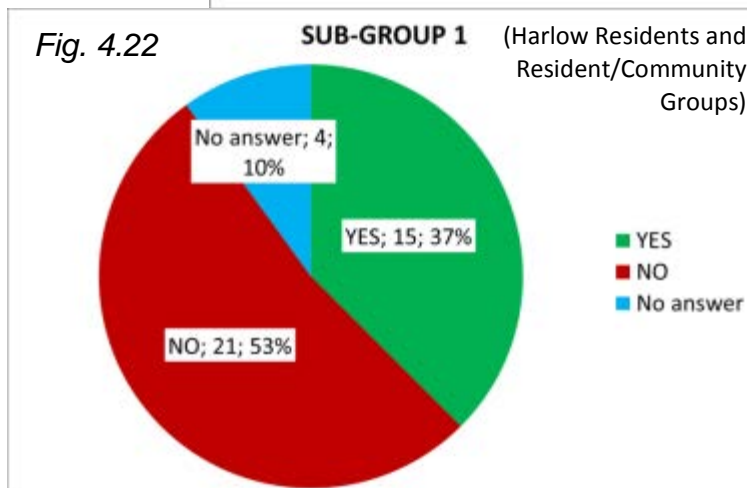
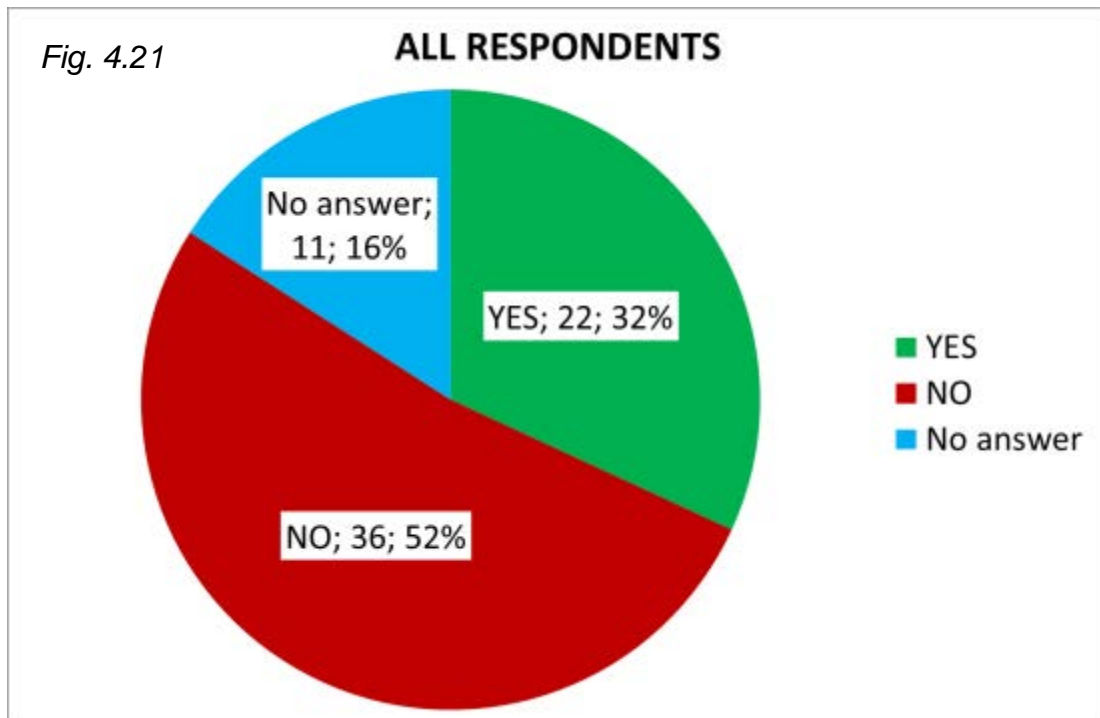
- 4.23. A number of comments were submitted relating to this question. A more detailed breakdown of the comments is provided in Appendix 1. The main issues raised were:
- regeneration should be the key principle to meet the core priorities;
 - enhancement of public transport and infrastructure are part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

Question 4

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

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

QUESTION 4: Graphical Representation of Responses



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

Question 5

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

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

QUESTION 5: Graphical Representation of Responses

Fig. 4.26

ALL RESPONDENTS

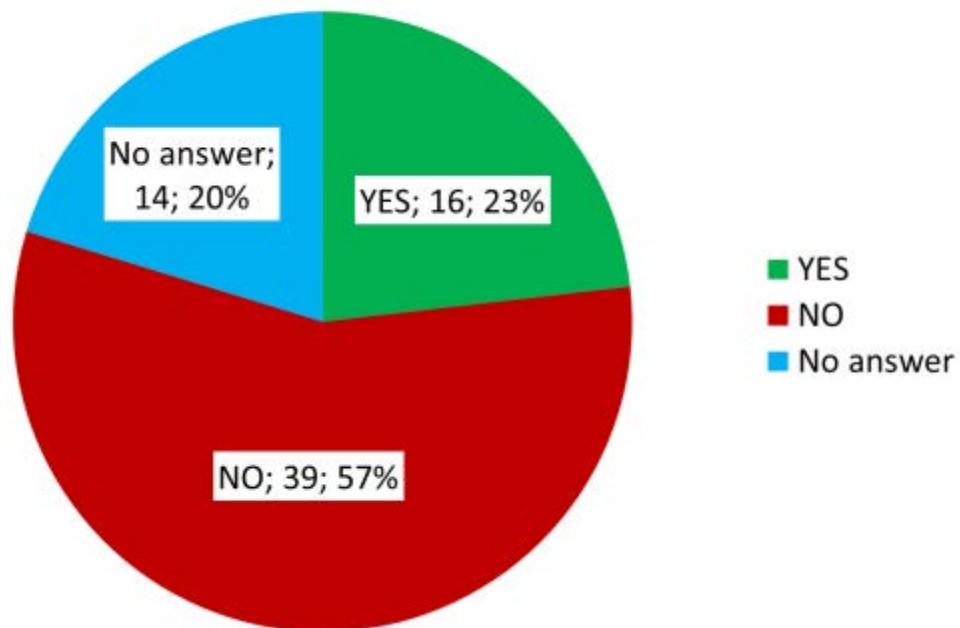


Fig. 4.27

SUB-GROUP 1 (Harlow Residents and Resident/Community Groups)

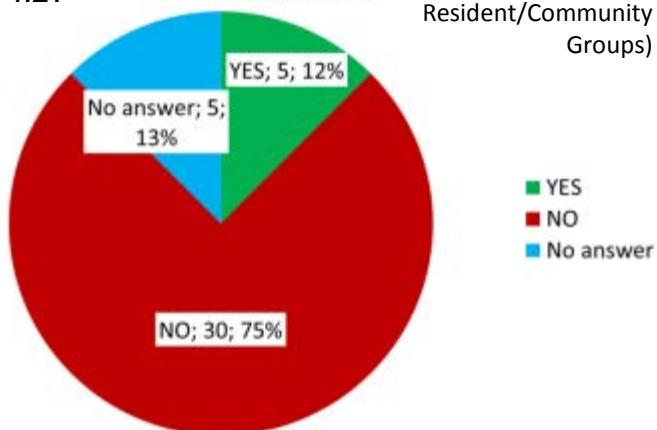


Fig. 4.28

SUB-GROUP 2 (Specific Consultees and Local Groups, Businesses & Organisations)

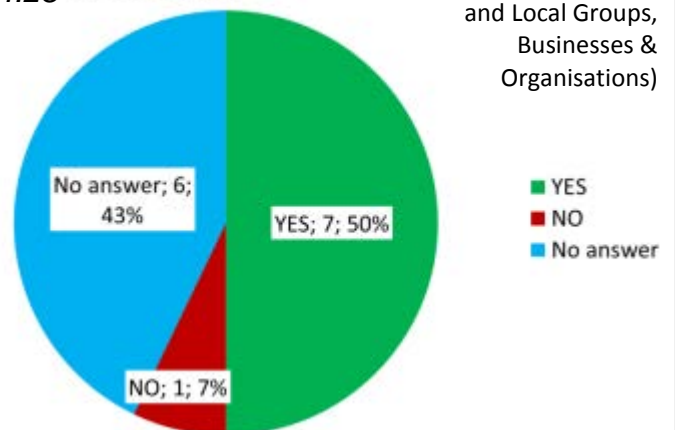


Fig. 4.29

SUB-GROUP 3 (Adjoining Parishes Residents and Other Residents)

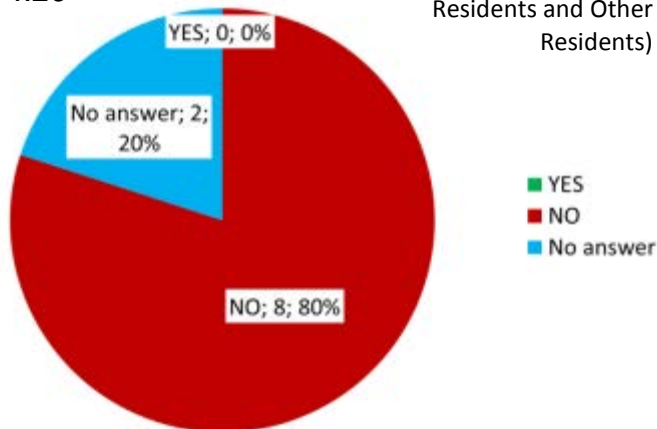
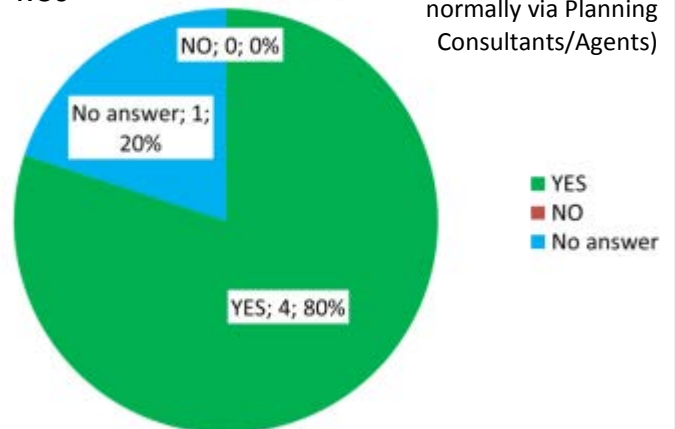


Fig. 4.30

SUB-GROUP 4 (Local Developers, normally via Planning Consultants/Agents)



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

Question 6

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

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

QUESTION 6: Graphical Representation of Responses

Fig. 4.31

ALL RESPONDENTS

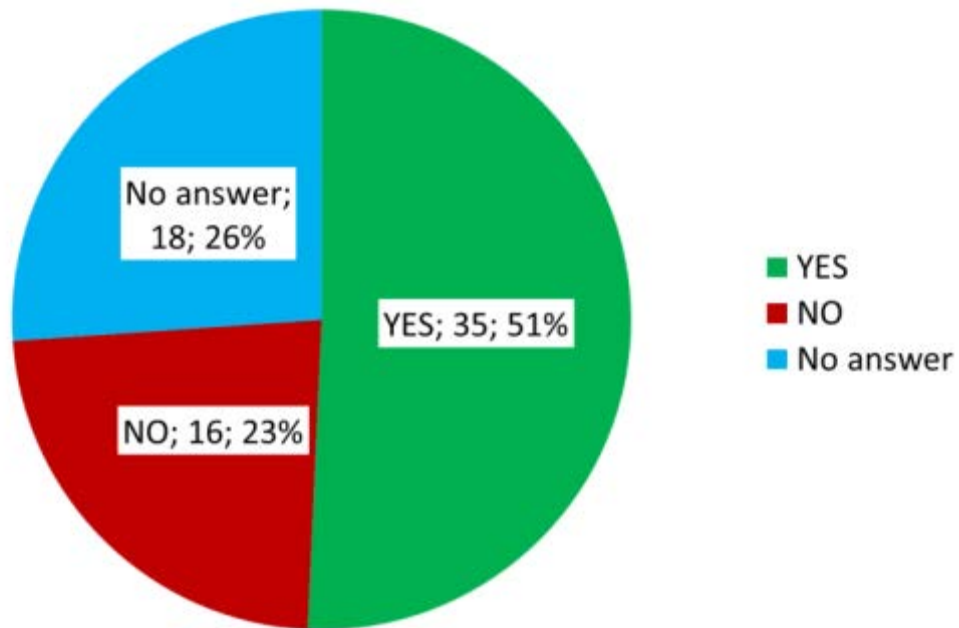


Fig. 4.32

SUB-GROUP 1

(Harlow Residents and Resident/Community Groups)

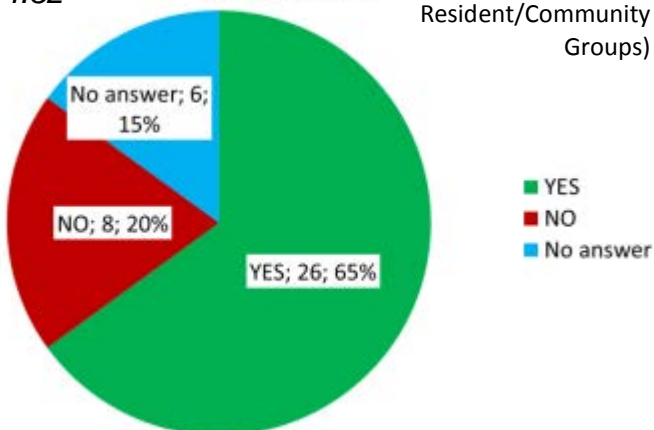


Fig. 4.33

SUB-GROUP 2

(Specific Consultees and Local Groups, Businesses & Organisations)

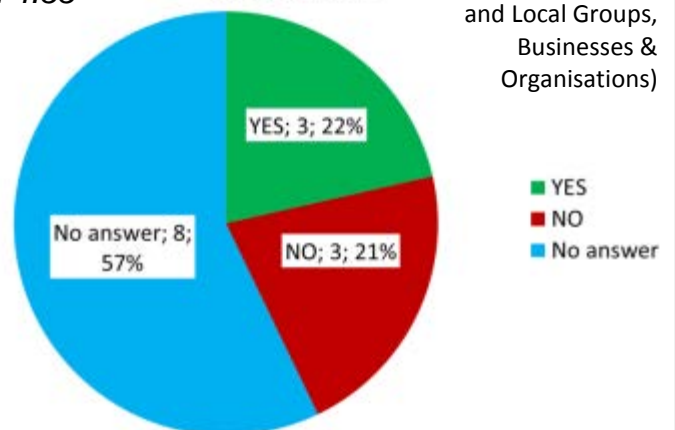


Fig. 4.34

SUB-GROUP 3

(Adjoining Parishes Residents and Other Residents)

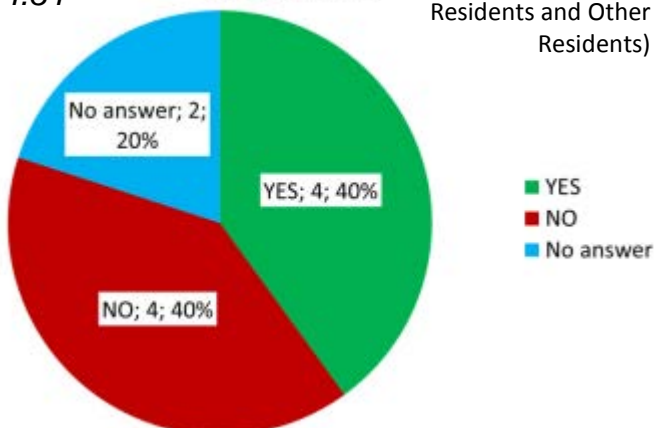
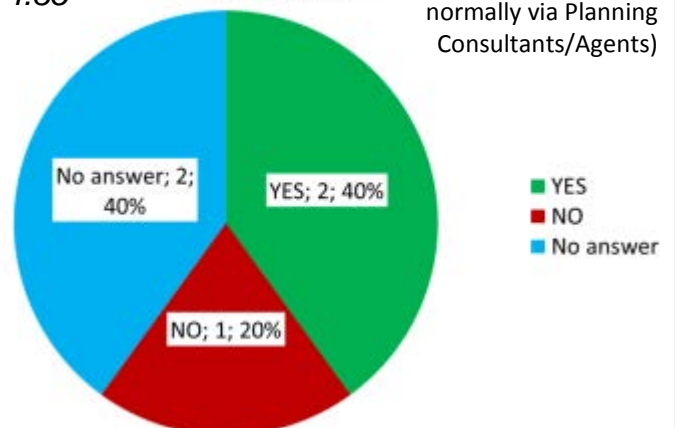


Fig. 4.35

SUB-GROUP 4

(Local Developers, normally via Planning Consultants/Agents)



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

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

Question 7

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

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

QUESTION 7: Graphical Representation of Responses

Fig. 4.36

ALL RESPONDENTS

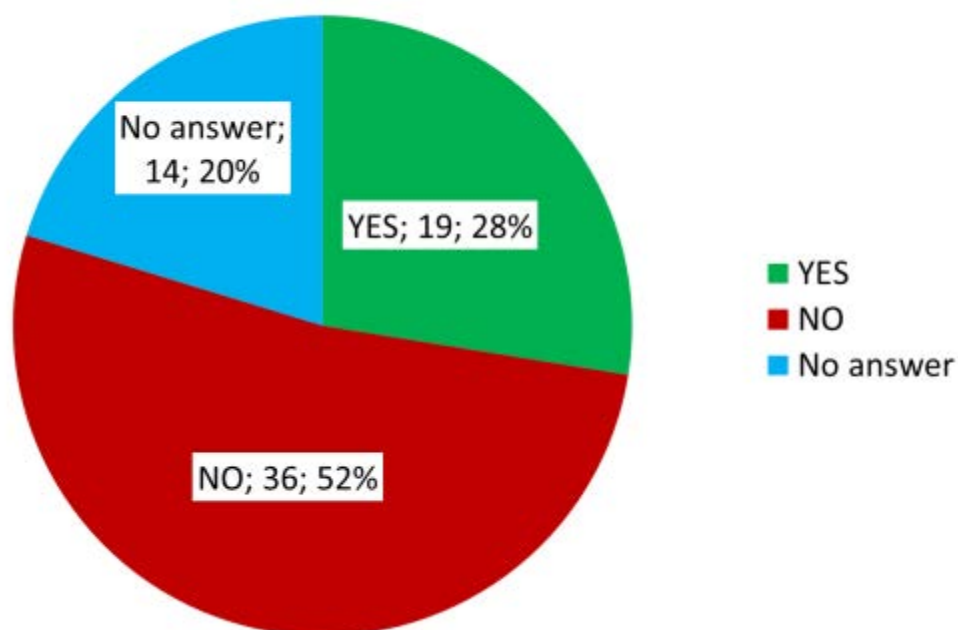


Fig. 4.37

SUB-GROUP 1 (Harlow Residents and Resident/Community Groups)

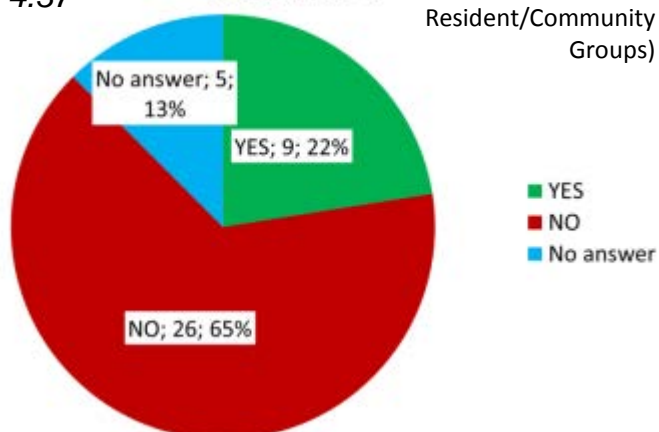


Fig. 4.38

SUB-GROUP 2 (Specific Consultees and Local Groups, Businesses & Organisations)

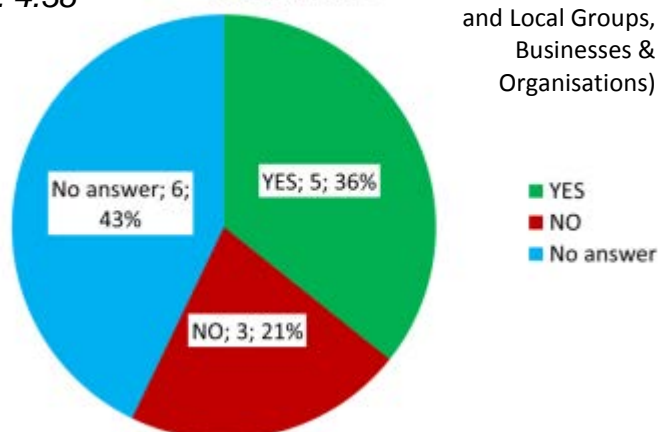


Fig. 4.39

SUB-GROUP 3 (Adjoining Parishes Residents and Other Residents)

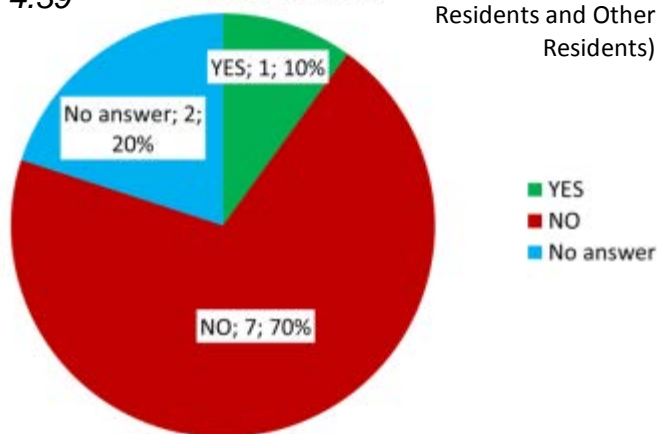
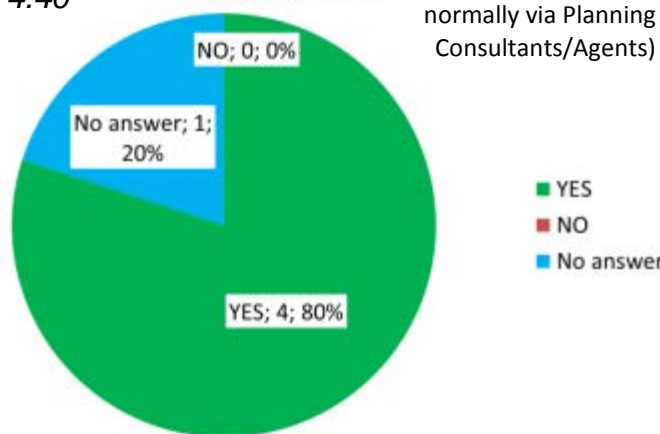


Fig. 4.40

SUB-GROUP 4 (Local Developers, normally via Planning Consultants/Agents)



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

Question 8

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

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

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

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

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

QUESTION 8: Graphical Representation of Responses

Fig. 4.41

ALL RESPONDENTS

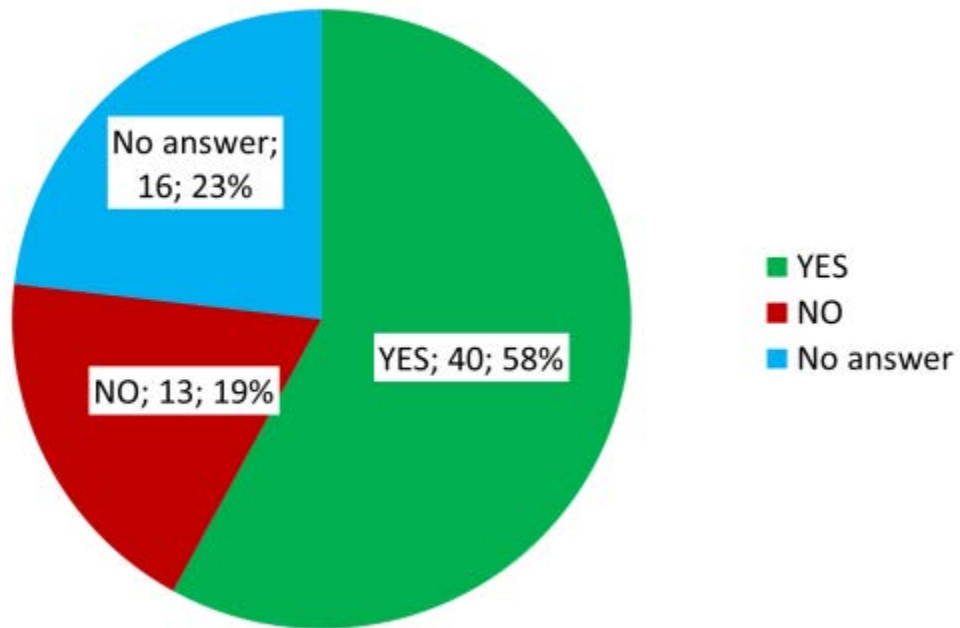


Fig. 4.42

SUB-GROUP 1 (Harlow Residents and Resident/Community Groups)

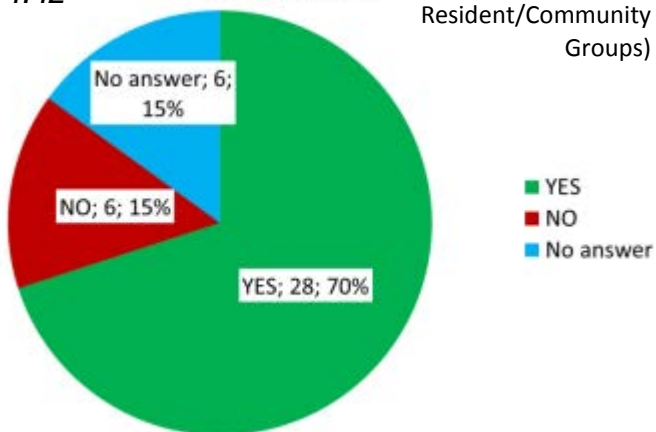


Fig. 4.43

SUB-GROUP 2 (Specific Consultees and Local Groups, Businesses & Organisations)

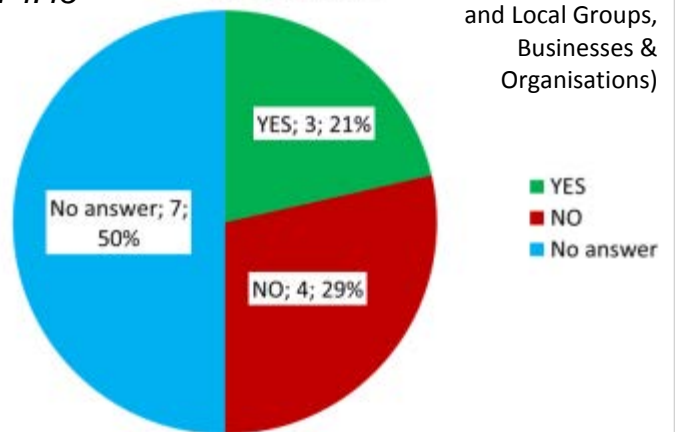


Fig. 4.44

SUB-GROUP 3 (Adjoining Parishes Residents and Other Residents)

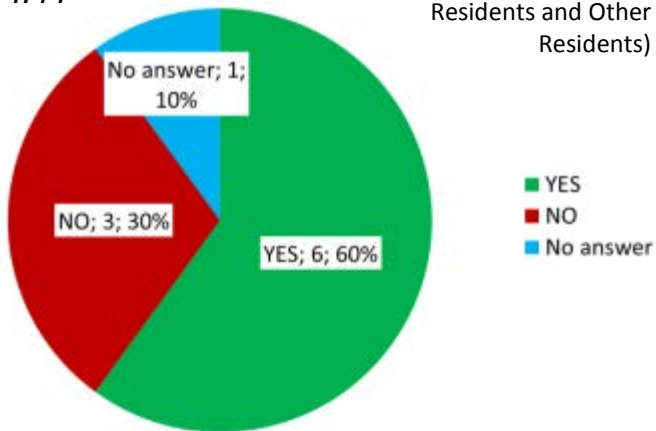
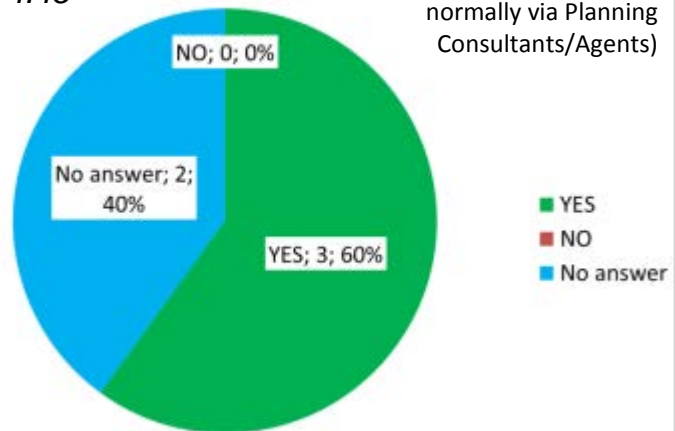


Fig. 4.45

SUB-GROUP 4 (Local Developers, normally via Planning Consultants/Agents)



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

Question 9

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

- 4.49. This question sought the views of people on whether a blend of the development examples would be more appropriate for the future growth of Harlow. Such a blend could include smaller amounts of development which are dispersed in and around the town, rather than focussing large amounts of development in particular areas.
- 4.50. The majority of respondents to this question **agreed** that a blend of development examples would be more appropriate (39% answered ‘yes’, 31% ‘no’ and 30% did not answer). This response was broadly reflected in the individual sub-groups, with the exception of sub-group 3 where the majority answer was ‘no’.
- 4.51. Figures 4.46 to 4.50 visually represent the breakdown of responses to this question.

QUESTION 9: Graphical Representation of Responses

Fig. 4.46

ALL RESPONDENTS

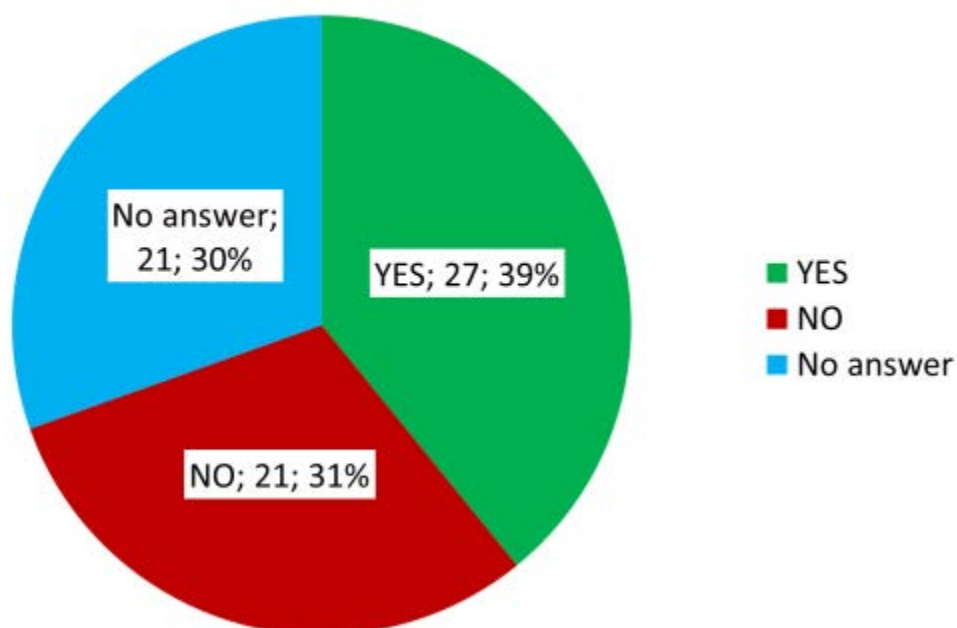


Fig. 4.47

SUB-GROUP 1

(Harlow Residents and Resident/Community Groups)

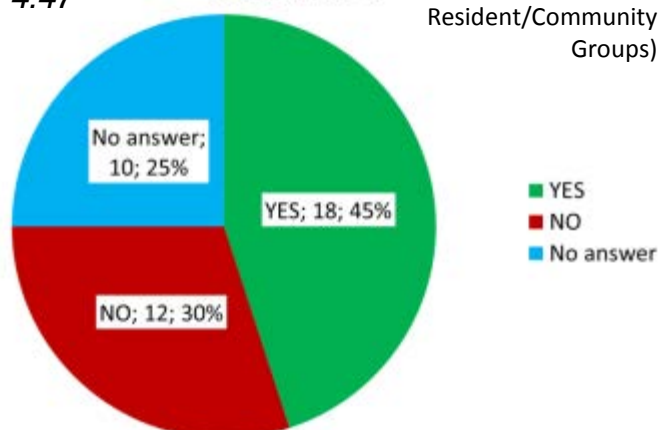


Fig. 4.48

SUB-GROUP 2

(Specific Consultees and Local Groups, Businesses & Organisations)

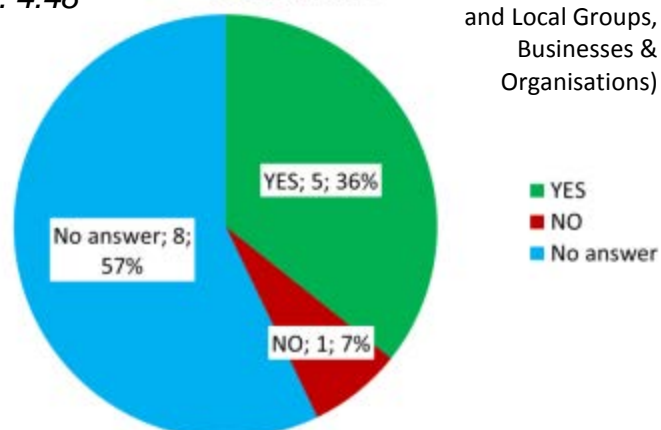


Fig. 4.49

SUB-GROUP 3

(Adjoining Parishes Residents and Other Residents)

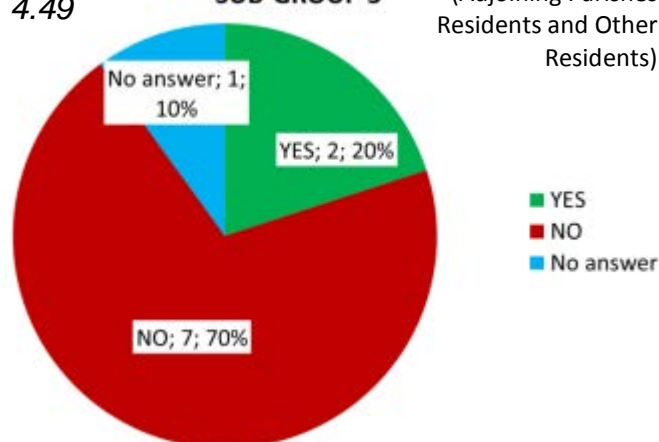
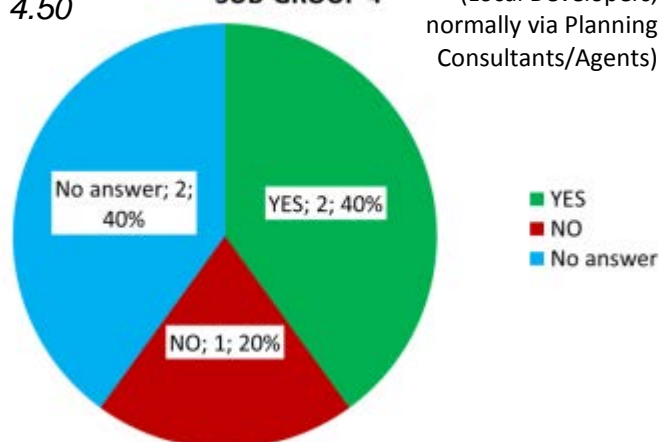


Fig. 4.50

SUB-GROUP 4

(Local Developers, normally via Planning Consultants/Agents)



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

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

5. Summary and Next Steps

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

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

Appendix 1: Question-specific comments received

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

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

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

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

Question 1

COMMENTS REGARDING QUESTION 1 AND THE PROPOSED LEVELS OF DEVELOPMENT

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

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

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

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

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

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

Question 2

COMMENTS REGARDING QUESTION 2 AND THE DEVELOPMENT EXAMPLES

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

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

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

Question 3

COMMENTS REGARDING QUESTION 3

Comment	Sub-Group
• New development areas must not detract from unique urban form of the town	4
• New development should enhance existing public transport	4
• Public transport and infrastructure improvements are needed to ensure sustainability of developments	4
• Facilitating access to passenger transport facilities and supporting key infrastructure improvements are part of achieving successful regeneration, and as such a strict prioritisation is not possible.	4
• All principles are significantly assisted; Regeneration (employment); landscape enhancements; CIL to support a northern bypass	4
• Support the Core Priorities for Harlow, which are overwhelmingly focused on achieving regeneration and renewal, and as such suggest that maximising regeneration priorities should be the key principle	4
• Development of West Sumners in accordance with Gibberd's expansion plans and would give critical mass to support regeneration	4
• Option 3 – Passenger Transport Led most closely aligns with HC's regeneration objectives as it focuses growth to the north which is considered to be the most sustainable location for delivering strategic growth to meet local and regional needs	4
• Believe it is wrong to rank these principles as they are interdependent and cannot be prioritized in this way. Have already expressed our concern that the five Examples set out in Question 2 do not address all of the Council's objectives and priorities.	4
• Locating development where it maximises regeneration targets important issues of deep seated social and economic deprivation	4

Question 4

COMMENTS REGARDING QUESTION 4

Comment	Sub-Group
• South Harlow should be last choice as it is in Green Belt	1
• This example will intensify problems in the south of Harlow and destroy Green Belt land	1
• West Sumners proposals would intensify transport congestion & pollution in south & west of Harlow	1
• New roads and road improvements required – West Sumners development could put extra 2,000 cars on the roads in a rural area. Is this sustainable in terms of road use, pollution and congestion?	1
• Large amounts of infrastructure required for this example, particularly to the road network	1
• West Sumners is able to deliver the most direct range of regeneration benefits, including renewal of hatch, school and community facilities which would form the heart of a new neighbourhood, improving viability and bringing disposable income to area	4

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

Question 5

COMMENTS REGARDING QUESTION 5

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

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

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

Question 6

COMMENTS REGARDING QUESTION 6

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

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

Question 7

COMMENTS REGARDING QUESTION 7

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

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

Question 8

COMMENTS REGARDING QUESTION 8

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

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

Question 9

COMMENTS REGARDING QUESTION 9

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

Appendix 2: Other comments received (split by topic)

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

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

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

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

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

Areas and Sites

North Harlow

Table A1.1

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

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

South/West Harlow

Table A1.2

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

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

East Harlow

Table A1.3

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

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

Other Areas/Sites

Table A1.4

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

Open Spaces

Green Wedges

Table A1.5

Comment	Sub-Group
• Must keep green wedges	1
• No more incursion into Green Wedges as a number of them have been eroded already	1
• Existing Green Wedges are inviolate. Green Wedges should be incorporated in expansion areas in the same proportions as now	2
• Green Wedges should not be built on as they are the lungs of the town	2
• Agree that the 'principle' of Green Wedges should be retained	4
• Do not agree that the viability of the land as farmland should need to be demonstrated, if the proposed use is compatible with Green Wedge (i.e. sports and recreation), as this restrictive policy could lead to the Green Wedge unable to provide the "multifunctional opportunities for residents and wildlife" set out in Vision 7 of the Vision for Harlow, and could mean that the vitality of the Green Wedge is eroded through over-restrictive policy constraints	4

Green Belt

Table A1.6

Comment	Sub-Group
• Object to use of Green Belt land for development and creeping development which encircles the town and threatens quality of life	1
• Allowing sites to absorb residential development will reduce the council's need to allow development in the Green Belt and also to require other authorities to accommodate their housing needs.	2
• More sustainable to develop a site within the established urban area and provide local facilities for residents as opposed to relying on greenfield sites located within the green belt	2
• Harlow's 'grandiose' growth claim sadly includes the inclusion/use of the Green Belt	3
• Creeping coalescence between Roydon and Harlow must be avoided. Two Planning Inspectors' Reports relating to land at East End have supported this. EFDC have been clear from the outset that all green belt land must be maintained as so	3
• Cooperation should include a comprehensive review of the Green Belt in Epping Forest District to ensure the needs of both districts are met	4
• Green Belt boundaries must be capable of enduring beyond the plan so the Council should aim for the upper (15,000 dwelling) growth level	4
• Harlow will need to work with adjoining authorities on a joint Green Belt review	4
• Scenario C - Jobs led might involve loss of Green Belt which is concerning	4

Other Open Space

Table A1.7

Comment	Sub-Group
• Erosion of Old Harlow & Churchgate St green spaces and rainwater soakaways	1

exacerbates flooding	
• First class farmland should not be developed – instead use land that is unproductive	1
• Harlow's green verges are suffering from 'cutting edge design' where new developments are being built virtually next to the roadside	1
• Substantial development on flood plains has resulted in flooding. Further development will exacerbate flooding	1
• SUDS have been proved to be a nonsense by experience of New Hall & Church Langley SUDS which has flooded Old Harlow & Churchgate St	1
• Harlow has a distinct character with buildings away from the road giving it a green and open feel	1
• Building on playing fields is fundamentally wrong as it removes children's rights to have a safe area for meeting, sports, exploring and playing	2
• Natural environment must be enhanced not destroyed	2
• Brownfield sites need to be considered and developed – and not greenfield sites, especially due to development planned at Gilden Way	2
• New housing areas should come from old brownfield sites	2
• Plans should recognise need to build on many of its own open spaces and brownfield sites whilst retaining green areas	3
• Trust diminishes as green space is identified for development	3
• Appropriate amounts of recreation and sporting space must be provided for both current and future residents	4

Employment

Table A1.8

Comment	Sub-Group
• No business plan is provided and there is no discussion of the financial cost and benefits of the proposals, including the levels of increased employment	1
• Employers are attracted to those places with good transport links	1
• Question whether more housing is needed. More jobs locally is what is really needed	1
• Many original residents have left because the jobs solutions have become dire	1
• NPPF effectively advises against local authorities retaining old employment sites if there is little prospect of them being brought forward for development	2
• Appear to be more of a need for housing land than employment land over the plan period	2
• Poor accessibility is a major inhibiting factor for the existing major employment sites and successful businesses have indicated their intention to move from Harlow rather than expand within the town	2
• Leaflet suggests at least 3,000 houses will home jobless people or commuters	3

Infrastructure (General)

Table A1.9

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

Infrastructure (Transport)

M11

Table A1.10

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

Northern bypass

Table A1.11

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

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

Other Transport

Table A1.12

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

Regeneration

Table A1.13

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

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

Town Centre

Table A1.14

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

Other Issues

Table A1.15

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

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

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

Consultation Process

Table A1.16

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

Petition submitted by STOP Harlow North

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

Environmental

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

Infrastructure

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

Other issues

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

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

Appendix 3: Summaries of Representations from Specific Consultees

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

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

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

Essex County Council

Transport & Highways

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

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

Education

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

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

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

Historic & Natural Environment

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

Minerals & Waste

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

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

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

Other

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

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

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

Hertfordshire County Council

Public transport

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

Roads

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

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

Ecology

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

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

Other

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

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

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

East Hertfordshire District Council

General

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

Question 1

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

Question 2

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

Question 3

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

Question 4

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

Question 5

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

Question 6

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

Question 7

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

Question 8

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

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

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

Question 9

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

Epping Forest District Council

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

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

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

Eastwick & Gilston Parish Council

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

Hunsdon Parish Council and Eastwick & Gilston Parish Council

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

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

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

Highways Agency

General

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

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

M11 Junctions

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

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

Modelling, Mitigation & Impacts

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

Environment Agency

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

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

Princess Alexandra Hospital NHS Trust

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

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

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

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

Natural England

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

English Heritage

General

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

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

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

Specific Areas/Sites

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

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

Thames Water (Agent: Savills)

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

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

Appendix 4: Comments received relating to the Sustainability Appraisal

SUB-GROUP 2

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

SUB-GROUP 4

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

HERTFORDSHIRE COUNTY COUNCIL

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

NATURAL ENGLAND

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

ENGLISH HERITAGE

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

Appendix 5: Youth Council presentation & discussion

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

Housing and Open Spaces

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

Opportunities in Harlow

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

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

Development Examples

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

Appendix 6: List of consultees

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

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

- **LOCAL GROUPS AND ORGANISATIONS (144)**

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

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

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

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

Appendix 7: Respondents

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

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

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

Appendix 8: Example of notification letter

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

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

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

Dear «Short_Name»,

HARLOW LOCAL DEVELOPMENT PLAN

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

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

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

Emerging Strategy and Further Options

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

Statement of Community Involvement (SCI) Draft Review

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

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

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

Yours sincerely,

Dianne Cooper
Planning & Building Control Manager

Appendix 9: Harlow Times news article (Spring 2014)

Planning Harlow's Future

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

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

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

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

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

email: star@harlowstarnews.co.uk

NEWS FOCUS Harlow Local Plan

Could Harlow become the next Cambridge by 2031?

GEMMA GARDNER
gemma.gardner@harlowstarnews.co.uk

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

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

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

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

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

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

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

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

FUTURE: Development may still take place at Harlow North



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

inquiry in public."

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

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

thing we should do."

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

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

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

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

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

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

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

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

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

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

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

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

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



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

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

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

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

Land identified as possible sites for housing until 2031

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

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

No new housing 'is not an option'

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

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

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

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

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

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

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

It should reflect the future needs of the community and

GEMMA GARDNER

gemma.gardner@hertssexnews.co.uk

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

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

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

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

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

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

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

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

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

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

The consultation closes on May 30.

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

email: star@harlowstarnews.co.uk

 Follow us on Twitter

Examples of new housing developments go on display

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

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

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

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

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

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

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

Responses to the consultation can be made via the questionnaire.

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

Appendix 13: Exhibition board panels



Harlow 2031 – Have your Say

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

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

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

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

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

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

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

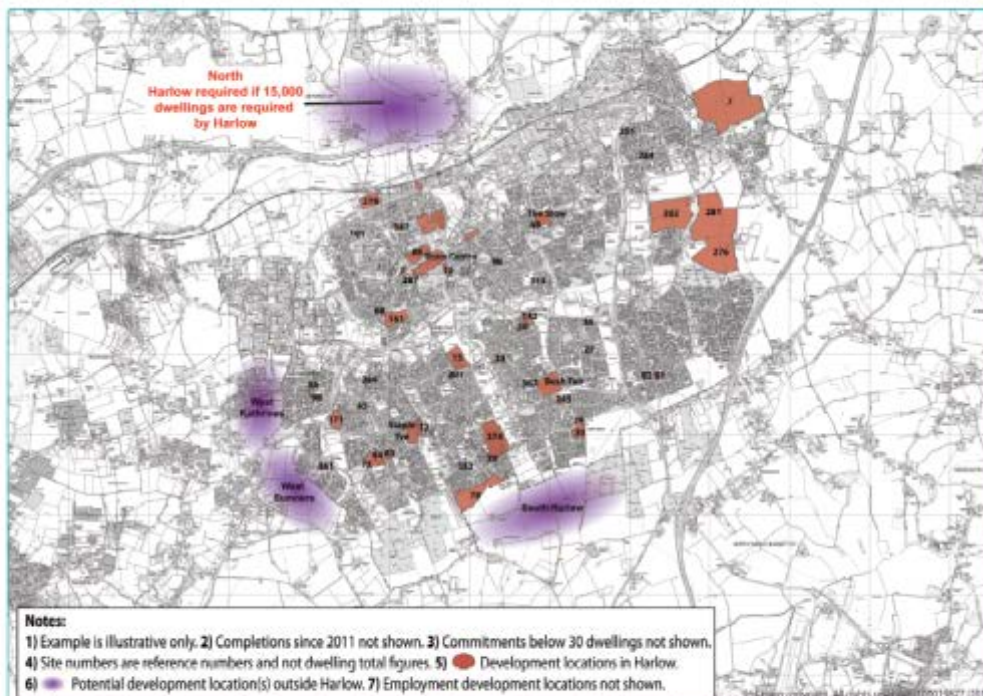
If you wish to discuss this consultation further please contact Forward Planning on 01279 446897 or email myharlow@harlow.gov.uk



Example 1 – Focused on Priority Regeneration Areas

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

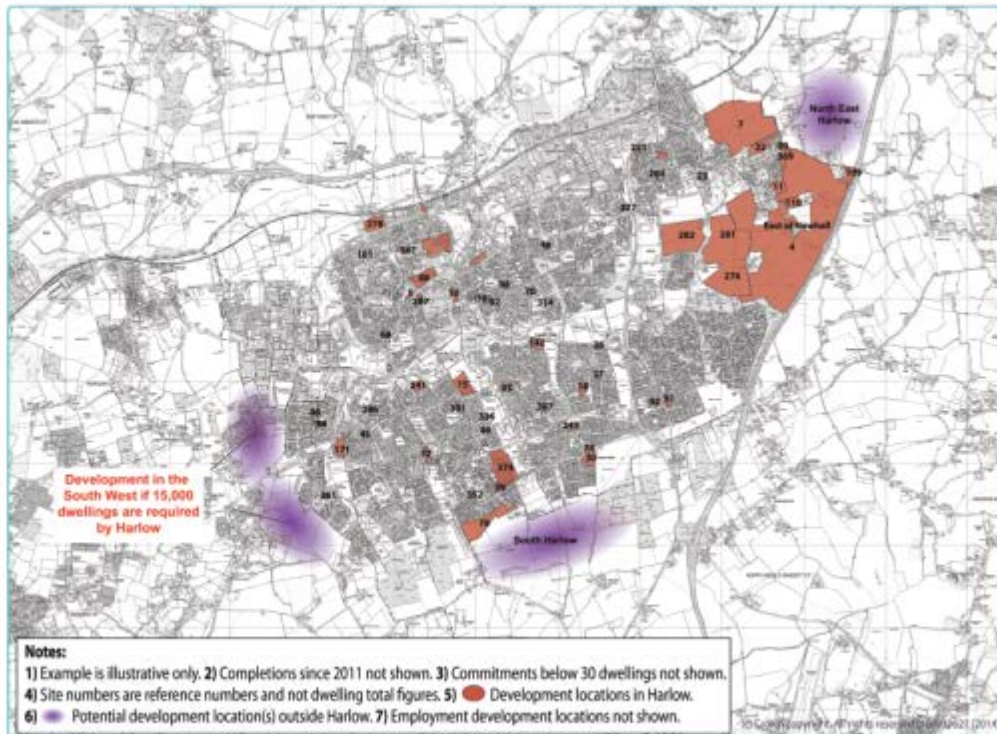
The site numbers are references and relate to the lists contained in appendix 1 of the consultation document.



Example 2 - Environmental / Landscape Led

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

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

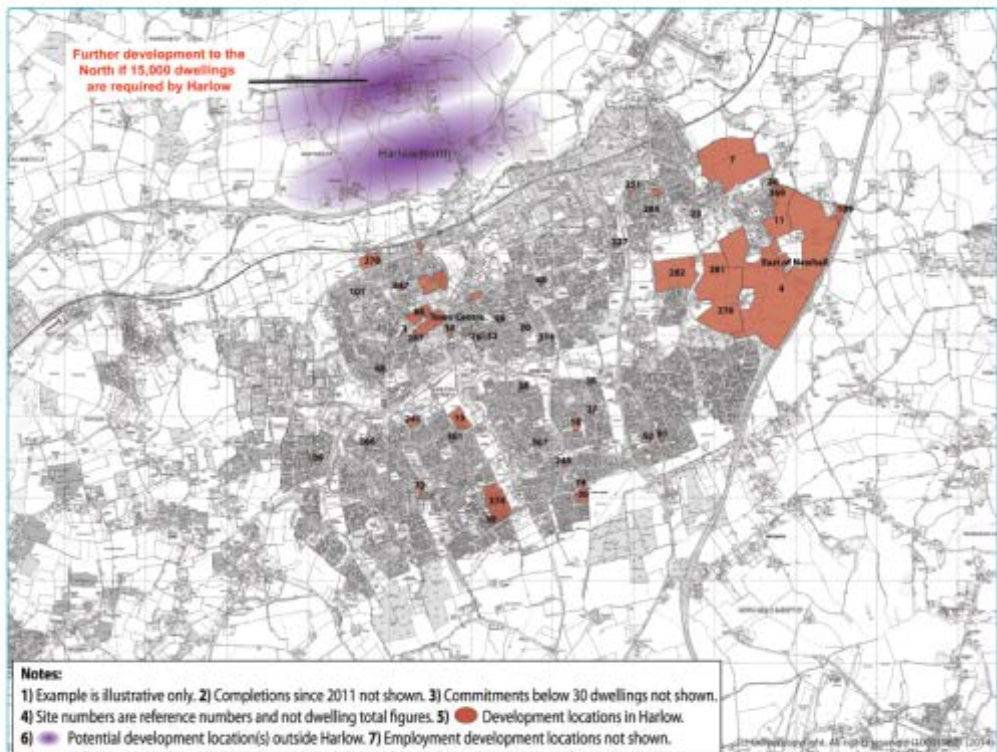


Harlow's Local Development Plan

Example 3 – Passenger Transport Led

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

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

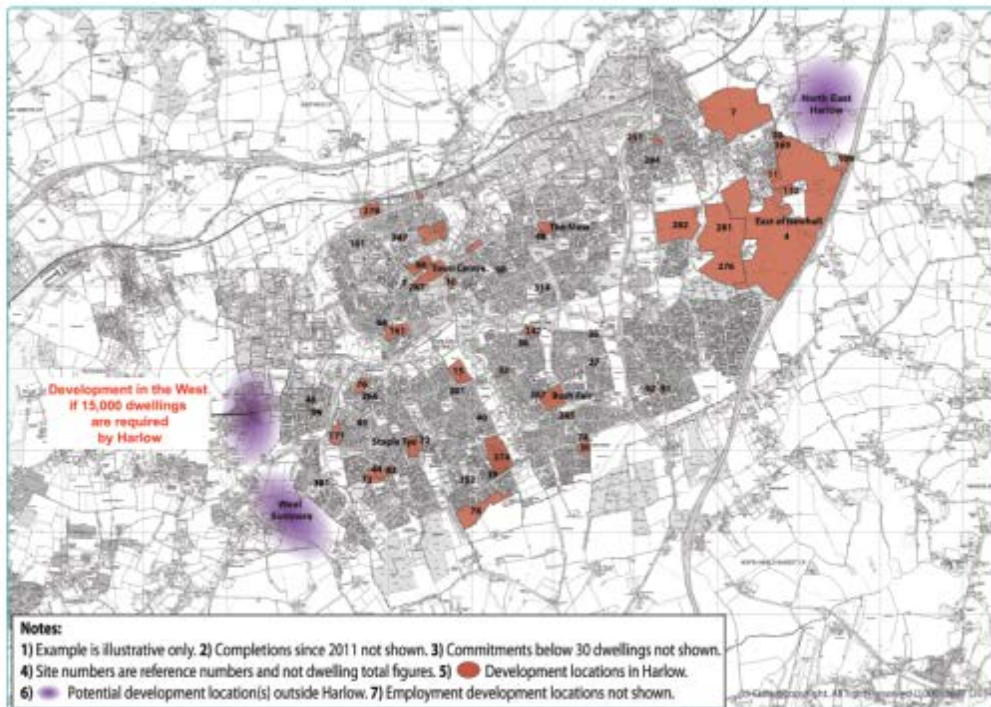


Harlow's Local Development Plan

Example 4 – Regeneration and Landscape Led

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

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

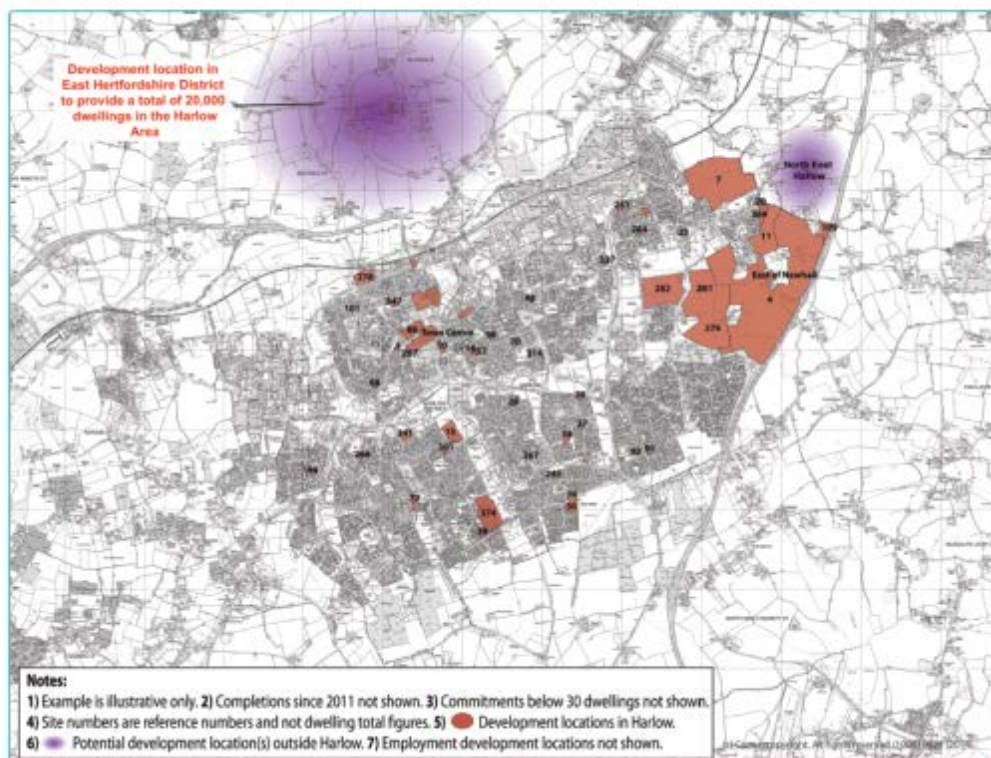


Harlow's Local Development Plan

Example 5 – Northern Bypass Led

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

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



Harlow's Local Development Plan

Appendix 14: Exhibition photos

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



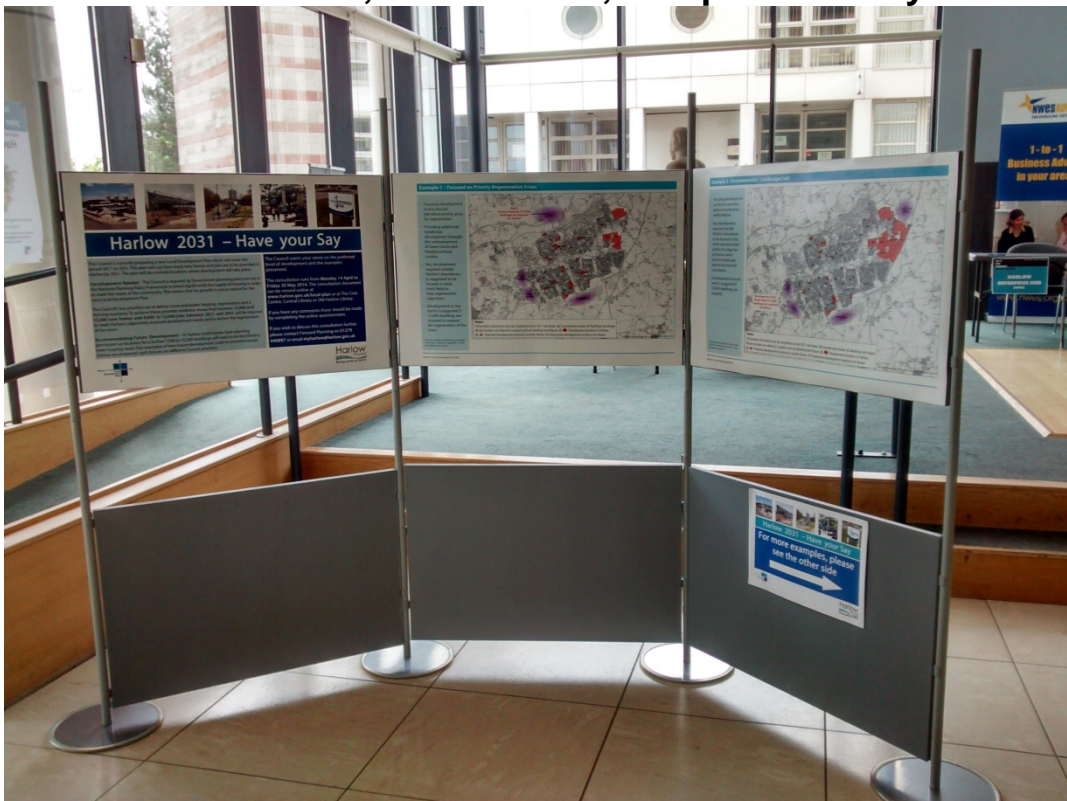
Staffed exhibition, Latton Bush Centre, 14 May 2014



Staffed exhibition, Harvey Centre, 21 May 2014



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



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

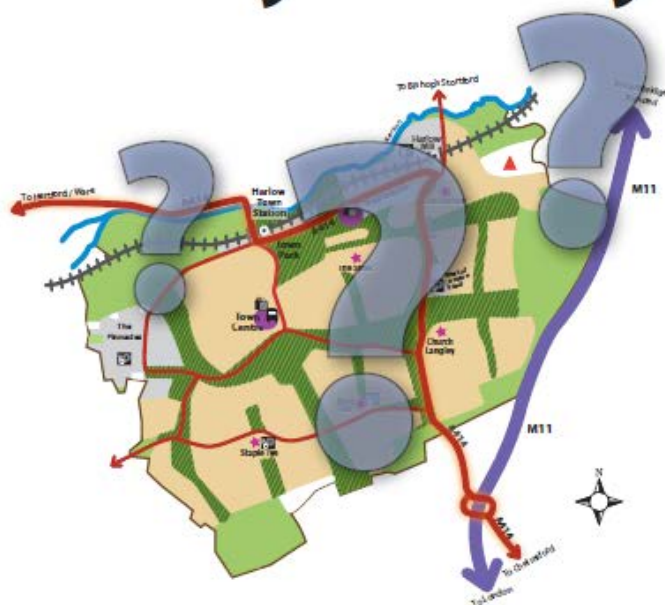


Appendix 15: Window poster in Civic Centre

How would YOU plan Harlow's future?

Harlow's Local Development Plan

Have your say!



Emerging Strategy and Further Options Consultation

14 April 2014 to 30 May 2014

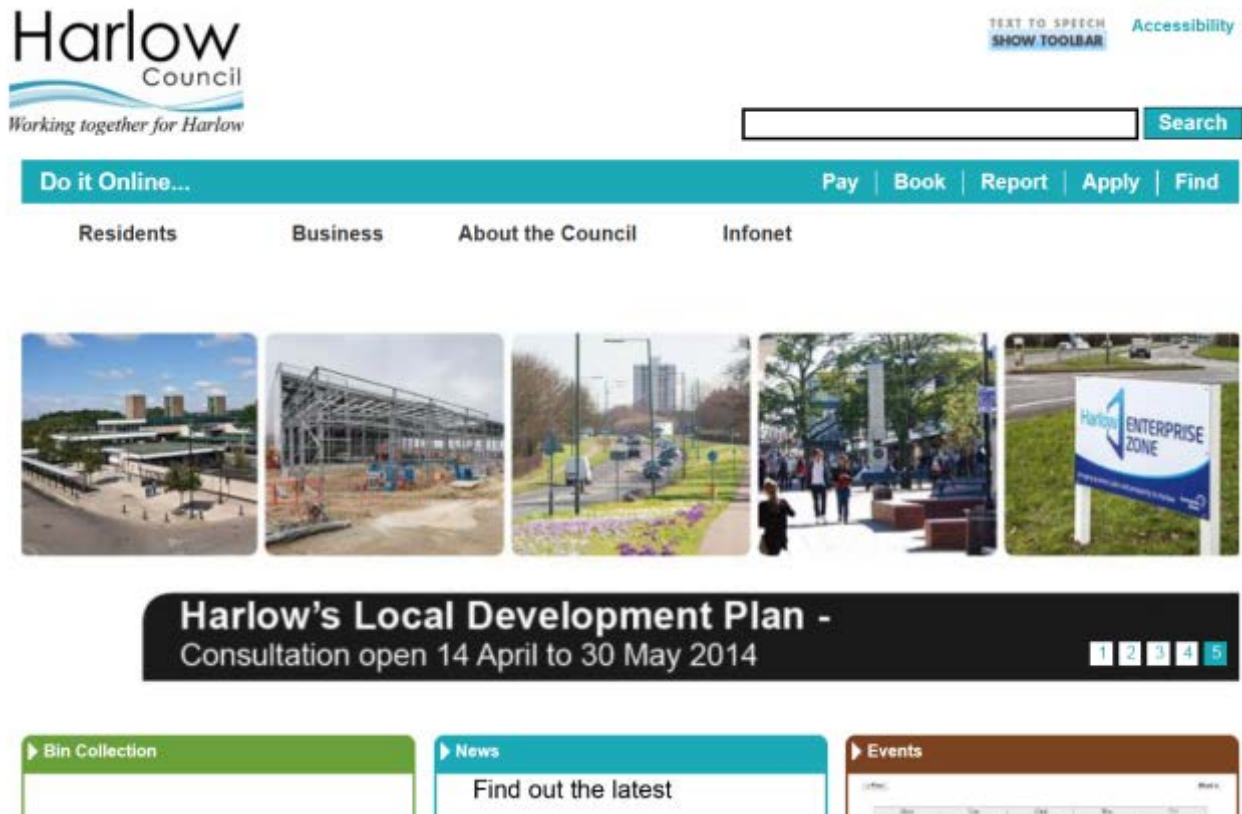
View the consultation document, pick up a questionnaire
and see the exhibition in the reception area, or visit

www.harlow.gov.uk/local-plan



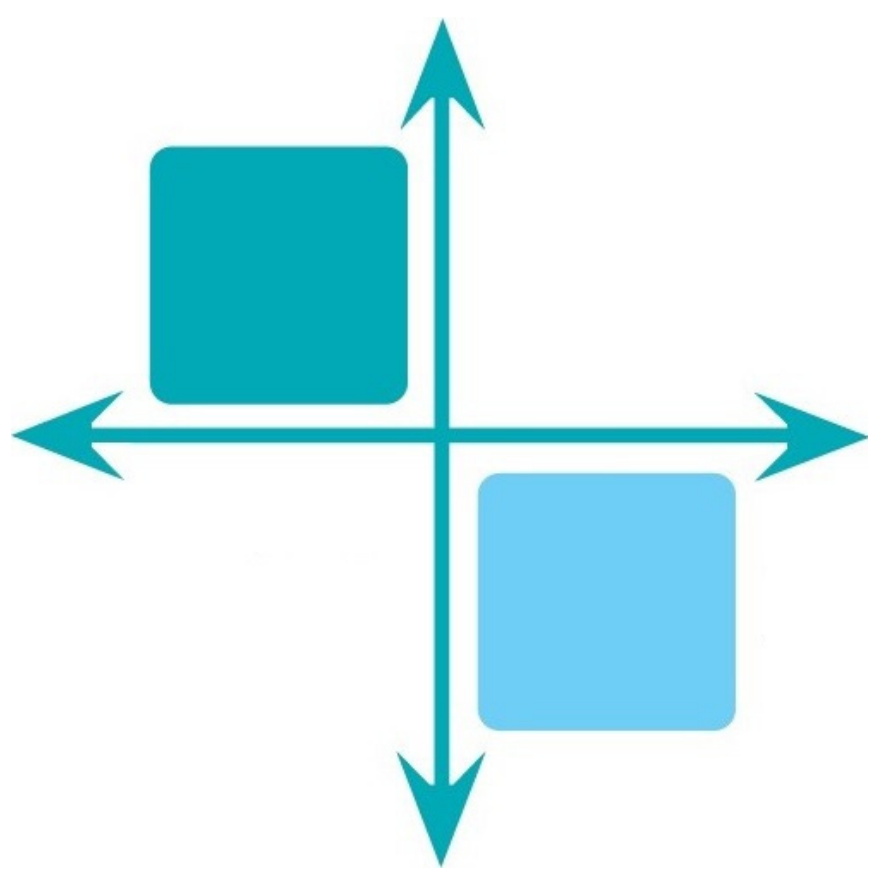
Harlow
Council
Working together for Harlow

Appendix 16: Website banner



Respondent List

. Pauline Black [8430]
 Anglican Deanery of Harlow (Revd Martin Harris) [8345]
 Barton Willmore (Miss Emma Gladwin) [8399]
 Countryside Properties Plc [70] represented by Barker Parry Town Planning Ltd. (Ms Elizabeth Fitzgerald) [8451]
 Dr Roger Bamford [8442]
 EFA (Dr Douglas McNab) [8404]
 Elaine Allen [6031]
 Environment Agency (Miss Lisa Mills) [8443]
 Essex Bridleways Association (Mrs Sue Dobson) [7887]
 Essex County Council (Mr Rich Cooke) [8452]
 Harlow Civic Society (Mr John Curry) [5318]
 Highways England (Mr Mark Norman) [7939]
 Historic England (Ms Katie Parsons) [8441]
 Home Builders Federation (Mr Mark Behrendt) [8450]
 Home Group (Jessica Watts) [8445]
 Janet Watkins [6004]
 Jean Wright [5878]
 Lichfields (Mr Harry Bennett) [8454]
 Miller Homes [8449] represented by Andrew Martin - Planning (Mr Olivier Spencer) [8448]
 Miss Sally SallyAnn Simpson [8418]
 Morley Grove Residents Association (Sheila Sullivan) [5043]
 Mr & Mrs Andy & Janice Gee [8438]
 Mr Andrew Whybrow [8423]
 Mr Gary Roberts [8432]
 Mr Simon Burton [8439]
 Mrs Giulia Festa-Burton [8436]
 Ms Sue McDonald [8446]
 Natural England (Mr Jamie Melvin) [8440]
 Persimmon Homes (Mr David Moseley) [8437]
 Quod Planning (Mr Philip Murphy) [7958]
 Roydon Parish Council (Janet Ballard) [5434]
 Sport England (. Laura Hutson) [8431]
 Thames Water (Savills) (Mr Chris Colloff) [8433]
 The Roydon Society (Miss Nicola Wilkinson) [27]
 The Theatres Trust (Tom Clarke) [216]



Harlow Local Plan

CONSULTATION

Development Management Policies

The new Local Development Plan for Harlow will contain Strategic Policies which provide an overarching development framework for the town, supported by Development Management Policies which provide more detailed planning guidance.



These policies will be accompanied by a Policies Map.

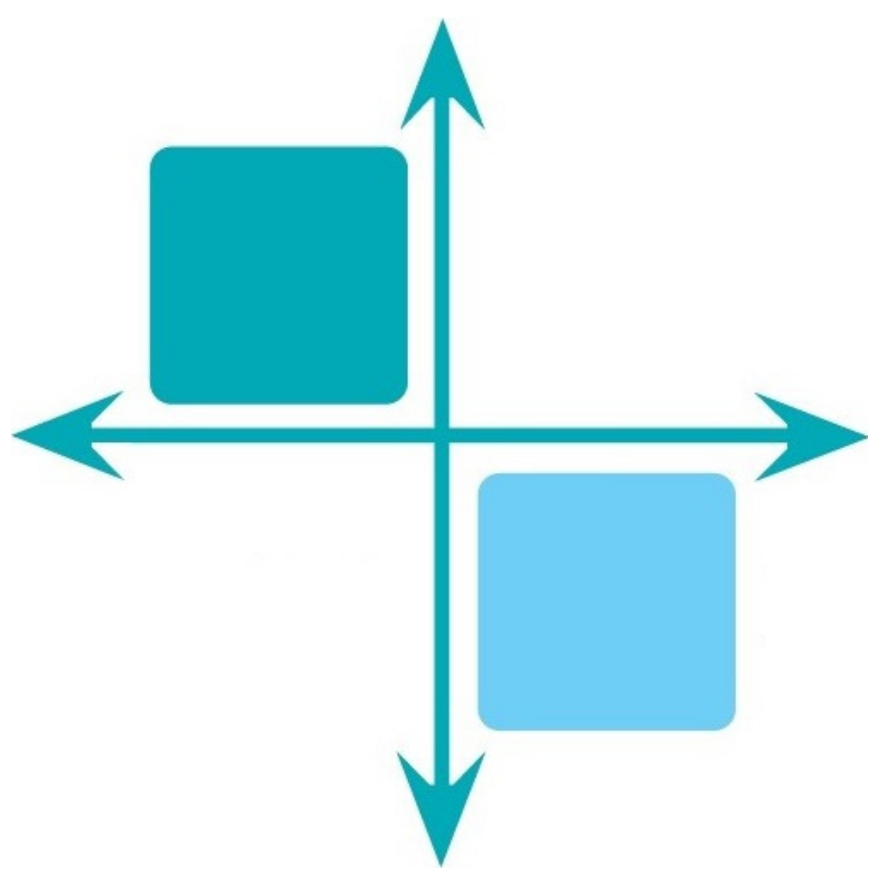


We are now consulting on the **Development Management Policies** that will help deliver the Plan's Strategic Objectives, which are split into five themes:

- Placeshaping
- Housing
- Prosperity
- Lifestyles
- Infrastructure

Please respond by 7 September 2017

www.harlow.gov.uk/local-plan



Harlow Local Plan

CONSULTATION

Development Management Policies

Local Plan Strategic Objectives

PLACESHAPING

- Establish quality streets which connect to revitalised green spaces
- Deliver high quality design through new development whilst protecting the district's heritage
- Adapt to and mitigate the impacts of climate change

HOUSING

- Identify sites to meet local housing needs both now and in the future
- Provide a range of suitable housing for the community including a range of tenures and types

PROSPERITY

- Improve the quality of homes in the district through new developments, regenerated neighbourhoods and priority estates
- Meet the employment needs of the district by diversifying and investing in the district's employment base
- Secure economic revitalisation and reinforce Harlow's reputation as a key centre for Research and Development
- Improve educational opportunities & the skills base of locals
- Provide a range of shopping needs for local residents and wider sub-region by regenerating the town centre and protecting and enhancing neighbourhood centres and hatches



LIFESTYLES

- Provide & enhance sporting, leisure, recreational facilities & cultural opportunities

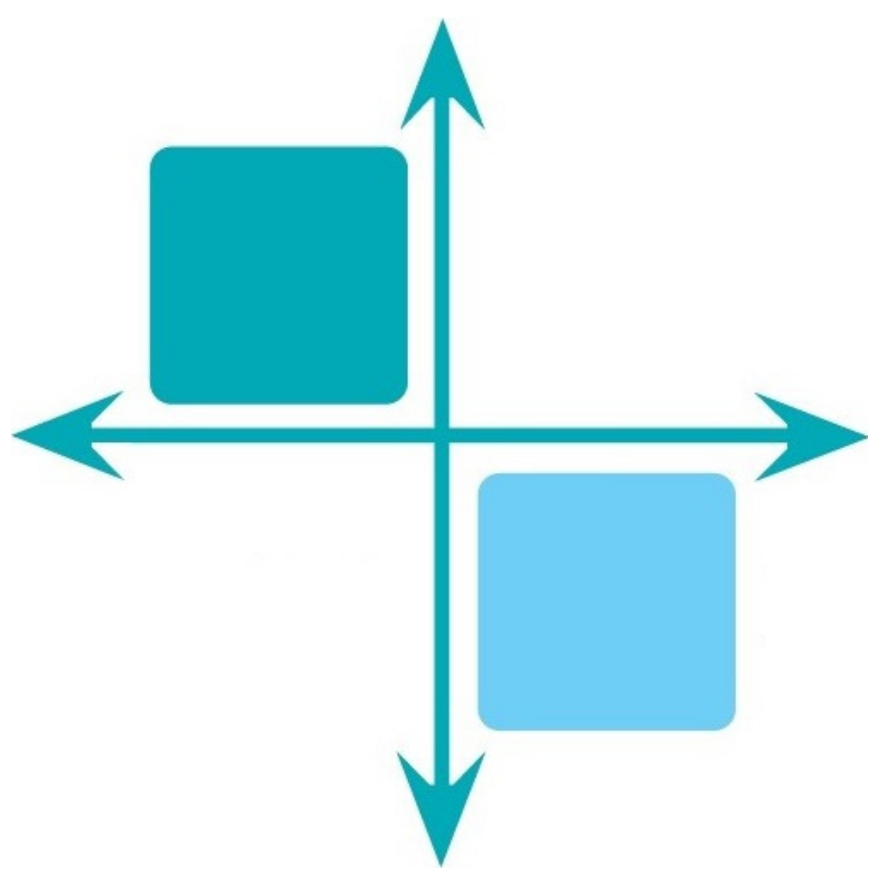
INFRASTRUCTURE

- Ensure development is fully supported by providing necessary infrastructure including education, healthcare & other community facilities
- Reduce the need to travel by car by ensuring new development is sustainably located
- Improve transport links, for all modes of transport, to community facilities
- Enhance & promote the role of Harlow as a transport interchange along the M11



Please respond by 7 September 2017

www.harlow.gov.uk/local-plan



Harlow Local Plan

CONSULTATION

Development Management Policies

The Council is now consulting on the Development Management Policies document and wants to hear your views.

The document can be viewed and comments submitted at **www.harlow.gov.uk/local-plan**

Please ensure you submit comments by 5pm on 7 September 2017.

The document can also be viewed at the Civic Centre Reception, Harlow Central Library and Old Harlow Library. Comments can alternatively be posted to Forward Planning, Harlow Council, Water Gardens, Harlow, Essex, CM20 1WG, or emailed to myHarlow@harlow.gov.uk.

Please ensure you include your name and address when responding, as we cannot accept anonymous comments.

By responding, you are giving your consent to the Council to hold and process your personal data in accordance with the requirements of the Data Protection Act 1998. Your name, organisation and comments may be available for others to view at the Council's offices and on the Council's website, but confidential information such as your address will remain confidential. The data gathered through this consultation will be held for the duration of the Local Plan, up to and probably beyond 2033. When you respond, we will add you to the Local Plan Database, so you can be kept informed of consultations on the Local Plan and other Planning Policy documents. You will be emailed rather than being contacted by post, unless you tell us otherwise or do not provide an email address. If you are already on the database, your details will not be duplicated. If you do not want to be added to the database, or are already on it and want to be removed, please tell us when you respond to the consultation.

Harlow Local Plan CONSULTATION

Development Management Policies

The new Local Development Plan for Harlow will contain Strategic Policies which provide an overarching development framework for the town, supported by Development Management Policies which provide more detailed planning guidance.

These policies will be accompanied by a Policies Map.

We are now consulting on the Development Management Policies that will help deliver the Plan's Strategic Objectives, which are split into five themes:

- Placeshaping
- Housing
- Prosperity
- Lifestyles
- Infrastructure

Please respond by 7 September 2017
www.harlow.gov.uk/local-plan

Harlow Council
 Building together for Harlow

Harlow Local Plan CONSULTATION

Development Management Policies

Local Plan Strategic Objectives

PLACESHAPING

- Encourage high quality streets which contain a mix of land uses and provide a range of housing types
- Encourage high quality design through new development whilst protecting the district's heritage
- Adapt to and mitigate the impacts of climate change

HOUSING

- Identify sites to meet local housing needs both now and in the future
- Provide a range of suitable housing for the community including a range of tenures and types

PROSPERITY

- Improve the quality of homes in the district through new developments, regeneration and refurbishment
- Meet the employment needs of the district by diversifying and expanding the district's employment base
- Secure economic resilience and ensure Harlow's reputation as a key centre for Research and Development
- Improve educational opportunities for all of our children
- Provide a range of shopping needs for local residents and wider catchment for supporting the maintenance and enhancing neighbourhood centres and markets

LIFESTYLES

- Promote a vibrant and thriving town with a range of cultural and recreational facilities

INFRASTRUCTURE

- Ensure development is fully supported by providing necessary infrastructure including education, healthcare & other community facilities
- Reduce the need to travel by car by increasing new development in sustainable locations
- Provide transport links for all modes of transport to support the town
- Enhance the role of Harlow as a transport corridor along the A10

Please respond by 7 September 2017
www.harlow.gov.uk/local-plan

Harlow Council
 Building together for Harlow

Harlow Local Plan CONSULTATION

Development Management Policies

The Council is now consulting on the Development Management Policies document and wants to hear your views.

The document can be viewed and comments submitted at www.harlow.gov.uk/local-plan

Please ensure you submit comments by 5pm on 7 September 2017.

The document can also be viewed at the Civic Centre Reception, Harlow Central Library and Old Harlow Library. Comments can alternatively be posted to Forward Planning, Harlow Council, Water Gardens, Harlow, Essex, CM20 1WG, or emailed to myharlow@harlow.gov.uk

Please ensure you include your name and address when responding, as we cannot accept anonymous comments.

By responding to this consultation you are helping to shape the future of Harlow. Your views will be taken into account when the Council develops the new Local Development Plan. The Council will be holding a series of public consultations to hear your views on the new Local Development Plan. Your views will be taken into account when the Council develops the new Local Development Plan. The Council will be holding a series of public consultations to hear your views on the new Local Development Plan.

Harlow Council
 Building together for Harlow

Robbers threaten shop staff

THREE men stole mobile phones and a five-figure sum of cash after threatening shop staff.

The men, wearing balaclavas, went into EE, in Edinburgh Way, Harlow, at about 4pm on Tuesday afternoon (July 25) and ordered workers to the shop's rear.

They then took phones, money and electrical appliances before driving away in a Volkswagen Golf. No one was injured.

Essex Police are appealing for information after the robbery.

One suspect is described as being white, about 6ft 2 ins with facial hair and wore a black and white striped hoodie.

The other suspects have been described as being black men, aged in their 20s and about 5ft 5ins tall.

They both wore black hoodies while all three wore gloves.

Anyone with information is asked to call Harlow Police Station on 101 or Crimestoppers, anonymously, on 0800 555 111.

Delays on M11 after blowout

MOTORISTS faced delays on the M11 southbound from junction at 8 Bishop's Stortford to junction 7 for Harlow.

Slight disruption was caused after a vehicle's part-worn tyres blew out on Saturday (July 22).

Essex Police sergeant Colin Shead posted pictures of the tyres on Twitter which were taken by PC Michelle Lockyer.

He wrote that a female driver has been reported to court as she already had 14 points on her licence.

The car passed its MOT in May but the driver purchased part-worn tyres as a replacement.

Drivers using the section faced delays of no more than five minutes.

Chance to have your say on council's master plan

Consultation on future planning guidelines which will shape area

By William Mata

william.mata@hertsessexnews.co.uk

HARLOW Council is inviting residents and businesses to have their say on how planning applications are considered.

The consultation is a precursor to the authority's local plan, planning guidelines that will shape the town's development up to 2033 and include policy on housing, infrastructure, the environment, services and support.

A replacement for Princess Alexandra Hospital could be on the cards while Harlow Council must fulfil a requirement to build 9,200 homes.

Councillor Danny Purton said: "This consultation is an important part of the local development plan.

Aspirations

"If we want to continue improving Harlow, providing much-needed housing and employment and creating new opportunities for local people and businesses, then we need a local development plan which supports Harlow's development, aspirations and growth for the future."

As neighbouring councils have already submitted a local plan, the announcement is a step forward for the local authority.

Policy is also expected to be shaped around major projects such as Harlow Enterprise Zone and Public Health England's campus in the town.

Mr Purton added: "As we plan



Residents can read the proposals at a number of sites around town, including Harlow Civic Centre. Inset, Councillor Danny Purton

Harlow's future, the council will be making sure that Harlow has the right mix of new homes, business spaces, shops, education, health and leisure facilities to meet the needs of residents and businesses.

"We will also provide protection for the green spaces and the environment by making sure that

new buildings respect Harlow's new town heritage and any traffic implications are minimised.

"The development management policies support all these things by providing guidance on how planning applications will be assessed."

Consultation on the proposed policies runs until 5pm on

Thursday, September 7.

The complete local plan will be published for further consultation and submitted to the secretary of state for examination in 2018.

■ To comment visit www.harlow.gov.uk/local-plan email comments to myharlow@harlow.gov.uk or post comments

to The Forward Planning Team, Harlow Council, Water Gardens, Harlow, Essex, CM20 1WG.

■ The proposed policies can be read at www.harlow.gov.uk/local-plan. Or they can be viewed, during normal opening hours, at the Harlow Civic Centre, the Harlow Central Library and Old Harlow Library.

BREAKING NEWS ON OUR WEBSITE

■ For breaking news from across the area

harlowstar.co.uk

Consultation over plan for new garden town

PROPOSALS to build a new garden town called Gilston Park, also colloquially known as Harlow North, will be put to consultation by East Hertfordshire District Council (EHDC).

The consultation, which started on Monday (July 24), will run until September 1.

Residents are being asked to give their views on plans for a new town being

proposed for Gilston.

The town, which is part of the East Hertfordshire District Plan, would include 10,000 homes, provision for schools, health care, parks, and transport links.

The consultation, which is taking place after the publication of the concept framework document, gives the public the chance to look at the first detailed plans

for the settlement.

To view the documents and to give feedback visit www.eastherts.gov.uk/gilstonconsultation

Developers will also be holding a drop-in session on August 5, from 10am until 3pm, at Manor of Groves Hotel in Sawbridgeworth, CM21 0JU for people to see plans and to give their opinions in person.

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Appendix IV (d) - Development Management Policies consultation representation summary

Glossary

6000 etc	This is the reference number of the representation received.
Background/Policy reference	This is the chapter/policy the representation relates to.
Respondent	This is the name of the individual/organisation that made a representation.
Summary	This is the content of the representation(s) made to the Development Management Policies consultation version of the Harlow Local Development Plan
Change to Plan	These are the suggestion(s) made by respondent(s) to the Local Development Plan (If any)

Development Management Policies Consultation Draft

CHAPTER: Development Management in Harlow Development Management in Harlow

6219 Comment

Respondent: Thames Water (Savills) (Mr Chris Colloff) [8433]

Agent: N/A

Summary:

General Comments

Thames Water are in discussion with Harlow and neighbouring authorities with regard to long term growth and infrastructure issues with the Rye Meads Sewage Treatment Works catchment and these discussions are ongoing. Hydraulic modelling is currently taking place of the sewer network and a position statement was issued in June 2017 in relation to the position with regard to the sewer network and sewage treatment.

Change To Plan:

Full Reference: C - 6219 - 8433 - Development Management in Harlow - None

6265 Comment

Respondent: Natural England (Mr Jamie Melvin) [8440]

Agent: N/A

Summary: Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

In general, Natural England considers the development management policies provided to be relatively comprehensive. Your authority is aware that the West Essex/East Hertfordshire Housing Market Area Local Planning Authorities including yourselves, along with Essex County Council, Natural England and the Conservators of Epping Forest are all signatories to a Memorandum of Understanding relating to Epping Forest Special Area of Conservation (SAC). As that project progresses and following the undertaking of Habitat Regulations Assessment (as required under section 102 of the Conservation of Habitats and Species Regulations 2010) further amendments to the policies may be necessary.

Change To Plan:

Full Reference: C - 6265 - 8440 - Development Management in Harlow - None

6271 Comment**Respondent: Barton Willmore (Miss Emma Gladwin) [8399]****Agent: N/A**

Summary: 1.0 INTRODUCTION

1.1 These representations have been prepared on behalf of De Merke Estates in response to Harlow District Council's (HDC's) Regulation 18 consultation on its Draft Development Management (DM) Policies.

1.2 HDC is in the process of producing a new Local Plan, which will contain Strategic Policies to provide an overarching development framework for the town, supported by DM Policies which contain more detailed planning guidance. These policies will be accompanied by a Proposals Map.

1.3 An initial Issues and Options consultation was undertaken between 22 November 2010 and 28 January 2011, followed by an Emerging Strategy and Further Options consultation between 14 April and 30 May 2014.

1.4 This has been followed by the current DM Policies consultation. HDC's timetable for the remainder of the Local Plan is as follows:

* Regulation 19 Consultation: January-February 2018

* Submission: April 2018

* Examination: Summer 2018

* Inspector's Report: August 2018

* Adoption: September 2018

1.5 These representations will highlight concerns with HDC's process of adopting the new Local Plan, concerns with specific policies and seek to promote our Client's Site for development.

Change To Plan:

Full Reference: C - 6271 - 8399 - Development Management in Harlow - None

6272 Comment**Respondent: Barton Willmore (Miss Emma Gladwin) [8399]****Agent: N/A**

Summary: 2.0 LOCAL PLAN PROCESS

2.1 Firstly, on behalf of our Client we wish to raise concerns regarding the Local Plan process that HDC is following.

i) Separation of Strategic and DM Policies

2.2 The process for producing a new Local Plan is detailed in The Town and Country Planning (Local Planning) (England) Regulations 2012, the National Planning Policy Framework (NPPF) and the Planning Practice Guidance (PPG).

2.3 All three of these documents detail that the plan making process is a collaborative one that requires engagement with statutory consultees, local residents, local businesses and all other parties that have an interest in the Local Plan.

2.4 This engagement must start at an early stage, as identified in Paragraph 155 of the NPPF which states that 'early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential'. It continues to state that Local Plans should 'reflect a collective vision and a set of agreed priorities for the sustainable development of the area'.

2.5 This is reiterated in the PPG, stating that Local Authorities must identify and engage at an early stage with all those who may be interested in the Local Plan, and must take into account all representations made and will need to set out how these have been taken into account (Reference ID: 12-010-20140306).

2.6 HDC first engaged with the local community and statutory consultees in 2010 with the Issues and Options consultation, starting engagement at an early stage. This was followed in 2014 by the Emerging Strategy and Further Options consultation.

2.7 Whilst these consultations did allow HDC to engage with the local community and consultees, these documents asked for their opinion on issues within the Harlow area and on a number of different options on various issues, including how development could be allocated.

2.8 These previous consultations did not provide any specific policies or incorporate any decision over the scale and distribution of development across Harlow and did not include a proposals map.

2.9 The Emerging Strategy and Further Options consultation itself stated 'the preferred option will be presented later this year / early next year before the plan undergoes public examination'.

2.10 However, no preferred options for the scale and distribution of development or draft proposals map have been presented.

2.11 The current consultation comprises the DM Policies only, which provide a detailed planning framework to be used in determining planning applications. These policies have been developed to help deliver the Local Plan's strategic objectives, which have been grouped into 5 No. themes and comprise 14 No. specific objectives.

2.12 However, these strategic objectives form part of the Strategic Policies aspect of the new Local Plan, and whilst these are listed within the current consultation there is no further detail given and limited opportunity to comment as a result.

2.13 Furthermore, the DM Policies refer to the strategic policies in some instances, particularly in relation to housing need and the distribution of development. No detail regarding this is given, with Policy H1 stating 'development of the Strategic Housing Site and other sites for housing (allocated in the Strategic Policies) will be supported. Development of the Strategic Housing Site will require a Master Plan to be submitted which takes into consideration the relevant policies in the Local Plan'.

2.14 The justification for Policy H1 states the housing requirement is set out in the Strategic Policies, with no other detail given.

2.15 To date there have been no documents published that identify HDC's preferred option for the scale and distribution of development. Various options have been published for consultation, but no details of any assessment or decisions that have been made.

2.16 The DM Policies suggest that decisions in this regard have been made, referring to 'the Strategic Housing Site'. However, any indication of where this will be and what this development will comprise is not available.

2.17 As detailed above, HDC is intending to publish only the DM Policies as the Regulation 18 Plan, with a full Local Plan comprising both the Strategic and DM Policies published as a Regulation

19 Plan in January 2018.

2.18 The remit to respond to a Regulation 19 Plan is quite limited, concentrating on the four Tests of Soundness and whether the Local Plan is compliant with relevant legislation.

2.19 As such, the PPG is clear that the Regulation 19 Plan 'should be the document that the Local Authority considers ready for examination' (Reference ID: 12-020-20140306). The content of the document should have already been consulted upon, with changes made as necessary.

2.20 There are substantial concerns that following the approach of only publishing the Strategic Policies and proposed development strategy as a Regulation 19 consultation will result in a Local Plan that fails to meet the legal requirement of having undertaken the necessary consultation and adequately considered the representations.

2.21 Furthermore, HDC is anticipating submitting the Local Plan for examination in April 2018, which does not provide any time to make amendments to the Local Plan and re-consult between the Regulation 19 consultation and submission.

2.22 Given that the Regulation 19 consultation will be the first publication of HDC's preferred strategy and strategic policies, it is highly likely that a considerable number of representations will be made. HDC has a statutory duty to consider these and, when submitting the Local Plan for examination, must identify how they have considered them and amended the Plan where necessary.

2.23 The current timetable and approach of HDC suggests that HDC is not anticipating amending the Plan following the Regulation 19 consultation. The more common approach is to undertake a Regulation 18 consultation on the whole draft Local Plan including the preferred strategy for development, making the necessary amendments, publishing the Regulation 19 Local Plan and then submitting to the Planning Inspectorate. This process adequately allows for genuine consultation on the Plan and preferred strategy, providing the collaborative approach required.

ii) Evidence Base

2.24 A Local Plan must be based on 'adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the area' (NPPF Paragraph 158).

2.25 The PPG further states that an appropriate and proportionate evidence base is essential for producing a sound Local Plan and 'the evidence needs to inform what is in the plan and shape its development rather than being collected retrospectively' (Reference ID: 12-014-20140306). The PPG continues to state if approaching submission and key studies are reliant on information that is a few years old, they should be updated.

2.26 As HDC has been in the process of producing the new Local Plan for over 10 years, the age of the evidence base documents varies, with some having been published prior to 2010.

2.27 The most recent Infrastructure Study was published in 2009, the SHLAA was undertaken in 2014 and the Employment Land Review was undertaken in 2013.

2.28 Furthermore, the SHMA was published in 2013 considering the 2012-based household projections and those from preceding years. The 2014-based household projections were published last year and it is unclear whether HDC has considered these.

2.29 There are concerns over the robustness of the evidence base for the new Local Plan, with some documents being out-of-date and others not having been published.

iii) Sustainability Appraisal

2.30 The PPG details that every Local Plan must be informed and accompanied by a Sustainability Appraisal (SA) to allow 'the potential environmental, economic and social impacts of the proposals to be systematically taken into account, and should play a key role throughout the plan-making process. The Sustainability Appraisal plays an important part in demonstrating that the Local Plan reflects sustainability objectives and has considered reasonable alternatives.' (Reference ID: 12-016-20140306).

2.31 HDC produced and consulted on a SA Scoping Report, with the final version published in February 2010.

2.32 The SA Scoping Report sets out that 'crucially, the appraisal should be undertaken in parallel with development of the plan and the appraisal findings should be fed into the emerging plan.

In practice, this means undertaking several rounds - or iterations - of appraisal at different stages in the plan-making process' (Paragraph 2.2.3).

2.33 The options presented in the Issues and Options consultation document were considered against the SA criteria, with a SA published alongside the consultation in November 2010.

2.34 The Issues and Options SA set out the assumptions and difficulties in undertaking certain parts of the appraisal at that stage, including that there were no specific details on the suggested approach to the overarching principles directing new development and the exact level and type of employment to be provided was unclear.

2.35 Furthermore, there were no details on the locations where densities could be increased, whether undeveloped and underused open spaces should be used for development before the Green Belt, and what role Green Wedges should play in the future development of Harlow.

2.36 The SA Scoping Report sets out that as such, the likely significant effects of these options could not be appraised at that stage, which is not uncommon for an Issues and Options paper. It continues to state that 'however, it is important that future iterations of the Core Strategy are clearer on the approach so to allow the Sustainability Appraisal to appraise their impact' (paragraph 2.3.18).

2.37 Further uncertainties were identified regarding the impact of the spatial options against the SA framework, mainly due to a lack of detail regarding the nature of the development for each option. Greater detail on the exact nature and geographical steer in terms of infilling within existing development would be required to enable a full assessment of the spatial options against the SA framework. Although proposed policy areas were identified, details were not provided at that stage, with these details highlighted as 'instrumental in the determination and identification of sustainability impacts'.

2.38 A SA is a statutory requirement to accompany a Local Plan which should be used throughout its development to ensure the Local Plan reflects the sustainability objectives and promotes sustainable development in accordance with the NPPF.

2.39 Whilst HDC produced a SA Scoping Report and a SA to accompany the Issues and Options consultation, there has been nothing further published since 2010 in this regard.

2.40 As detailed above, if HDC had published the full Local Plan as part of the Regulation 18 consultation, a SA report could have been published alongside. Instead, the first full SA report will have to be published alongside the Regulation 19 consultation, allowing limited opportunity for comments and amendments.

Change To Plan:

Full Reference: C - 6272 - 8399 - Development Management in Harlow - None

6273 Comment

Respondent: Barton Willmore (Miss Emma Gladwin) [8399]

Agent: N/A

Summary: PROMOTION OF SITE

See attached file.

Change To Plan:

Full Reference: C - 6273 - 8399 - Development Management in Harlow - None

6274 Comment

Respondent: Historic England (Ms Katie Parsons) [8441]

Agent: N/A

Summary: As the Government's adviser on the historic environment Historic England is keen to ensure that the protection of the historic environment is fully taken into account at all stages and levels of the local planning process. Therefore we welcome the opportunity to comment on the draft development management policies. We have now had the opportunity to review the documents and can provide the following substantive comments.

General comments

Historic England has published a number of Good Practice Advice and Advice Notes which you may find useful in developing your local plan. In particular:

Good Practice Advice in Planning 1 - the historic environment in local plans:
<<https://historicengland.org.uk/images-books/publications/gpa1-historic-environmentlocal-plans/>>

Good Practice Advice in Planning 3 - the setting of heritage assets:
<<https://content.historicengland.org.uk/images-books/publications/gpa3-setting-ofheritage-assets/gpa3.pdf/>>

For the avoidance of doubt, we have not considered archaeological issues in this brief desk based assessment but would refer you to the HER who should be able to advise in this regard. We have also not identified non-designated assets.

Paragraph 126 of the NPPF requires Local Plans to set out a positive and clear strategy for the conservation, enjoyment and enhancement of the historic environment. Ideally the strategy should offer a strategic overview including overarching heritage policies to deliver the conservation and enhancement of the environment.

A good strategy will offer a positive holistic approach throughout the whole plan whereby the historic environment is considered not just as a stand-alone topic but as an integral part of every aspect of the plan, being interwoven within the entire document. So policies for housing, retail, and transport for example may need to be tailored to achieve the positive improvements that paragraph 8 of the NPPF demands. Site allocations may need to refer to the historic environment, identifying opportunities to conserve and enhance the historic environment, avoid harming heritage assets and their settings and may also be able to positively address heritage assets at risk. The plan may need to include areas identified as being inappropriate for certain types of development due to the impact they would have on the historic environment.

A good strategy will also be spatially specific, unique to the area, describing the local characteristics of the borough and responding accordingly with policies that address the local situation. We would expect references to the historic environment in the local plan vision, the inclusion of a policy/ies for the historic environment and character of the landscape and built environment, and various other references to the historic environment through the plan relating to the unique characteristics of the area.

Further opportunity should be sought to address the historic environment in every aspect of the Plan and to make the strategy more spatially specific and unique to Harlow.

Change To Plan:

Full Reference: C - 6274 - 8441 - Development Management in Harlow - None

6291 Comment **Respondent: Historic England (Ms Katie Parsons) [8441]** **Agent: N/A**

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

Change To Plan:

Full Reference: C - 6291 - 8441 - Development Management in Harlow - None

6297 Comment **Respondent: Dr Roger Bamford [8442]** **Agent: N/A**

Summary: The document is well laid-out, clear and professional. However it is very disappointing that the council has not yet published the strategic policies. It is most peculiar that the more detailed development management policies have been published first. The council is treading on dodgy ground by not having a 'preferred options' consultation. I, for one, will object to the soundness of the plan if we are not allowed to comment on preferred options.

Change To Plan:

Full Reference: C - 6297 - 8442 - Development Management in Harlow - None

6303 Comment **Respondent: EFA (Dr Douglas McNab) [8404]** **Agent: N/A**

Summary: Submission of the Education and Skills Funding Agency
1. The Education and Skills Funding Agency (ESFA) welcomes the opportunity to contribute to the development of planning policy at the local level.
2. The ESFA, launched on 1st April 2017, brings together the existing responsibilities of the Education Funding Agency (EFA) and the Skills Funding Agency (SFA) to create a single funding agency accountable for funding education and training for children, young people and adults. The ESFA are accountable for £61 billion of funding a year for the education and training sector, including support for all state-provided education for 8 million children aged 3 to 16, and 1.6 million young people aged 16 to 19.
3. Under the provisions of the Education Act 2011 and the Academies Act 2010, all new state schools are now academies/free schools and the ESFA is the delivery body for many of these, rather than local education authorities. As such, we aim to work closely with local authority education departments and planning authorities to meet the demand for new school places and new schools. In this capacity, we would like to offer the following comments in response to the proposals outlined in the above consultation document.

Change To Plan:

Full Reference: C - 6303 - 8404 - Development Management in Harlow - None

6307 Comment **Respondent: Miller Homes [8449]** **Agent: Andrew Martin - Planning (Mr Olivier Spencer) [8448]**

Summary: In summary, our client requests that all future consultations present the Local Plan as a whole.

Change To Plan:

Full Reference: C - 6307 - 8449 - Development Management in Harlow - None

6308 Comment **Respondent: Jean Wright [5878]** **Agent: N/A**

Summary: Having commented in previous years on the Local Plan I was left, after looking at the document, feeling disappointed as this is a policy document with no detail. It is the briefest of documents.
As a resident I feel none the wiser about Harlow's future development.
I feel unable to comment.

Change To Plan:

Full Reference: C - 6308 - 5878 - Development Management in Harlow - None

6323 Comment **Respondent: Quod Planning (Mr Philip Murphy) [7958]** **Agent: N/A**

Summary: a) Gilston Area
As the Council will be aware Places for People, alongside City & Provincial Properties, are working with East Herts District Council (EHDC) to secure an allocation for 10,000 homes at the Gilston Area. The Gilston Area is currently identified as a Site Allocation in the Pre-Submission draft of the East Herts District Plan (November 2016). This was submitted to the Secretary of State on 31 March 2017 and the independent examination is due to start on 3 October 2017.
As recognised in the evidence base to the EHDC District Plan, the Gilston Area will provide a full range of residential properties, both private and affordable, to assist in meeting the housing needs of East Herts, and also contributes toward the economic regeneration of Harlow.
Paragraph 11.1.3 of the draft EHDC District Plan states "As well as providing benefits to East Herts, the development will support the regeneration of Harlow by helping to draw investment to the town and enhance its economic performance."
In delivering the Gilston Area development, Places for People are keen to support the regeneration of Harlow. This will include the indirect benefits of growth at the Gilston Area (e.g. investment and spending from the residents of the 10,000 homes being drawn into Harlow), and there will also be direct benefits in the form of highway improvements including the proposed Central and (likely Eastern) Stort Crossings.
Detailed designs for the crossings are currently being prepared by Places for People in consultation with the two county highway authorities. These enhancements will deliver significant strategic improvements to the transport network across the greater Harlow area, and directly assist Harlow's wider aspirations for residential and economic growth.
In order to correctly reflect the published evidence base, as well as have due regard to the advanced progress of the East Herts District Plan, the Development Management Policies document should specifically recognise the role and importance of the Gilston Area in supporting the Local Plan's strategic objectives, especially those set out in the Prosperity chapter.

Change To Plan:

Full Reference: C - 6323 - 7958 - Development Management in Harlow - None

6329 Comment **Respondent: Quod Planning (Mr Philip Murphy) [7958]** **Agent: N/A**

Summary: Places for People welcome the opportunity to continue to engage with Harlow District Council on the evolution of Harlow's Local Development Plan, particularly as the detail on the proposals for the Gilston Area, and Central and Eastern Stort Crossings, continues to progress.

Change To Plan:

Full Reference: C - 6329 - 7958 - Development Management in Harlow - None

6333 Comment **Respondent: Countryside Properties Plc [70]** **Agent: Barker Parry Town Planning Ltd. (Ms Elizabeth Fitzgerald) [8451]**

Summary: In reviewing the policies proposed there is some concern that the evidence base is now significantly dated and in many instances pre-dates the National Planning Policy Framework (NPPF), such that the position established lacks any clarity or weight to enable a developer to reasonably establish the policy requirements prior to the submission of a planning application.

Change To Plan:

Full Reference: C - 6333 - 70 - Development Management in Harlow - None

6338 Comment**Respondent: Home Group (Jessica Watts) [8445]****Agent: N/A**

Summary: Home Group wishes to express support of the Draft Development Management Policies document Harlow has issued as part of the Local Plan. We believe the policies show a generally positive and practical attitude, and as a developer partner active in the district, we welcome any approach that encourages sustainable housing developments and promotes good design principles. We also advocate the focus on preserving heritage and the natural environment whilst being pragmatic about the potential for open space development where appropriate.

Change To Plan:

Full Reference: C - 6338 - 8445 - Development Management in Harlow - None

6344 Comment**Respondent: Essex County Council (Mr Rich Cooke) [8452]****Agent: N/A**

Summary: It is assumed that a statement will be inserted into the introduction of the final Plan clarifying that all development plan policies, including those found in the Essex Minerals Local Plan and Essex and Southend-on-Sea Waste Local Plan, will apply in the administrative area of Harlow, and that the Plans and their policies apply as a whole.

Potential Policy Omission

Reference is made to the NPPF as requiring developments to have a social role and support developing strong, vibrant and healthy communities. There is, however, no health and wellbeing policy within this document. This could possibly be included as part of Policy PL1, or it may be that such a policy would form part of the over-arching strategic Local Plan policies, that are yet to be published. If that is the case, ECC advises and reminds HDC not to overlook that consideration as key throughout the plan and its objectives. In the latter respect, it is noted that there is currently no Local Plan objective that specifically covers health and wellbeing.

In addition, ECC actively encourages the adoption of Health Impact Assessments in line with the existing Essex Planning Officers Association 2008 guidance, which will be updated. ECC also signposts to Public Health Guidance from colleagues at Herts County Council Public Health team, which can be found here- <https://www.hertfordshire.gov.uk/media-library/documents/public-health/hertfordshire-s-health-and-wellbeing-planning-guidance-may-2017.pdf>. The Harlow DM policies could usefully include a policy requirement for HIAs to be prepared for development proposals.

Change To Plan:

Full Reference: C - 6344 - 8452 - Development Management in Harlow - None

6345 Comment**Respondent: Essex County Council (Mr Rich Cooke) [8452]****Agent: N/A**

Summary: Paragraph 1.2

The reference to 'national policies' could be made clearer by referring instead specifically to the National Planning Policy Framework.

Paragraph 1.3

This reference to 'strategic policies of the Local Plan could be made clearer by referring instead to the new Local Plan, in order to avoid any confusion with the old, previous Local Plan. NB This also applies to paragraph 2.5.

Paragraph 1.4

There is a lack of substantial references to Passenger Transport within the Policy Objectives and DM Policies. There are only two objectives which offer any suggestion of support for sustainable modes generally or Public Transport specifically. Neither of these however go into sufficient even high level detail to demonstrate that the HDC Plan is intent on encouraging and incentivising bus travel in particular. Objective 13 refers to "reducing the need to travel by vehicle, by locating new developments sustainably", whilst Objective 14 speaks of "improving transport links for all modes, to transport community facilities".

Change To Plan:

Full Reference: C - 6345 - 8452 - Development Management in Harlow - None

6384 Comment **Respondent: Lichfields (Mr Harry Bennett) [8454]** **Agent: N/A**

Summary: We write on behalf of our client, Mulberry Developments (Harlow) Ltd ("Mulberry Developments"), in relation to the above consultation.
Mulberry Developments is grateful for the opportunity to comment and we provide our comments on the draft Development Management Policies document within this letter of representation.
Mulberry Developments is the owner of the former GSK South Site, Third Avenue, Harlow. Mulberry Developments bought the site, located within the Pinnacles Industrial Estate, following its purchase from GSK in December 2016.
The site is currently subject to an outline planning application (ref. HW/OUTAM/17/00246) seeking to erect up to 46,916 sq.m (GIA) of Class B8 floorspace.
More generally, Mulberry Developments is a multidisciplinary development company based in Northamptonshire that specialises in both commercial and residential sectors. Since 2005, they have delivered over 2 million sq ft. of commercial development across the country.

Change To Plan:

Full Reference: C - 6384 - 8454 - Development Management in Harlow - None

6389 Comment **Respondent: Roydon Parish Council (Janet Ballard) [5434]** **Agent: N/A**

Summary: The Gibberd principles should continue to apply.

Change To Plan:

Full Reference: C - 6389 - 5434 - Development Management in Harlow - None

6195 Comment**Respondent: Miss Sally SallyAnn Simpson [8418]****Agent: N/A**

Summary: Protection of already "in place" housing needs attention, not just for new developments; that is, the town needs new signage everywhere, not just for new developments like "Atelier" for instance. Street signage & housing designations all need to be consistent, in many instances they are damaged or displaced or have disappeared altogether. To maintain & protect Gibberd's vision, the town needs an upgrade in all signage, not just for traffic flow/directions, but more importantly for the various housing areas, eg Peterswood, Long Banks, St Katherines, Latton Bush, just about everywhere. At present, it is an inconsistent mess-this is not being addressed.

Change To Plan:

Full Reference: C - 6195 - 8418 - Placeshaping - None

6214 Comment**Respondent: The Roydon Society (Miss Nicola Wilkinson) [27]****Agent: N/A**

Summary: Agree with protection of green areas including the Green Belt and maintaining the trees and hedges.

Support the continued protection and enhancement of biodiversity and geodiversity.
Supportive of the Gibberd Masterplan to improve the natural environment, creating additional wildlife habitats and reinforce existing green links.

We expect any new green infrastructure to be well planned and effectively managed in the future, especially in times of reduced budgets.

In view of additional vehicles - minimize and reduce all forms of pollution and contamination.

All new dwellings to be water efficient and have the facility for rainwater harvesting. Using no more than 110 litres/day is optimistic.

Maintain all heritage assets and their environs.

Change To Plan:

Full Reference: C - 6214 - 27 - Placeshaping - None

6224 Comment**Respondent: Essex Bridleways Association (Mrs Sue Dobson) [7887]****Agent: N/A**

Summary: 6 Local Plan Strategic Objectives: Objective 1 is to 'Create and enhance high quality built environments which are well connected to revitalised green spaces'. This we do not object to, but we feel that recreational access to all green spaces for all user groups is important and should be reflected within Harlow's key objectives. We therefore suggest that the wording should be amended to read 'Create and enhance high quality built environments which are well connected to revitalised fully accessible green spaces'.

Change To Plan:

Full Reference: C - 6224 - 7887 - Placeshaping - None

6283 Comment

Respondent: Historic England (Ms Katie Parsons) [8441]

Agent: N/A

Summary: We welcome the reference to the historic environment in paragraph 2.1 of the supporting text. Paragraphs 2.2 and 2.3 helpfully go on to concisely explain the character and nature of Harlow's New Town heritage, and highlight the importance of non-designated buildings and structures which are of local interest which contribute to the distinct character and heritage of the area.

It is recommended that the word "heritage" is replaced with the term "historic environment" in objective 2 of the Local Plan Strategic Objectives in paragraph 2.5. The term "historic environment" is a more all-encompassing term which demonstrates consideration of non-designated heritage assets and intangible cultural heritage. This applies throughout the Plan policies.

Change To Plan:

Full Reference: C - 6283 - 8441 - Placeshaping - None

6212 Comment**Respondent: Sport England (. Laura Hutson) [8431]****Agent: N/A**

Summary: PL1 - Design Principles for Development - Active Design

It is stated that a high standard of urban and architectural design is expected within all developments. It is also noted that there is a focus within the Local Plan on residents' health and wellbeing more generally.

Sport England welcomes this approach and believes it would be strengthened with reference to Sport England Active Design guidance, which goes far beyond sport and recreation and aims to build physical activity into everyday life.

Sport England and Public Health England have recently refreshed our 'Active Design' guide which provides some really useful advice and case studies with clear reference to the NPPF to maximise the opportunities for design in physical activity. Sport England would commend this to you and suggest the concept of 'Active Design' be incorporated into policy - please see website extract and link below:

We believe that being active should be an intrinsic part of everyone's daily life - and the design of where we live and work plays a vital role in keeping us active. Good design should contribute positively to making places better for people and create environments that make the active choice the easy choice for people and communities.

That's why Sport England, in partnership with Public Health England, has produced the Active Design Guidance. This guidance builds on the original Active Design (2007) objectives of improving accessibility, enhancing amenity and increasing awareness, and sets out the Ten Principles of Active Design.

The ten principles have been developed to inspire and inform the layout of cities, towns, villages, neighbourhoods, buildings, streets and open spaces, to promote sport and active lifestyles.

The guide features an innovative set of guidelines to get more people moving through suitable design and layout. It includes a series of case studies setting out practical real-life examples of the principles in action to encourage planners, urban designers, developers and health professionals to create the right environment to help people get more active, more often.

The Active Design Principles are aimed at contributing towards the Governments desire for the planning system to promote healthy communities through good urban design.

Active Design has been produced in partnership with David Lock Associates, specialists in town planning and urban design.

<https://www.sportengland.org/facilities-planning/active-design/>

Or watch our short video here <https://www.youtube.com/watch?v=mDaVBh1Bs7Y>

Change To Plan:

Full Reference: C - 6212 - 8431 - PL1 Design Principles for Development - None

6225 Comment**Respondent: Essex Bridleways Association (Mrs Sue Dobson) [7887]****Agent: N/A**

Summary: Policy PL1 Design Principles for Development: there is no mention of the provision of green infrastructure as part of new development which should be addressed, together with the aims to link in with the existing green infrastructure. Any new green infrastructure should also be accessible to all users, including equestrians.

Change To Plan:

Full Reference: C - 6225 - 7887 - PL1 Design Principles for Development - None

6275 Comment**Respondent: Historic England (Ms Katie Parsons) [8441]****Agent: N/A**

Summary: Policy PL1: Design Principles for Development
We support the inclusion of an overarching design principles policy. The need for development to protect or enhance local distinctiveness and to have regard for historic significance is welcomed. It is however recommended that the part b is amended to refer simply to the "historic environment" rather than to "features of local and historic significance". The acknowledgement in the policy to locally listed or significant building is supported but this would also be captured under the wider umbrella term "historic environment".

Change To Plan:

Full Reference: C - 6275 - 8441 - PL1 Design Principles for Development - None

6346 Comment**Respondent: Essex County Council (Mr Rich Cooke) [8452]****Agent: N/A**

Summary: ECC recommends that flood mitigation should also be mentioned in the design principles.
ECC Public Health promotes the 10 Active Design principles. These could be incorporated within this policy.
The reference to a high standard of urban and architectural design could be improved by adding 'landscape' as well in the design context.
The policy refers to an adopted SPD (on design). This SPD (and others) will need to be linked specifically to the new Local Plan policies and that will need to be made clear in the adopted SPD by revising it. Consideration could also be given to whether there is a need to otherwise review and update or revise the SPDs
Policy PL1 requires a high standard of urban and architectural design for all development. Consideration needs to be given to the skills infrastructure to support criterion (g) - in particular technological changes (Digital Construction / Modern Methods). Paragraph 1.2 references that the purpose of the planning system is to contribute to the achievement of sustainable development, which has three roles:
* An economic role by contributing to a strong, responsive and competitive economy
* A social role by supporting strong, vibrant and healthy communities
* An environmental role by contributing to the protection and enhancement of the environment

This indicates that support should be sought from developers in major developments to support the Skills Infrastructure required. There is also a need to support the delivery of training / education courses in urban design / regeneration / house design. There is no mention of Skills in the infrastructure section (see ECC comments on Policy PR4 and its supporting text).

Change To Plan:

Full Reference: C - 6346 - 8452 - PL1 Design Principles for Development - None

6196 Comment**Respondent: Miss Sally SallyAnn Simpson [8418]****Agent: N/A**

Summary: These design principles have not been adhered to, you only have to look at the state of the Bus Stops on Parnall Road, vandalised & dirty, which are going to suggest to any homebuyer that there is crime in the neighbourhood. Also rusty railings all bent over & rotting suggest that design principles for local features are being ignored.

Change To Plan:

Full Reference: C - 6196 - 8418 - PL1 Justification - None

6201 Comment**Respondent: Mr Andrew Whybrow [8423]****Agent: N/A**

Summary: Whilst the concept of Gibberd was laudable the actual design and materials used in the Town Centre & the "original" Staple Tye have proved to be a total disaster. This comment can also be made of the experimental materials & designs of Berecroft, Bishopsfield & the now demolished Honey Hill development. Consequently any new building must not be of an experimental nature or some pet project by a trendy architect. Always ask the question what will the Building be like in 50/100 years in the future.

Change To Plan:

Full Reference: C - 6201 - 8423 - PL1 Justification - None

6348 Comment**Respondent: Essex County Council (Mr Rich Cooke) [8452]****Agent: N/A**

Summary: It is usual for full planning applications to be accompanied by BOTH a planning statement and a Design and Access Statement. These are normally two different documents.
ECC recommends that the wording should be amended to:
2.8 A Supplementary Planning Statement and Design and Access Statement will be required for major developments and may be required for other developments. They should demonstrate how the criteria in this policy and relevant national policies and guidance have been complied with.

Change To Plan:

Full Reference: C - 6348 - 8452 - PL1 Implementation - None

6347 Comment**Respondent: Essex County Council (Mr Rich Cooke) [8452]****Agent: N/A**

Summary: More detail should be inserted into clause (f) or the supporting text should be expanded to state that a role of the policy is to ensure that new development would not compromise the current or future operation of safeguarded minerals and waste infrastructure which are either developed or allocated. This is to the benefit of both the operators of the existing or allocated mineral or waste development, and potential users of any new development.

Please also note that any site allocations made within the sand and gravel MSA should make reference to the need for a mineral resource assessment to be carried out either as part of or prior to any planning application being made. ECC can assist in screening proposed site / growth allocations for mineral and waste implications.

Change To Plan:

Full Reference: C - 6347 - 8452 - PL2 Amenity Principles for Development - None

6232 Comment**Respondent: Persimmon Homes (Mr David Moseley) [8437]****Agent: N/A**

Summary: Persimmon Homes support sustainable development and the significant energy savings that can be made through the design and specification of the fabric of new homes.

The Government have been clear as to the extent the planning system should have in the delivery of additional technical building standards. Both the ministerial statement from July 2015 and paragraphs 56-001 to 56-023 in the PPG show that it is the Government's intention to deliver the vast majority of improvements in technical building standards through Building Regulations. As such there should be no requirement for applicants to demonstrate how they will meet Building Regulations or provide an Energy Assessment detailing the energy demands and carbon dioxide emissions as required by Part L of the Building Regulations. These regulations are legal standards to which all developers must accord and as such it is inappropriate and unnecessary to require any evidence on these matters when applying for planning permission. It is also unreasonable to expect exceedance of these standards.

Change To Plan:

Full Reference: C - 6232 - 8437 - PL3 Sustainable Design, Construction and Energy Usage - None

6276 Comment**Respondent: Historic England (Ms Katie Parsons) [8441]****Agent: N/A**

Summary: Policy PL3: Sustainable Design, Construction and Energy Use

We welcome the inclusion of a policy for sustainable construction, design and energy use. However, as currently drafted the policy makes no specific reference to the historic environment or to visual impact and setting. This policy is likely to refer to new build developments only, but that is not clear and could be interpreted as applying to all developments of all scales. The use of modern construction techniques on a listed building, for example, may detrimentally affect existing historic fabric elsewhere in the building therefore risking damage to the heritage asset contrary to the objective of the NPPF to conserve and enhance the historic environment. Listed buildings, buildings in conservation areas and scheduled monuments are exempted from the need to comply with energy efficiency requirements of the Building Regulations where compliance would unacceptably alter their character or appearance. Special considerations under Part L of the Building Regulations are also given to locally listed buildings, buildings of architectural or historic interest within registered parks and gardens and the curtilages of scheduled monuments, and buildings of traditional construction with permeable fabric that both absorbs and readily allows the evaporation of moisture. It is recommended that the policy is clarified as at this stage as it's remit is unclear to prospective applicants and decision makers.

Change To Plan:

Full Reference: C - 6276 - 8441 - PL3 Sustainable Design, Construction and Energy Usage - None

6349 Comment

Respondent: Essex County Council (Mr Rich Cooke) [8452]

Agent: N/A

Summary: ECC suggests that this should refer to the new EA climate change allowances - <https://www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances>
In regard to surface water drainage, when designing new development it should be demonstrated that the upper end allowance for climate change is designed for whenever possible. Should it prove impossible to accommodate these additional volumes within the formal drainage design it should be demonstrated that the additional volumes could be accommodated elsewhere on the site in the form of managed exceedance flows.

Change To Plan:

Full Reference: C - 6349 - 8452 - PL3 Sustainable Design, Construction and Energy Usage - None

CHAPTER: PLACESHAPING

PL3 Justification

6247 Comment

Respondent: Mrs Giulia Festa-Burton [8436]

Agent: N/A

Summary: 2.17 - My concern is that for the sake of creating affordable housing and new Council development, green areas may be 'eaten away' to the detriment of currently existing Harlow residents who would have chosen their home next to green areas to enjoy the amenities. More housing development yes, but certainly not to the expenses of existing residents.

Change To Plan:

Full Reference: C - 6247 - 8436 - PL3 Justification - None

CHAPTER: PLACESHAPING

PL3 Implementation

6350 Comment

Respondent: Essex County Council (Mr Rich Cooke) [8452]

Agent: N/A

Summary: This states that a sustainability statement may be required for new developments. It is suggested that this should be made a requirement for major developments, albeit in a proportional way.
This paragraph also states that the energy hierarchy set out in the Strategic Policies should be considered within the Sustainability Statement. However, the strategic policies have not been published and are not yet available for this purpose.

Change To Plan:

Full Reference: C - 6350 - 8452 - PL3 Implementation - None

6221 Comment **Respondent: Janet Watkins [6004]** **Agent: N/A**

Summary: 2.22 - ".....continue to protect green wedges and green fingers from encroachment....."

Therefore, I trust the following will be protected:

- (a) land between High House Estate and Moor Hall Road (green belt, formerly a tree nursery, HDC owned), now overgrown and wildlife haven/sanctuary for deer, foxes, pheasants, squirrels and many birds etc.
- (b) playing field next to Gilden Way, used by footballers, walkers and residents alike. A recreational and visual asset to the local community and town.
- (c) small woodland next to Gilden Way/above playing field, which is regularly used by locals, and shelters birds and wildlife alike. Believe this is part of an ancient woodland, which should have protection.

Change To Plan:

Full Reference: C - 6221 - 6004 - PL4 Green Wedges and Green Fingers - None

Summary:

i) Policy PL4 Green Wedges and Green Fingers

3.2 In total 54% of Harlow comprises open space, being 21% Green Belt, 23% Green Wedge and 10% other open spaces (excluding residential gardens). The administrative boundary of Harlow is drawn tightly around the developed area, with there clearly being considerable pressure on land for new development to meet the objectively assessed need.

3.3 Policy PL4 considers Green Wedges and Green Fingers, stating development on such land will only be supported where it is for small-scale development (defined as householder applications, school or sports related development, recreation and community uses), essential infrastructure, replacement buildings, or it constitutes strategic infrastructure which is of benefit to the wider community.

3.4 Additionally, development must demonstrate that the roles and functions of the Green Wedges and Green Fingers are not adversely affected and it enhances the landscape, promotes biodiversity and integrates with existing green infrastructure.

3.5 The justification for Policy PL4 states that Green Wedges and Green Fingers are fundamental to the character of Harlow, with the purpose of the policy being to continue to protect these areas whilst recognising there may be opportunities for some development within them.

3.6 However, Policy PL4 is overly restrictive for the whole of the Green Wedge and does not recognise that there are some areas that do not contribute towards the roles and functions of the Green Wedge.

3.7 Given that 54% of the total Harlow area comprises open space, releasing land within the Green Wedge that does not contribute towards its roles and functions would assist HDC in meeting the housing need whilst retaining the functioning areas of open space.

3.8 HDC undertook a Green Wedge Review in 2014, which identified the predominant land uses within the Green Wedge as being park and other grassland, park and other woodland, recreation and education. A small number of other uses are found, including residential, although the proportion of these other uses is low overall.

3.9 The Green Wedge Review considered the Green Wedges and Green Fingers within Harlow, relevant national and local policy and consultation responses. This identified 7 No. key roles that the Green Wedge network in Harlow fulfils, as follows:

1. Separation between neighbourhoods;
2. Preservation of original natural, physical and landscape features;
3. Preservation and enhancement of the setting and character of historic/cultural sites and areas;
4. Bringing a sense of the countryside into urban areas;
5. Provision of informal and formal sport and recreation facilities;
6. Provision of transport and wildlife corridors which link the Green Wedges with residential areas and the surrounding countryside;
7. Protection for undeveloped corridors of open land.

3.10 The Green Wedge Review refers to the Strategic Gaps and Green Wedge Policies in Structure Plans Report produced by the Office of the Deputy Prime Minister in 2002, which identified that Green Wedges 'serve a more specific purpose than rural buffers and strategic gaps, as Green Wedges are more related to providing access to open space from urban areas' (Paragraph 4.5).

3.11 The Harlow Design Guide SPD (October 2011) defines Green Wedges as large areas of strategic open space which help define neighbourhoods from each other, bring the countryside into the urban area and are more than movement corridors for vehicles or simply landscape buffers, and are an enduring legacy of Gibberd's masterplan.

3.12 Whilst it is clear the Green Wedges perform various roles and functions, their key purpose is to provide landscape features, open spaces and recreational facilities.

3.13 The Green Wedge Review undertook the first detailed assessment of the Green Wedge network in Harlow, dividing the network into 18 wedges to assess each part independently. However, in some instances these wedges were of a substantial size, with a limited number of viewpoints chosen within these.

3.14 Some specific sites were then chosen for assessment of removal, although it is not clear how these were chosen and only a limited number were assessed.

3.15 Overall it is considered that there is a greater potential for the removal of sites within the Green Wedge than considered in the Green Wedge Review. As no policies map has been published to date it is unclear whether HDC is taking forward the removal of sites within the Green Wedge as identified within the Review or whether additional or alternative sites are proposed for removal.

3.16 In the absence of this information, these representations have been formulated on the basis that those sites identified for removal in the Green Wedge Review are the only sites that have been considered for removal in the Local Plan.

3.17 HDC has not considered the removal of all potential sites from the Green Wedge and the currently wording of Policy PL4 does not allow for any further consideration, restricting development to a very small scale and for a limited number of uses.

3.18 As detailed in Section 4 below, our Client's Site is currently located within the Green Wedge and was not specifically assessed or identified for removal within the Green Wedge Review. In the absence of any site specific assessment undertaken by HDC, these representations seek to provide such an assessment against the roles and functions of the Green Wedge, demonstrating that the Site does not contribute towards these.

3.19 The current wording of Policy PL4 is overly restrictive and does not allow for any consideration of whether a site contributes towards the roles and functions of the Green Wedge on a site-by-site basis, unduly giving a high level of protection to all land contained within the Green Wedge.

Change To Plan:

Full Reference: C - 6266 - 8399 - PL4 Green Wedges and Green Fingers - None

6309 Comment

Respondent: Miller Homes [8449]

Agent: Andrew Martin - Planning (Mr Olivier Spencer) [8448]

Summary: Our client requests that Policy PL4 is relaxed to specifically allow the following uses, where their provision does not adversely affect the role and function of the Town's Green Wedges and Green Fingers:

- (i) social clubs;
- (ii) sports clubs;
- (iii) schools including their playing fields;
- (iv) allotments; and
- (v) public open spaces.

Change To Plan:

Full Reference: C - 6309 - 8449 - PL4 Green Wedges and Green Fingers - None

6324 Comment

Respondent: Quod Planning (Mr Philip Murphy) [7958]

Agent: N/A

Summary: The Central and Eastern Stort Crossings will play an important role in facilitating Harlow's growth and it is important that the Development Management document supports their delivery.

Policy PL4 should be re-worded to recognise and support the delivery of the crossings within a specific part of the Stort Valley green wedge. This would be consistent with EHDC's draft Policy GA2 (The River Stort Crossings) which states that "The Council will work with key stakeholders including Hertfordshire County Council, Essex County Council, Harlow Council, Hertfordshire LEP, and others as appropriate, to facilitate the delivery of the following transport improvements to crossings of the River Stort...".

The policy should also recognise that the introduction of improved public transport corridors may require a balance to be drawn between the benefits of changing modes of travel and existing green spaces and landscaping.

Change To Plan:

Full Reference: C - 6324 - 7958 - PL4 Green Wedges and Green Fingers - None

6337 Comment**Respondent: Harlow Civic Society (Mr John Curry) [5318]****Agent: N/A**

Summary: On behalf of Harlow Civic Society:

We are generally in favour of the draft document, but would comment as follows in respect of Section PL4 - Green Wedges & Green Fingers.

Given recent developments on Green Wedges, we believe that the protection measures for these vital areas of Harlow are not strong enough, nor sufficiently specific. We think that the document should say that " development on land designated as Green Wedge or Green Finger will not be supported except in exceptional circumstances".

The conditions that we would apply would be for example: A direct replacement for an existing building, or, minor modifications and additions to existing buildings; but excluding creeping addition over long periods.

We have come to this opinion because, in recent years the Green Wedges have been built on in a way that can be considered to be cynical - involving land swap deals. We are equally concerned that authorities and organisations - other than Harlow Council - that have "ownership" or administrative rights over our priceless Green Wedges & Fingers, such as Essex County Council, The Homes & Community Agency and Harlow College, could be encouraged by the use of the positive phrase "will be supported".

We recommend a change in the wording that will imply that within the Green Wedges & Fingers is discouraged.

Change To Plan:

Full Reference: C - 6337 - 5318 - PL4 Green Wedges and Green Fingers - None

6351 Comment**Respondent: Essex County Council (Mr Rich Cooke) [8452]****Agent: N/A**

Summary: Criterion (a) refers to 'small scale development' but this is not clear as to how this will be defined. It is noted that this policy states that

"Additionally, development must meet both the criteria below:

- (e) it demonstrates that the roles and functions of the Green Wedges and Green Fingers are not adversely affected; and
- (f) it enhances the landscape, it promotes biodiversity and integrates with existing Green Infrastructure."

As Green Wedges and Green Fingers should promote biodiversity, ECC points out that they should be seen as making an important contribution towards the strategic green infrastructure around Harlow to avoid recreational impacts on Harlow Woods SSSI.

Paragraph 2.22 would benefit from reference to Green Wedges and Green Fingers as contributing to strategic green infrastructure as a strategic solution to avoiding recreational impacts on Harlow Woods SSSI and improve biodiversity of this designated site.

Whilst it is recognised that there may be potential for development with some of the green wedges, fingers and other open spaces it is also suggested that the two policies need to read more strongly in favour of protecting the spaces unless it can be seen that the development provides much needed community facilities or enhances the use and appearance of the space. ECC welcomes the wording in the text that appears to set that out e.g. paragraph 2.21 and 2.22. Any possible conflict with policy PL7, stating that green infrastructure and landscaping must be protected needs to be avoided.

ECC is unclear as to paragraph 2.24 where reference to householder applications is set out; this implies that residents are able to purchase/use land for their own benefit and could lead to piecemeal extension of buildings and garden curtilage into the green space/s.

The text in paragraphs 2.26 - 2.28 is good but the wording of the two policies is less positive in terms of the objective of protecting the spaces which make a positive contribution. The open spaces are not mapped but green wedges and fingers are. Noted the text in paragraph 2.29 the woodland and landscape belts should perhaps be classified as green fingers.

Small scale development should be strictly defined.

ECC advises that both policies PL4 and PL5 are strengthened so that protection is the stronger objective. For example the wording could read along the following lines; 'Development on land designated as green wedges/finger or other open space will be refused/resisted unless it can be shown that': then the criteria are listed out.

Policy PL4 green fingers and green wedges; reads as below, we suggest adding in some extra wording (red and underline):

Policy PL4 Green Wedges and Green Fingers

Development on land designated as Green Wedge or Green Finger will be supported where it meets one or more of the criteria below:

- (a) it is for small-scale development;
- (b) it is for essential infrastructure and local transport infrastructure which must demonstrate a requirement for a Green Wedge or Green Finger location;
- (c) it is for the replacement of buildings, provided that the new building/buildings are in the same use and not more harmful than the one it replaces;
- (d) it constitutes strategic infrastructure development which can demonstrate that it is of benefit to the wider community.

Additionally, development must meet both the criteria below:

- (e) it demonstrates that the roles and functions of the Green Wedges and Green Fingers are enhanced and not adversely affected; and
- (f) it demonstrates that the wider landscape and setting is enhanced, it promotes biodiversity and integrates with existing Green Infrastructure.

Change To Plan:

Full Reference: C - 6351 - 8452 - PL4 Green Wedges and Green Fingers - None

6385 Comment**Respondent: Roydon Parish Council (Janet Ballard) [5434]****Agent: N/A**

Summary: Note: The following also applies to policies PL5 - PL7.

The retention of hedgerows and trees should be a priority to maintain the town's 'green' credentials and new developments should provide green wedges and amenity space - these should not be allowed to be developed at a later date as they also provide wildlife habitats.

Change To Plan:

Full Reference: C - 6385 - 5434 - PL4 Green Wedges and Green Fingers - None

6202 Comment**Respondent: Mr Andrew Whybrow [8423]****Agent: N/A**

Summary: There must be no development of these Green Wedges they are fundamental in ability of Wildlife to survive in all ready over developed area.

Change To Plan:

Full Reference: C - 6202 - 8423 - PL4 Justification - None

6293 Comment**Respondent: Dr Roger Bamford [8442]****Agent: N/A**

Summary: It is good to see continued protection of the Green Wedges and the introduction of Green Fingers. In many ways these open spaces are more important than the Green Belt in Harlow.

The Green Wedge Review provides clear evidence for the continued protection of the Green Wedge and the release of areas not functioning as such.

Change To Plan:

Full Reference: C - 6293 - 8442 - PL4 Justification - None

6277 Comment**Respondent: Historic England (Ms Katie Parsons) [8441]****Agent: N/A**

Summary: Policy PL5: Other Open Spaces
We welcome the reference to the urban design principles of the town.

Change To Plan:

Full Reference: C - 6277 - 8441 - PL5 Other Open Spaces - None

6352 Comment**Respondent: Essex County Council (Mr Rich Cooke) [8452]****Agent: N/A**

Summary: ECC would advise that both policies PL4 and PL5 are strengthened so that protection is the stronger objective.

PL5 other open spaces; reads as below. ECC is unclear as to the intent of the policy. Surely development on open spaces would only be supported where strict criteria are met? Is it meant to read that development will be supported only where certain criteria are met, as in the case of the PL4? The a), b), c) text below in the policy are not criteria. They are aspects which would create unacceptable impacts and should therefore not be supported?

PL5 Other Open Spaces Development on Other Open Spaces will be supported unless one or more of the following criteria are met:
(a) the development would compromise the landscape character, openness, biodiversity or urban design principles of the town and/or the surrounding area;
(b) the development would remove access to an open space which, in accordance with the current evidence, is of high quality and/or high public value in providing opportunities for sport and recreation;
(c) the development would prejudice the potential for comprehensive development of adjacent land.

The policy wording could read more strongly if it said: Development on other open spaces will only be supported in exceptional circumstances (set these out). Where the following impacts will result then development will normally be refused: a) b) and c) could then be added.
Also, refer to ECC comments above (on Policy PL4) regarding recreational impacts on designated sites for biodiversity - Other Open Spaces are valuable for providing local opportunities for recreation as part of a strategic solution to avoid impacts on Harlow Woods SSSI, so the above paragraphs would benefit from amendment.

Change To Plan:

Full Reference: C - 6352 - 8452 - PL5 Other Open Spaces - None

6248 Comment**Respondent: Mrs Giulia Festa-Burton [8436]****Agent: N/A**

Summary: I refer to my comments on PL3 2.17. How is the Council planning to monitor and ensure Sir Gibberd's plans to create a green amenities rich town will be maintained, when every green area seems to be put at risk of housing development? It shows no respect for the original New Town and no consideration for Harlow existing residents who enjoy such green amenities.

Change To Plan:

Full Reference: C - 6248 - 8436 - PL5 Justification - None

6353 Comment**Respondent: Essex County Council (Mr Rich Cooke) [8452]****Agent: N/A**

Summary: ECC supports the main intentions of this policy and supporting text relating to trees and hedgerows. The reference to veteran and ancient trees in paragraph 2.33 is welcomed although the text in paragraph 2.34 would be more robust in defending hedgerows from inappropriate development if this was amended to also refer to assessment for biodiversity, eg bat foraging or commuting habitat, not just Arboricultural Impact Assessments. Hedgerows are listed as Priority s41 Habitats so this should be added to the justification in paragraph 2.33.

Change To Plan:

Full Reference: C - 6353 - 8452 - PL6 Trees and Hedgerows - None

6354 Comment**Respondent: Essex County Council (Mr Rich Cooke) [8452]****Agent: N/A**

Summary: This should read with red text below added:

Existing specific protections that trees and/or hedges may have include Tree Preservation Orders and other protections offered by Conservation Areas and the 1997 Hedgerows Regulations.

Change To Plan:

Full Reference: C - 6354 - 8452 - PL6 Implementation - None

6203 Comment**Respondent: Mr Andrew Whybrow [8423]****Agent: N/A**

Summary: The Council should work in conjunction with outside Agencies such as Essex Wildlife Trust to ensure that any development has a minimal effect of the Natural Environment. Any tree/hedgerow removed should be replaced on a 3 to 1 basis to ensure future sustainability.

Change To Plan:

Full Reference: C - 6203 - 8423 - PL7 Green Infrastructure and Landscaping - None

6226 Comment**Respondent: Essex Bridleways Association (Mrs Sue Dobson) [7887]****Agent: N/A**

Summary: Policy PL7 Green Infrastructure and Landscaping: this Policy should aim to ensure that any green infrastructure is accessible to all users, including equestrians.

Change To Plan:

Full Reference: C - 6226 - 7887 - PL7 Green Infrastructure and Landscaping - None

6278 Comment**Respondent: Historic England (Ms Katie Parsons) [8441]****Agent: N/A**

Summary: Policy PL7: Green Infrastructure and Landscaping
We would recommend that the policy is amended to refer to the function that Green Infrastructure can have in enhancing and conserving the historic environment. The policy in its current draft only refers to the enhancement of landscape character, it is suggested that the historic environment is also considered here. Green Infrastructure can be used to improve the setting of heritage assets and to improve access to it, likewise heritage assets can help contribute to the quality of green spaces by helping to create a sense of place and tangible link with history.

Change To Plan:

Full Reference: C - 6278 - 8441 - PL7 Green Infrastructure and Landscaping - None

6355 Comment

Respondent: Essex County Council (Mr Rich Cooke) [8452]

Agent: N/A

Summary: ECC welcomes and supports this policy relating to green infrastructure and landscape. That said, there is an identified wording improvement as an addition to suggest.

Current text reads: "(a) new Green Infrastructure and landscaping are well planned, taking into consideration the practicalities and requirements of future management and maintenance;"

Suggested wording: new Green Infrastructure and landscaping are well planned and integrated as part of the development layout, taking into consideration the practicalities and requirements of future management and maintenance;

Paragraphs 2.42 and 2.43: Green infrastructure should be viewed as flood risk reduction and mitigation infrastructure. This is in line with the NPPF, which clearly promotes the use of mixed developments to encourage multiple benefits from the use of urban and rural land. Some open land can perform many functions such as for wildlife habitats, recreation, flood risk mitigation, carbon storage, or food production.

Also on paragraphs 2.42 and 2.43, see ECC comments above regarding a suggested strategic solution with green infrastructure playing an important role in avoiding recreational impacts on designated sites such as Harlow Woods SSSI and it is recommended that this should be added to the justification in paragraph 2.40. Creating functional greenspace within new developments is important to provide a daily walking route of 2.6km for new residents and ECC suggests that paragraph 2.42 refers to this benefit to improving the natural environment within the Impact Risk Zone of designated sites.

Change To Plan:

Full Reference: C - 6355 - 8452 - PL7 Green Infrastructure and Landscaping - None

6264 Comment**Respondent: Natural England (Mr Jamie Melvin) [8440]****Agent: N/A**

Summary: Natural England notes that paragraph 2.48 recognises the hierarchy of sites. This however needs to be incorporated into the policy itself to satisfy paragraph 113 of the National Planning Policy Framework. Note that 113 further requires that criteria based policies are set and that distinctions should be drawn between international, national and locally designated sites. Whilst the document correctly recognises that Sites of Special Scientific Interest are the highest order of site within Harlow your authority should afford sites outside of the authority boundary the same level of protection.

Change To Plan:

Full Reference: C - 6264 - 8440 - PL8 Biodiversity and Geodiversity Assets - None

6298 Comment**Respondent: Environment Agency (Miss Lisa Mills) [8443]****Agent: N/A**

Summary: Policy PL8 Biodiversity and Geodiversity Assets
We support the inclusion of this policy. However, it should also make reference to invasive non-native species and their management, including biosecurity measures. Invasive species are a growing issue and must be addressed to stop the spread, particularly Japanese Knotweed. Development sites should be checked for invasive species and measures should be put in place to follow biosecurity and eradicate the invasive species on site.

Change To Plan:

Full Reference: C - 6298 - 8443 - PL8 Biodiversity and Geodiversity Assets - None

6356 Comment**Respondent: Essex County Council (Mr Rich Cooke) [8452]****Agent: N/A**

Summary: Policy PL8 would benefit from re-structure to follow the mitigation hierarchy and Government's Natural Environment White Paper. Therefore ECC recommends the following order of requirements:

- a) Conserve/protect biodiversity and geodiversity assets
- b) Where this is not possible, mitigation measures will be required
- c) Where there is a residual impact, compensatory measures will need to be secured offsite.
- d) Reasonable enhancement of existing assets and creation of new biodiversity to improve connectivity and contribute towards improving ecological networks, particularly in the Living Landscape areas and Greater Thames Marshes NIA to deliver net gain for biodiversity.

Paragraph 2.47 refers to no net loss of biodiversity but Policy PL8 does not contain any reference to compensatory measures. In addition, this policy has the opportunity to ensure development delivers a net gain for biodiversity - see d) above.

Paragraph 2.49 would benefit from adding a references to:

- a) Non-statutory Local Sites (for both biodiversity and geodiversity) which are part of the evidence base for the Local Plan, as referenced in the NPPF
- b) Reporting of condition monitoring for Local Sites (for both biodiversity and geodiversity) to Government (Single Data List 160-00 re Positive Conservation Management) and
- c) A commitment to declaration of Local Nature Reserves to provide opportunities for people to enjoy nature

Best practice for implementation of Policy PL8 includes a validation checklist for developments likely to affect biodiversity and geodiversity. Reference to the Essex Biodiversity Validation Checklist in paragraph 2.50 would enable biodiversity to be considered at the earliest stage in planning a development which de-risks it and avoids delays. Paragraph 2.51 would benefit from re-wording to follow the mitigation hierarchy too (ie protect, mitigate, compensate, enhance) and list planning conditions first, then obligations and finally management agreements.

Change To Plan:

Full Reference: C - 6356 - 8452 - PL8 Biodiversity and Geodiversity Assets - None

6249 Comment**Respondent: Mrs Giulia Festa-Burton [8436]****Agent: N/A**

Summary: Regarding noise pollution, Harlow has become regular target by airplanes which fly from and to Stansted airport at lower levels. The low height from ground means that Harlow residents are currently affected by noisy airplanes flying over our heads at a frequency of only every 5 minutes from one another, and on a 24 hour cycle. How is Harlow Council planning to resolve this?

Change To Plan:

Full Reference: C - 6249 - 8436 - PL9 Pollution and Contamination - None

6299 Comment**Respondent: Environment Agency (Miss Lisa Mills) [8443]****Agent: N/A**

Summary: Policy PL9 Pollution and Contamination

We strongly support the inclusion of this policy within the plan. A robust policy must be in place to ensure that risks to groundwater are minimised as much as possible. The policy must ensure that no development will negatively impact upon water quality or waterbodies, whilst specifically focusing upon the prevention and remediation of land contamination within the borough. Contaminated sites have the potential to mobilise contaminants and consequently cause pollution.

The policy should help to ensure that developing land affected by contamination won't create unacceptable risks, or allow existing ones to continue. It should require developers to ensure sites are suitable or made suitable for the intended use, whilst ensuring that future developments are in appropriate locations where pollution and other adverse effects on the local environmental or amenity value are minimised.

The policy should state that all land which is considered to be contaminated will require a Preliminary Risk Assessment (PRA) to be submitted as part of the planning application, and that where necessary further site investigations, detailed risk assessments, remediation strategies, long term maintenance regimes, and validation reports may be required if contamination is found. It should be explicit that planning permission will not be granted for development that poses a threat to the quality of surface and/or groundwater, and should specifically reference the importance for all development to not detrimentally impact upon Source Protection Zones (SPZ) in particular, which are areas designated for the abstraction of clean drinking water.

The policy should be explicit in avoiding high risk development proposals within vulnerable groundwater areas, specifically petrol stations and cemeteries.

Change To Plan:

Full Reference: C - 6299 - 8443 - PL9 Pollution and Contamination - None

6357 Comment**Respondent: Essex County Council (Mr Rich Cooke) [8452]****Agent: N/A**

Summary: ECC suggests that this should mention that the Essex SuDS Design Guide provides guidance on how to mitigate against surface water pollution.
See: <http://flood.essex.gov.uk/new-development-advice/how-to-design-suds-in-essex>

Change To Plan:

Full Reference: C - 6357 - 8452 - PL9 Pollution and Contamination - None

6251 Comment**Respondent: Mrs Giulia Festa-Burton [8436]****Agent: N/A**

Summary: Re 2.54, my concern is that again, for the sake of bringing in more employment and industries to Harlow, Harlow Council does not respect existing green fields next to existing residential estates, which contribute to retain the amenity character of this town.

Change To Plan:

Full Reference: C - 6251 - 8436 - PL9 Justification - None

Summary: Policy Comments

Thames Water support the proposed policy on SuDS under Policy PL10. With regard to surface water drainage it is the responsibility of the developer to make proper provision for drainage to ground or watercourse. It is only when all options have been exhausted and there is not practical reason for using sustainable drainage, that developers should seek connection to the public network. It is important to minimise the quantity of surface water entering the wastewater system in order to maximise the capacity for foul sewage conveyance and to reduce the risk of sewer flooding.

Need for a policy on wastewater infrastructure

With regard to the proposed Development Management Policies consultation it will be important to ensure that any development proposals coming forward are aligned with any necessary upgrades to the sewerage network. Developers should be required to demonstrate that there is adequate capacity both on and off the site to serve the development and that it would not lead to adverse amenity impacts for existing or future users in the form of internal and external sewer flooding, or pollution of land and water courses.

In order to address this issue Thames Water request that the following policy and supporting text is included in the Local Plan. Alternatively similar wording could be incorporated into the proposed policies such as Policy PL10, which should address all forms of flood risk including sewer flooding.

Proposed Policy:

Planning permission will only be granted for developments which increase the demand for off-site wastewater infrastructure where:*

- 1) Sufficient capacity already exists; or
- 2) Extra capacity can be provided in time to serve the development that will ensure that the environment and the amenities of other users are not adversely affected.

In accordance with the Planning Policy Guidance, when there is a capacity constraint and improvements in off-site infrastructure are not programmed, planning permission will only be granted where the appropriate infrastructure improvements will be completed prior to occupation of the development.

Proposed Supporting Text:

The Local Planning Authority will seek to ensure that there is adequate wastewater infrastructure to serve all new developments. Developers will be required to demonstrate that there is adequate capacity both on and off the site to serve the development and that it would not lead to adverse amenity impacts for existing or future users in the form of internal and external sewer flooding, pollution of land and water courses.

In some circumstances this may make it necessary for developers to carry out appropriate appraisals and reports to ascertain whether the proposed development will lead to overloading of existing waste water infrastructure. Where there is a capacity constraint the Local Planning Authority should require the developer to provide a detailed drainage strategy informing what infrastructure is required, where, when and how it will be delivered.

Where there are infrastructure constraints, it is important not to under estimate the time required to deliver necessary infrastructure. For example: local network upgrades take around 18 months and Sewage Treatment & Water Treatment Works upgrades can take 3-5 years. Implementing new technologies and the construction of a major treatment works extension or new treatment works could take up to 10 years.

Thames Water has limited powers under the Water Industry Act 1991 to prevent connection to its network ahead of infrastructure upgrades. Thames Water relies heavily on the planning system to ensure infrastructure upgrades are provided ahead of development either through Local Plan Policies or the use of appropriately worded 'Grampian style' planning conditions.

In order to ensure that the water supply and drainage requirements of development proposals are understood and that any upgrade requirements are identified, all developers should be encouraged to contact Thames

Water Developer Services in advance of the submission of planning applications.

Thames Water recommend that developers engage with them at the earliest opportunity to establish the following:

- * The developments demand for wastewater infrastructure both on and off site and can it be met; and
- * The surface water drainage requirements and flood risk of the development both on and off site and can it be met.

Information for Developers on water/wastewater infrastructure can be found on Thames Water's website at:
<http://www.thameswater.co.uk/developers/1319.htm>

Change To Plan:

Full Reference: C - 6220 - 8433 - PL10 Water Quality, Water Management, Flooding and Sustainable Drainage Systems - None

6233 Comment

Respondent: Persimmon Homes (Mr David Moseley) [8437]

Agent: N/A

Summary: Policy PL10 requires all new residential development to achieve a water efficiency target of 110 litres per person per day and development should also make adequate and appropriate provision for water recycling.
Changes to Building Regulations in 2010 require that the potential consumption of someone occupying a new home must not exceed 125 l/p/d and it is through the building regulations rather than planning, that this consumption should be addressed.
Any additional requirements need to be fully evidenced and the Local Planning Authority should consider the impact of using these standards as part of their Local Plan viability assessment.

Change To Plan:

Full Reference: C - 6233 - 8437 - PL10 Water Quality, Water Management, Flooding and Sustainable Drainage Systems - None

6252 Comment

Respondent: Mrs Giulia Festa-Burton [8436]

Agent: N/A

Summary: You refer to European directives regarding 3. Flooding. How is Brexit going to affect new policies regarding prevention and solution to floods in Harlow?

Change To Plan:

Full Reference: C - 6252 - 8436 - PL10 Water Quality, Water Management, Flooding and Sustainable Drainage Systems - None

6300 Comment

Respondent: Environment Agency (Miss Lisa Mills) [8443]

Agent: N/A

Summary: Policy PL10 Water Quality, Water Management, Flooding and Sustainable Drainage Systems

1. Water Quality

We are pleased to see that the deculverting of watercourses will be required where appropriate. All relevant proposals should investigate and secure the implementation for restoring culverted sections of watercourses to a naturalised state. This is in line with the requirements of the Water Framework Directive (WFD) and the Thames River Basin Management Plan (TRBMP). We would object to any planning application that we are consulted upon which does not do so. The policy should also specifically state that where deculverting or other river enhancements are shown to be unfeasible, the council will seek a financial contribution to restore another section of the same watercourse.

In addition to deculverting, you should also include the requirement for all new development adjacent to designated main rivers to provide and maintain a minimum undeveloped 8 metre buffer zone to the watercourse. This is to enhance and protect local biodiversity and wildlife corridors, provide space for flood waters, and provide access for maintenance works. This distance is in line with our Flood Risk Activity Permit, which is legally required for certain works within 8 metres of a main river. The buffer zone will provide a naturalised buffer free of built development, be designed for the benefit of biodiversity (including the planting of locally appropriate, UK native species) and be 'undisturbed' by development (i.e. no fencing, footpaths, lighting or other development). Such proposals must also include a long term scheme put in place to protect and enhance the conservation value of the watercourse, in line with the requirements of the WFD and the TRBMP.

Under the WFD, waterbodies must be at 'good' ecological status/potential (i.e. clean and healthy) by 2027. The UK has a legal obligation to meet this target and you as a local authority have a duty to work to achieve this, including through your Local Plan policies. None of your watercourses are currently achieving 'good' ecological status/potential, and therefore it is essential that you should be seeking to improve the quality of your watercourses to comply with your requirements under the TRBMP.

2. Water Management

We are pleased to see that water efficiency has been considered within this policy, with a commitment that all new dwellings should achieve water efficiency standards of no more than 110 litres per day. However, you should also set a target for commercial properties. This is necessary to ensure new development appropriately considers water consumption, in this area of the country which is under extreme water stress.

3. Flooding

We are pleased to see that flood risk has been considered within this policy, as Harlow contains areas of Flood Zone 2, 3a and 3b. It is therefore essential that you consider the risks associated with flooding in order to protect new developments against flood risk. However, there are a few aspects of the policy which should be amended in order to strengthen the policy.

In particular, specific reference within the policy should be made to the fact that a Flood Risk Assessment (FRA) must be submitted for all proposed developments within areas at risk of flooding. Planning applications within Flood Zones 2 and 3 that are without an FRA should be refused.

The policy must also state that no inappropriate development will be permitted within Flood Zone 3b, defined by your own Strategic Flood Risk Assessment (SFRA) as the functional floodplain where flood water is to be stored in times of flooding. The only development types that are considered compatible with Flood Zone 3b are 'water compatible' and 'essential' development, as defined within Tables 2 and 3 of the Planning Practice Guidance Flood Risk and Coastal Change section. The policy should also state that the functional floodplain should be restored wherever possible through a reduction of footprint within Flood Zone 3b as a result of development proposals. Additionally, whilst it is good that the policy ensures that 'there should be no net loss in flood storage on site', it should also encourage an increase in flood storage wherever possible.

It would also be good for the policy to have more emphasis on the climate change allowances which all development proposals within flood risk areas must consider. The climate change allowances must be used to determine the existing flood risk on the site, and the proposed mitigation measures such as finished floor levels, floodplain compensation, and routes of safe access and egress.

Finally, the beginning of point 'C' should read 'floor levels', not 'flood levels'.

Change To Plan:

Full Reference: C - 6300 - 8443 - PL10 Water Quality, Water Management, Flooding and Sustainable Drainage Systems - None

6310 Comment

Respondent: Miller Homes [8449]

Agent: Andrew Martin - Planning (Mr Olivier Spencer) [8448]

Summary: Policy PL10 currently directs that all dwellings should achieve the Optional Technical Housing Standard for water efficiency of no more than 110 litres per day. The actual standard is no more than 110 litres per day "per person", not per dwelling as the policy currently implies.

Policy PL10 should be amended accordingly to avoid any ambiguity.

Change To Plan:

Full Reference: C - 6310 - 8449 - PL10 Water Quality, Water Management, Flooding and Sustainable Drainage Systems - None

6325 Comment

Respondent: Quod Planning (Mr Philip Murphy) [7958]

Agent: N/A

Summary: Places for People would like to work closely with Harlow Council on the final content of this policy to ensure its criteria do not inadvertently prejudice the delivery of the two proposed crossings across the Stort Valley.

Change To Plan:

Full Reference: C - 6325 - 7958 - PL10 Water Quality, Water Management, Flooding and Sustainable Drainage Systems - None

6358 Comment

Respondent: Essex County Council (Mr Rich Cooke) [8452]

Agent: N/A

Summary: SuDS can be designed and incorporated to the development layout to contribute towards Green Infrastructure and Landscaping policy (PL7) and Biodiversity (PL8).

Policy text says "4. Sustainable Drainage Systems. Where a sustainable drainage system (SuDS) is required,..." ECC as Lead Local Flood Authority recommends SuDS to be an integral part of any and all developments.

Developments located in Critical Drainage Areas, as outlined in the Harlow Surface Water Management Plan, must take the evidence of surface water flood risk into consideration in the process of preparing site flood risk assessments.

1. Water quality - Comment: The Essex SuDS Design Guide provide guidance on how to mitigate against surface water pollution

3. Flooding

All development proposals will be considered against the NPPF (including application of the sequential test and, if necessary, the exception test) and against the European Water Framework Directive (or any subsequent equivalent).

Development must follow a risk-based and sequential approach, so that it is located in areas at low risk of flooding from all forms of flood risk. If this cannot be achieved, the exception test must be applied and the appropriate mitigation measures must be undertaken.

Development must meet all the following criteria:

- (a) it must not increase the risk of flooding elsewhere. Comment: On brownfield sites, run-off rates should be restricted back to the 1 in1 greenfield rate and if this is demonstrated not be achievable, a minimum of 50% betterment on existing run-off rates should be sought - this is in line with the Essex SuDS Design Guide.
- (b) within sites at risk of flooding, the most vulnerable parts of the proposed development must be located in areas at lowest risk of flooding from all forms of flood risk.
- (c) flood levels of development in Flood Zones 2 and 3 should be situated above the 1% (1 in 100 years) plus climate change predicted maximum water level, plus a minimum watertight depth of 300mm above the normal water level; comment: development should also be situated above any 1 in 100 plus climate change maximum surface water flood levels .
- (d) development must be flood resilient and resistant, with safe access and escape routes, and it should also be demonstrated that residual risks can be safely managed;
- (e) any necessary flood protection or mitigation measures should not have an undue impact on nature conservation, landscape character, recreation or other important matters; - remove point. This suggests that flood protection is a lower priority when it should have equal weighting to other considerations when designing a site.
- (f) there should be no net loss in flood storage on site;
- (g) flood flow routes should be preserved; and
- (h) where necessary (add) through the use of CILs and s106 Agreements, planning permission will be conditional upon flood protection and/or runoff control measures, (add) provided by the appropriate Risk Management Authorities, being operative before other site works.

4. Sustainable Drainage Systems

A surface water drainage scheme must meet all the following criteria:

- (a) provide the most sustainable option from the SuDS hierarchy;
- (b) achieve multiple benefits including management of flood risk and surface water pollution, amenity and biodiversity;
- (c) achieve the greenfield runoff rate. Where greenfield run-off rate is demonstrated not to be viable on brownfield sites, a minimum of 50% betterment on run off rates should be demonstrated;
- (d) provide appropriate attenuation taking into account climate change;
- (e) provide arrangements for future maintenance and management; and
- (f) major proposals should also comply with the principles and standards set out by the Lead Local Flood Authority for SuDS.

Other comments

It should be made clear that in line with Paragraph 103 of the NPPF priority should be given to SuDS.

Reference should be made to the Harlow Surface Water Management Plan and the Essex SuDS Design Guide. The Essex SuDS Design Guide provide guidance on local standards for water quality and water quantity from developments and guidance on SuDS design.

Change To Plan:

Full Reference: C - 6358 - 8452 - PL10 Water Quality, Water Management, Flooding and Sustainable Drainage Systems - None

6204 Comment

Respondent: Mr Andrew Whybrow [8423]

Agent: N/A

Summary: You state that Harlow is in an area where the Water availability is under stress. However the increased development will only increase that further, consequently any excessive development is totally unjustified.

Change To Plan:

Full Reference: C - 6204 - 8423 - PL10 Justification - None

6359 Comment**Respondent: Essex County Council (Mr Rich Cooke) [8452]****Agent: N/A**

Summary: ECC suggests adding the following wording to the end of paragraph 2.65:

National policies and guidance defines flood zones and the types of development which are considered appropriate and inappropriate. It also provides information on the sequential test for Flood Risk Zones and how to then apply an exception test. The sequential test and exception test should be applied to all forms of flood risk.

This is line with national guidance which states:

In plan-making, local planning authorities apply a sequential approach to site selection so that development is, as far as reasonably possible, located where the risk of flooding (from all sources) is lowest, taking account of climate change and the vulnerability of future uses to flood risk. (<https://www.gov.uk/guidance/flood-risk-and-coastal-change>)

ECC suggests adding the following advice and requirements to paragraph 2.66:

Any major development should include a drainage strategy which should be submitted for the Lead Local Flood Authority (LLFA) to review, a stipulation which is in line with their requirements as outlined in the Essex SuDS Design Guide.

The Essex SuDS Design Guide provides guidance on local standards for water quality and water quantity from developments and guidance on SuDS design. This could be referenced in paragraph 2.69

ECC suggests adding the following advice and requirements to paragraph

The risk of flooding can be avoided and reduced by:

- * locating new development within areas of lower flood risk through the application of the sequential test for Flood Risk and then applying an exception test in accordance with the NPPF;
- * ensuring that development proposals in flood risk areas actively manage and reduce flood risk from all sources by applying the sequential approach at site level;
- * where possible, the footprint of existing buildings should be reduced. On Brownfield sites, run-off should be restricted back to greenfield. Where this is demonstrated not to be viable, a minimum of 50% betterment on existing run off rates should be demonstrated;
- * Flood storage should be maximised through the use of Green Infrastructure unless it is clearly demonstrated, with the support of calculations, that above ground green infrastructure is not viable economically. Where the use of green infrastructure is not viable, alternative principles which meet national and local standards on water quantity and water quality should be used.

This states:

When considering whether a drainage system is appropriate for a development, the Council will consider the technical standards produced by DEFRA, design and constructions costs and advice from the relevant flood risk management bodies. When planning a sustainable drainage system, developers need to ensure their design takes account of the construction, operation and maintenance requirements of both surface and subsurface components, allowing for any personnel, vehicle or machinery access required to undertake this work.

Comment:

Reference in the above should also be made to the Essex SuDS Design Guide.

It should be made clear that, in line with paragraph 103 of the NPPF, priority should be given to the use of Sustainable Drainage Systems.

Change To Plan:

Full Reference: C - 6359 - 8452 - PL10 Implementation - None

6279 Comment**Respondent: Historic England (Ms Katie Parsons) [8441]****Agent: N/A**

Summary: Policy PL11: Heritage Assets and their Settings

Reference to the setting of heritage assets within the headline of the policy and within the body of the policy itself is welcomed. Reference to the irreplaceable nature of heritage assets in the supporting text is also welcomed. The policy however, provides no recognition of the potential for development to enhance or better reveal the significance of heritage assets.

The supporting text in paragraph 2.83 should be expanded upon to refer to the need to consult Historic England on proposals which affect grade II* or grade I listed buildings or their setting, as well as other developments outlined within tables 1 and 2 (requirement to notify or consult with Historic England) within paragraphs 57 and 58 of the National Planning Policy Guidance (NPPG).

There is concern regarding the supporting text in paragraph 2.74 which states that, "The purpose of this policy is to protect the features and characteristics for which designated and non-designated heritage assets were selected". It would be more appropriate to state that, "The purpose of this policy is to protect the significance of heritage assets". The wording in its current form could be misleading and imply that only aspects of the heritage assets noted in list descriptions are worthy of conservation. The list descriptions are for identification purposes only and the designation generally covers all aspects of the heritage asset and whilst the reasons why a heritage asset was designated can be a useful starting point for defining significance it is not all that is considered. For the purposes of decision making, paragraph 128 of the NPPF states that local authorities should require applicant to provide a statement of significance. Paragraph 129 states that local authorities should then identify and assess the particular significance of any heritage asset that may be affected by a particular proposal. The assessment of significance happened during the assessment of a site specific application.

Paragraph 2.83 of the supporting text states that a heritage statement should be submitted where planning permission is required for alterations or additions to listed and locally listed buildings. It should be noted that a heritage statement should be provided stand-alone listed building consent application as well. The need for a heritage statement should be mentioned as a criterion in the policy itself and not only in the supporting text.

Paragraph 2.88 relates to archaeology and outlines the need for a desk based assessment or field evaluation to be submitted where proposals affect sites or are adjacent to sites of known archaeological interest or sites where there is reason to suggest there is archaeological interest. This is welcomed but is not included in the policy itself. It recommended that the policy is amended to secure this requirement.

Change To Plan:

Full Reference: C - 6279 - 8441 - PL11 Heritage Assets and their Settings - None

6316 Comment

Respondent: Anglican Deanery of Harlow (Revd Martin Harris) [8345]

Agent: N/A

Summary: I would like to suggest a further item to this effect here or elsewhere:

"In assessing the desirability of conservation, account will be taken of the need to encourage ongoing use of the building so that it continues to make a positive contribution to the community (not only as a physical asset but) through its use for and by the community".

I would propose a positive statements to the effect:

"In assessing planning applications, the provision or local availability of good and accessible (where possible shared) community facilities, including places of worship, will be a requirement"; and

"The provision of good infrastructure including schooling and adequate parking for local facilities will be a requirement in all housing developments"

Change To Plan:

Full Reference: C - 6316 - 8345 - PL11 Heritage Assets and their Settings - None

6360 Comment

Respondent: Essex County Council (Mr Rich Cooke) [8452]

Agent: N/A

Summary: Policy P11 should be rephrased to ensure that it encompasses all of the heritage assets both above and below ground.

Under paragraph 2.76 there should be reference to the Essex Historic Environment Record containing all data on designated and non-designated heritage assets.

Archaeology is identified under paragraphs 2.88 and 2.89, however, there is no mention of enhancement of the heritage assets within development proposals which should be the starting position. This should also be reflected within the policy which at present seems targeted at the built heritage. It is recommended that the policy is reworded to encompass the whole of the historic environment.

Under paragraph 2.89 it is recommended that in the second line the word 'may' should be changed to 'will' to ensure compliance with the NPPF.

In addition:

* The majority of LPAs have sought to phrase new policies in a positive manner in accordance with the presumption in favour of sustainable development. Usually policies are now phrased "Harlow Council will support development which...." Rather than "Development that affects a heritage asset or its setting will be assessed based on the harm caused by the development..." which infers that all development will cause harm to a degree.

* PL11(a) - missed off 'and' at the end, leading onto (b)

* PL11(a) - missed off 'the' - 'of the significance'

* PL11(b) - 'harmonising' is perhaps not quite the right word as it could be construed as being conservative in your approach.

Justification

* 2.74 - 'special interest' rather than features and characteristics as some are less tangible than these.

Implementation

* 2.78 - This statement should be reworded. What it is trying to convey is to list the types of assets the policy relates to, and this should be the emphasis.

* 2.80 - In Para.2.83 it states "For proposals which affect a Grade I or II* listed building or structure, the council will also seek advice from Historic England" which is a repetition of 2.8. In addition, if providing this detail Harlow must also state all circumstances which amenity societies are notified and other types of application such as Grade I and II* Registered Parks and Gardens.

* 2.81 - This section needs clarity with regards to Locally Listed Buildings and Non-Designated Heritage Assets. A separate section entitled Non-Designated Heritage Assets (of which Local Heritage Assets form a sub-section) would be beneficial. At present Non-Designated Heritage Assets are barely covered in comparison with the Local List which currently only has 21 entries and so are a minority of NDHAs.

* 2.82 - Harlow could be making work for itself and making itself liable in the case of discrepancies and errors. This would be solved by referencing the National List for England maintained by Historic England which is available online and also more easily accessed by the public.

* 2.83 - Need to provide clarity as there are no specific permissions required to alter or extend Locally Listed Buildings compared to Listed Buildings. Also, see above reference discussing overlap of this paragraph with 2.80.

* 2.83 - Sentence should be reworded "...how the proposal compliments or mitigates any harm towards a building's historic...."

* 2.85 - Assessing cumulative change and economic viability are overlapping but separate consideration. This paragraph merges the two concepts together uncomfortably. Suggest review.

* 2.86 - Whilst CA's were traditionally designated because of their special architectural or historic interest modern good practice takes into account other qualities (even though this is not reflected in the 1990 Act). Leave out Architectural and Historic.

* 2.87 - Suggest no need to name the Article 4 Direction Areas as Harlow may add others in time.

* 2.88/89 - There is no mention of development responding to archaeology of the site which implies two options - archaeology halts development or archaeology is lost.

Change To Plan:

Full Reference: C - 6360 - 8452 - PL11 Heritage Assets and their Settings - None

6383 Comment **Respondent: Lichfields (Mr Harry Bennett) [8454]** **Agent: N/A**

Summary: Our Heritage Team has identified a number of concerns with this policy as currently drafted as follows:
1 There is nothing in the policy text regarding weighing any harm against the public benefits. This makes it inconsistent with the NPPF (paras 133 to 134). Additional text should be accordingly added;
2 Paragraph. 2.74- This second sentence as drafted is too expansive and vague. This policy is intended to also protect a building/structure within the wider setting of a heritage asset that contributes towards its significance. However, this could encompass a significant number of buildings where only designated and non-designated heritage assets are relevant. The paragraph should be amended to clarify this;
3 Paragraph. 2.78- Designated heritage assets do not always include their curtilage; for Listed Buildings only curtilage structures if pre-1948 and potentially if building was listed after 1969. Also, settings aren't designated. Again we would suggest that this paragraph is amended to make this clear.

Change To Plan:

Full Reference: C - 6383 - 8454 - PL11 Heritage Assets and their Settings - None

6386 Comment **Respondent: Roydon Parish Council (Janet Ballard) [5434]** **Agent: N/A**

Summary: Note: The following also applies to policy PL12.

As a relatively new town, heritage assets should be protected from development in order to preserve the town's character.

Change To Plan:

Full Reference: C - 6386 - 5434 - PL11 Heritage Assets and their Settings - None

CHAPTER: PLACESHAPING **PL11 Justification**

6361 Comment **Respondent: Essex County Council (Mr Rich Cooke) [8452]** **Agent: N/A**

Summary: ECC advises an addition and clarification, so that this should read as follows (or similarly) to avoid any confusion with other older gardens and parks which exist and which also will be important in their own right:

2.77 Harlow contains one Historic Park and Garden recorded on the Historic England register of Historic parks and gardens. This is to the east of the district which was previously owned, developed and maintained by Sir Frederick Gibberd. The gardens and the house are located within the Stort Valley to the east of the town.

Change To Plan:

Full Reference: C - 6361 - 8452 - PL11 Justification - None

6280 Comment**Respondent: Historic England (Ms Katie Parsons) [8441]****Agent: N/A**

Summary: Policy PL12: Enabling development of Heritage Assets and their Settings
 A policy which seeks to address heritage at risk is welcomed, however this policy on enabling development is not the best way to achieve this. The policy reflects paragraph 140 of the NPPF but is written to apply to only heritage at risk which is more restrictive than the NPPF. By definition in the NPPF, enabling development is development that is not otherwise in accordance with adopted policy and is therefore not a necessary component of a local plan document. A stand-alone policy on enabling development is not necessary as it covered entirely by the NPPF and should be applied on a case by case basis depending on the merits of a particular proposal rather than as part of the Plan. A local plan should adequately set out a positive strategy for the historic environment without the need to include such a policy. It is advised that a policy on heritage at risk rather than enabling development would better achieve the desired outcome.

Change To Plan:

Full Reference: C - 6280 - 8441 - PL12 Enabling Development of Heritage Assets and their Settings - None

6362 Comment**Respondent: Essex County Council (Mr Rich Cooke) [8452]****Agent: N/A**

Summary: ECC advises that Historic England is publishing new guidance imminently on Enabling Development (ED) which is likely to raise the required evidence base to justify ED. Accordingly when this is published this needs to be accommodated and reflected in Policy PL12, to ensure the Policy is in line with the most up to date good practice.

Change To Plan:

Full Reference: C - 6362 - 8452 - PL12 Enabling Development of Heritage Assets and their Settings - None

6281 Comment**Respondent: Historic England (Ms Katie Parsons) [8441]****Agent: N/A**

Summary: PL13: Advertisements
 It is recommended that the "historic environment" is used rather than "heritage assets" in part (a) of the policy. It is recommended that part (d) is expanded upon to include reference to lighting and the effect that illuminated advertisements can have on the character of the surrounding area. It would also be useful if the policy included a provision which addressed the removal of redundant advertisements in order to reduce visual clutter and improve the quality of the surrounding visual environment. The draft Plan does not contain a policy which relates to shopfronts. The retention of significant shopfront elements is often integral to the character of retail frontages and that of the wider street scene, especially where they are characteristic of Harlow's particular architectural style. It is noted that the Harlow Design Guide SPD (Oct 2011) contains design principles regarding shopfronts but the SPD's objectives would be strengthened if there was a Local Plan policy in place in order to manage their change successfully.

Change To Plan:

Full Reference: C - 6281 - 8441 - PL13 Advertisements - None

6253 Comment

Respondent: Mrs Giulia Festa-Burton [8436]

Agent: N/A

Summary: My concern is that Harlow Council again may show leniency in apply tighter policies when it comes to allowing A boards in areas of high amenity and character, such as Old Harlow High Street or even Broad Walk in Town Centre.

Change To Plan:

Full Reference: C - 6253 - 8436 - PL13 Justification - None

6209 Comment **Respondent: . Pauline Black [8430]****Agent: N/A**

Summary:

Hi
Please can the Harlow Council planning consultation take in to account we need at least 4000 life time tenancies council homes built for the future of Harlows next generations.
Regards
Pauline Black

Change To Plan:

Full Reference: C - 6209 - 8430 - Housing - None

6215 Comment **Respondent: The Roydon Society (Miss Nicola Wilkinson) [27]****Agent: N/A**

Summary: Taking into account the problems have had in the past with travelers - restrictions on their locality must be observed and adhered to .

Change To Plan:

Full Reference: C - 6215 - 27 - Housing - None

6222 Comment **Respondent: Janet Watkins [6004]****Agent: N/A**

Summary: Objective 5 - "Provide a range of suitable housing for the community....."

There is no mention of building bungalow for the numerous single elderly people in 3/4 bedroom houses in the town. Many of these people would gladly downsize (myself included) if some affordable bungalows were available in the town. This would free up properties for families and allow the elderly to buy/move to a more suitable property.

Change To Plan:

Full Reference: C - 6222 - 6004 - Housing - None

6282 Comment **Respondent: Historic England (Ms Katie Parsons) [8441]****Agent: N/A**

Summary: The capacity for the area to accommodate new housing development whilst maintaining its historic environment should be a key consideration, so that the quality and character of neighbourhoods, towns and villages is conserved. Integrating consideration of the historic environment into plan making alongside other considerations is a key principle of sustainable development. Where less successful neighbourhoods are proposed for redevelopment opportunities for enhancement should be a priority.

Change To Plan:

Full Reference: C - 6282 - 8441 - Housing - None

6318 Comment**Respondent: Home Builders Federation (Mr Mark Behrendt) [8450]****Agent: N/A**

Summary: Thank you for consulting the Home Builders Federation (HBF) on these development management policies. The HBF is the principal representative body of the housebuilding industry in England and Wales and our representations reflect the views of discussions with our membership of national and multinational corporations through to regional developers and small local housebuilders. Our members account for over 80% of all new housing built in England and Wales in any one year. We have commented in the past on the more strategic elements of the Harlow Local Plan and we hope to see these progressed as soon as possible. It is important that the Council moves forward with its Local Plan to ensure sufficient sites are allocated to meet Harlow's housing needs. The Council has consistently under delivered against its planned targets and having an adopted plan will secure the necessary allocations to meet its housing needs. However, as this consultation is purely on proposed development management policies we will not comment further on the strategic concerns relating to housing needs and supply.

Change To Plan:

Full Reference: C - 6318 - 8450 - Housing - None

6319 Comment**Respondent: Home Builders Federation (Mr Mark Behrendt) [8450]****Agent: N/A**

Summary: Viability evidence
Our principal concern is that the Council does not appear to have undertaken any assessment as to the viability of the policies it is proposing in this consultation. The most recent evidence on the Council's website is the 2010 study prepared by Levvel for the London Commuter Belt (East)/M11 Sub Region. This study cannot be considered an appropriate evidence base to support the preparation of a local plan and the we would expect the Council to undertake a full assessment of whole plan viability prior to any further consultation. Without this evidence the Council cannot support any of the policies in the consultation document which will place additional costs on the development industry in the Borough. As such the H5 Accessible and Adaptable Housing, H8 Affordable Housing and H9 Self and Custom Build Housing are not justified and cannot be considered to be sound.
In addition to concerns with regard to the lack of an up to date viability assessment supporting these policies, and in fact the whole plan, we also have concerns regarding the approach taken to each of these policies.

Change To Plan:

Full Reference: C - 6319 - 8450 - Housing - None

6326 Comment**Respondent: Quod Planning (Mr Philip Murphy) [7958]****Agent: N/A**

Summary: The development of 10,000 homes at the Gilston Area will support the housing and economic needs of Harlow. By providing a wide range of private and affordable homes to rent or buy, the Gilston Area will help attract and retain skilled workers. Many of these will work in Harlow and provide the more diverse local workforce which has been identified as critical to developing the Harlow economy. The contribution that this will make should be recognised in the opening paragraphs of Chapter 3 which focus solely on the 9,200 homes to be delivered in Harlow.
Homes at the Gilston Area will also help rebalance the local housing mix. This is particularly true for the Harlow wards adjacent to East Herts which, whilst having high levels of social rented provision, offer very few intermediate options and limited professionally managed private rented homes.

Change To Plan:

Full Reference: C - 6326 - 7958 - Housing - None

6227 Comment**Respondent: Essex Bridleways Association (Mrs Sue Dobson) [7887]****Agent: N/A**

Summary: Policy H1 Housing Allocations: this Policy should also mention the need for connectivity of open space and green infrastructure, together with its accessibility to all users.

Change To Plan:

Full Reference: C - 6227 - 7887 - H1 Housing Allocations - None

6267 Comment**Respondent: Barton Willmore (Miss Emma Gladwin) [8399]****Agent: N/A**

Summary: ii) Policy H1 Housing Allocations

3.20 As detailed in Section 2 above, Policy H1 states that development of the Strategic Housing Site and other sites for housing, as allocated in the Strategic Policies, will be supported. A Master Plan is required to be submitted for development of the Strategic Housing Site.

3.21 As outlined within Section 2, we raise an objection to Policy H1 as currently drafted as no other information is provided. As the Strategic Policies and the Proposals Map have not been published, there is no indication of where the Strategic Housing Site or other site allocations are.

3.22 There is also no detail regarding what form development will take on these sites and whether they are allocated for residential, retail, employment, recreation, or a combination of uses.

3.23 As currently drafted, Policy H1 has no substance and cannot be adequately considered or assessed.

Change To Plan:

Full Reference: C - 6267 - 8399 - H1 Housing Allocations - None

6295 Comment**Respondent: Dr Roger Bamford [8442]****Agent: N/A**

Summary: This is a rather pointless policy as it stands as details of the strategic housing site are currently unknown. I assume this is because the development management policies have peculiarly been published ahead of the strategic ones.

Change To Plan:

Full Reference: C - 6295 - 8442 - H1 Housing Allocations - None

6268 Comment **Respondent: Barton Willmore (Miss Emma Gladwin) [8399]** **Agent: N/A**

Summary: iii) Policy H2 Residential Development
 3.24 Policy H2 recognises that there has been a small but constant supply of new housing on infill sites and garden plots, which can contribute to meeting local housing need, supporting such development subject to various criteria being met.
 3.25 Policy H2 recognises the constraints of the District and seeks to support residential development where it would be appropriate, in accordance with the NPPF. As such we support the aims of Policy H2 in encouraging residential development on suitable infill sites, garden plots, minor residential schemes and vacant plots.

Change To Plan:

Full Reference: C - 6268 - 8399 - H2 Residential Development - None

6284 Comment **Respondent: Historic England (Ms Katie Parsons) [8441]** **Agent: N/A**

Summary: Policy H2: Residential Development
 It is recommended that the historic environment is listed as an aspect for consideration in part (a). It is recommended that the supporting makes reference to the positive contribution open spaces and gardens can make a positive contribution to the character of an area and to the its distinctive townscape.

Change To Plan:

Full Reference: C - 6284 - 8441 - H2 Residential Development - None

6363 Comment **Respondent: Essex County Council (Mr Rich Cooke) [8452]** **Agent: N/A**

Summary: Criterion (b) refers to 'adopted vehicle parking standards' but does not make clear whether this means the Essex County Council parking standards (or others). This also applies to Policy H7.

Change To Plan:

Full Reference: C - 6363 - 8452 - H2 Residential Development - None

6254 Comment **Respondent: Mrs Giulia Festa-Burton [8436]** **Agent: N/A**

Summary: I am sorry, but this utter rubbish. If there is only a garden or field between estates, surely this would enrich the character of a residential area, hence creating a break to overcrowding. Instead, you state that where only one green area is still standing between estates or building, that area is very likely to be considered for development, hence allowing that overcrowding of building all crunched up and next to each other. This is unacceptable!

Change To Plan:

Full Reference: C - 6254 - 8436 - H2 Implementation - None

6208 Comment

Respondent: Morley Grove Residents Association (Sheila Sullivan) [5043]

Agent: N/A

Summary: Note: This is a transcript of a scanned letter. See attachment for original letter.

I would like to make the following comments and contribution to your document. My particular concern has long been the issue of Houses in Multiple Occupation in Harlow (section H3 in your document). From personal experience in Morley Grove I know what a disastrous effect they can have on a neighbourhood in our town. Eventually, Harlow Council successfully took planning enforcement action and then established an Article 4 Direction withdrawing permitted development rights for HMOs in Morley Grove.

I, and many others, had hoped that the same protection would be established for the whole of the town, so that no property could be converted into an HMO without prior planning consent. However, despite the government's loosening of the rules on A4D in 2010 to facilitate such decisions, Harlow Council has not taken up that option.

I am therefore asking that your Development Plan includes the adoption of an Article 4 Direction withdrawing the permitted development rights of conversion from a house/flat into an HMO anywhere in Harlow. An A4D is essential to control the development of HMOs. It means that developers would need to apply for prior planning consent and the Planning Committee could make their decision based on the Council's policy. It would replace random development with development in appropriate locations and to the Council's requirements.

My justification for applying an A4D across the whole of Harlow is as follows. There is heavy pressure on existing housing in Harlow and, as your document confirms, this is a particularly true for large family homes (the very properties targeted by HMO developers). The town was originally designed to accommodate people in groups of properties and close communities. These were high density areas focussed on single families. Most of the housing was designed and built for single families and this is reflected in the covenants the properties carry which restrict use to single families only. Parking is a major problem in the town. Parking on pavements is a common sight in some areas and emergency services are challenged by blocked access. Noise transference between terraced properties is common and cannot be reduced easily. Housing in Harlow is largely in terraces.

Your document does not give enough weight to the importance of community cohesion. The dispersal of HMO properties around the town is uneven at present with some areas having runs of them. (I enclose a document which demonstrates the locations of currently licensed HMOs). Your threshold policy of 1 HMO in 5 is too high a proportion. I believe that only 1 in 10 in a street, as well as area, should be allowed to be converted into an HMO. Nationally this 10% threshold is the one most commonly adopted by local authorities. Harlow has special characteristics of design which mean 10% of properties converted to HMOs would be the most it could accommodate without adverse effects for the neighbours, neighbourhood and community cohesion.

Section H3

I would change your section H3 to read

The creation or conversion of a dwelling to a House in Multiple Occupation(HMO) will be supported where it meets all the criteria below:

- (a) the number of HMOs would not exceed one out of a row of 10 units.
- (b) it is supported by a design rationale based on an understanding and

analysis of local context and character taking into consideration the Adopted Harlow Design Guide Supplementary Planning Document (SPD).

(c) the development makes adequate provision for refuse storage in an enclosed /covered storage area and collection from it.

(d) parking is provided at a level of one space per bedroom, plus one secure covered cycle space per bedroom, and one car parking space for visitors and management use.

(e) effective measures are proposed to minimise the effects of noise and disturbance.

(f) property complies with Building Regulations.

In addition to changing the threshold (a) above, I have made two other changes to your list and added a sixth.

The unpleasant effects of careless handling and storage of refuse at HMOs are well known around the town (c). Requiring storage areas to be covered/enclosed would fit better with the Council's design requirements.

HMO tenants parking vehicles on the street and blocking access for others can be a major cause of concern and conflict. I am therefore pleased to see the Council is specifying a parking space for each bedroom. However, one additional parking space is needed for visitors and management use (d).

Minimising the effects of noise and disturbance (e) is more easily said than done in terrace houses in Harlow. The Planning Inspector's decision in the case of Morley Grove was that it was not possible, bearing in mind the noise transmission between houses.

For the safety of tenants, the property needs to comply with Building Regulations (f). This has been highlighted by the terrible tragedy of Grenfell Tower.

Implementation

Your implementation section acknowledges that current permitted development rights exempt conversion to small HMOs (3 to 6 unrelated persons) from requiring planning consent.

This means that none of this policy will apply to HMOs claiming to have only that number of unrelated occupiers. Experience has taught us that landlords easily move their tenants from one HMO to another to deal with inspections carried out to check on the number of people living in a property.

This policy will therefore only have any power of enforcement over small HMOs when an Article 4 Direction removing permitted development rights is established across the town.

In paragraph 3.18 the document makes reference to HMO Licensing which is carried out by Environmental Health. At present Harlow has established an Additional Licensing Scheme which licenses all HMOs not subject to the Mandatory Licensing Scheme. The Additional Licensing Scheme is time limited and due to finish in April 2020. If that scheme does not continue the Council will lose data about where HMOs are and so undermine the threshold policy.

Establishing the Article 4 Direction and withdrawing permitted development rights is the only way to ensure the Council can manage the growth of HMOs.

(See attachment for original letter and attached appendix.)

Change To Plan:

Full Reference: C - 6208 - 5043 - H3 Houses in Multiple Occupation - None

6239 Comment

Respondent: Mr & Mrs Andy & Janice Gee [8438]

Agent: N/A

Summary: I have lived in Harlow since 1955 and my Wife was born in the town a few years later. We have the upmost respect and regard for Sir Frederick Gibberd who's Master Plan has passed the test of time, proving Harlow with great living space with the green wedges and fingers. How much better Harlow would have been if his plan had been implemented for connecting the roads to the M11 north of the River Stort.

Our main comments to the Consultation Draft is with regard to Section H3 Houses with Multiple Occupancy. The initial comment we would like to make is that when our house in Collins Meadow was built in the nineteen fifties by the Harlow Development Corporation, a Covenant on the land states "Not to use any dwelling erected on the hereby transferred for purposes other than that of a single private dwelling-house in one occupation.....". The Covenant is transferred when the house is sold and still valid to the new owners. We also believe that this is the same for a lot of the properties built in Harlow at that time. Harlow Council took over from the Development Corporation and inherited their obligations with regards to Harlow's housing stock. We have an HMO on the opposite side of the road to us in Collins Meadow and we cannot understand how Harlow Council issued a licence some eighteen months ago, as an HMO for Six rooms, Six Occupancies with these Covenants we believe still in force. The reason we have been given for this is that as 'Harlow Council do not own this land then they cannot enforce this Covenant'. Our stance is that the protections put in by Harlow Development Corporation to protect our 'way of life' are not being honoured.

The next door neighbours to this HMO have suffered noise and disturbance due to open windows and more conversations and shouting in the rear gardens. Over occupancy on a regular basis, which has substantially increased the 'comings and going' to the property. The fire doors are slam shut and noisy and have been fitted to a house that was not designed for their use. We believe this could be a 'statutory nuisance' particularly at night. Any visit to the bathroom at night will result in the fire doors slamming shut four times. We have been more fortunate living opposite this HMO, than the next door neighbours, but we have still suffered with the non emptying of bins at times and the eye sore of six bins instead of two, and parking issues. We have had two major incidents where the police have been involved, the first a fight in the HMO with the loser being left for dead, and more recently an alleged knife threat! Cannabis smoking has been regularly occurring and the police have been taking action.

The Development Plan H3 mentions HMO's allowable (a) 'One in Five units', this would mean another three in our cul-de-sac, which would completely ruin life in this community. We welcome (d) 'parking is provided for one space per bedroom' as this should protect Collins Meadow, and we would think most areas of the town, from HMO's as most suffer a severe lack of parking.

The Councils own multi dwelling houses are generally detached properties, this keeps some of the noise from becoming a problem, as there are no next door neighbours. Our recommendation for HMO's is that Harlow Council do not issue licences for HMO's within a terrace. But we feel we have far too many already as we've noticed on the HMO Public Register there's over 200 at the moment and they are spoiling our town!

Finally we wish you good luck with the future development of Harlow, Sir Frederick Gibberd has set some very high standards.

Change To Plan:

Full Reference: C - 6239 - 8438 - H3 Houses in Multiple Occupation - None

6241 Comment

Respondent: Mrs Giulia Festa-Burton [8436]

Agent: N/A

Summary: I strongly believe point d) is never met at present when landlords apply for HMO licence. Likewise on point a) the ratio should be increased to 1:10 in order to avoid overcrowding and in respect of local character of Harlow estates and areas.

Change To Plan:

Full Reference: C - 6241 - 8436 - H3 Houses in Multiple Occupation - None

6246 Comment**Respondent: Mrs Giulia Festa-Burton [8436]****Agent: N/A**

Summary: (h). By encouraging investors to apply for HMO licences, Harlow Council encourages an influx of transient tenant base in residential areas already family oriented. The transient nature of HMO tenants often encourages crime and higher levels of anti social behaviour, often due to the fact that landlords are not obliged to seek references for potential tenants.
(f) I have concerns that currently Harlow has very inadequate transport solutions in place both by rail and bus - already insufficient now, let alone with the increment of commuters to Harlow following regeneration.

Change To Plan:

Full Reference: C - 6246 - 8436 - H3 Houses in Multiple Occupation - None

6250 Comment**Respondent: Mrs Giulia Festa-Burton [8436]****Agent: N/A**

Summary: By allowing HMOs in existing residential areas, effectively Harlow Council allows a business to run next to residential properties, without even demanding for planning applications for change of use. This is unacceptable as HMOs are only detrimental to residents and residential areas.

Change To Plan:

Full Reference: C - 6250 - 8436 - H3 Houses in Multiple Occupation - None

6294 Comment**Respondent: Dr Roger Bamford [8442]****Agent: N/A**

Summary: Unfortunately this policy is rather weak compared to other councils who have much more detailed HMO policies and criteria for assessment. It would be appropriate therefore to revisit this policy and strengthen it.

Change To Plan:

Full Reference: C - 6294 - 8442 - H3 Houses in Multiple Occupation - None

6205 Comment**Respondent: Mr Andrew Whybrow [8423]****Agent: N/A**

Summary: Houses with multiple occupations tend to be owned by "dubious" landlords. There should be NO increase of that type of property. With the vast increase in building the need for HMO should be reduced & therefore the aim should be to reduce rather than increase numbers.

Change To Plan:

Full Reference: C - 6205 - 8423 - H3 Justification - None

6242 Comment**Respondent: Mrs Giulia Festa-Burton [8436]****Agent: N/A**

Summary: I firmly believe the use of HMO to alleviate the housing register overcrowded subscription as well as homelessness is only a palliative. HMO landlords are allowed to charge rent which is nearly double the Local Housing Allowance paid through Housing Benefits. Therefore, when tenants become unemployed, or if already unemployed at the point of renting an HMO room, they have no choice but to apply for Discretionary Housing Payments from their Housing Benefits entitlement - if this additional payment is not granted by Housing Benefits of Harlow Council, they then fall in arrears to then become homeless again.

Change To Plan:

Full Reference: C - 6242 - 8436 - H3 Justification - None

6243 Comment**Respondent: Mrs Giulia Festa-Burton [8436]****Agent: N/A**

Summary: The current policy of granting HMO licences does not look at the currently existing local amenities and characters of the surrounding houses within an estate. No consideration is paid to whether there is additional parking space for a potential minimum of 6 extra households in a street. And this can only bring further upset to the local residents.

Change To Plan:

Full Reference: C - 6243 - 8436 - H3 Justification - None

6262 Comment**Respondent: Mr Simon Burton [8439]****Agent: N/A**

Summary: In principle I can see the use of HMOs as part of the solution to decrease the number of applicants to the Housing Register or of homeless applicants. However criteria should be changed to include a ratio of 1 HMO property for every 20 single dwelling properties. This draft very much focuses on respecting the original plans set out by Sir Gibberd in designing this Town. As such, HMOs should not be allowed in properties that were purpose built for single dwelling, but new purpose built properties should be solely used for the purpose of multiple occupancy.

Change To Plan:

Full Reference: C - 6262 - 8439 - H3 Justification - None

6244 Comment **Respondent: Mrs Giulia Festa-Burton [8436]****Agent: N/A**

Summary: It is appalling that this Council will only enable Environmental Health to deal with the matter of granting HMO licences. All the above mentioned issues, including ensuring respect of local amenities and that not too many family homes are lost to what essentially is a business, should be overseen by Planning, and the two services should work alongside to ensure all these issues are avoided when issuing an HMO licence. I believe HMOs should all go through a planning applications, irrespective of the size and number of tenants.

Change To Plan:

Full Reference: C - 6244 - 8436 - H3 Implementation - None

6245 Comment **Respondent: Mrs Giulia Festa-Burton [8436]****Agent: N/A**

Summary: With the overall regeneration of Harlow and the introduction of new employment opportunities with the redevelopment of the former Nortel site and with PHE move to Pinnacles in a few years time, I can see how new housing formulae and opportunities may be needed. However I do not believe HMOs are the answer, as for the sake of encouraging business coming to Harlow from investors, existing residents are penalised. This is not acceptable, and the influx of leisurely granted HMO licences has to stop. Harlow is already overcrowded with HMOs, which bring only but disruption to residential areas.

Change To Plan:

Full Reference: C - 6245 - 8436 - H3 Implementation - None

6260 Comment **Respondent: Mrs Giulia Festa-Burton [8436]****Agent: N/A**

Summary: I see a neat discrepancy between the policy adopted by Housing to use detached properties for TA purposes when the houses are Council owned as there is an acknowledgement that TA properties can cause disruption to a neighbourhood, and the policy adopted by the Council in granting HMO licences to landlords who purchase terraced or semi detached properties for this purpose. It proves that Planning needs to be involved in the decision making and in the process to grant HMO licences in order to monitor the detrimental impact to the local community.

Change To Plan:

Full Reference: C - 6260 - 8436 - H3 Implementation - None

6261 Comment **Respondent: Mrs Giulia Festa-Burton [8436]****Agent: N/A**

Summary: HMOs are encouraged and facilitated at such an extent at the expenses to the well being of current local communities, that Planning do not even get involved when it comes to enforcing Restrictive Covenants for change of use from single to multiple dwelling.

Change To Plan:

Full Reference: C - 6261 - 8436 - H3 Implementation - None

6234 Comment**Respondent: Persimmon Homes (Mr David Moseley) [8437]****Agent: N/A**

Summary: H5 Accessible and Adaptable Housing states that;

- All new dwellings must be at least Building Control Part M4(2) standard for accessible and adaptable homes to meet the occupiers' future needs.
- In addition, major residential development must provide a proportion of Building Control Part M4(3) standard dwellings for wheelchair users.

The need for such housing requirements is not evidenced. In the absence of supporting evidence the use of the optional standards on accessibility cannot be justified. As such the requirements relating to these standards in this policy should be deleted. Notwithstanding this, the proportion of M4(3) units sought is not clear. There is a need for a viability assessment to support the local plan and it should consider the implication of policy H5 on Accessible Housing. This optional standard will increase the cost of providing each dwelling. In particular the highest standard, M4(3), will add a substantial additional cost that must be assessed as part of the viability study. As such we do not consider either policy H5 to be adequately justified.

Change To Plan:

Full Reference: C - 6234 - 8437 - H5 Accessible and Adaptable Housing - None

6311 Comment**Respondent: Miller Homes [8449]****Agent: Andrew Martin - Planning (Mr Olivier Spencer) [8448]**

Summary: In order to address these concerns, our client recommends that Policy H5 is amended to read:

"All new affordable dwellings must be at least Building Control Part M4(2) standard for accessible and adaptable homes to meet the occupiers' future needs. In addition, for major residential development, 10% of new affordable dwellings must be Building Control Part M4(3) standard (i.e. wheelchair user dwellings)."

Change To Plan:

Full Reference: C - 6311 - 8449 - H5 Accessible and Adaptable Housing - None

6320 Comment**Respondent: Home Builders Federation (Mr Mark Behrendt) [8450]****Agent: N/A**

Summary: The Council must provide more detailed evidence relating to the need for these optional standards. Planning Practice Guidance (PPG) sets out the evidence required to support the introduction of such policies and this must be considered by the Council if it is to justify this policy. The policy is also vague and does not provide the required certainty that will allow the development industry to consider the implications of this policy on development viability. If the Council can justify the need for this policy then it must set out the proportion of homes to the higher optional standard are required on major sites. At present this policy is not consistent with the NPPF which sets out in paragraph 17 the need for plans to provide a practical framework within which decision can be made with a high degree of predictability.

Change To Plan:

Full Reference: C - 6320 - 8450 - H5 Accessible and Adaptable Housing - None

Summary: Policy H5 relates to accessible and adaptable housing and would replace policies H7 & H8 of the Local Plan 2006.

The extant policy base (Policy H7) allowed for a negotiation to take place regarding the extent of accessible and adaptable housing to be provided on any specific site, enabling a mixed community to be created on any site, allowing for viability issues and ensuring accessibility to community facilities and shops. Policy H8 sought to allocate sites that would provide for such provision.

The emerging policy takes this policy position much further stating that all new dwellings must be accessible and adaptable dwellings, in accordance with Part M4(2) of the Building Regulations.

There is a requirement under Building Regulations for all properties to meet Part M4(1), with Part M4(2) being an optional requirement. The policy requirement for all dwellings to comply with an optional Building Regulation requirement is not therefore justified.

The Strategic Housing Market Assessment (SHMA) 2015 acknowledges that the increase in people over 65 equates to three-quarters of the growth identified within the Housing Market Area. It also Page 2 of 4

states that "most of these older people will already live in the area and many will not move from their current homes". On this basis, to require all new homes to comply with Part M4(2) is disproportionate to the likely need within the plan period.

Furthermore, the application of this requirement across all dwellings, within all developments will undermine the principles of high quality design required by the NPPF and the adopted Harlow Design Guide.

Looking at the parking requirements associated with Part M4(2), each standard parking space associated with each Part M4(2) compliant property needs to be widened from the Essex Parking Standard requirement of 2.9m to 3.3m. The parking sizes are already considered to be land hungry, with any further increases in size further eroding the ability to deliver developments that do not appear overly car dominant. To quantify the impact of this element of the policy proposed, for a residential development constructed at an average density of 35dph, the increased parking space size will result in the loss of 1 dwelling per hectare of development.

The additional requirement of full step free access to entrances and shallow gradients being applied creates a flat, lifeless environment with no articulation.

The need to introduce ramps and lift shafts to developments further increases the amount of land required per dwelling and erodes flexibility in design.

The SHMA acknowledges that the application of Part M4(2) should only occur where viability is not compromised. This position is not reflected in the proposed policy wording, which makes no allowance for viability to be discussed.

By way of example, Part M4(2) requires a step-free access to be created for each dwelling, irrespective of the storey upon which it is located. If this is applied to a flatted development, each and every flat block would require an lift to be installed, regardless of height. Similarly in instances where the sub-division of an existing dwelling is proposed, forming 1no ground floor flat and 1no first floor flat, a lift would be required.

The increase in cost associated with the installation of a lift will no doubt dissuade people from subdividing their properties, and will challenge the viability of many mid-scale developments within the District. Or lead to a reduction in the mix of housing being offered on each site to maximise viability.

The requirements of Part M4(2), when applied across an entire development site, result in a significant loss of development land, such that meeting these standards will result in either a reduction in the number of dwellings being delivered per hectare, an increase in height of development or, worse case scenario, a reduction in the number of developers wishing to develop in the District due to the policy requirements being overly onerous. Of course the latter will raise significant issues in obtaining a consistent 5 year land supply and potentially even being able to demonstrate that future sites are deliverable.

Given the level of growth required in Harlow, along with the boundary constraints associated with the New Town, this extent of loss on all development sites will significantly reduce the ability to meet the OAHN and in turn place additional pressure on less suitable sites.

Emerging Policy H5 goes on to state that the even more onerous requirement of Part M4(3) should be achieved across 10% of market housing and 15% of affordable housing. Again this is based on information within the SHMA 2015, in which it states: "the evidence therefore supports the need for 10% of market housing and 15% of affordable housing to meet Category 3 requirements".

The SHMA seemingly fails to provide the stated evidence to support this position. There is no localised information available in respect of disability data, however, the national figures for England show that around 1 in 30 households (3.3%) have at least one wheelchair user, with this being significantly higher for affordable housing at 7.1%. The SHMA fails to provide any indication as to how this trend has changed over recent years, that would in turn enable an assessment, as to likely increase, to be made over the plan period. The SHMA merely concludes that the existing 3.3% should increase by a huge 6.7% and the affordable housing requirement by 7.9%.

When based on an average development size of 100 residential units with 30% affordable housing, this would equate to a 330% increase in provision over the existing 1 in 30 dwelling identified within England to date.

Whilst the provision of clear guidance in a policy is welcomed, it does need to be reasonable, substantiated and not result in development being unviable.

It is noted that Harlow District Council has yet to undertake (or publish) a viability assessment in respect of the overall emerging Plan, presumably as a result of the Plan still being formulated. It is therefore considered that this policy is premature and its impact cannot be fully understood without a complete picture of viability being ascertained in the first instance.

It is noted that the equivalent policy within the, now submitted, East Hertfordshire District Plan (Policy HOU7) contains a viability clause as recommended by the SHMA, it states: "II. Only where circumstances exist where it can be demonstrated by the applicant that it is not practically achievable or financially viable to deliver this policy, will new development be exempt from the requirement." If this emerging policy is to be retained, a viability clause should be included.

Lastly, Government Policy specifically warns against reference to non-planning legislation, as other legislation/standards are subject to regular change and results in planning policy becoming out of date quickly. This was seen with the changes to the Code for Sustainable Homes and Authorities with specific policies found themselves with unenforceable policies, conditions and legal agreements.

Certainly in respect of Part M, changes were introduced in 2015 which incorporated the accessibility requirements M4 (1) (2) & (3). These changes superseded the Code

for Sustainable Homes and the Design and Quality Standards, amongst other technical standards. The Code for Sustainable Homes was adopted in 2006, lasting only 9 years before it was replaced with the revised Part M requirements. The revised document incorporates some elements of the standards it replaced but is not readily transferable and as such many Local Plan Policies were rendered out of date and unenforceable. It is considered highly likely that this policy will result in a significant amount of viability questions in respect of future development and without some form of amendment to enable a discussion on this point to be had, may lead to a shortfall in housing development, or an increase in appeals. Furthermore, the regular change in building regulations is likely to result in the policy being defunct within the early stages of the plan period. This policy is considered to be flawed, it is therefore recommended that it be deleted to ensure housing development can be readily delivered.

Change To Plan:

Full Reference: C - 6334 - 70 - H5 Accessible and Adaptable Housing - None

CHAPTER: HOUSING

H5 Implementation

6339 Comment

Respondent: Home Group (Jessica Watts) [8445]

Agent: N/A

Summary: Home Group supports the Council's intention to ensure new properties are accessible for all future occupiers. We presume the Council will specify on a site by site basis whether the proportion of homes to the Part M4(3) standard are to be adaptable or adapted as per the Regulations, based on known housing needs at that time? Establishing specific users during the planning process is key to optimising occupation.

Change To Plan:

Full Reference: C - 6339 - 8445 - H5 Implementation - None

CHAPTER: HOUSING

H6 Housing Mix

6364 Comment

Respondent: Essex County Council (Mr Rich Cooke) [8452]

Agent: N/A

Summary: This policy, which is important to ensure a balanced housing stock and market, is very brief and light on detail. Clearer references for developers on what types / sizes of homes are required would be beneficial and a specific reference within the policy to the relevant evidence base (SHMA / housing needs survey) would be beneficial. It also does not mention specialist housing requirements or independent living (refer to ECC Independent Living programme).

Change To Plan:

Full Reference: C - 6364 - 8452 - H6 Housing Mix - None

CHAPTER: HOUSING

H6 Justification

6255 Comment

Respondent: Mrs Giulia Festa-Burton [8436]

Agent: N/A

Summary: Private developments focus on 2 bedroom or bigger properties, whereas there still seem to be a need for 1 bed self contained flats or studio flats, for that group of single adults towards whom the Council does not have duty of care for homelessness, but who have no alternative but to rent HMO rooms. This gives way to an increased demand for rooms, when in fact HMOs bring only disruption and anti social behaviour. Once again the Council does not think of the long term consequences of immediate solutions, at the detriment of existing residents.

Change To Plan:

Full Reference: C - 6255 - 8436 - H6 Justification - None

6206 Comment**Respondent: Mr Andrew Whybrow [8423]****Agent: N/A**

Summary: No planning permissions should be granted where a developer intends to sell a house subject to an increasing Ground Rent. That type of development should not be welcome in the Town.

Change To Plan:

Full Reference: C - 6206 - 8423 - H6 Implementation - None

6365 Comment**Respondent: Essex County Council (Mr Rich Cooke) [8452]****Agent: N/A**

Summary: This reference is very brief and light on detail. Clearer references for developers on what types / sizes of homes are required would be beneficial and a specific reference within the policy to the relevant evidence base (SHMA / housing needs survey) would be beneficial. It also does not mention specialist housing requirements or independent living (refer to ECC Independent Living programme)

Change To Plan:

Full Reference: C - 6365 - 8452 - H6 Implementation - None

6285 Comment**Respondent: Historic England (Ms Katie Parsons) [8441]****Agent: N/A**

Summary: Policy H7: Residential Annexes
It is recommended that this policy requires development to have regard to the character of the surrounding area, it is noted that this is referred to in the supporting text but only in the context of intensification of use and not in the implications for the physical environment.

Change To Plan:

Full Reference: C - 6285 - 8441 - H7 Residential Annexes - None

6213 Comment**Respondent: Mr Gary Roberts [8432]****Agent: N/A**

Summary: I have just read the proposed Local Development Plan for Harlow and in particular section H8 on Housing.

Having been a Harlow Council tenant for some 33 years and involved in tenant issues for at least 27 of those years I would make the following points on the housing plan:

The right to buy council homes should be stopped immediately or failing that the period of right to buy Harlow Council homes be increased to at least 20 years,

Harlow Council should receive 50% of all "affordable" housing built by private construction developers in Harlow and not 30%,

The proportion of "affordable" homes built for council rent should be increased from the stated 3,400 to at least 4,200,

The infrastructure to deal with this increase in housing should be professionally assessed and implemented before any housing development is approved.

I hope these views will be included in the final consultation document and a copy of that document forwarded to me when complete.

Change To Plan:

Full Reference: C - 6213 - 8432 - H8 Affordable Housing - None

6235 Comment**Respondent: Persimmon Homes (Mr David Moseley) [8437]****Agent: N/A**

Summary: H8 - Affordable Housing.

The Policy states 'Major residential development will be supported where affordable housing is provided at a rate of at least 30%'. This policy is too imprecise as to the level of affordable housing sought. At present this policy is not consistent with the NPPF which sets out in paragraph 17 the need for plans to provide a practical framework within which decision can be made with a high degree of predictability.

Change To Plan:

Full Reference: C - 6235 - 8437 - H8 Affordable Housing - None

6269 Comment**Respondent: Barton Willmore (Miss Emma Gladwin) [8399]****Agent: N/A**

Summary: iv) Policy H8 Affordable Housing

3.26 Whilst the aims of Policy H8 of providing needed affordable housing across the District are supported, the policy states 85% should be affordable rent and the remaining 15% should be intermediate affordable housing.

3.27 No reference is made to 'starter homes' and whether HDC will be including these within the 15% intermediate affordable housing, with starter homes not referenced throughout the DM Policies document.

3.28 The Housing White Paper published earlier this year was clear that Local Authorities are expected to deliver starter homes as a mixed package of affordable housing. Rather than set a threshold, the Government announced Local Authorities will be required to promote starter homes and work with developers for their provision.

3.29 These aims should be reflected within Policy H8, clearly identifying what HDC will be expecting from developers in terms of affordable housing.

Change To Plan:

Full Reference: C - 6269 - 8399 - H8 Affordable Housing - None

- 6312 Comment** **Respondent: Miller Homes [8449]** **Agent: Andrew Martin - Planning (Mr Olivier Spencer) [8448]**
- Summary: Our client submits that until such time that HDC is able to publish the Local Plan in its entirety, including supporting evidence to demonstrate viability (both in terms of overall affordable provision and any preferred affordable split), Policy H8 should only seek "up to" 30% affordable housing, rather than "at least" 30%.
- Change To Plan:
- Full Reference: C - 6312 - 8449 - H8 Affordable Housing - None
- 6321 Comment** **Respondent: Home Builders Federation (Mr Mark Behrendt) [8450]** **Agent: N/A**
- Summary: Similarly the policy on affordable housing must also send out clear signals to the market about the Council's intentions. By stating that the Council will require "at least 30%" of major residential development to be affordable homes suggests that in some circumstances a higher proportion may be required. This does not meet the principles set out in paragraph 17 as highlighted above and makes it difficult for the development industry to be sure as to the actual costs of bringing a site forward in Harlow. We would also suggest that the Council ensures that this policy reflects national guidance on planning contributions for affordable housing to ensure clarity and support predictable decision making.
- Change To Plan:
- Full Reference: C - 6321 - 8450 - H8 Affordable Housing - None
- 6327 Comment** **Respondent: Quod Planning (Mr Philip Murphy) [7958]** **Agent: N/A**
- Summary: We suggest that an additional paragraph is added under the Implementation text of policy H8 (affordable housing) stating that:
"Major sites outside the district, including the Gilston Area in East Herts, also have an important role in diversifying the existing housing market and supporting economic aims. These sites could provide a wide range of types and tenures of home, informed by site-specific evidence and ensuring that there is a balanced mix of sustainable and high-quality homes across the West Essex and Hertfordshire HMA".
- Change To Plan:
- Full Reference: C - 6327 - 7958 - H8 Affordable Housing - None
- 6335 Comment** **Respondent: Countryside Properties Plc [70]** **Agent: Barker Parry Town Planning Ltd. (Ms Elizabeth Fitzgerald) [8451]**
- Summary: Policy H8 sets out the Council's affordable housing requirement of 30%, which is not objectionable and is supported by the SHMA. The need for 30% affordable housing to be provided on all major residential sites is however contrary to National Planning Policy Guidance. For the purposes of affordable housing provision, there is a distinct difference drawn between the Town and Country Planning (Development Management Procedure)(England) Order 2015 definition of major development and Government guidance on the 10-unit threshold, which requires affordable housing only to be provided on schemes of 11 units or more. The policy should be amended to reflect the NPPG.
- Change To Plan:
- Full Reference: C - 6335 - 70 - H8 Affordable Housing - None
- 6340 Comment** **Respondent: Home Group (Jessica Watts) [8445]** **Agent: N/A**
- Summary: Home Group supports the Council's policy to require this level of affordable housing in the borough as we recognise the housing need for lower cost homes in the area. We also support the provision of these homes on site where possible as it helps create a mixed and sustainable community.
- Change To Plan:
- Full Reference: C - 6340 - 8445 - H8 Affordable Housing - None

6236 Comment**Respondent: Persimmon Homes (Mr David Moseley) [8437]****Agent: N/A**

Summary: H9 Self-build and Custom-build Housing

This policy sets out that all allocated sites must include an element of serviced plots for self-build housing. The policy provides no indication as to the amount of self-build plots that will be required from allocated sites. This makes it impossible to assess the impact on viability of this policy. We would suggest that the Council first considers the evidence of the need for self-build plots using its statutory register as this would give an indication as to the number of self-build plots required. From this starting point an appropriate evidence based strategy for supporting self and custom-build housing could be developed.

We consider the two year time frame for commencement before the plots revert to conventional development to be too long. If there is a demand for such units as evidenced by the Council's self-build register there should be very little delay in the plots being acquired a development commenced. We would suggest that the time frame is reduced to 12 months.

Change To Plan:

Full Reference: C - 6236 - 8437 - H9 Self-build and Custom-build Housing - None

6270 Comment**Respondent: Barton Willmore (Miss Emma Gladwin) [8399]****Agent: N/A**

Summary: v) Policy H9 Self-Build and Custom-Build Housing

3.30 Policy H9 requires an element of serviced plots for self-build housing to be included within the development of allocated sites. Development of the self-build plots must commence within 2 years of completion of the related phase of the allocate site, otherwise they may revert to conventional development and marketing.

3.31 Policy H9 does not currently provide any clarity regarding the level of self-build housing that will be required on allocated sites, only stating an 'element' will be required. It is not clear if the level of self-build housing will be identified on a site-by-site basis when further detail is given on the site allocations, but at present Policy H9 requires considerable negotiation and no indication of what HDC would expect.

3.32 Furthermore, whilst the principle of allowing self-build plots to revert to conventional development and marketing if they are not commenced within 2 years is supported, Policy H9 does not currently contain any requirements for developers to have adequately marketed the plots in the intervening period. This could result in plots being left for 2 years then automatically becoming conventional development plots, restricting the delivery of self-build housing within the District.

Change To Plan:

Full Reference: C - 6270 - 8399 - H9 Self-build and Custom-build Housing - None

6313 Comment **Respondent: Miller Homes [8449]** **Agent: Andrew Martin - Planning (Mr Olivier Spencer) [8448]**

Summary: Policy H9 directs that allocated sites must include "an element" of serviced plots for self-build, unless this would render the development unviable. Where serviced plots have not commenced within two years of the relevant phase of the site, they may revert to conventional housing.

Our client submits that until such time that HDC is able to publish the Local Plan in its entirety, including supporting evidence to demonstrate viability (both in terms of overall affordable provision and any preferred affordable split), Policy H8 should only seek "up to" 30% affordable housing, rather than "at least" 30%.

Change To Plan:

Full Reference: C - 6313 - 8449 - H9 Self-build and Custom-build Housing - None

6322 Comment **Respondent: Home Builders Federation (Mr Mark Behrendt) [8450]** **Agent: N/A**

Summary: This policy sets out that all allocated sites must include an element of serviced plots for self-build housing. Such an approach is ineffective and unjustified. Firstly, the Council does not appear to have considered that some allocated sites may well be a purely flatted development. On such sites it would not be possible to deliver any self-build units and the Council should ensure such sites are not required to include an element of self-build plots. Secondly, the policy provides no indication as to the amount of self-build plots that will be required from allocated sites. This makes it impossible to assess the impact on viability of this policy. We would suggest that the Council first considers the evidence of the need for self-build plots using its statutory register. This would then give an indication as to the number of self-build plots required. From this starting point an appropriate evidence based strategy for supporting self and custom-build housing could be developed.

We also consider the two year time frame for commencement before the plots revert to conventional development to be too long. If there is a demand for such units as evidenced by the Council's self-build register there should be very little delay in the plots being acquired a development commenced. We would suggest that the time frame is reduced to 12 months.

Change To Plan:

Full Reference: C - 6322 - 8450 - H9 Self-build and Custom-build Housing - None

CHAPTER: HOUSING H10 Travellers' Pitches and Plots

6286 Comment **Respondent: Historic England (Ms Katie Parsons) [8441]** **Agent: N/A**

Summary: Policy H10: Traveller's Pitches and Plots

We welcome the policy provision which requires development consider that the character of the locality but recommend that the historic environment is also listed as a consideration in part (a).

Change To Plan:

Full Reference: C - 6286 - 8441 - H10 Travellers' Pitches and Plots - None

CHAPTER: HOUSING H10 Justification

6194 Comment **Respondent: Miss Sally SallyAnn Simpson [8418]** **Agent: N/A**

Summary: Re Travellers Pitches at Fern Hill Caravan site-that users of the pitch pay to use it in regards to rubbish pick up & any supplies of lighting & any water & electrical usages including sewage, & for general maintenance to keep it clean. As best I know, travellers don't pay Council Taxes but they should be made to pay a sum,however nominal, to use the facility. People generally don't appreciate stuff they get for free & then take it for granted; even if they paid a nominal sum, it would help stop deterioration.

Change To Plan:

Full Reference: C - 6194 - 8418 - H10 Justification - None

6211 Comment **Respondent: Sport England (. Laura Hutson) [8431]****Agent: N/A**

Summary: Prosperity policies - Economic development

Sport England wishes to highlight the fact that sport makes a very substantial contribution to the economy and to the welfare of individuals and society. It is an important part of the national economy, contributing significantly in terms of spending, economic activity (measured using Gross Value Added) and employment. For those who participate there are health and well-being (or happiness) impacts. Its economic impact places it within the top 15 sectors in England and its wider economic benefits mean that it is a key part of society, which results in huge benefits to individuals and communities. Sport England would therefore request that the value of sport to the economy is reflected within the Local Plan.

Change To Plan:

Full Reference: C - 6211 - 8431 - Prosperity - None

6216 Comment **Respondent: The Roydon Society (Miss Nicola Wilkinson) [27]****Agent: N/A**

Summary: Starter units for small business must be included and encouraged.

Job opportunities must be encouraged and a wide range of opportunities not just jobs for retail, cleaning and low skilled posts.

Change To Plan:

Full Reference: C - 6216 - 27 - Prosperity - None

6371 Comment **Respondent: Essex County Council (Mr Rich Cooke) [8452]****Agent: N/A**

Summary: From a Public Health and other perspectives, ECC would encourage Harlow, due to the current local Health profile in relation to obesity in both adults and children, to consider how best to plan to support reducing the obesogenic environment. This could be through design or policy implementation i.e. via an A5 uses restriction policy (or incorporation of such restrictions within the appropriate shop units regulation policies

Change To Plan:

Full Reference: C - 6371 - 8452 - Prosperity - None

6287 Comment**Respondent: Historic England (Ms Katie Parsons) [8441]****Agent: N/A**

Summary: Policy PR1: Development within Employment Areas
This policy is based on Sir Fredrick Gibberd's design for Harlow Town which separated land uses. Consideration of the designed town and its distinct plan should help preserve its historic interest.

Change To Plan:

Full Reference: C - 6287 - 8441 - PR1 Development within Employment Areas - None

6366 Comment**Respondent: Essex County Council (Mr Rich Cooke) [8452]****Agent: N/A**

Summary: Appropriate 'sui generis' uses which share characteristics of light or general industrial development including the use of warehousing should be included in the list of appropriate use classes contained within clause a) of this policy (B1, B2, B8). It is not considered appropriate to include 'sui generis' uses within clause b) which would be the outcome of omitting them from clause a).

ECC is broadly supportive (from an Economic Growth and Regeneration perspective) of the PR1 policy to protect development within designated employment areas and supportive of the variety of information that would be required to support the development of non-B-Class uses. However we believe, in conjunction with colleagues from INVEST Essex, that the requirement to market the site for a minimum of 1 year is not enough to demonstrate that site has been marketed sufficiently for B-Class use as this does not account for variances in market performance and during potential downturns in the market it may take more than 1 year to adequately market the property. In addition we have noted that Local Authorities such as Basildon Borough Council have stipulated a minimum requirement for marketing vacant B-Class premises for a minimum period of 2 years. We therefore believe that Harlow's policy could be increased to require a minimum period of marketing a vacant B-Class property for a period of no less than 2 years.

ECC has developed robust evidence around the need for 'Grow On Employment space'. Neither of these policies (or others) refer to this requirement, which is identified in the interests of sustaining and growing the economy. ECC can provide standard text for this section, which has been adopted by other Essex authorities.

Change To Plan:

Full Reference: C - 6366 - 8452 - PR1 Development within Employment Areas - None

6381 Comment **Respondent: Lichfields (Mr Harry Bennett) [8454]** **Agent: N/A**

Summary: We are generally supportive of this draft policy but have a number of concerns as outlined below.
Policy PR1 states that development in employment areas for uses other than B1, B2 and B8 will be supported if it meets a number of criteria, including B(ii). This states that:
"The development will increase the number of jobs for local residents" (Our emphasis)
We are concerned with B(ii) as drafted as there is not clear what is meant by 'local residents'. Does this mean that only jobs created for the residents of Harlow District will be relevant?
The reality is that Harlow sits within a wider labour catchment area and attracts employees from within this area which will extend beyond the district boundary. Does this mean that any jobs filled by staff not resident in the District will not be taken into account? How will this be assessed? How will an employer know at the outset where his staff will live? Our client's site sits adjacent to the boundary with East Herts DC- some employees might be expected to travel from this District into Harlow to our client's proposed development. Should these jobs be ignored when assessing this policy?
We would suggest that this criteria be reworded to read
"The development will increase the number of jobs"
In addition, the adopted Harlow Design Guide SPD (Oct, 2011) states at paragraph 4.6.2 the following:
"The Local Plan also encourages the regeneration, modernisation and intensification of existing employment sites ... "
This support for the intensification of existing employment sites should be reiterated in Policy PR1 for the avoidance of doubt.
We suggest that an additional criteria (c) be added as follows:
"where it involves the regeneration, modernisation and intensification of existing employment sites subject to a consideration of other policies in the Local Plan"

Change To Plan:

Full Reference: C - 6381 - 8454 - PR1 Development within Employment Areas - None

CHAPTER: PROSPERITY PR2 Development within Neighbourhood Service Areas

6368 Comment **Respondent: Essex County Council (Mr Rich Cooke) [8452]** **Agent: N/A**

Summary: In line with the comments with regard to policy PR1, we suggest that the minimum period for marketing of vacant units could be increased to 2 years.

Change To Plan:

Full Reference: C - 6368 - 8452 - PR2 Development within Neighbourhood Service Areas - None

6367 Comment**Respondent: Essex County Council (Mr Rich Cooke) [8452]****Agent: N/A**

Summary: ECC has developed robust evidence around the need for 'Grow On Employment space'. Neither of these policies (or others) refer to this requirement, which is identified in the interests of sustaining and growing the economy. ECC can provide standard text for this section, which has been adopted by other Essex authorities.

ECC supports this policy.

Policy PR3 sets out a range of criteria to prevent the loss of waste uses (amongst others) outside of employment areas. Waste uses are safeguarded through Policy 2 of the adopted Essex and Southend-on-Sea Waste Local Plan 2017, which forms part of the Development Plan of Harlow. Policy 2 of the Waste Local Plan sets out different criteria to those in Policy PR3 and therefore references to waste uses within Policy PR3 must be removed. It would be helpful to amend the supporting text to this policy to clarify that redevelopment proposals that would result in the loss of waste uses or infrastructure would be covered by Policy 2 of the Essex and Southend-on-Sea Waste Local Plan 2017.

In line with comments in relation to PR1 and PR2 above, we suggest that the minimum period for marketing of vacant units could be increased to 2 years to ensure units have been adequately marketed.

Change To Plan:

Full Reference: C - 6367 - 8452 - PR3 Employment Development outside Employment Areas and Neighbourhood Service Areas - None

6314 Comment**Respondent: Miller Homes [8449]****Agent: Andrew Martin - Planning (Mr Olivier Spencer) [8448]**

Summary: Although our client supports the principle behind this policy, i.e. to get local residents back into work and to improve their skills level, additional information is required to explain how these obligations could work in reality and the level of obligation likely to be sought. Furthermore, while our client is keen to encourage the "employment of local people", it is debatable whether they (or their contractors or subcontractors) could solely select employees from a particular geographical area, without being deemed to discriminate unlawfully against those living further afield.

Change To Plan:

Full Reference: C - 6314 - 8449 - PR4 Improving Job Access and Training - None

6369 Comment**Respondent: Essex County Council (Mr Rich Cooke) [8452]****Agent: N/A**

Summary: ECC supports this policy and the approach set out in the supporting text. This applies particularly for the construction sector, given its importance and for effective growth delivery. There will be a need to develop and improve both capacity and skills in this sector. Accordingly, ECC would support reference to the use of the authority placing enforceable developer responsibilities on Skills in the construction sector.

Change To Plan:

Full Reference: C - 6369 - 8452 - PR4 Improving Job Access and Training - None

6382 Comment**Respondent: Lichfields (Mr Harry Bennett) [8454]****Agent: N/A**

Summary: Paragraph 4.23 relating to the implementation of Policy PR4 states that:
 "The policy will be applied to major development and secured through a planning obligation, tailored to individual schemes. Applicants should prepare an action plan setting out a schedule of new job opportunities to be created through the proposed development..." (Our emphasis)
 We submit that the wording be changed as follows:
 "The policy will be applied to major development and secured through a planning obligation, tailored to individual schemes. Where possible, applicants should prepare an action plan setting out a schedule of new job opportunities to be created through the proposed development..." (addition in bold)
 Our concern is that particularly in relation to outline applications the applicant will not know what the exact job opportunities will be as this will be subject to the occupier.

Change To Plan:

Full Reference: C - 6382 - 8454 - PR4 Improving Job Access and Training - None

6292 Comment**Respondent: Anglican Deanery of Harlow (Revd Martin Harris) [8345]****Agent: N/A**

Summary: I would especially like to commend the following paragraph:

"The vitality and viability of the Town Centre is important to the local economy and to ensure it is an attractive place for residents, employees and visitors. This is particularly pertinent as the services and facilities available also serve a catchment area that extends beyond the district boundary. The Town Centre is a sustainable transport hub, well-served by public transport, which has good connectivity with key locations along the London Stansted Cambridge corridor. This policy directs Main Town Centre Uses towards the Town Centre in order to preserve and/or enhance its position."

Indeed, I affirm the policy of where possible directing business etc towards the town centre rather than out of town. This is important for

- developing community
- encouraging healthy life style (easier to walk)
- a greener economy - less driving required

I appreciate that it is not always possible to achieve these aims alongside the need to attract business. However, positive incentives / disincentives in this direction are ways to help this take place.

If possible, more 'joined up thinking' for town centre parking and business would be helpful. Eg Harvey Centre parking with discounts for shoppers. I believe this exists in measure but it is not well advertised eg for cinema goers

Thank you for your consideration

Change To Plan:

Full Reference: C - 6292 - 8345 - PR5 The Sequential Test and Principles for Main Town Centre Uses - None

6302 Comment

Respondent: Ms Sue McDonald [8446]

Agent: N/A

Summary: MY comments on this consultation Document focus on Harlow's Town Centre because the English Heritage and CABE Urban Panel's report following their 2006 visit strongly emphasised that "the defects in the town centre must be corrected first before development outside it is encouraged".

Nevertheless the Council this March agreed a massive increase in population in and around Harlow without any proposals for a strategy to improve the town centre which has continued to decline since the Urban Panel's visit eleven years ago.

After the Government stopped further development by the HDC in 1980, dissolved the Corporation, sold off the land, stripped the town of its lucrative assets, leaving the Council with the housing and pavements, the Council's spending has been kept to a minimum.

In its present condition there is plentiful evidence in the Press and Social Media that many citizens of Harlow regard their town centre as without attraction and it is not likely to attract a new population around who will simply use the new infrastructure to drive elsewhere with no benefit to Harlow.

Recent developments have shown that Harlow is at present unable to attract high class retail units and the retail marketing world is changing. Consumers are increasingly looking to spend their money on experiences rather than things. A radically different solution is needed to give Harlow Town Centre the attraction it needs.

The Council does own the last significant public space since the Civic Square disappeared - the Market Square and adjoining paved areas. Over these a Crystal Palace / Winter Garden pavilion could arise containing, for example, quality restaurants, art and handicraft shops, designer clothes boutiques (a specialist market providing a quality shopping experience) exhibition space for Enterprise Zone products or activities, space for musical events, together with exotic planting areas. Such an ever changing, transparent, sparkling yet protected environment at all times of the year would have special attraction.

The last scheme designed by Sir Frederick Gibberd in 1978/9 was a glass-walled Winter Garden in West Square to which the Council "made no objection but decided not to support it financially" (see page 147 of A Civic History of Harlow Council by Ron Bill). Naturally without financial support it came to nothing.

The type of Pavilion I have described could be quickly constructed and relatively light but the cost of commissioning the design and constructing such a building, which needs to be of the highest quality, would be considerable. If, the Government really regards Harlow as acting as the centre of the expansion it now requires, having recently designated it a "Garden Town" and referred to its "new elevated position", if these are not merely words, should it not be prepared to help Harlow meet this challenge of making the Town Centre attractive by providing the financial means?

No developer will do this; the initiative needs to come from the Council under its new executive. Many in the town are already longing for the Council to embrace a new vision and will work with them to achieve it.

"The unique artistic inheritance which Harlow has should not be underplayed". This final quote from the Urban Panels report is relevant because this aspect of Harlow's life has continued to flourish throughout its seventy years. Since the Development Corporation's work was stopped the Arts Trust has continued to place sculpture throughout the town; I took over the lease of the Gibberd Office and ran it as a town centre gallery for three years; the Playhouse had exhibitions; the Gibberd Gallery opened in 2004 and the art community at Parndon Mill has thrived, as have the Gibberd Garden and the ARC in Old Harlow. Clearly there is abundant creative talent in the town to underpin such development as I have described.

Harlow needs a rebirth if it is not to become a dormitory town. I hope the Council will rise to the challenge.

Change To Plan:

Full Reference: C - 6302 - 8446 - PR5 The Sequential Test and Principles for Main Town Centre Uses - None

6370 Comment

Respondent: Essex County Council (Mr Rich Cooke) [8452]

Agent: N/A

Summary: ECC supports this policy.

Change To Plan:

Full Reference: C - 6370 - 8452 - PR5 The Sequential Test and Principles for Main Town Centre Uses - None

6197 Comment**Respondent: Miss Sally SallyAnn Simpson [8418]****Agent: N/A**

Summary: This is a self-justification based on the balls-up of the loss of the M&S store & subsequently also applies to Monsoon & lack of any other slightly more upmarket shops. Turning these large store spaces into smaller units is a piece-meal approach. What is needed is to attract larger shopping "outlets" into the town centre; with current growth in population in the area, the argument to would-be retailers is already extant; many people come from Hertford & Sawbridgeworth etc to shop in Harlow rather than go to over-crowded Brookfield in Cheshunt & this shopping footfall is lost in Harlow at present.

Change To Plan:

Full Reference: C - 6197 - 8418 - PR7 Justification - None

6343 Comment**Respondent: Home Group (Jessica Watts) [8445]****Agent: N/A**

Summary: Home Group are in support of the Council's drive to keep street frontage in town centres to primarily A1 uses. However it is encouraging to see that a pragmatic approach is being taken to the inclusion of other use classes, including C3, on upper floors in these areas as we believe it there is potential to create vibrant and active neighbourhoods by cleverly combining uses in this way.

Change To Plan:

Full Reference: C - 6343 - 8445 - PR8 Primary and Secondary Frontages in Neighbourhood Centres - None

6256 Comment**Respondent: Mrs Giulia Festa-Burton [8436]****Agent: N/A**

Summary: All hatches, bar Clifton Hatch which has recently been regenerated, need remodernising and attract viable and needed business. The current state of disrepair of certain hatches, like Slacksbury Hatch, only attracts anti social behaviour through the state of abandonment of some units and through the use of other units for businesses not needed, at the detriment of other retail or business projects that may be more justified in respect of the needs of the local community to the actual individual hatch.

Change To Plan:

Full Reference: C - 6256 - 8436 - PR9 Development in Hatches - None

6372 Comment**Respondent: Essex County Council (Mr Rich Cooke) [8452]****Agent: N/A**

Summary: ECC supports in general terms the intentions of this policy. However, ECC would also raise an issue for 'Hatches' in terms of A5 uses (takeaway food) being within close proximity (400m) of schools. This conflicts with ECC Public Health current advice and that of some Public Health national policies.

Change To Plan:

Full Reference: C - 6372 - 8452 - PR9 Development in Hatches - None

6199 Comment**Respondent: Miss Sally SallyAnn Simpson [8418]****Agent: N/A**

Summary: Thinking "outside the box" might be appropriate here-by asking retailers in the Retail Parks to also have a small store in the Town Centre, eg Argos already has a small outlet in the Harvey Centre & well as being in one of the retail parks. This would re-focus shoppers & those unable to get to retail parks without cars & there are certainly no busses! This would help everybody, retailers picking up footfall in the shopping centre & pedestrian shoppers being able to access these retailers, also alleviating parking & traffic problems at retail parks.

Change To Plan:

Full Reference: C - 6199 - 8418 - PR10 Implementation - None

6198 Comment**Respondent: Miss Sally SallyAnn Simpson [8418]****Agent: N/A**

Summary: The Council over-stepped its mark on helping young people at present with the obvious disappearance of "The Square" & no replacement viable or permanent musical facility/ies provided. Harlow used to be known as a music centre in the 1970s, people would come on coaches to attend concerts & musical events. Music clubs & venues are a viable evening activity for young & old alike & should be seen as a significant cultural contribution to the town's image, this has been destroyed by present 'implementation'. The Town Centre is NOT RESIDENTIAL so any noise from musical establishments is not a significant concern.

Change To Plan:

Full Reference: C - 6198 - 8418 - PR11 Implementation - None

6217 Comment**Respondent: The Roydon Society (Miss Nicola Wilkinson) [27]****Agent: N/A**

Summary: Encouragement of differing lifestyles must be enhanced as the town develops. Seeing recreation land listed within the Local Plan details is seriously concerning that, like the rugby club, land is proposed for development.

Change To Plan:

Full Reference: C - 6217 - 27 - Lifestyles - None

6373 Comment**Respondent: Essex County Council (Mr Rich Cooke) [8452]****Agent: N/A**

Summary: Section 5 for lifestyles makes very little reference to health with the exception being related to green space access. Healthy environments go very much beyond this scope and in its current form, ECC Public Health would not support this plan.

Change To Plan:

Full Reference: C - 6373 - 8452 - Lifestyles - None

6336 Comment**Respondent: Countryside Properties Plc [70]****Agent: Barker Parry Town Planning Ltd. (Ms Elizabeth Fitzgerald) [8451]**

Summary: Policy L1 is supported by the Harlow Design Guide, which assists in layout and design of facilities to be provided, alongside the Open Space, Sport and Recreation SPD 2007 and the Playing Pitch Strategy 2009, the latter of which forms part of the Local Plan evidence base.

Both the SPD and Playing Pitch Strategy are significantly out of date, they pre-date the NPPF and do not reflect recent developments within the District including, new sports pitches, the re-location of Harlow Rugby Club, planning approvals for new pitches and associated pavilions/changing facilities, or potentially a shift in the sports clubs currently operating.

Without an up to date evidence base supporting this proposed policy, there is little scope for ensuring that appropriate or adequate provision can be made, or more importantly if there is a demonstrable need for further provision. For example, it is understood that there is current vacancies within the allotments within Harlow, should additional provision be made, if there is a lack of need within the District generally.

Similarly, given the need to upgrade existing provision within the District, would it be more preferable for contributions to be made to allow for these facilities to be upgraded and therefore of greater benefit to the wider community, than providing additional facilities that may not be required.

It is considered that this policy is premature and lacks a robust evidence base to ensure developments deliver facilities that meet a demonstrable need. The content of the policy should be revisited to enable a more appropriate and flexible approach to be taken to provision of open space and sports facilities etc, to enable improved facilities to be provided, as well as meeting a demonstrable need.

Taking such an approach could maximise the amount of development that could be accommodated on any one site, where off site contributions are considered more preferable, over on site provision.

Change To Plan:

Full Reference: C - 6336 - 70 - L1 Open Spaces, Play Areas and Sporting Provision and Facilities in Major Development - None

6210 Comment**Respondent: Sport England (. Laura Hutson) [8431]****Agent: N/A**

Summary: L2 The Provision and Loss of Recreational, Sporting, Cultural and Community Facilities

Sport England welcomes the general aim of this policy, however would suggest some changes are made to the wording of this policy in order to ensure full compliance with the NPPF

In terms of the first part of the policy, 'evidence of a demonstrable need' must refer to the new Playing Pitch Strategy (PPS) and Built Facilities Strategy (BFS), in order to avoid less robust and up to date evidence being provided.

In terms of the second part of the policy, the PPS and BFS should once again be referred to as suitable evidence that the use and/or facility is surplus to requirements and an alternative replacement is not required, in order to avoid other less robust forms of evidence being put forward.

The NPPF (para 74) is clear on the need for such an assessment.

Point 2c should also read 'such a development is ancillary AND will support and enhance the existing use and/or facility'.

The final point (2d) should be reworded in order to clarify that the development is for alternative sports provision where the loss of a sporting facility is proposed, the needs for which clearly outweigh the loss, as per NPPF paragraph 74.

Sport England therefore objects to the Local Plan with its current wording as it considers it to be unsound due to the fact that currently it does not fully comply with the NPPF.

Change To Plan:

Full Reference: C - 6210 - 8431 - L2 The Provision and Loss of Recreational, Sporting, Cultural and Community Facilities - None

6223 Comment**Respondent: The Theatres Trust (Tom Clarke) [216]****Agent: N/A**

Summary: The Theatres Trust supports proposed Policy L2. It reflects clear guidance in para. 70 of the NPPF regarding the promotion and protection of community and cultural facilities.

Change To Plan:

Full Reference: C - 6223 - 216 - L2 The Provision and Loss of Recreational, Sporting, Cultural and Community Facilities - None

6228 Comment**Respondent: Essex Bridleways Association (Mrs Sue Dobson) [7887]****Agent: N/A**

Summary: Policy L2: Public Rights of Way and other green infrastructure should also be considered within this policy, together with an aspiration to enhance and increase the existing provision where possible.

Change To Plan:

Full Reference: C - 6228 - 7887 - L2 The Provision and Loss of Recreational, Sporting, Cultural and Community Facilities - None

6257 Comment**Respondent: Mrs Giulia Festa-Burton [8436]****Agent: N/A**

Summary: There are a lot of open spaces and fields interposed in between groups of properties or buildings, which help retain the open space character as per original plans by Sir Gibberd. However at the same time there are not provisions in place to protect these individual areas and fields from future further housing development.

Change To Plan:

Full Reference: C - 6257 - 8436 - L2 The Provision and Loss of Recreational, Sporting, Cultural and Community Facilities - None

6258 Comment**Respondent: Mrs Giulia Festa-Burton [8436]****Agent: N/A**

Summary: More bus routes, more frequent runs and higher number of buses for each route are needed in this town to reduce a progressive increase in number of cars clogging our roads. But at the same time, bus fares need to be reduced, as at current levels they are unaffordable and unjustified.

Change To Plan:

Full Reference: C - 6258 - 8436 - L2 Justification - None

6237 Comment**Respondent: Persimmon Homes (Mr David Moseley) [8437]****Agent: N/A**

Summary: L3 Development Involving the Provision or Relocation or Loss of Public Art
The viability of this Policy will need to be assessed alongside the other policy requirements of the local plan to ensure development viability is not threatened.

Change To Plan:

Full Reference: C - 6237 - 8437 - L3 Development Involving the Provision or Relocation or Loss of Public Art - None

6315 Comment**Respondent: Miller Homes [8449]****Agent: Andrew Martin - Planning (Mr Olivier Spencer) [8448]**

Summary: f HDC is minded to retain Policy L3 in its emerging Local Plan, it should prepare and present evidence to demonstrate where there are public art deficiencies in the Town, how those deficiencies should be addressed and the level of contribution / obligation likely to be necessary to do so. This will ensure that Policy L3 complies with the tests of soundness at paragraph 182 of the NPPF and will help inform HDC's forthcoming Delivery Study in respect of viability.

Change To Plan:

Full Reference: C - 6315 - 8449 - L3 Development Involving the Provision or Relocation or Loss of Public Art - None

6341 Comment**Respondent: Home Group (Jessica Watts) [8445]****Agent: N/A**

Summary: Home Group are in support of this policy, which sets Harlow apart as a cultural centre, supports the creative arts and gives added value to developments.

Change To Plan:

Full Reference: C - 6341 - 8445 - L3 Development Involving the Provision or Relocation or Loss of Public Art - None

6218 Comment **Respondent: The Roydon Society (Miss Nicola Wilkinson) [27]****Agent: N/A**

Summary: Additional traffic is a major concern for Roydon with those working in Harlow from the adjacent authority using the B181 as a rat run causing major congestion and pollution in the main village.

Change To Plan:

Full Reference: C - 6218 - 27 - Infrastructure - None

6229 Comment **Respondent: Essex Bridleways Association (Mrs Sue Dobson) [7887]****Agent: N/A**

Summary: Paragraph 6.1 refers to vehicle, pedestrian and cycle access, however all non-motorised users should be included within Harlow's policies. Whilst paragraph 6.3 refers to the maintenance and repair of public rights of way as a responsibility of the Local Highway Authority, this document omits any aim or aspiration to improve the rights of way network within Harlow and this should be amended. Harlow is poorly-served with bridleway access and the Plan should ensure that every opportunity is taken to improve the network and ensure that as much as possible is accessible to as many users as practicable.

Change To Plan:

Full Reference: C - 6229 - 7887 - Infrastructure - None

6240 Comment **Respondent: Highways England (Mr Mark Norman) [7939]****Agent: N/A**

Summary: We have been talking to the District for a long time about aspirations for growth, it is recognised that large parts of the district are not served well by public transport. Parts of the strategic road network (SRN) running through the districts are already close to capacity and cannot reasonably cope with large amounts of additional development without significant improvement and it recognised that Essex CC have proposals for a new junction on the M11 and this will provide some relief to both junctions 7 and 8. Until housing and employment is committed, schemes can really only deal with existing challenges allowing for a limited amount of growth as the designs are based on previously envisaged growth rates rather the much more ambitious level proposed in the fourth coming local plan. This means the need for careful planning to ensure proposed development is in the most appropriate place with the necessary facilities and infrastructure available at the right time and a steep change both in the provision and take up of public transport, if this level of development is to be sustainable. We support the policies in the document aimed at reducing the need to travel by private car, such as improved walking, cycling and public transport infrastructure, and the provision of high speed broadband allowing people to more easily communicate and work remotely reducing the demand for travel.

Change To Plan:

Full Reference: C - 6240 - 7939 - Infrastructure - None

6263 Comment **Respondent: Elaine Allen [6031]** **Agent: N/A**

Summary: (Note: This is a transcript of a scanned letter. See attachment for original letter.)

I have made several visits to the Old Harlow Library to read the above book. I found it a very bland book and difficult to relate all it said to our local area. I would like to point out some of the problems it failed to take into account.

I live in Churchgate Street and am very aware that we will be cut off from Old Harlow and the rest of the town. We are an older population than the rest of Harlow, a number of the people living there are widowed and living on their own, mostly women, many of them unable to drive often due to poor health. They/we will be cut off from the Old town's Doctors, the Library, and also the (food) shops.

The local bus only runs hourly if you are lucky, I have on several occasions picked up a friend who has been waiting for a bus home for over an hour (she is nearly 90) and now house bound. She is not an isolated case.

I have friends in Old Road, and Little Hailing bury plus several other local areas. To reach them I would have to travel to Mark Hall and return almost to where I had started. An absolute waste of fuel, time and unnecessary pollution to visit them as you are intending stopping us using our present routes.

In the morning rush hour there is gross queuing the get into Harlow from Heriford on the A414 and also on the A1184 from Bishop Stortford, north of Sawbridgeworth into Harlow. This is not a very attractive situation for the people you are hoping to recruit into the new research centres you are building/planning. Surely it would, long term, be more economic/sensible to build a road from the Highwyh round-a-bout now rather than a second road to the motorway in 2030ish. Are you going the dual Fifth Avenue over the marsh/and, River Stort and railway to alleviate the current traffic problems that exist there? A very expensive solution which would not be needed if the northerly route where built.

Change To Plan:

Full Reference: C - 6263 - 6031 - Infrastructure - None

6288 Comment **Respondent: Historic England (Ms Katie Parsons) [8441]** **Agent: N/A**

Summary: All proposed infrastructure schemes should take into consideration their impacts on heritage assets and their setting alongside archaeological potential.

Change To Plan:

Full Reference: C - 6288 - 8441 - Infrastructure - None

6301 Comment **Respondent: Environment Agency (Miss Lisa Mills) [8443]** **Agent: N/A**

Summary: There is currently no policy focused on ensuring necessary sewage capacity is in place to support proposed developments. This is crucial in order for the impact of proposals on the waste water network to be appropriately considered, and in order to prevent development being approved which is then found to be unviable for this reason. It must also be stated that all new development should be connected to mains, unless this is proven unfeasible. Confirmation from the relevant water utility company should be required before granting permission to planning applications in order to ensure that there will be no detrimental impact as a result.

Change To Plan:

Full Reference: C - 6301 - 8443 - Infrastructure - None

6304 Comment

Respondent: EFA (Dr Douglas McNab) [8404]

Agent: N/A

Summary: General Comments on the Local Plan Approach to New Schools

4. The draft Development Management Policies includes limited content relating to the provision of schools. However, this is to be expected as this issue is generally addressed in strategic policies and site allocations, which the ESFA understands will be included in the next round of Local Plan consultation early in 2018.

5. Essex County Council's recently published 10 year plan for meeting the demand for school places indicates that, based on existing plans for growth, there will be a need for 1078 additional primary school places and 1635 secondary school places over the next ten years. However, there are already plans in place to help to address this need, including a new 8FE secondary free school (Sir Frederick Gibberd College, Burnt Mill Academy Trust) and a new 2FE primary school (Essex Newhall school, Reach2 Academy Trust). The requirement for school places may increase once the latest housing target for Harlow is confirmed. The Local Plan will need to be 'positively prepared' to meet the objectively assessed development needs and infrastructure requirements.

6. In light of the above and the Duty to Cooperate on strategic priorities such as community infrastructure (NPPF para 156) , the ESFA encourages close working with local authorities during all stages of planning policy development to help guide the development of new school infrastructure and to meet the predicted demand for primary and secondary school places. Please add the ESFA to your list of relevant organisations with which you engage in preparation of the plan.

7. With regard to planning positively for new schools, the ESFA commends, for example, the approach taken by the London Borough of Ealing in producing a Planning for Schools Development Plan Document (DPD) . The DPD provides policy direction and establishes the Council's approach to providing primary and secondary school places and helps to identify sites which may be suitable for providing them (including, where necessary and justified, on Green Belt/MOL), whether by extension to existing schools or on new sites. The DPD includes site allocations as well as policies to safeguard the sites and assist implementation and was adopted in May 2016 as part of the Local Plan. The DPD may provide useful guidance with respect to an evidence based approach to planning for new schools in the emerging Harlow Local Plan, securing site allocations for schools as well as providing example policies to aid delivery through Development Management policies.

8. A strategic infrastructure policy within the Local Plan could usefully highlight some wider infrastructure planning principles, including:

- A commitment to work with infrastructure providers to ensure the necessary infrastructure is provided to support development and meet need;
- The need to coordinate development and infrastructure provision to ensure development is supported by the timely provision of adequate infrastructure;
- A requirement for all development to safeguard the requirements of infrastructure providers, including education facilities.

9. Ensuring there is an adequate supply of sites for schools is essential and will ensure that Harlow can swiftly and flexibly respond to the existing and future need for school places to meet the needs of the district over the plan period.

Change To Plan:

Full Reference: C - 6304 - 8404 - Infrastructure - None

6306 Comment

Respondent: EFA (Dr Douglas McNab) [8404]

Agent: N/A

Summary: Evidence Base

17. An up to date Infrastructure Delivery Plan that draws on the Harlow Infrastructure Study (2010) and provides clarity about what infrastructure will be required when and how it will be funded will clearly be an important evidence base document for the Local Plan. As part of the development of a complete draft of the Local Plan it would be useful if a background/topic paper could also be developed setting out clearly how the forecast housing growth at allocated sites has been translated (via an evidence based pupil yield calculation) into an identified need for specific numbers of school places and new schools at different times, expanding on the information in an Infrastructure Delivery Plan and site specific policies. This could also reference Essex County Council's recently published 10 year plan for meeting the demand for school places. This would help to demonstrate clearly that the approach to the planning and delivery of education infrastructure is justified based on proportionate evidence. If required, the ESFA can assist in providing good practice examples of background documents relevant to this stage of your emerging Plan.

Conclusion

18. Finally, I hope the above comments are helpful in shaping Harlow's Local Plan, with specific regard to the provision of land for new schools. Please advise the ESFA of any proposed changes to the emerging Local Plan policies, supporting text and/or evidence base arising from these comments.

19. Please do not hesitate to contact me if you have any queries regarding this response. The ESFA looks forward to continuing to work with Harlow Council to aid in the preparation of the Local Plan.

Change To Plan:

Full Reference: C - 6306 - 8404 - Infrastructure - None

6328 Comment**Respondent: Quod Planning (Mr Philip Murphy) [7958]****Agent: N/A**

Summary: Places for People will be sponsoring the applications for the Central and Eastern Crossings, and will if necessary be providing the forward funding to ensure their delivery. However, the Crossings are required to meet existing demand and to accommodate the planned growth of Harlow and the wider area. The Infrastructure Chapter should include a policy that makes it clear that development that benefits from the Crossings and other strategic infrastructure should make appropriate contributions either by way of planning obligations or Community Infrastructure Levy payments.

Change To Plan:

Full Reference: C - 6328 - 7958 - Infrastructure - None

6330 Comment**Respondent: Quod Planning (Mr Philip Murphy) [7958]****Agent: N/A**

Summary: Para 6.1 - This should refer to "local transport infrastructure" rather than highway infrastructure;
* Para 6.3 - Consultation with Highways England should only take place where the proposals affect a Highways England road;
* Objective 13 - We suggest this is re-worded as follows: "Reduce the need to travel, in particular by single occupancy vehicles, by ensuring new development is located where it is, or can be, well served by sustainable modes of transport";
* Objective 14 - We suggest the insertion of the words "where necessary" after "Improve transport links";

Change To Plan:

Full Reference: C - 6330 - 7958 - Infrastructure - None

6374 Comment**Respondent: Essex County Council (Mr Rich Cooke) [8452]****Agent: N/A**

Summary: Consider removing the word 'walkways' and adding footways and referring to the public rights of way network including footpaths, bridleways and byways.

Change To Plan:

Full Reference: C - 6374 - 8452 - Infrastructure - None

6230 Comment **Respondent: Essex Bridleways Association (Mrs Sue Dobson) [7887]** **Agent: N/A**

Summary: This Policy omits any reference to other users within any new developments, stating that consideration will be given to only pedestrians and cyclists. This Policy should be amended to ensure that multi-user routes are created, accessible to all non-motorised road users. As the Policy stands it is discriminatory against a significant user group and this should be rectified. It is interesting to note that in another Local Plan in Essex which had little mention of equestrian access, at the public inquiry, the Inspector specifically requested the Plan was changed to incorporate equestrian access within it.

Change To Plan:

Full Reference: C - 6230 - 7887 - IN1 Development and Sustainable Modes of Travel - None

6238 Comment **Respondent: Persimmon Homes (Mr David Moseley) [8437]** **Agent: N/A**

Summary: IN1 Development and Sustainable Modes of Travel
Policy IN1 requires charging points for vehicles and infrastructure for the future operation and maintenance of the facility.
In considering development plan policies, Para 173 of the NPPF stresses the importance of ensuring viability, including having regard to the costs of any requirements likely to be applied to development. According to the Energy Savings Trust the typical cost for a home charge point and installation is approximately £1,400. It is unclear whether such an assessment has been undertaken in relation to the proposed policy and its impact upon development viability.
Notwithstanding the above, the NPPF contains a clear requirement that such facilities should only be required 'where practical'. It is considered that the practicality of delivery should be a factor when it comes to incorporating charging plug-in. For instance, it may not be practical to make provision where parking is provided off-plot (such as in a parking court or within a communal area).
It is also considered that the policy should consider the practicality of delivery. There are a range of different technologies for charging. It would be more practicable if the requirement related to on-plot parking adjacent to the property it serves.
Furthermore, that the requirement relates to the ability to make a connection (i.e. the development delivers a suitably sited separate electrical spur) which would allow for a charging unit for an electric vehicle to be installed by the householder (should they choose to do so).

Change To Plan:

Full Reference: C - 6238 - 8437 - IN1 Development and Sustainable Modes of Travel - None

6296 Comment **Respondent: Dr Roger Bamford [8442]** **Agent: N/A**

Summary: Fingers crossed Harlow, unlike other councils, will accept the need for future road improvements and accept that not everyone will be able or willing to travel by bicycle or public transport (unless there are major improvements to these more sustainable methods!).

Change To Plan:

Full Reference: C - 6296 - 8442 - IN1 Development and Sustainable Modes of Travel - None

6331 Comment

Respondent: Quod Planning (Mr Philip Murphy) [7958]

Agent: N/A

Summary: * Policy IN1 - We suggest that "where appropriate" should be inserted at the beginning of clause (a). We suggest that clause 2 is amended to include the option of passive provision as well as active provision. In addition, the text following the policy (e.g. 6.10) refers to sustainable modes i.e. bus and rail but the policy wording only refers to walking and cycling. Therefore, the policy wording should be expanded to include these other modes;
* Para 6.13 - As noted above, the aim is to reduce single occupancy car journeys since car sharing can, in the right circumstances, be beneficial and sustainable. The reference to car sharing should apply to all forms of development, not just residential;

Change To Plan:

Full Reference: C - 6331 - 7958 - IN1 Development and Sustainable Modes of Travel - None

6375 Comment

Respondent: Essex County Council (Mr Rich Cooke) [8452]

Agent: N/A

Summary: There are no references within the DM document to the Harlow and Gilston Garden Town, nor any of its key elements, i.e. the sustainable travel corridors connecting the strategic sites
a. Consider adding 'footways' so it reads footways/cycleways, footpaths can remain but generally is used in the context 'public' footpath, i.e. a public right of way.
b. Consider adding 'footways' so it reads footways/cycleways and changing 'footpaths' to public rights of way serving the development.
c. Consider adding 'footway' so it reads footway/cycleway and public rights of way network.

Generally there is no reference here to public transport/buses and it is considered essential that there should be. It should include references to the following:

* Residential development being well located within 400m of a bus stop

* New development providing new bus stop infrastructure or upgrading existing infrastructure to include, signage, shelters, timetables or real time passenger information

* New development to provide new/enhanced bus services.

Policy IN1 refers to modal hierarchy as set out in the Strategic Policies although these are not yet available to review. There is no reference to public transport (rail or bus) in the policy (although it is mentioned in the supporting text). This policy and the accompanying text does not appear to give sufficient weight to the need to deliver a step-change in travel behaviour in the district (and beyond). Greater emphasis could be given to Travel Plans in this document, and their long term role in monitoring and delivering modal switch. For example, Travel Plan co-ordination across smaller sites and/or Travel Plan Co-ordinators, and their requirement for the larger strategic sites are worth considering. Use of planning obligations to employ a Travel Plan co-ordinator is suggested, particularly for the larger sites, but may be appropriate for a wider Harlow and Gilston Garden Town Travel Plan Co-ordinator to deliver the wider area initiatives which could include smaller sites/existing development
This policy / group of Development Management policies could include reference to the need to support the Harlow and Gilston Garden Town and any of its future initiatives which would actively encourage sustainable travel/reduce the need to travel, and any associated infrastructure

Change To Plan:

Full Reference: C - 6375 - 8452 - IN1 Development and Sustainable Modes of Travel - None

CHAPTER: INFRASTRUCTURE

IN1 Implementation

6376 Comment

Respondent: Essex County Council (Mr Rich Cooke) [8452]

Agent: N/A

Summary: Consider including reference to the Essex Rights of Way Improvement Plan and Essex Development and Public Rights of Way advice note.

There is mention in 6.14 that employment developments should 'investigate' the potential for shuttle buses. There is also mention of a potential need for Transport Assessments or Transport Statements to be prepared. Neither of these explicitly state that developers will be expected to provide suitable levels of bus service, where these do not already exist. A good example is the planned future increase of healthcare jobs to the (broadly) Pinnacles area - these collective organisations could end up with shifts starting and finishing at all times throughout the day, making it a 24/7 operation - 'shuttle buses' would not be sufficient to cater for this need.

Change To Plan:

Full Reference: C - 6376 - 8452 - IN1 Implementation - None

- 6231 Comment** **Respondent:** Essex Bridleways Association (Mrs Sue Dobson) [7887] **Agent:** N/A
- Summary: Policy IN2: Point (b) again only caters for pedestrians, cyclists and powered two-wheelers and omits equestrians. This should be rectified as per our comments on Policy IN1 above.
- Change To Plan:
- Full Reference: C - 6231 - 7887 - IN2 Impact of Development on the Highways Network including Access and Servicing - None
- 6317 Comment** **Respondent:** Miller Homes [8449] **Agent:** Andrew Martin - Planning (Mr Olivier Spencer) [8448]
- Summary: Policy IN2 confirms that development will be supported where it meets a number of highway network related criteria, including that it should not cause a "significant" detrimental impact on road congestion and movement.
- However, the corresponding test at paragraph 32 of the NPPF states that development should only be refused on transport grounds where the residual cumulative impacts of development are "severe".
- Therefore to be consistent with national policy, Policy IN2(a) should be amended to read "it would not cause a severe detrimental impact on road congestion and movement".
- Change To Plan:
- Full Reference: C - 6317 - 8449 - IN2 Impact of Development on the Highways Network including Access and Servicing - None
- 6332 Comment** **Respondent:** Quod Planning (Mr Philip Murphy) [7958] **Agent:** N/A
- Summary: * Policy IN2 - In relation to clauses (a) and (b), we consider that the wording of this policy should be amended to make it consistent with NPPF and in particular paragraph 32 i.e. development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe;
* Para 6.20 - We consider this should refer to the tests set out in NPPF; and
* Para 6.21 - We suggest this is amended so that the scope of the studies is agreed prior to submission rather than the studies themselves. The reference to Highways Agency should be Highways England.
- Change To Plan:
- Full Reference: C - 6332 - 7958 - IN2 Impact of Development on the Highways Network including Access and Servicing - None
- 6377 Comment** **Respondent:** Essex County Council (Mr Rich Cooke) [8452] **Agent:** N/A
- Summary: b. ECC suggests consideration of whether powered two wheelers require a specific reference given that they are road users.
- Change To Plan:
- Full Reference: C - 6377 - 8452 - IN2 Impact of Development on the Highways Network including Access and Servicing - None
- 6387 Comment** **Respondent:** Roydon Parish Council (Janet Ballard) [5434] **Agent:** N/A
- Summary: Impact of development on the Highways Network - It is important that development does not impact negatively on communities bordering Harlow such as Roydon. Congestion here is already severe and more traffic generated from new development should not make the current situation even more difficult.
- Change To Plan:
- Full Reference: C - 6387 - 5434 - IN2 Impact of Development on the Highways Network including Access and Servicing - None

6200 Comment**Respondent: Miss Sally SallyAnn Simpson [8418]****Agent: N/A**

Summary: Sadly, traffic flow is not being managed well by Ringway Jacobs & others whose responsibility it is. They seem unable to come up with significant improvements. EG the Burnt Mill roundabout improvement is only marginally successful, at peak times, it is still a nightmare & impacts all the way back to Third Avenue. Also the roundabout at Sainsburys is a mess along with unclear footways which create a hazard to pedestrians near their petrol station & near the Fire Station. I am sure there are many other instances around The Town as well. Clearly, 'implementing' has gone wrong here.

Change To Plan:

Full Reference: C - 6200 - 8418 - IN2 Implementation - None

6378 Comment**Respondent: Essex County Council (Mr Rich Cooke) [8452]****Agent: N/A**

Summary: This sets out the Local Plan strategic objectives - consideration is suggested as to whether these should include ref to Harlow and Gilston Garden Town, and its aims. "Objective 13 - reduce the need to travel by vehicle by ensuring new development is sustainably located; Objective 14 - Improve transport links for all modes of transport, to community facilities" (my italics) - consideration is suggested as to whether this address the need for/emphasis on sustainable travel as a priority. It cannot be assumed that just because a development is located sustainably, that it would be accessed sustainably.

It is recommended that this paragraph is rewritten to avoid use of the expression 'negative'.
Reference should be added at the end of the paragraph to 'Essex County Council Development Management Policies'

'Highways Agency' should now read 'Highways England'.

Change To Plan:

Full Reference: C - 6378 - 8452 - IN2 Implementation - None

6259 Comment**Respondent: Mrs Giulia Festa-Burton [8436]****Agent: N/A**

Summary: The Council needs to create more parking spaces for the already existing residential areas where, it is true, the reality is that often enough each household has an average of 2 vehicles per household or property. Housing have already started creating open free parking areas where they have demolished garage block not to replace them. The Council should create more of these free parking areas, where there are buildings that have been left empty for many years (both of Harlow Council or Essex County Council ownership).

Change To Plan:

Full Reference: C - 6259 - 8436 - IN3 Parking Standards - None

6388 Comment**Respondent: Roydon Parish Council (Janet Ballard) [5434]****Agent: N/A**

Summary: Parking - Whilst Harlow Council may wish to promote alternative transport methods, the reliance on the car must not be underestimated and parking provided accordingly. New Hall already has parking problems, which require a resolution from a private parking company, so this needs to be addressed.

Change To Plan:

Full Reference: C - 6388 - 5434 - IN3 Parking Standards - None

6342 Comment**Respondent: Home Group (Jessica Watts) [8445]****Agent: N/A**

Summary: Home Group understands the need to acknowledge and provide for the local demand for parking, but are in support of reducing this where appropriate to help achieve sustainability aspirations and unlock constrained sites. This is particularly important on sites with limited footprints but with good links to transportation where the use of other methods of travel can be encouraged in order to create viable and vibrant schemes.

Change To Plan:

Full Reference: C - 6342 - 8445 - IN3 Implementation - None

6289 Comment**Respondent: Historic England (Ms Katie Parsons) [8441]****Agent: N/A**

Summary: Policy IN4: Broadband and Development
It is recommended that part (a) is amended to refer to both the natural and built environment rather than simply "environment".

Change To Plan:

Full Reference: C - 6289 - 8441 - IN4 Broadband and Development - None

6379 Comment**Respondent: Essex County Council (Mr Rich Cooke) [8452]****Agent: N/A**

Summary: Add the word 'Superfast' to this paragraph. This would accordingly read:
'Superfast Essex' does not cover new build properties and therefore Harlow DC needs to ensure that Superfast broadband in new developments is considered at the outset along with other important utility infrastructure provision such as water pipes and gas mains. This is easier to implement during the construction phase rather than retrospectively. The purpose of this policy is to secure the delivery of fibre broadband as part of new developments.

Change To Plan:

Full Reference: C - 6379 - 8452 - IN4 Justification - None

6290 Comment**Respondent: Historic England (Ms Katie Parsons) [8441]****Agent: N/A**

Summary: Policy IN5: Telecommunications Equipment
We would request that this policy is amended have regard to the wider townscape and historic environment. The siting and location of telecommunications equipment can affect the appearance of the public realm and wider streetscene, the consideration of their positioning is therefore important, particularly in conservation areas.

Change To Plan:

Full Reference: C - 6290 - 8441 - IN5 Telecommunications Equipment - None

6305 Comment**Respondent: EFA (Dr Douglas McNab) [8404]****Agent: N/A**

Summary: Developer contributions

10. The key policy included in the document relating to planning for schools is policy IN6 Planning obligations. The establishment of the central principle that "Planning permission will only be granted for development if the provision is secured for related infrastructure, affordable housing, services, facilities...which are necessary to make the development acceptable in planning terms..." is supported. The ESFA requests that this policy explicitly refers to schools here as a key type of infrastructure that tends to be secured via s106, especially where new schools are required to support housing growth.

11. The explanation of onsite and offsite contributions is also useful: "Where it can be demonstrated that provision on site is not feasible then provision elsewhere, or a contribution towards this provision, will be required."

12. The ESFA is aware that Essex County Council has a model infrastructure policy that they are encouraging all Essex local planning authorities to adopt. Harlow Council should have regard to this in developing the next version of policy IN6.

13. One of the tests of soundness is that a Local Plan is 'effective' i.e. the plan should be deliverable over its period. In this context and with specific regard to planning for schools, there is a need to ensure that education contributions made by developers are sufficient to deliver the additional school places required to meet the increase in demand generated by new developments. The ESFA note that Essex County Council has produced a Developers' Guide to Infrastructure Contributions (revised 2016) that includes an explanation of contributions towards expanding existing schools and creating new schools. It would be helpful and relevant for this document to be referenced within the Local Plan in the section alongside policy IN6.

14. The explicit recognition of education facilities alongside other types of infrastructure and services that development can create a need for is welcomed (para 6.3).

15. Paragraph 6.4 states that "Requirements for individual developments will depend on the nature of the proposals, specific site circumstances and on the requirements laid out in any adopted SPDs". The ESFA notes that further guidance will be set out in a Planning Obligations Supplementary Planning Document. The ESFA request that this document clearly sets out how contributions towards expanding existing schools and developing new schools will be calculated, using an evidence based child yield figure for new developments and up to date information on costs (with clearly identified evidence sources).

16. The ESFA would be interested in responding to any draft Planning Obligations SPD, review of infrastructure requirements or proposed CIL. As such, please add the ESFA to the database for future CIL/infrastructure consultations.

Change To Plan:

Full Reference: C - 6305 - 8404 - IN6 Planning Obligations - None

6380 Comment

Respondent: Essex County Council (Mr Rich Cooke) [8452]

Agent: N/A

Summary: ECC supports the inclusion of policies covering strategic infrastructure, and developer contributions and Community Infrastructure Levy. ECC suggests replacing this policy, which is currently relatively light on content and detail with ECC's standard best practice wording

A revised policy should consider covering the following:

- * Specify when developers are required to either make direct provision or to contribute towards development for the provision of local and strategic infrastructure required by the development (including land for new schools);
- * Requirements for all new development to be supported by, and have good access to all necessary infrastructure;
- * Requirement to demonstrate that there is or will be sufficient infrastructure capacity to support and meet all the necessary requirements arising from the proposed implications of a scheme (i.e. not just those on the site or its immediate vicinity) and regardless of whether the proposal is a local plan allocation or a windfall site;
- * When conditions or planning obligations will be appropriate - as part of a package or combination of infrastructure delivery measures - likely to be required to ensure new developments meets this principle; and
- * Consideration of likely timing of infrastructure provision - phased spatially or to ensure provision of infrastructure in a timely manner.

Recommended wording for such an 'Infrastructure delivery and impact mitigation' policy is provided within the ECC Exemplar Infrastructure delivery and impact mitigation Policy as below:

"Policy IN6:Planning Obligations, Infrastructure delivery and impact mitigation

Permission will only be granted if it can be demonstrated that there is sufficient appropriate infrastructure capacity to support the development or that such capacity will be delivered by the proposal. It must further be demonstrated that such capacity as is required will prove sustainable over time both in physical and financial terms.

Where a development proposal requires additional infrastructure capacity, to be deemed acceptable, mitigation measures must be agreed with the Council and the appropriate infrastructure provider. Such measures may include (not exclusively):

- * financial contributions towards new or expanded facilities and the maintenance thereof;
- * on-site construction of new provision;
- * off-site capacity improvement works; and/or
- * the provision of land.

Developers and land owners must work positively with the Council, neighbouring authorities and other infrastructure providers throughout the planning process to ensure that the cumulative impact of development is considered and then mitigated, at the appropriate time, in line with their published policies and guidance.

The Council will consider introducing a Community Infrastructure Levy (CIL) and will implement such for areas and/or development types where a viable charging schedule would best mitigate the impacts of growth. Section 106 will remain the appropriate mechanism for securing land and works along with financial contributions where a sum for the necessary infrastructure is not secured via CIL.

For the purposes of this policy the widest reasonable definition of infrastructure and infrastructure providers will be applied. Exemplar types of infrastructure are provided in the glossary appended to this plan.

Exceptions to this policy will only be considered whereby:

- * it is proven that the benefit of the development proceeding without full mitigation outweighs the collective harm;
- * a fully transparent open book viability assessment has proven that full mitigation cannot be afforded, allowing only for the minimum level of developer profit and land owner receipt necessary for the development to proceed;
- * full and thorough investigation has been undertaken to find innovative solutions to issues and all possible steps have been taken to minimise the residual level of unmitigated impacts; and
- * obligations are entered into by the developer that provide for appropriate additional mitigation in the event that viability improves prior to completion of the development."

Please note that the following glossary to support this policy could be included within the Draft Plan at Appendix 1 - Acronyms and Glossary.

"Glossary

Infrastructure means any structure, building, system facility and/or provision required by an area for its social and/or economic function and/or well-being including (but not exclusively):

- a. footways, cycleways and highways
- b. public transport

- c. drainage and flood protection
- d. waste recycling facilities
- e. education and childcare
- f. healthcare
- g. sports, leisure and recreation facilities
- h. community and social facilities
- i. cultural facilities, including public art
- j. emergency services
- k. green infrastructure
- l. open space
- m. affordable housing
- n. live/work units and lifetime homes
- o. broadband
- p. facilities for specific sections of the community such as youth or the elderly"

Change To Plan:

Full Reference: C - 6380 - 8452 - IN6 Planning Obligations - None

Respondent List for Local Development Plan Pre-Submission Publication

B.K. & J.T. Drabble [8611]
 Barker Parry Town Planning Ltd. (Ms Elizabeth Fitzgerald) [8451]
 BOC (Glen Jenkins) [8571]
 Canal & River Trust (Ms Tessa Craig) [8612]
 Chelmsford City Council (Ms Jenny Robinson) [8636]
 De Merke Estates (Ms Emma Gladwin) [8643] represented by Barton Willmore (Miss Emma Gladwin) [8399]
 Deanery of Harlow (Anglican) (Revd Martin Harris) [8586]
 East Herts District Council (Mr George Pavey) [8616]
 Environment Agency (Miss Lisa Mills) [8443]
 Epping Forest District Council (Ms Alison Blom-Cooper) [8637]
 Essex Bridleways Association (Mrs Sue Dobson) [7887]
 Essex County Council (Mr Rich Cooke) [8452]
 Forestry Commission (England) (Ms Corinne Meakins) [8617]
 Gillian Atkins [8577]
 GLADMAN (Mr Phill Bamford) [8618]
 Hallam Land Management & Commercial Estates Group (Mike Newton) [7646]
 Harlow Alliance Party (Mr Nicholas Taylor) [8621]
 Harlow Civic Society (Mr John Curry) [5318]
 Hertfordshire County Council (Mr Martin Wells) [8622]
 Highways England (Mr Mark Norman) [7939]
 Historic England (Ms Debbie Mack) [8623]
 Home Builders Federation (Mr Mark Behrendt) [8450]
 Indigo Planning Limited (Mr Diogo Duraes) [8632]
 Jean Wright [5878]
 Lawson Planning Partnership (Miss Kathryn Oelman) [8532]
 Little Hadham Parish Council (Mr Neil Wardrop) [8624]
 Miller Strategic Land [5769] represented by Andrew Martin - Planning (Mr Olivier Spencer) [5533]
 Miss Aimee Turvill [8607]
 Miss Erin Rose BALDRY [8560]
 Miss Mary Wiltshire [6026]
 Morley Grove Residents Association (Sheila Sullivan) [5043]
 Mr David Naylor [8579]
 Mr Danny McCaughey [8578]
 Mr David Beavis [8615]
 Mr Dean Burns [8552]
 Mr Ethan Baldry [8559]
 Mr James Humphreys [8561]
 Mr John Graham [8542]
 Mr MASOUD ESKANDARIAN [8625]
 Mr Mike Stokes [8551]
 Mr Nigel Bangert [8638]
 Mr Ray Goodey [8580]
 Mr Ricky Goldblatt [8631]
 Mrs Karen Garrod [8596]
 Mrs Samantha Baldry [8554]
 Mrs Sarah Gibbins [8582]
 Ms Angela Parish [8550]
 Ms Christina Webb [8613]
 Ms Jennifer Bedford [8557]
 Ms Nikki Kellman [8629]
 National Federation of Gypsy Liaison Groups (A. Yarwood) [8627]

Respondent List for Local Development Plan Pre-Submission Publication

Natural England (Ms Sarah Fraser) [8628]
NHS West Essex CCG (Mrs Jolene Truman) [8584]
Persimmon Homes (Mr David Moseley) [8437]
Peter Mountsteven [5553]
Quod Planning (Mr Philip Murphy) [7958]
Redrow Homes (Ms Kate Holland) [8640] represented by Redrow Homes (Ms Kate Holland) [8640]
Roydon Parish Council (Janet Ballard) [5434]
Sandra Beavis [5035]
STOP Harlow North [8588] represented by Mr Jed Griffiths [8576]
Tetlow King Planning (MEGHAN ROSSITER) [8630]
Thames Water (Savills) (Mr Chris Colloff) [8433]
The Roydon Society (S.N. Wilkinson) [8634]
The Theatres Trust (Tom Clarke) [216]
Weston Homes Plc (Mr David Poole) [8590]

May 2018

Pre-Submission Publication

24th May 2018 to 6th July 2018

Local Development Plan and Policies Map

Available to view at:

- Civic Centre
- Latton Bush Centre
- Harlow libraries

All the documents including supporting technical studies are available to view at: www.harlow.gov.uk/local-plan-publication



@HarlowCouncil



Reference:

Date:

Representation Form

Please note that it is not possible for representations to be considered anonymously. You must include your name and address on any comment in order for it to be accepted and complete the data consent form.

For more information on how Harlow Council collect, use and protect personal information generally, please visit <http://www.harlow.gov.uk/privacy-notice> or write to Data Protection Officer, Harlow Council, Civic Centre, The Water Gardens, Harlow, Essex CM20 1WG.

Personal Details

Please tick as appropriate:

Responding as an individual

Responding on behalf of an organisation

Agent responding on behalf of client

Please complete in block capitals

Agent Details (if applicable)

First Name	<input type="text"/>
Last Name	<input type="text"/>
Job Title/Dept	<input type="text"/>
Organisation	<input type="text"/>
Email	<input type="text"/>
Address Line 1	<input type="text"/>
Line 2	<input type="text"/>
Line 3	<input type="text"/>
Line 4	<input type="text"/>
Postcode	<input type="text"/>
Tel.No	<input type="text"/>
Mobile	<input type="text"/>

First Name	<input type="text"/>
Last Name	<input type="text"/>
Job Tittle/Dept	<input type="text"/>
Organisation	<input type="text"/>
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HARLOW COUNCIL – FORWARD PLANNING PRIVACY

This is an editable form – please return by email to myharlow@harlow.gov.uk once complete.

In accordance with the General Data Protection Regulation, please complete below:

- **Section 1** if you are making comments (a representation) on the Local Plan
- **Section 2** if you want to receive Planning Policy updates (even if you already receive them)
- **Section 3** to provide your details

1. USE OF PRIVATE DATA WHEN MAKING COMMENTS

If you do not provide consent, we cannot process your comments and you may not be able to participate in the Local Plan examination.

☐ Please tick this box to provide your consent to allow an external supplier (JDi Solutions) to process your data* on behalf of Harlow Council, in accordance with the General Data Protection Regulation and the Data Protection Act, so your comments on the Local Plan can be processed.

**Your name and comments will be made public, but any address, telephone and email details will remain confidential.*

2. RECEIVING UPDATES

Even if you already receive updates, you must provide consent to continue receiving them.

☐ Please tick this box to provide your consent to allow an external supplier (JDi Solutions) to process your data on behalf of Harlow Council, in accordance with the General Data Protection Regulation and the Data Protection Act, so Harlow Council can contact you using the details you provide to send you updates on the Local Plan and other Planning Policy matters.

3. YOUR DETAILS

Please confirm below your name and email or postal address. If you consent to receive updates, you will receive them via email or post depending on whether you supply your email or postal address. You are not obliged to provide your details; however we will be unable to process your any comments you make, or send you updates if you want them.

Contact name

Email

or Postal Address

We will keep a record of your consent for two years, after which time we will contact you to see if you still wish to receive this information. If you no longer wish to receive the above service, you may opt out at any time by contacting data.protection@harlow.gov.uk A record of your decision to opt out will be kept for six months. For more information on how we collect, use and protect personal information generally, please visit <http://www.harlow.gov.uk/privacy-notice>

Representation

Do you consider the proposed Pre-Submission Harlow Local Development Plan to be:

- | | | |
|---|-----|----|
| ➤ Legally Compliant | Yes | No |
| ➤ Sound | Yes | No |
| ➤ Compliant with the Duty to Co-operate | Yes | No |

Please indicate which part of the Local Development this comment relates to

Page	<input type="text"/>	<input type="text"/>	<input type="text"/>
Paragraph	<input type="text"/>	<input type="text"/>	<input type="text"/>
Policy	<input type="text"/>	<input type="text"/>	<input type="text"/>

Comment

e.g. whether you feel the Pre-Submission Local Development Plan is legally compliant, compliant with the duty to co-operate and sound.

Suggestion of the modification(s)

e.g. If anything you consider necessary to change in order to make the Local Development Plan legally compliant or sound.

A large, empty rounded rectangular box with a black border, intended for writing suggestions or modifications. The box is oriented vertically and occupies most of the lower half of the page.

Examination

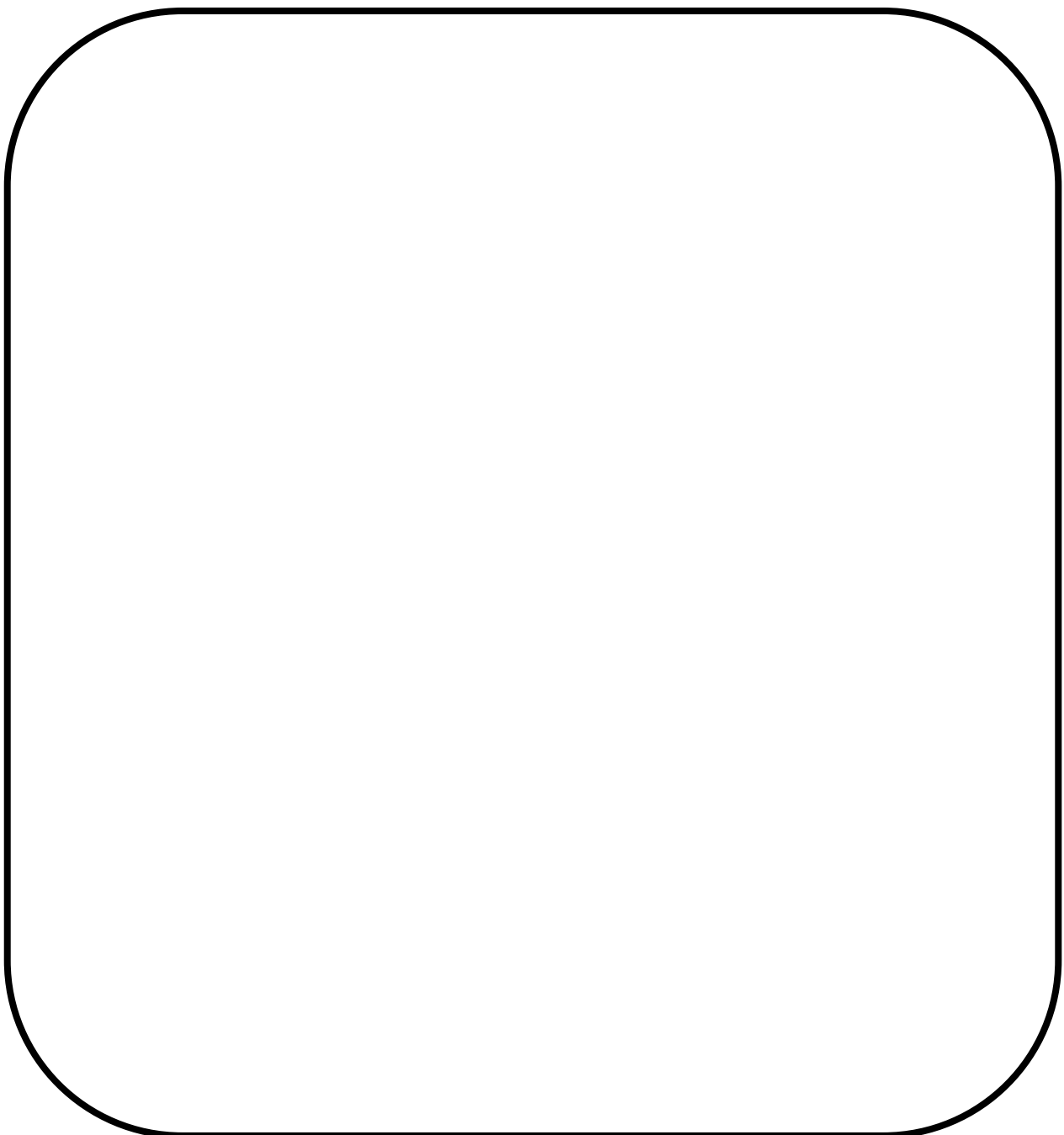
Please note that written and oral comments are equally weighted and will be given equal consideration by the inspector.

Please indicate your preference to participate at the oral examination

Yes, I Think it is necessary to participate at the oral examination

No. I do not wish to participate at the oral examination

If you consider it necessary to speak at the examination, please outline below why you consider it to be necessary. Please note that the Inspector will determine the most appropriate process to adopt to hear those who have indicated that they wish to participate at the examination.

A large, empty rounded rectangular box with a black border, intended for the respondent to provide reasons for their preference to participate in the oral examination.

Do you wish to be notified of any of the following?

The submission of the Harlow Local Development Plan for examination	Yes	No
The publication of the Inspectors Report on the Harlow Local Development Plan	Yes	No
The adoption of the Harlow Local Development Plan	Yes	No

Please return form to the Forward Planning Team:

By Email: myharlow@harlow.gov.uk

By Post **Forward Planning, Harlow Council, Civic Centre, The Water
Gardens, Harlow, Essex, CM20 1WG**

or

Go to the Harlow Council website at www.harlow.gov.uk/local-plan , and follow the link to view and comment on the document online

Please note that it is not possible for representations to be considered anonymously. You must include your name and address on any comment in order for it to be accepted and complete the data consent form.

Comment must be submitted no later than 4pm on Friday 6th July, 2018
(Comments received after this time may not be considered.)

This information is available in Accessible communication formats upon request

Signature

Date

Property

Private: 03448 475026

Accommodation To Let

PITTMANS FIELD HARLOW

Single Room in Town House,
2 Bathrooms
Communal areas cleaned
Saturdays
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£100 inc bills pw
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Tel: 07838791688

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Public Notices

24/7 Advertising for private and trade

Lost

SEEKING TO LOCATE

Whiskers LLP are urgently trying to track down a retired police officer by the name of Harry Knight in relation to one of our current clients. Would you please contact us urgently on this number: 01279 439439 quoting AC.

Andrew Clowser -
Whiskers LLP

Public Notices

JOHN ALLBUTT (Deceased)

Pursuant to the Trustee Act 1925 any persons having a claim against or an interest in the Estate of the aforementioned deceased, late of 44 Copshall Close Harlow Essex CM18 7LJ, who died on 11/02/2018, are required to send particulars thereof in writing to the undersigned Solicitors on or before 27/07/2018, after which date the Estate will be distributed having regard only to claims and interests of which they have had notice.

WHISKERS LLP
6 Mire Buildings Kison Way
Harlow Essex CM20 1DR

TS30390

WHY NOT?
Self-serve

STATEMENT OF AVAILABILITY FOR INSPECTION UNDER THE TOWN AND COUNTRY PLANNING (LOCAL PLANNING) (ENGLAND) REGULATIONS 2012 (REGULATIONS 19)

The submission version of the Harlow Local Development Plan and other supporting documents will be available for public inspection during the Regulation 19 Publication period at the Harlow Civic Centre, Latton Bush Centre and Harlow libraries during normal opening hours.

Regulation 19 Publication period from
Thursday 24th May 2018 until Friday 6th July 2018

All the documents including supporting technical studies are available to view on Harlow Council Website at:
<http://www.harlow.gov.uk/local-plan>

For any further enquiries, please email
myharlow@harlow.gov.uk or contact the Forward Planning team on 01279446897

This information is available in Accessible communication formats upon request



GOODS VEHICLE OPERATOR'S LICENCE

Courtlands Waste Management (UK) Ltd of North Place, Edinburgh Way, Harlow Essex CM20 2SL is applying to change an existing licence as follows:

To keep an extra 5 goods vehicles at North Place, Edinburgh Way, Harlow Essex CM20 2SL.

Owners or occupiers of land (including buildings) near the operating centre(s) who believe that their use or enjoyment of that land would be affected, should make written representations to the Traffic Commissioner at Hill Crest House, 386 Harehills Lane, Leeds, LS9 6NF stating their reasons, within 21 days of this notice. Representors must at the same time send a copy of their representations to the applicant at the address given at the top of this notice. A guide to making representations is available from the Traffic Commissioner's Office.

Self-serve and save time

GOODS VEHICLE OPERATOR'S LICENCE

Gary Bone trading as Rightway Scaffolding Ltd of 8 Longwood Court, Upminster, Essex, RM14 2BX is applying for a licence to use Foster Street Farm, Foster Street, Harlow, Essex, CM17 9HS as an operating centre for 2 goods vehicles and 0 trailers

Owners or occupiers of land (including buildings) near the operating centre(s) who believe that their use or enjoyment of that land would be affected, should make written representations to the Traffic Commissioner at Hill Crest House, 386 Harehills Lane, Leeds, LS9 6NF stating their reasons, within 21 days of this notice. Representors must at the same time send a copy of their representations to the applicant at the address given at the top of this notice. A guide to making representations is available from the Traffic Commissioner's Office.

Public Notices

STATEMENT OF REPRESENTATIONS PROCEDURE AND ARRANGEMENTS FOR INSPECTION OF THE HARLOW LOCAL DEVELOPMENT PLAN

(Proposed Submission "Publication Draft" Version)

Notice is hereby given, in accordance with regulations 19 and 35 of the Town and Country Planning (Local Planning) (England) Regulations 2012, that Harlow Council is publishing the Harlow Local Development Plan. This notice gives details for inspection and public involvement.

Harlow Local Development Plan Pre-Submission Publication
May 2018

Subject matter and area covered by the Local Development Plan
Harlow Council has prepared the Pre-Submission Publication version of the Harlow Local Development Plan together with a Policies Map which it proposes to submit to the Secretary of State for Housing, Communities and Local Government. The Harlow Local Development Plan provides a spatial planning framework to shape and guide development in the town until 2033. The plan sets out a spatial vision together with a number of strategic objectives that are supported by a suite of strategic and development management policies. The accompanying Policies Map identifies sites for housing employment and other forms of development, as well as those areas which are subject to a range of policy and environmental constraints. A separate Area Action Plan is, however, being prepared for Harlow Town Centre. The inset on the Policies Map indicates the area covered by separate Area Action Plan.

Representations

The period for submission of representations to the Council will run for six weeks from **Thursday 24th May 2018 until 16:00 on Friday 6th July 2018**.

There are various ways that you can send the Council your representation:

- Go to the Harlow Council website at www.harlow.gov.uk/local-plan, and follow the link to view and comment on the document online; or
- Complete the representation form and post it to **Forward Planning, Harlow Council, Civic Centre, The Water Gardens, Harlow, Essex, CM20 1WG** or email to the myharlow@harlow.gov.uk. Copies of the representation form can be found on the website at www.harlow.gov.uk/local-plan-publication, and hard copies in the Civic Centre reception upon request; or
- Send an email or letter to the Council with the data consent form.

For any further enquiries, please email myharlow@harlow.gov.uk or contact the Forward Planning team on 01279446897

Harlow Council 24th May 2018

This information is available in Accessible communication formats upon request



Public Notices

TOWN AND COUNTRY PLANNING ACT 1990 PLANNING (LISTED BUILDINGS AND CONSERVATION AREAS) ACT 1990 Planning (Listed Buildings and Conservation Areas) Regulations 1990 Town and Country Planning (Development Plans and Consultation) Directions 1992

PUBLIC NOTICE OF APPLICATIONS

The following applications have been received by Harlow District Council. These applications and others received can be inspected online at www.harlow.gov.uk or at Harlow Council Planning Services, Civic Centre, The Water Gardens, Harlow, Essex CM20 1WG on Monday-Friday, 9am-4.45pm. If you are unable to view the plans during these times, please telephone Planning Services on 01279 446856 where a suitable appointment can be made with the relevant case officer.

Anyone who wishes to make representations about these applications should write to the Council at the above address within 21 days of the date of this notice.

Application No HW/FUL/18/00205 **Ward:** Mark Hall
Application Type Full Application
Location Proposed Residential Development, 62 Glebelands, Harlow, Essex
Proposal Detached new residential build in land to rear of no. 62 Glebelands.

Reason for Advert Conservation Area
Application No HW/HSE/18/00198 **Ward:** Old Harlow
Application Type Householder Application
Location Round House, Bunting Street, Newhall, Harlow
Proposal Demolition of existing garage, greenhouse and coal store, and construction of new cart lodge garage with office over.

Reason for Advert Listed Building
Application No HW/LBC/18/00199 **Ward:** Old Harlow
Application Type Listed Building Consent
Location Round House, Bunting Street, Newhall, Harlow
Proposal Demolition of existing garage, greenhouse and coal store, and construction of new cart lodge garage with office over.

Reason for Advert Listed Building
Application No HW/HSE/18/00226 **Ward:** Old Harlow
Application Type Full Application
Location Former NatWest Bank, Station Road, Harlow, Essex
Proposal First-floor extension over restaurant to form one residential flat unit.

Reason for Advert Conservation Area
Application No HW/HSE/18/00219 **Ward:** Old Harlow
Application Type Householder Application
Location 25 Fore Street, Harlow, Essex CM17 0AB
Proposal Demolish single-storey extension and conservatory, construct two-storey extension and single-storey lean-to.

Reason for Advert Listed Building in a Conservation Area
Application No HW/LBC/18/00220 **Ward:** Old Harlow
Application Type Listed Building Consent
Location 25 Fore Street, Harlow, Essex CM17 0AB
Proposal Removal of existing cement render from the external face of the west wall and replacement with lime render. Installation of two cast iron ventilation grills and insect mesh to the west wall and below the level of the floor.

Reason for Advert Listed Building in a Conservation Area
Harlow Council
Harlow Star Publication 24 May 2018

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Harlow Local Development Plan

May 2018



Pre-Submission Publication

24th May 2018 to 6th July 2018

Frequently Asked Questions



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Harlow Local Development Plan

Pre-Submission Publication

May 2018

Frequently Asked Questions

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1. What does the Local Development Plan say?

The Local Development Plan sets out a long-term vision for Harlow, identifying land where development will be acceptable and where it will be unacceptable. It contains policies that ensure future development is sustainable by meeting the needs of residents, businesses and visitors, while providing the required infrastructure and protecting environmental assets. Planning applications will be decided against the Local Plan policies.

The Policies Map, which maps the planning policies and proposals across Harlow, accompanies the Local Plan, along with other documents such as the Sustainability Appraisal and Infrastructure Delivery Plan. The policies in the Local Plan are justified by an Evidence Base, which includes studies such as the Strategic Housing Market Assessment (SHMA) and the Green Belt Review.

2. What is the Pre-Submission Publication?

The latest stage of the production of the new Harlow Local Plan is known as the Regulation 19 Pre-Submission Publication, which is the final public consultation stage before the Local Plan is submitted to the Planning Inspectorate for Examination.

3. How long is the Publication period?

The Pre-Submission Local Plan will be available for comments for a period of six-weeks from **Thursday 24th May to 4 pm on Friday 6th July 2018.**

Comments submitted after 4 pm on 6th July may not be considered.

4. Do I need to submit my comments if I have already done so previously?

Yes, because in order to comply with plan-making legislation, the Council cannot carry

forward previous comments into the Pre-Submission Publication.

5. What should I comment on?

At the Pre-Submission Publication stage, the Council is seeking views on whether the Local Plan is sound and meets the tests set out in the National Planning policy Framework (NPPF). In order for the Local Plan to be found sound at the Examination and be adopted by the Council, it has to meet a number of tests:

- The Plan must plan for the housing, employment and infrastructure needs;
- The Plan must be based on sound evidence;
- The development proposals identified within the Plan can be delivered by 2033; and

- The Plan is consistent with national policy, and enables sustainable development.

Comments will be passed to the Examination Inspector and it is recommended that comments should be clear, concise and targeted. In order to have the greatest influence at this stage it is advisable that comments should relate to the soundness of the Local Plan or its compliance with legal requirements.

Soundness

Plan-making regulations state that a local planning authority should submit a Local Plan for examination which it considers to be ‘sound’ – namely that it is:

- **Positively prepared** – the Plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet

requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;

- **Justified** – the Plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;
- **Effective** – the Plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and
- **Consistent with national policies** – the Plan should enable the delivery of sustainable development in accordance with the policies in the National Planning Policy Framework.

It is advisable that comments made at this stage should therefore focus on whether the

Local Plan meets the tests listed above. This is because these are the broad areas that the Inspector will focus on in examining the Local Plan.

Legal Requirements

When considering if the Local Plan meets the legal requirements, the Inspector will consider a number of issues including:

- **Local Development Scheme** – has the Plan been prepared in accordance with the timetable set out in the Local Development Scheme?
- **Statement of Community Involvement and relevant regulations** – has consultation on the Plan been in accordance with the Council's Statement of Community Involvement and have the appropriate bodies been consulted?
- **Duty to Co-operate** – has the Plan been prepared in co-operation with other local planning authorities and statutory

bodies, such as the Environment Agency and the Local Enterprise Partnership, to identify and address any issues?

- **Sustainability Appraisal** – has an adequate Sustainability Appraisal been carried out?
- **Habitats Regulation Appropriate Assessment** – has an adequate Appropriate Assessment under the Habitats Regulations been carried out?
- **National Policy and Legislation** – does the Plan comply with national policy and legislation, for example, the National Planning Policy Framework?

6. What is the best way to submit comments?

- Go to the Harlow Council website at www.harlow.gov.uk/local-plan, and follow the link to view and comment on

the document online; or

- Complete the representation form and send it to myharlow@harlow.gov.uk or post it to **Forward Planning, Harlow Council, Civic Centre, The Water Gardens, Harlow, Essex, CM20 1WG**

7. Where can I find the representation form?

Copies of the representation form can be found on the website at **www.harlow.gov.uk/local-plan-publication**, and hard copies at the Civic Centre reception upon request.

8. Where can I find the Local Plan?

The Harlow Local Plan and supporting documents are available on the website at **www.harlow.gov.uk/local-plan**

The Policies Map and key evidence base documents are also available to view at the Harlow Civic Centre, Latton Bush

Centre, and Harlow libraries during normal opening hours.

9. How Harlow Council collect, use and protect my personal information?

For more information on how Harlow Council collect, use and protect personal information generally, please visit

www.harlow.gov.uk/privacy-notice or write to Data Protection Officer, Harlow Council, Civic Centre, The Water Gardens, Harlow, Essex CM20 1WG

10. More Questions

If you have any other questions about the Local Development Plan, please contact a member of the Forward Planning Team on 01279446897 or email

Myharlow@harlow.gov.uk

Designed and produced by



Visit www.harlow.gov.uk/local-plan



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May 2018

Consultation has started on town's 15-year development

Residents are given the opportunity to comment on new homes, shops, etc

By Charlotte Page

charlotte.page@harrow.gov.uk

HARROW residents are invited to share their views on how the town will develop over the next 15 years in a series of consultations held over the next six weeks.

The consultation period has been branded as a "once-in-a-lifetime opportunity" as Harrow Council welcomes residents to have their say on the Local Development Plan before it is submitted for final examination by the Government.

The aim of the plan is to create the perfect mix of homes, shops, education, health facilities and more in response to the needs of the regeneration of the town until at least 2033.

This is the last formal consultation on the plan before it is submitted to the Secretary of State for Housing, Communities and Local Government later this year for examination.

The five themes of the plan are: growing, housing, prosperity, identity, and infrastructure.

WHAT DOES THE LOCAL DEVELOPMENT PLAN INCLUDE?

The plan will guide development over the next 15 years, including identifying where developments are both acceptable and unacceptable.

as well as providing a strategy to help grow and regenerate the town up to 2033.

It includes proposals to build on Harrow's Golden Triangle status, Public Health England's vision, Enterprise Zone developments and the new M11 junction 5A.

The aim is to ensure the right infrastructure is in place at the right time to support new housing and future employment opportunities. However, a key focus is the need for a mix of housing to meet the needs of the town and ensure a mix of housing and services match Harrow's needs and ambitions for the future.

Previous consultations have highlighted a number of important issues which now form part of the plan.

These include what new infrastructure is required, where and how much new housing there will be and how green spaces will be protected.

According to an assessment of housing need, the plan will allow 4,200 homes within the Harrow Development Plan to be built up to 2033, with at least 30 per cent affordable housing.

Additionally, it sets out a strategy to assist in the provision of the Harrow and Golden Triangle Communities with East Harrow and Epping Forest District Councils.

Open online, the Harrow Local Development Plan will replace the 2006 Harrow Local Plan.



For more about the plan and supporting documents, visit harrow.gov.uk/development-plan. Documents are also available to view during office hours at Harrow Civic Centre, Letchford Centre and at Harrow Libraries. The consultation period begins on Thursday, May 24, and will run through until Friday, July 6.

To submit your comments go online or alternatively by post to: The Forward Planning Team, Harrow Council, West Gardens, Harrow, Essex, CM20 1WQ, or email forwardplanning@harrow.gov.uk

The Forward Planning Team, Harrow Council, West Gardens, Harrow, Essex, CM20 1WQ, or email forwardplanning@harrow.gov.uk

County Hall urges people to get behind Option D for new, improved A120 to secure Government funding

ESSEX County Council has urged people to "vote behind a shared vision" after announcing their favoured route for a new and improved A120.

Local Deputy Councillor Kevin Beale, Essex County Council and cabinet member for Infrastructure, announced option D as the council's preferred option for a new dual carriageway between Braintree and the A12.

The decision comes following a public consultation where 62 per cent of respondents agreed that this section of the A120 needed to be completely upgraded to a dual carriageway in order to reduce congestion.

The proposed route would see Gillingham Corner drastically altered and it would lead onto a dual carriageway road joining the A12 at junction 23 south of Colchester.

"I truly believe that route option D offers the best solution to the problems of the current A120 between Braintree and the A12," said Cllr Beale at the event at Braintree Golf Club.

"Our study work has demonstrated that the £100m A120 scheme on improving the A120, residents will see £2,750,000 in benefits. Route D also delivers 10 to 15 minutes in journey time savings."

"The current single carriageway road is not fit for purpose and is often



The preferred route for the A120 from Braintree to the A12

heavily congested, causing major issues, not only for drivers and local businesses in Essex, but also those helping to fund the country's transport infrastructure projects."

"Now is when the real work begins. This scheme is competing with dozens across the country for Government funding so it is vital that everyone united behind a shared vision for an improved A120."

"Please make your voice heard and make sure the Government know just how important this road improvement is to the future of Essex, East Anglia and the economic future of the county."

The work currently underway by the county council is only a start at this stage and a preferred route announcement for the A120 can only be made by the Highways England in consultation with the Department for Transport.

An announcement on whether the scheme has been successful is expected to be made in 2020. If it is to be funded, the newly-upgraded A120 between Braintree and the A12 could open as early as 2023.

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This is an editable form – please return by email to myharlow@harlow.gov.uk once complete.

In accordance with the General Data Protection Regulation, please complete below:

- **Section 1** if you are making comments (a representation) on the Local Plan
- **Section 2** if you want to receive Planning Policy updates (even if you already receive them)
- **Section 3** to provide your details

1. USE OF PRIVATE DATA WHEN MAKING COMMENTS

If you do not provide consent, we cannot process your comments and you may not be able to participate in the Local Plan examination.

☐ Please tick this box to provide your consent to allow an external supplier (JDi Solutions) to process your data* on behalf of Harlow Council, in accordance with the General Data Protection Regulation and the Data Protection Act, so your comments on the Local Plan can be processed.

**Your name and comments will be made public, but any address, telephone and email details will remain confidential.*

2. RECEIVING UPDATES

Even if you already receive updates, you must provide consent to continue receiving them.

☐ Please tick this box to provide your consent to allow an external supplier (JDi Solutions) to process your data on behalf of Harlow Council, in accordance with the General Data Protection Regulation and the Data Protection Act, so Harlow Council can contact you using the details you provide to send you updates on the Local Plan and other Planning Policy matters.

3. YOUR DETAILS

Please confirm below your name and email or postal address. If you consent to receive updates, you will receive them via email or post depending on whether you supply your email or postal address. You are not obliged to provide your details; however we will be unable to process your any comments you make, or send you updates if you want them.

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or Postal
Address

We will keep a record of your consent for two years, after which time we will contact you to see if you still wish to receive this information. If you no longer wish to receive the above service, you may opt out at any time by contacting data.protection@harlow.gov.uk A record of your decision to opt out will be kept for six months. For more information on how we collect, use and protect personal information generally, please visit <http://www.harlow.gov.uk/privacy-notice>

Appendix V (g) - Pre-submission Publication Harlow Local Development Plan representation summary

Glossary

6000 etc	This is the reference number of the representation received.
Background/Policy reference	This is the chapter/policy the representation relates to.
Respondent	This is the name of the individual/organisation that made a representation.
Summary	This is the content of the representation(s) made to the Pre-submission Publication version of the Harlow Local Development Plan
Change to Plan	These are the suggestion(s) made by respondent(s) to the Local Development Plan (If any) for the Inspector to consider in order to make the plan sound.

Local Development Plan Pre-Submission Publication

CHAPTER: BACKGROUND

BACKGROUND

6650 Object

Respondent: Harlow Alliance Party (Mr Nicholas Taylor) [8621]**Agent: N/A**

Summary: lack of consultation that has taken place with residents.

Back in the 1990's Harlow Council produced a document called "Consultation, Guide to good practice" which set out how it would engage with residents. A copy of this is attached to this submission. It is clear from what it has done in respect of the Local Plan has not adhered to its own commitment to consult. The way that residents have (or indeed have not) been involved in any form of consultation is very clear, simply from the fact that members of our party have spoken to hundreds of residents whilst out canvassing leading up to the recent local elections, hardly anyone has been aware of what has been proposed in respect of this plan. Harlow Council has almost exclusively consulted only with other statutory bodies, those with a vested interest in seeing Harlow expand and neighbouring Local Authorities. In doing so, it has failed to engage with the most important people of all, the residents of Harlow. We would make the following points:

The Council has primarily used its website during this entire process, but we know that many older people, those on low incomes and homeless households do not have access to a computer.

The most up-to-date information available shows that 21 % of Harlow's residents were not born in the UK and therefore a considerable number of residents may not have English as their first language. Harlow Council has failed to engage with such residents.

The Council publishes a document called Harlow Times four times a year which is delivered to every home in Harlow. This should have been used to tell residents what was going on, but Harlow Council chose not to do so.

Whilst Harlow Council engages with its tenants and leaseholders using various forums, it has none which includes residents. Harlow Council could and should have set up neighbourhood forums to specifically consult and inform on this plan.

Evidence of this lack of resident involvement can clearly be seen by the fact that supposed consultation earlier in this process only saw 136 submissions being made in response, something Harlow Council should have taken steps to be more inclusive at later stages in the process.

We enclose a petition, completed in less than 4 weeks signed by over 380 residents who object to the inclusion of 8 greenfield sites amongst the 21 sites in the Plan.

Change To Plan:

Full Reference: O - 6650 - 8621 - BACKGROUND - None

6846 Object

Respondent: Miss Mary Wiltshire [6026]**Agent: N/A**

Summary: Object to the whole document. As it is a wish-list rather than set of plan for discussion. It is not much of consultation.

Change To Plan:

Full Reference: O - 6846 - 6026 - BACKGROUND - None

6603 Support

Respondent: East Herts District Council (Mr George Pavey) [8616]**Agent: N/A**

Summary: East Herts Council supports the Local Plan's intention to meet its objectively assessed housing needs, including the positive approach taken to reviewing the Green Belt to identify land for such development purposes. East Herts Council further supports Harlow Council's commitment to joint working to address the collective needs of the housing market area in terms of key infrastructure, employment and housing needs.

Change To Plan:

Full Reference: S - 6603 - 8616 - BACKGROUND - None

- 6761 Support** **Respondent: Quod Planning (Mr Philip Murphy) [7958]** **Agent: N/A**
- Summary: PfP are strongly supportive of Harlow's ambition, and pro-activity strategy for growth over the Local Plan period. PfP welcome the opportunity to continue to engage with HDC on the evolution of Harlow's Local Development Plan, whether regarding the above points, or more generally, particularly as the detail on the proposals for the GPE, and Central and Eastern Stort Crossings, continues to progress.
- Change To Plan:
- Full Reference: S - 6761 - 7958 - BACKGROUND - None
- 6807 Support** **Respondent: Chelmsford City Council (Ms Jenny Robinson) [8636]** **Agent: N/A**
- Summary: Officers have reviewed the Local Development Plan Pre-Submission Publication, and consider that the identified housing, employment and infrastructure needs for development in Harlow to 2033 will be met through delivery of the Plan. Officers are satisfied that the duty to co-operate has been met, and consider the plan to be sound.
- Change To Plan:
- Full Reference: S - 6807 - 8636 - BACKGROUND - None
- 6582 Comment** **Respondent: Barker Parry Town Planning Ltd. (Ms Elizabeth Fitzgerald) [8451]** **Agent: N/A**
- Summary: we reiterate concerns that the evidence base, is largely significantly dated and in many instances pre-dates the National Planning Policy Framework (NPPF), such that the position established lacks any clarity or weight to enable a developer to reasonably establish the policy requirements prior to the submission of a planning application, whilst also not having regard to significant changes in the local environment as a result of subsequent planning permissions.
- Change To Plan:
- Full Reference: C - 6582 - 8451 - BACKGROUND - None
- 6620 Comment** **Respondent: Forestry Commission (England) (Ms Corinne Meakins) [8617]** **Agent: N/A**
- Summary: Thank you for consulting the Forestry Commission on the pre-submission publication. We do not have any comment on the soundness or legal compliance. We would like to draw your attention to the standing advice on Ancient Woodland <https://www.gov.uk/guidance/ancient-woodlandand-veteran-trees-protection-surveys-licences> should you need to assess any sites near to Ancient Woodland when delivering the plan.
- Change To Plan:
- Full Reference: C - 6620 - 8617 - BACKGROUND - None
- 6652 Comment** **Respondent: Harlow Alliance Party (Mr Nicholas Taylor) [8621]** **Agent: N/A**
- Summary: This is evidenced by the fact that residents have already been consulted about detailed plans for two of the sites (Lister House and St Andrews Meadow) when the Plan has not been agreed. In addition, running alongside this Local Plan process, is what seems a parallel process involving other sites, such as at Bushey Croft, where Harlow Council has a Planning Application for homes on a playing field site, which is not included in the Local Plan.
- Change To Plan:
- Full Reference: C - 6652 - 8621 - BACKGROUND - None

6712 Comment**Respondent: Mr James Humphreys [8561]****Agent: N/A**

Summary: Firstly, can I say that the secretive approach to this has been incredibly alarming. When PHE plans were announced there was a full public consultation, and looking at other neighbouring councils, it seems they take a more open and consultative approach. This plan has seemingly been hidden from residents in the hope that nobody notices so that you can continue with the plans. While there is the opportunity to view the plans online and in libraries, it is hard to find and there has been no publication of these to people who actually work 9-5 and the publication period is Thursday 24 May 2018 to Friday 6 July 2018. I hope this is only a publication period and not a consultation period as this less than two weeks nowhere near long enough to invite consultation on something that hasn't even been made public and is hundreds of pages long including evidence base. It looks like it has been rushed and public comment is not actually welcome. At the very least this should be 30 days.

Change To Plan: I believe these plans have serious flaws and should be paused immediately and public consultation should be invited, rather than hoped nobody finds it. In addition, a lot of the evidence based used is over 10 years old, which renders it either out of date or at worst inaccurate, including infrastructure and health. Other more recent reports aren't localised enough or provide the right information needed, such as wildlife and other environmental factor reports seem to have been simply ignored. More worryingly, your link to sign up to be kept informed about developments doesn't work despite numerous attempts to create a log on, I have still not received a registration email so there doesn't seem to be a way to be kept informed even if I am trying to be so.

Full Reference: C - 6712 - 8561 - BACKGROUND - None

6718 Comment**Respondent: Jean Wright [5878]****Agent: N/A**

Summary: This document is an idealistic wish list but trying to achieve quality of life with meeting government required housing numbers is not easy. Nor is the type of housing required necessarily that which will be built. Harlow desperately needs more social housing. There will always be people who cannot afford to buy, cannot afford deposits and rents required by private landlords.

Unless Harlow's assets of green space are seriously protected people moving here for jobs may well not live in Harlow but commute in from villages offering serenity if nothing else. This has been the choice of many professionals working in Harlow.

Change To Plan:

Full Reference: C - 6718 - 5878 - BACKGROUND - None

6721 Comment**Respondent: Mrs Karen Garrod [8596]****Agent: N/A**

Summary: Uncertainty
Throughout the report, there seems to be "significant levels of uncertainty" in key areas which undermines the subject matter.

Change To Plan:

Full Reference: C - 6721 - 8596 - BACKGROUND - None

6726 Comment**Respondent: Little Hadham Parish Council (Mr Neil Wardrop) [8624]****Agent: N/A**

Summary: The plan appears deliverable and sufficiently meets development needs. The Harlow A&E hospital is the local A&E for Little Hadham residents, please consider this when deciding on a suitable location for the new hospital as part of this plan so that it continues to be accessible. Please provide more details on how/where water is likely to be drawn from to provide water supplies to all the new homes.

Change To Plan:

Full Reference: C - 6726 - 8624 - BACKGROUND - None

6762 Comment**Respondent: Lawson Planning Partnership (Miss Kathryn Oelman) [8532]****Agent: N/A**

Summary: The current Adopted Replacement Harlow Local Plan (2006) makes reference to the need to facilitate the improvement of PAH's local health services, guided by a Master Plan as follows:

"Saved Policy CP4: The future development of Princess Alexandra Hospital will be granted planning permission subject to it according with their approved Master Plan."

The previous Master Plan was developed having regard for the constraints of the site; these include a group Tree Preservation Order covering the whole site (TPO/10/92), two Scheduled Monument designations (bowl barrows in the north and east of the site), a Grade II listed building (Parndon Hall) and land designated as a Green Wedge. A strip of land in the south east of the site also contains two central water mains serving the wider Harlow area.

Whilst the draft Local Plan acknowledges the redevelopment of the existing Hospital site is a credible possibility, the Trust would like to see a similar masterplanning policy in this document which supports the redevelopment of the site for hospital uses, should this be identified as the preferred option in the future.

Without this supportive policy basis, the longer-term strategic aims of the Trust in redeveloping and expanding the site would not be acknowledged, and thus in the process, applications for short-term development necessary to achieve this could encounter a lack of planning policy certainty and support.

Change To Plan: The Trust therefore requests that the existing support for a masterplanned approach to redevelopment of the existing site is replicated in the draft Local Plan. The policy could also be flexibly worded to allow this approach to be adjusted in the event that the outcome of the Outline Business Case / Site Selection process identifies a hospital relocation as the preferred option instead.

Full Reference: C - 6762 - 8532 - BACKGROUND - None

6767 Comment**Respondent: Tetlow King Planning (MEGHAN ROSSITER) [8630]****Agent: N/A**

Summary: The Government consulted on proposed changes to the NPPF, and aims to publish the "NPPF2" this month. The proposed changes include a new definition of affordable housing with a number of new categories aimed at widening the scope of the definition to include a wider array of tenures to assist people into homes that meet their needs, including rent to buy under 'other affordable routes to home ownership'. While Rentplus has sought a minor amendment to that definition, we do not anticipate significant changes to be made to the document prior to publication.

The significant level of need for affordable housing in Harlow points clearly to a need for a step change in delivery to meet those needs. The Local Plan Spatial Vision clearly captures this need and sets the right tone for an ambitious approach to maximising delivery of affordable housing over the Plan period. Access to a deposit remains one of the most challenging blockers on accessing home ownership, which even intermediate affordable housing does not resolve; the Council should take a proactive approach to welcoming the delivery of the wider range of affordable tenures set out in the draft NPPF to encourage a more diverse housing stock and to improve the ability of all developers, particularly those bringing forward the new Garden Communities, to deliver an appropriate and higher quantum of affordable housing.

Change To Plan: The definition sought by Rentplus is set out below:
"d) Other affordable routes to home ownership: is housing provided for sale that provides a route to ownership for those who could not achieve home ownership through the market. It includes shared ownership, relevant equity loans, other low cost homes for sale and rent to buy (which includes a period of affordable or intermediate rent). Where public grant funding is provided, there should be provisions for the homes to remain at an affordable price for future eligible households, or for any receipts to be recycled for alternative affordable housing provision, or refunded to Government or the relevant authority specified in the funding agreement."

Full Reference: C - 6767 - 8630 - BACKGROUND - None

6781 Comment**Respondent: The Roydon Society (S.N. Wilkinson) [8634]****Agent: N/A**

Summary: The Roydon Society supports the comments made by Roydon Parish Council and sent under separate cover recently.

Change To Plan:

Full Reference: C - 6781 - 8634 - BACKGROUND - None

6849 Comment **Respondent: Miss Mary Wiltshire [6026]**

Agent: N/A

Summary: typographical error has been found.

Change To Plan:

Full Reference: C - 6849 - 6026 - BACKGROUND - None

6870 Comment **Respondent: Essex County Council (Mr Rich Cooke) [8452]**

Agent: N/A

Summary: ECC has worked to ensure as far as possible through its ongoing engagement and representations with HC throughout plan preparation that this Draft Plan addresses ECC's areas of responsibility consistent with national policy to enable sustainable development. The ECC response to the Draft Plan recommends several areas for clarification to enable effective delivery and amendments to improve policy and explanatory text. ECC will work cooperatively with HC to ensure issues can be positively addressed prior to HC submitting the Draft Plan for examination. It is likely that Statement(s) of Common Ground will be needed to be prepared at that time to address any outstanding issues or ahead of the examination hearings. The approach will be confirmed with HC closer to the time.

ECC has identified a limited number of issues arising through the Draft Plan relating to consistency with national (planning) policy. These are set out in Appendix 1 and most are considered capable of being readily addressed relatively easily, through policy revisions, rewording etc. The main area where ECC recommends a change to ensure consistency with NPPF is in relation to health and well-being matters. It is accordingly recommended that ECC urges the inclusion of an embracing health and well-being policy and sets out requirements for HIAs, to reflect NPPF requirements and the profile of health and well-being within the NPPF. Some basic elements of well-being considerations are evident but these are not deemed sufficiently clear explicit and their scope is too limited. This point was made by ECC at the previous Plan-making stage.

Change To Plan:

Full Reference: C - 6870 - 8452 - BACKGROUND - None

6871 Comment **Respondent: Essex County Council (Mr Rich Cooke) [8452]**

Agent: N/A

Summary: The Local Plan includes only basic reference to well-being matters. Accordingly, ECC Public Health recommends that an over-arching health and well-being policy and/or a specific Health Impact Assessment (HIA) policy is included in the Local Plan. It is accordingly unclear as to how this specifically supports the NPPF 'Promoting Healthy Communities' sections. This matter was raised by ECC in its representations at the Development Management Policies (Local Plan) consultation stage in 2017. This also means absence of an appropriate policy basis for assessing development proposals (the Plan being largely silent on these matters)

Change To Plan: ECC Public Health recommends adding an over-arching health and well-being policy and a specific Health Impact Assessment (HIA) policy to ensure conformity with the NPPF.

ECC recommends collaborative working prior to Local Plan submission between ECC (Public Health) and HC to set the form of wording.

Full Reference: C - 6871 - 8452 - BACKGROUND - None

6621 Comment **Respondent: GLADMAN (Mr Phill Bamford) [8618]**

Agent: N/A

Summary: It is welcomed that the HDLP recognises the need to regenerate the town. However, as set out in Section 4 above, it is considered that the housing requirement across the HMA does not reflect the full level of housing need. Concern is also expressed over the identification of a number of large scale garden communities in Harlow, Epping Forest and East Hertfordshire in order to deliver substantial housing growth in these areas across the plan period. New Garden Communities are complex and difficult to deliver. Lead-in times are significant and the infrastructure which is required, often before development is commenced, has a considerable impact on viability. Great care should therefore be exercised when considering the allocation of large scale strategic sites, especially when several are being proposed in a limited geographical area. This has proven to be the case in North Essex where the examining Inspector for the North Essex Plan has expressed considerable concerns with the Councils' approach to the delivery of Garden Communities.

Change To Plan:

Full Reference: C - 6621 - 8618 - CONTEXT, VISION AND OBJECTIVES - None

6659 Comment **Respondent: Hertfordshire County Council (Mr Martin Wells) [8622]**

Agent: N/A

Summary: The transport vision and objectives set out within the Local Plan are progressive and are a clear step change from the traditional private vehicle focused measures. Of key importance is the aspiration for a modal shift outlined in paragraph 2.34 ... There are also aspirations for a modal shift in travel, meaning 60% of travel would be by sustainable modes of transport... For the level of growth proposed, the impact on the transport network would be acceptable if this 60% modal split is achieved. This is also recognised within paragraph 5.16 of the Pre-Submission Local Plan. If the Local Plan is to deliver such a significant mode shift, the sustainable travel policies should be extensive and robust. The local Plan contains appropriate support for these policies, and outlines them within the objectives 13 and 14.

Change To Plan:

Full Reference: C - 6659 - 8622 - CONTEXT, VISION AND OBJECTIVES - None

6872 Comment **Respondent: Essex County Council (Mr Rich Cooke) [8452]**

Agent: N/A

Summary: ECC has identified that there is very little evidence base coverage of Harlow health portrait and key issues / challenges in early Plan sections, other than at paragraph 2.12: 'The population of Harlow, in comparison to the rest of Essex, is relatively young with 21% of its residents aged between 0-15 years, and the percentage of older persons living in Harlow is lower than Essex and England averages. The district has a higher than average number of lone parent households and higher overcrowding levels compared to the rest of Essex and England. Smoking and obesity levels in Harlow are higher than average, with physical activity rates lower than average' Harlow Health and Wellbeing Strategy (2018-2028):

Change To Plan: ECC (Public Health) recommends adding content in Chapter 2 to outline key health and well-being challenges for Harlow (drawing from the Harlow health profile) This section would also benefit significantly from inclusion of references to the up-to-date Harlow Health and Wellbeing Strategy (2018-2028).

This would not only help frame and inform an Local Plan policy response but that response would also help to implement the aims of the strategy and compliance and delivery of the NPPF.

Full Reference: C - 6872 - 8452 - CONTEXT, VISION AND OBJECTIVES - None

6426 Object **Respondent: STOP Harlow North [8588]**

Agent: Mr Jed Griffiths [8576]

Summary: The Local Plan has not fully complied with the Regulations on public consultation, with a lack of meaningful engagement on the overall strategy for the HMA as a whole.

Change To Plan: Put the submission on hold. All three LPAs should consult on the overall strategy for the wider sub-region.

Full Reference: O - 6426 - 8588 - The Preparation of the Harlow Local Development Plan - i, ii, iii, iv

6654 Comment **Respondent: Harlow Alliance Party (Mr Nicholas Taylor) [8621]**

Agent: N/A

Summary: We are sure the Council would like to be transparent with its Citizens, but it appears that they have submitted the local plan without giving the details of the additional infrastructure needed in health, education, wellbeing or transport. We therefore feel that the Council should have started the consultation period only when the plan is complete with the infrastructure expectations. It is not acceptable to state in the Sustainability Assessment dated May 201 8 that a Sustainability Transport Corridor Study for Harlow and Gilston Garden Development is currently being prepared.

The council are quite aware that infrastructure was agreed that affects Harlow's population as part of the LA working group and the Infrastructure Assessment dated December 201 7 submitted as part of the Epping Local Plan clearly defines these matters within and on the borders of Harlow.

The council therefore, should be clearly showing its citizens these matters rather than people having to hunt for them in adjoining authorities' plans.

Change To Plan:

Full Reference: C - 6654 - 8621 - The Preparation of the Harlow Local Development Plan - None

6716 Comment **Respondent: Jean Wright [5878]**

Agent: N/A

Summary: The map used in the pack does not show Gilden Park or the land being developed as a designated building site. This is misleading as anyone looking at it, unfamiliar with the now building site on Gilden Way, would think it was still an open space. It now resembles an industrial site more than a building site with what looks like houses which could be found anywhere in Britain and large heaps of what looks like subsoil which appear to be constantly on the move or being increased in size.

Change To Plan:

Full Reference: C - 6716 - 5878 - The Preparation of the Harlow Local Development Plan - None

6809 Comment **Respondent: Chelmsford City Council (Ms Jenny Robinson) [8636]**

Agent: N/A

Summary: Overall, CCC believes the Plan provides a coherent strategy for future growth of Harlow district, and seeks to meet the identified objectively assessed development needs for housing and employment, as supported by its evidence base. The Plan is therefore considered to be sound.

Change To Plan:

Full Reference: C - 6809 - 8636 - The Preparation of the Harlow Local Development Plan - None

6685 Object **Respondent: Historic England (Ms Debbie Mack) [8623]**

Agent: N/A

Summary: Registered Parks and Gardens should also be included in the list of heritage assets.

Change To Plan: Registered Parks and Gardens should also be included in the list of heritage assets.

Full Reference: O - 6685 - 8623 - Next Steps - None

6469 Object

Respondent: Miller Strategic Land [5769]

Agent: Andrew Martin - Planning (Mr Olivier Spencer) [5533]

Summary: Our client is broadly supportive of the Policies Map referred to at paragraph 1.19, but would like to raise a specific objection in respect of:

- (i) the new east-west Green Wedge shown permeating through the East Harlow site;
- (ii) the New Allotment provision in the same location; and
- (iii) the Indicative East-West Sustainable Transport Corridor, as it passes through New Hall.

Change To Plan: Our client respectfully requests that the Policies Map is amended to show the following:

- an "Indicative Green Wedge" rather than a "Green Wedge" on-site at East Harlow;
- "Indicative New Allotments" rather than "New Allotment" on-site at East Harlow; and
- the "Approved East-West Sustainable Transport Corridor" rather than an "Indicative East-West Sustainable Transport Corridor" where it passes through the New Hall site.

Full Reference: O - 6469 - 5769 - The Policies Map - ii

6848 Object

Respondent: Miss Mary Wiltshire [6026]

Agent: N/A

Summary: Policies Map does not show the detail of Gilden way. indicated green wedge and green finger lands not generally open for public access.

Change To Plan:

Full Reference: O - 6848 - 6026 - The Policies Map - None

6780 Comment

Respondent: Thames Water (Savills) (Mr Chris Colloff) [8433]

Agent: N/A

Summary: As set out above a high quality hydraulic sewer model has been created and we are currently reviewing the sites specified in the Local Plan to assess the whether it is likely that any network reinforcement works will be required to support their delivery. The outputs from this work will feed into the Water Cycle Study being prepared by the Council and we will provide comments on the sites as soon as they are available.

Notwithstanding the above, Thames Water will work with developers and local authorities to ensure that any necessary infrastructure reinforcement is delivered ahead of occupation.

Thames Water will deliver any necessary upgrades required to support growth and these will be funded through the Infrastructure Charge.

In some circumstances Thames Water may seek the inclusion of phasing conditions in order to avoid adverse amenity impacts for existing or future users such as internal and external sewer flooding and pollution of land and water courses. To minimise the likelihood of requiring such conditions developers are advised to contact Thames Water as early as possible to discuss their development proposals and intended delivery programme. This is important as the potential impacts on the network can be affected by factors including the scale of development, timing of delivery, point of connection and development elsewhere in the catchment.

Change To Plan:

Full Reference: C - 6780 - 8433 - Evidence Base - None

6789 Comment

Respondent: Hallam Land Management & Commercial Estates Group (Mike Newton) [7646]

Agent: N/A

Summary: Further justification is required as to why the full OAN for the West Essex and East Hertfordshire HMA is not proposed to be met, particularly given that an updated MoU has not been prepared to reflect the latest SHMA Update and that additional capacity is available at sustainable allocations, such as Latton Priors

Change To Plan:

Full Reference: C - 6789 - 7646 - Evidence Base - None

6833 Comment **Respondent: Sandra Beavis [5035]**

Agent: N/A

Summary: There maybe a slight growth to the local Hatches from building extra dwellings, but the Hatches are not used for 'the weekly shop', but as a back-up to those items that have been forgotten on the weekly shop.
Online food shopping is a growth industry and therefore reliance on buses and private vehicles has already reduced.
Owners of private vehicles will always prefer to do their shopping at supermarkets in their cars as their 'travel choice', than the alternative of public transport, consequently it is certain that there will not be a 'modal shift'.

Options B or C, in Table 5.3 for the HS2-5 site remains at 36 dwellings, however, paragraphs 1-3 are pertinent to the effects of what could be built on the land, the infrastructure, transport, existing built-up areas within close proximity of homes, the landscape of Harlow and countryside and the impact of design to the layout of existing streets, is contrary to the original Master Plan of Sir Frederick Gibberd.

In my opinion this is going to be detrimental to the quality of life for all the existing residents of Harlow. This could lead to working people leaving Harlow to find more pleasant areas of the country to live in. This in turn would increase the proportion of very young and old people, thus increasing the demand on Harlow council for social spending, whilst the tax paying base has decreased.

Change To Plan:

Full Reference: C - 6833 - 5035 - Sustainability Appraisal and other supporting documents - None

6834 Comment **Respondent: Sandra Beavis [5035]**

Agent: N/A

Summary: 'Air pollution in Harlow is considered generally low and the air quality is improving in the District' I do not see how creating more homes and consequently more vehicles can keep the pollution and air quality in Harlow low. Creating 'sustainable transport corridors' in the belief that owners of vehicles will shift to public transport, is from my personal observation, something that will just not happen. (Consider this, if you needed to bring home the weekly shopping and you had a choice of using your car or a bus, which would you choose?) Furthermore, the consequential increase in commercial vehicles that will come into Harlow to sustain its increased population will have a detrimental effect to the infrastructure, in particular the roads in air quality.

Change To Plan:

Full Reference: C - 6834 - 5035 - Sustainability Appraisal and other supporting documents - None

6835 Comment **Respondent: Sandra Beavis [5035]**

Agent: N/A

Summary: By focusing housing and employment in the east, even with good public transport and infrastructure, does not equate to reducing dependency on the car. The Gibberd Master Plan was not to have housing too near to the industrial estates and cycling and public transport was the preferred mode of transport at that time.
Commuters cannot rely on bus companies to provide sustainable and reliable public transport to their places of employment. Furthermore, buses do not always provide a service that goes to the required destination nor run at the times required. The cost of fares can also be off-putting to workers. The overall consequences of this, will be to increase pressure on key transport corridors, exacerbating congestion problems where they exist and possibly creating new areas of congestion where they don't currently exist.

Change To Plan:

Full Reference: C - 6835 - 5035 - Sustainability Appraisal and other supporting documents - None

6836 Comment**Respondent: Sandra Beavis [5035]****Agent: N/A**

Summary: In my opinion, the design of every new-dwelling that Harlow Council commissions, should have suitable facilities* for the occupiers to install charging points when they make the transition from petrol/diesel to electric vehicles . .
* e.g. garages or hard standings close to the dwellings and close to high power electric cables that can carry power to the occupier's charging point.
There is a 'chicken and egg' situation where people are reluctant to change to electric vehicles if they consider there is inadequate facilities for charging, whilst councils and businesses seem to be reluctant to invest in charging points whilst there are so few electric vehicles on the road.
In my opinion, Harlow Council should become a leader in the provision of charging points for electric vehicles by providing them in all new builds and public car parks. In addition it should create an incentive for local businesses with parking facilities to provide charging points for its employees and customers.

Change To Plan:

Full Reference: C - 6836 - 5035 - Sustainability Appraisal and other supporting documents - None

6837 Comment**Respondent: Sandra Beavis [5035]****Agent: N/A**

Summary: From the above Policy IN3 I assume that any new builds will have parking provided near the residents home for 'accessibility and promoting their travel choice'. It does not automatically follow that Policy IN3 will reduce reliance to travel in any particular vehicle 'while ensuring that on-street parking issues are not created'.
There are already on-street parking issues for existing residents, as the vehicle requirements outweigh the available space, and consequently 'hardstands' on residents homes are becoming the norm, which could have future long-term drainage issues (this is not just a problem in Harlow, but countrywide).

Change To Plan:

Full Reference: C - 6837 - 5035 - Sustainability Appraisal and other supporting documents - None

6838 Comment**Respondent: Sandra Beavis [5035]****Agent: N/A**

Summary: In my opinion it is not appropriate to conclude these plans will have a neutral effect for all the reasons I have previously stated. I am alarmed to read that the mitigation measures will be an 'iterative process'. To me, this sounds like 'let the people of Harlow suck it and see', which is not the way I would expect a Report of this kind to conclude.

Change To Plan:

Full Reference: C - 6838 - 5035 - Sustainability Appraisal and other supporting documents - None

6839 Comment**Respondent: Sandra Beavis [5035]****Agent: N/A**

Summary: I agree with the first sentence of 9.40, that the loss of greenfield land has the potential for a cumulative negative effect on biodiversity through habitat loss and fragmentation. For this reason I object to building dwellings on the playing field labelled HS2-5 site. This playing field is surrounded by trees and hedgerows in a built-up area.
Please remember the Gibberd Master Plan included 'green wedges and green fingers as an infrastructure to provide ecological corridors for wildlife', which need to be protected, 'which are key physical features of Harlow that have shaped its subsequent growth'.

Change To Plan:

Full Reference: C - 6839 - 5035 - Sustainability Appraisal and other supporting documents - None

6840 Comment**Respondent: Sandra Beavis [5035]****Agent: N/A**

Summary: I note that the report acknowledges that site specific policies will be required and despite this, its concluded that uncertain minor negative effects will be inflicted on the residents of Harlow. For the reasons and objections I have stated, I do not believe the negative effects will be minor- they are more likely to be major negative effects.

Change To Plan:

Full Reference: C - 6840 - 5035 - Sustainability Appraisal and other supporting documents - None

6841 Comment Respondent: Sandra Beavis [5035]

Agent: N/A

Summary: In my opinion building more dwellings throughout Harlow will increase the number of vehicles in Harlow and this will inevitably lead to greater emissions of pollutants. If you've seen some of the thick black smoke emitted by some of the buses in Harlow, you would probably agree with me that quoting the 7 use of public transport is not necessarily going to reduce obnoxious emissions.

Change To Plan:

Full Reference: C - 6841 - 5035 - Sustainability Appraisal and other supporting documents - None

6842 Comment Respondent: Sandra Beavis [5035]

Agent: N/A

Summary: HS2-5 is a playing field, with trees, bushes and hedgerows and a source of drainage for lower-lying homes. It is constantly used by Radburn Close residents for a variety of purposes that includes viewing as a source of relaxation and enjoyment, a cycle track, playing football, golf etc.

Change To Plan:

Full Reference: C - 6842 - 5035 - Sustainability Appraisal and other supporting documents - None

6843 Comment Respondent: Sandra Beavis [5035]

Agent: N/A

Summary: I agree with the sentiments expressed in the above paragraph provided all new dwellings are on brown-field sites and green sites are left undeveloped as was envisaged in the Sir Frederick Gibberd's original plans. If Harlow is made into a concrete jungle, all the laudable sentiments expressed in the above paragraph will be in serious jeopardy.

Change To Plan:

Full Reference: C - 6843 - 5035 - Sustainability Appraisal and other supporting documents - None

6844 Comment Respondent: Sandra Beavis [5035]

Agent: N/A

Summary: (1). Disagree that the long-term negative effects will only be minor.
(2). The report author acknowledges uncertainty on the subject of negative effects, thereby strengthening our arguments that the effects will be major, not minor.
(3). We cannot understand the logic of saying that a 'no plan' scenario will necessarily result in greenfield loss. Naturally there should be a plan, but this should not take away greenfield sites within Harlow. If housing pressure demands the use of greenfield sites, these should be on the outskirts of Harlow, not within Harlow.

Change To Plan: The significance of effects will be mainly caused by the developments within Harlow and only to a lesser extent by those developments surrounding Harlow.

Full Reference: C - 6844 - 5035 - Sustainability Appraisal and other supporting documents - None

6854 Comment**Respondent: Redrow Homes (Ms Kate Holland) [8640]****Agent: Redrow Homes (Ms Kate Holland) [8640]**

Summary: HARLOW GREEN BELT REVIEW (2016)

The Council subsequently subdivided those eight areas which scored averagely or poorly in the Stage 1 Assessment to allow them to be further assessed against purposes 3 (safeguarding the countryside from encroachment) and purpose 4 (preserving the setting and special character of historic towns). The Site at Moor Hall Road was located within sub-area 8.1 which was assessed as having a minor contribution to purpose 3 and no contribution to purpose 4. The Council therefore determined that this sub-area is not functioning Green Belt as assessed against Paragraph 80 of the NPPF.

At present, the Green Belt boundary at Parcel 8.1 is defined by the rear gardens of properties on Windmill Fields and surrounding residential roads. The varied garden depths and boundary features forms a weak boundary with the Green Belt. The location of area 8.1 adjacent to the existing built up area of Churchway Green to the west and positioned between the urban area and the M11 motorway to the east, provides an opportunity to strengthen the Green Belt boundary to the east of Harlow using a significant existing permanent physical feature of the M11 motorway. This would reinforce the Green Belt boundary in perpetuity in accordance with NPPF paragraph 85.

Change To Plan: The Site south of Moor Hall Road falls within parcel 8.1, located directly adjacent to the existing built up area. The Site sits within an area of land which is considered by the Council as not functioning as Green Belt when assessed against the five purposes as defined at Paragraph 80 of the NPPF and it is therefore considered that this land should be released from the Green Belt in accordance with the recommendations of the Council's Green Belt Review.

Full Reference: C - 6854 - 8640 - Sustainability Appraisal and other supporting documents - None

6427 Object

Respondent: STOP Harlow North [8588]

Agent: Mr Jed Griffiths [8576]

Summary: As noted in response to paragraphs 1.9 - 1.19 above, SHN notes the efforts made by Harlow District Council to fulfill the Duty to Co-operate. The overall strategy for Harlow and the surrounding area, however, has not been subjected to any meaningful engagement with local communities. There is a democratic deficit which should be addressed.

Change To Plan: Put the submission on hold. The three LPAs should jointly prepare a strategy for Harlow and the sub-region, which should be published for public consultation.

Full Reference: O - 6427 - 8588 - Duty to Co-operate - i, ii, iii

6810 Support

Respondent: Chelmsford City Council (Ms Jenny Robinson) [8636]

Agent: N/A

Summary: Duty to Co-operate has been met through the ongoing engagement via the West Essex authorities forming Harlow's Housing Market Area. The Plan's allocations are unlikely to have any adverse cross-boundary impacts on Chelmsford.

Change To Plan:

Full Reference: S - 6810 - 8636 - Duty to Co-operate - None

6699 Comment

Respondent: Home Builders Federation (Mr Mark Behrendt) [8450]

Agent: N/A

Summary: There has clearly been a significant level of co-operation between Epping Forest and those other authorities in the East Herts and West Essex Housing Market Area (HMA). The four authorities forming this HMA have worked together to identify the housing needs for the area and then agreed a distribution between each authority. This distribution places significant emphasis on growth in and around the Harlow area, a similar approach to that identified in the East of England Regional Spatial Strategy. Whilst we welcome the level of co-operation that has been achieved between the four authorities in the HMA, we remain concerned regarding the approach taken in assessing the level of housing needs for the HMA and the subsequent approach taken to distributing needs across each LPA. In summary we consider that there the Council's within the HMA have underestimated their housing needs by unjustifiably reducing the demographic starting point and taking insufficient account of market signals. We consider that there is a need to allocate further sites across the HMA in order to meet needs. However, in relation to Harlow we recognise the limited ability to increase delivery given the tightly bounded nature of the Council's boundary. A brief appraisal of the Council's assessment of housing needs is set out below.

Change To Plan:

Full Reference: C - 6699 - 8450 - Duty to Co-operate - None

6826 Comment

Respondent: Epping Forest District Council (Ms Alison Blom-Cooper) [8637]

Agent: N/A

Summary: EFDC are pleased to note the Plan's reference to the Duty to Cooperate and to the agreed MoUs to which EFDC is a signatory. Further detail could be given on the Duty to Cooperate working that has taken place such as through the Cooperation for Sustainable Development Board. This would further emphasise the productive and collaborative working between the Essex, Hertfordshire and Greater London authorities that has taken place since the creation of the Board in 2014.

Change To Plan:

Full Reference: C - 6826 - 8637 - Duty to Co-operate - None

6831 Comment **Respondent: Epping Forest District Council (Ms Alison Blom-Cooper) [8637]** **Agent: N/A**

Summary: Paragraph 1.31 makes reference to the MoU with respect to the management of growth from development on the Epping Forest SAC. It would be helpful, for the sake of completeness, to provide further commentary which explains that this is in relation to the potential effects of recreational pressure and air pollution on the integrity of the SAC.

EFDC recognises that there are no European designated nature conservation sites within the Harlow District Council administrative area. However, it is suggested that again, for completeness, and in order to reflect the MoU, that reference is made to the Epping Forest SAC site (and it is suggested the Lee Valley SPA/Ramsar site) as being located to the south and south east of Harlow within the supporting text to Policy WE3 Biodiversity and Geodiversity, particularly bearing in mind the statutory 'in combination' test applicable under Habitats Regulations. It would also be helpful to include the Plan's Habitats Regulations Assessment (HRA) findings with regard to these two European sites and in particular to those findings in relation to the Epping Forest SAC.

Change To Plan:

Full Reference: C - 6831 - 8637 - Duty to Co-operate - None

CHAPTER: CONTEXT, VISION AND Harlow and Gilston Garden Town
OBJECTIVES

6446 Support **Respondent: Deanery of Harlow (Anglican) (Revd Martin Harris) [8586]** **Agent: N/A**

Summary: I welcome the development of Gilston Garden Town. It is good to see the focus on infrastructure development generally.

Change To Plan:

Full Reference: S - 6446 - 8586 - Harlow and Gilston Garden Town - None

6428 Comment **Respondent: STOP Harlow North [8588]** **Agent: Mr Jed Griffiths [8576]**

Summary: Paragraphs 1.34 and 1.35 acknowledge the key assumption underlying the Local Plan - the delivery of the Harlow and Gilston Garden Town. In the view of SHN this is a fundamental weakness of the Plan, which is over-ambitious and too dependent on external circumstances. Proposals for the Gilston Area, to the north of Harlow, have been set out in a Concept Framework, which shows that development would be delivered in seven garden villages. From the evidence of the Concept Framework, it would appear that these elements would develop independently from Harlow and would contribute little to its regeneration.

Change To Plan:

Full Reference: C - 6428 - 8588 - Harlow and Gilston Garden Town - None

6666 Comment **Respondent: Hertfordshire County Council (Mr Martin Wells) [8622]** **Agent: N/A**

Summary: Paragraph 1.34 should be amended to include Hertfordshire County Council (HCC), as it is both a service provider and Highway Authority.

Change To Plan:

Full Reference: C - 6666 - 8622 - Harlow and Gilston Garden Town - None

CHAPTER: CONTEXT, VISION AND
OBJECTIVES

Applying the policies in the assessment of planning applications

6580 Comment

Respondent: Canal & River Trust (Ms Tessa Craig) [8612]

Agent: N/A

Summary: We would request that page 7 'Applying the policies in the assessment of planning applications' point 1.36-1.42 include a section encouraging developers to seek pre-application advice. Where their proposal is adjacent to our waterway, they should consult the Trust, we provide free pre-application advice. We would also advise developers to consult our Code of Practice for practical advice:

Change To Plan:

Full Reference: C - 6580 - 8612 - Applying the policies in the assessment of planning applications - None

CHAPTER: CONTEXT, VISION AND
OBJECTIVES

Population Profile

6850 Object

Respondent: Mr John Graham [8542]

Agent: N/A

Summary: The population growth forecast is questionable.

As the former partner of Frederick Gibberd, I worked with him for more 30 years from 1952, from key buildings in Harlow to the design of the eastern side of the market square. I am a fellow of the R.I.B.A.

Change To Plan:

Full Reference: O - 6850 - 8542 - Population Profile - None

6701 Comment

Respondent: Home Builders Federation (Mr Mark Behrendt) [8450]

Agent: N/A

Summary: We would agree with the Council that the 2014 based Sub National Population Projections and Household Projections, published by ONS and DCLG respectively, are the starting point for assessing housing needs. However, the Council considers the five-year migration trend used in the preparation of both these datasets to overestimate the level of migration in future. The Council deems that a 10-year trend better reflects future trends and that the five-year migration trend is an "unprecedented" representation of migration when considered against the context of the last 25 years.

Change To Plan: We would therefore suggest that there is sufficient evidence to support the migratory patterns set out in the DCLG official projections and given that these are favoured by Government and considered to be robust they should form the demographic starting point for considering OAN. However, the Council have not looked to justify their position other than to state that it is their favoured approach. At present the Government supports the use of the official projections, which uses a five-year trend, and without further and compelling evidence as to why a different trend should be used the official projections should be considered robust.

Full Reference: C - 6701 - 8450 - Population Profile - None

CHAPTER: CONTEXT, VISION AND
OBJECTIVES

Housing and Affordability

6448 Comment

Respondent: Deanery of Harlow (Anglican) (Revd Martin Harris) [8586]

Agent: N/A

Summary: Affordable housing is a local issue eg when I spoke to a couple looking too get married recently. Though this is acknowledged (30% desirable), can more be done to make sure that developers include significant affordable housing? ie that this is more than an aspiration. Developers tend to want to build more expensive homes and this wants to be resisted wherever possible (hopefully resulting in something suitably balanced.)

Change To Plan:

Full Reference: C - 6448 - 8586 - Housing and Affordability - None

6449 Comment **Respondent: Deanery of Harlow (Anglican) (Revd Martin Harris) [8586]**

Agent: N/A

Summary: I welcome the proposed new M11 junction for reasons of developing the local economy. This needs simply to be done; virtually any additional junction within reason is better than no new one.

Change To Plan:

Full Reference: C - 6449 - 8586 - Transport and Accessibility - None

6660 Comment **Respondent: Hertfordshire County Council (Mr Martin Wells) [8622]**

Agent: N/A

Summary: Whilst the Local Plan has an overarching theme of a significant increase of sustainable travel, HCC are concerned that the transport related policies are not supportive enough and the policy wording lacking in crucial areas to achieve the modal shift to 60% sustainable travel.
A primary area of concern is the lack of a clearly defined modal hierarchy. Whilst it is referred to throughout, it is not presented definitively.
Another key concern is the lack of linkage with the parking policy. In order to encourage a switch to sustainable transport modes, there is a need to limit the amount of parking provision, particularly at locations served by the proposed sustainable transport corridors. Whilst Essex County Council's parking strategy allows some flexibility, there is concern it is not in line with the ambition of the sustainable travel target.

Change To Plan:

Full Reference: C - 6660 - 8622 - Transport and Accessibility - None

6679 Comment **Respondent: Highways England (Mr Mark Norman) [7939]**

Agent: N/A

Summary: Highways England interest with the proposal is with the potential impact on the Strategic Road Network (SRN) and its ability to be able to operate safely and efficiently with the proposals in place. In particular, our interest relates to the M11, Junction 7 being the nearest access point of the proposed development to the SRN.
It is noted that planning permission has been sought and design is progressing for a new M11 Junction 7a, and this will need to be in place when the development in the plan commences construction if problems at M11 J7 are to be avoided. This applies more so to site HS 3 than any of the other sites, which individually are likely to have relatively little impact upon M11 J7.

Change To Plan:

Full Reference: C - 6679 - 7939 - Transport and Accessibility - None

6722 Comment **Respondent: Mrs Karen Garrod [8596]**

Agent: N/A

Summary: For the purposes of sustainable travel plans, the report justifies sustainable travel methods with the inclusion of cycling, walking and public transport. A high emphasis is placed on residents cycling, walking and using public transport. However, most working people are 'time poor' and these methods are time consuming.

Change To Plan:

Full Reference: C - 6722 - 8596 - Transport and Accessibility - None

6791 Comment **Respondent: Hallam Land Management & Commercial Estates Group (Mike Newton) [7646]**

Agent: N/A

Summary: The opportunity to create a north/south Sustainable Transport Corridor through Harlow is supported subject to further assessment and, if found sound, should carry a specific policy commitment.

Change To Plan:

Full Reference: C - 6791 - 7646 - Transport and Accessibility - None

6873 Comment**Respondent: Essex County Council (Mr Rich Cooke) [8452]****Agent: N/A**

Summary: Text may not place sufficient emphasis on the importance of and localised necessary characteristics of sustainable travel. ECC (Highways) recommends the paragraph is amended.

Change To Plan: ECC (Highways) recommends the following amendments:

"There is also a need to increase the frequency of the bus services to the industrial estates; to provide more opportunities to travel sustainably within and in and out of Harlow; to increase the provision of Sunday services; and to improve journey times for buses."

The deletion of the last few words of the sentence is recommended as there are other ways of improving bus journey times, such as providing additional Passenger Transport infrastructure.

Full Reference: C - 6873 - 8452 - Transport and Accessibility - None

6874 Comment**Respondent: Essex County Council (Mr Rich Cooke) [8452]****Agent: N/A**

Summary: Addition to text suggested in the interests of ensuring that the sustainable travel hierarchy is included, reflected appropriately and sets context for policies / strategies.

Change To Plan: ECC (Highways) recommends the following additional text is added:

"Sustainable transport matters (including walking, cycling and public transport) and reducing the need to travel are, therefore, important for the successful future growth of Harlow."

Full Reference: C - 6874 - 8452 - Transport and Accessibility - None

CHAPTER: CONTEXT, VISION AND OBJECTIVES
Green Infrastructure and the Natural Environment**6664 Comment****Respondent: Hertfordshire County Council (Mr Martin Wells) [8622]****Agent: N/A**

Summary: The reference to Green Infrastructure (GI) is fully supported. However, there is no mention of the River Stort as a key strategic GI asset. There is also no mention of local distinctiveness or wording to promote the conservation and enhancement of landscape character and visual amenity. These demonstrate an ambition to create places that are not only high quality, but attractive too, and provide vital hooks to local landscape/townscape character assessment that are an important tool to help guide positive change (see comment under local distinctiveness).

The reference to GI and a strong network of green wedges and fingers is well embedded throughout the plan. There is concern however that it should be clearer that the definition of GI includes both green and blue assets, in particular the Stort River Valley that is an important regional asset that runs along the boundary between Hertfordshire and Essex.

It is the view of HCC that the Stort River Valley could be brought into public use, as a way of integrating the new communities in the Gilston Area with the expansion of Harlow to the south. This area is identified as a rural green link in the Hertfordshire Green Infrastructure Plan, where the connectivity of the GI network could be strengthened, in order to encourage public access within this area.

There is no reference to the Hertfordshire Strategic Green Infrastructure Plan (Incorporating the Green Arc area) which also covers Harlow and the wider area. This document should be a key aspect of the evidence base, and recognises key GI proposals/projects for the river valley of the Stort, the woodland arc and strategic connections.

Change To Plan:

Full Reference: C - 6664 - 8622 - Green Infrastructure and the Natural Environment - None

CHAPTER: CONTEXT, VISION AND
OBJECTIVES

Historic Environment

6686 Object **Respondent: Historic England (Ms Debbie Mack) [8623]**

Agent: N/A

Summary: Include Registered Parks and Gardens.

Change To Plan: Include Registered Parks and Gardens.

Full Reference: O - 6686 - 8623 - Historic Environment - None

CHAPTER: CONTEXT, VISION AND
OBJECTIVES

Issues and Challenges

6429 Comment **Respondent: STOP Harlow North [8588]**

Agent: Mr Jed Griffiths [8576]

Summary: Harlow should address its economic problems within the District Council boundary. There is no guarantee that the provision of large-scale housing would solve the problem.

Change To Plan:

Full Reference: C - 6429 - 8588 - Issues and Challenges - None

6875 Comment **Respondent: Essex County Council (Mr Rich Cooke) [8452]**

Agent: N/A

Summary: Wording revisions recommended to reflect the context of future travel requirements more fully, beyond public transport (although the first extra word suggested is descriptive in nature, the latter wording addition is necessary to describe the full extent of transport investments required).

Change To Plan: ECC (Highways) recommends the following suggested amendment:

"Residential growth, located, managed and phased appropriately, will help to provide the investment needed to deliver infrastructure requirements including improvements to sustainable and public transport, the local and strategic road network and social infrastructure such as education and health, including the future requirements of the Princess Alexandra Hospital."

Full Reference: C - 6875 - 8452 - Issues and Challenges - None

6876 Comment **Respondent: Essex County Council (Mr Rich Cooke) [8452]**

Agent: N/A

Summary: It is unclear what is meant by this paragraph in the context of delivering major infrastructure through its current wording. Amendments are recommended to provide clarity

Change To Plan: ECC (Highways) suggests an amendment of this paragraph to:

"Significant behavioural change..." And: "... ensure Harlow is an attractive, sustainable and healthy town ..."

NB wording 'attractive' is meant in context of the town's ability to attract visitors, investors, etc.

Full Reference: C - 6876 - 8452 - Issues and Challenges - None

6447 Support

Respondent: Deanery of Harlow (Anglican) (Revd Martin Harris) [8586]

Agent: N/A

Summary: I welcome the development of Gilston Garden Town; the work for the relocation or replacement of Princess Alexandra Hospital; the focus on the Town Centre (PR5) and the focus on regeneration generally. It is good to see the focus on infrastructure development generally.

Change To Plan:

Full Reference: S - 6447 - 8586 - 3. SPATIAL VISIONS AND LOCAL PLAN STRATEGIC OBJECTIVES - None

6460 Support

Respondent: The Theatres Trust (Tom Clarke) [216]

Agent: N/A

Summary: The Trust welcomes that Harlow's vision contains reference to its residents having excellent sporting, leisure and cultural facilities.

Change To Plan:

Full Reference: S - 6460 - 216 - 3. SPATIAL VISIONS AND LOCAL PLAN STRATEGIC OBJECTIVES - None

6461 Support

Respondent: The Theatres Trust (Tom Clarke) [216]

Agent: N/A

Summary: We also welcome that the provision and enhancement of Harlow's sports, leisure, recreational facilities and cultural opportunities are included as a strategic objective.

Change To Plan:

Full Reference: S - 6461 - 216 - 3. SPATIAL VISIONS AND LOCAL PLAN STRATEGIC OBJECTIVES - None

6687 Support

Respondent: Historic England (Ms Debbie Mack) [8623]

Agent: N/A

Summary: Welcome reference to delivering high quality design through new development whilst protecting and enhancing the districts historic environment.

Change To Plan:

Full Reference: S - 6687 - 8623 - 3. SPATIAL VISIONS AND LOCAL PLAN STRATEGIC OBJECTIVES - None

6729 Support

Respondent: Natural England (Ms Sarah Fraser) [8628]

Agent: N/A

Summary: Natural England supports the spatial vision's recognition of the value of Green Infrastructure and the ambition to retain and supplement existing green wedges. We note that Local Plan Strategic Objective mentions 'revitalised green spaces', however we would advise that these should be strengthened to include objectives specifically relating to the safeguarding, creation and enhancement of green infrastructure and environmental designations under the 'Placeshaping (Enhancing the quality of the built environment)' theme.

We are pleased to see the positive approach to the environment supported in the Local Plan Vision for the LSCC Core Area and commend the recognition of the economic value of green assets.

Change To Plan:

Full Reference: S - 6729 - 8628 - 3. SPATIAL VISIONS AND LOCAL PLAN STRATEGIC OBJECTIVES - None

6411 Comment **Respondent:** Essex Bridleways Association (Mrs Sue Dobson) [7887] **Agent:** N/A

Summary: Page 22 Local Plan Strategic Objectives: Objective 1 is to 'Create and enhance high quality built environments which are well connected to revitalised green spaces'. This we do not object to, but we feel that recreational access to all green spaces for all user groups is important and should be reflected within Harlow's key objectives.

To make this Plan sound, we suggest that the wording should be amended to read 'Create and enhance high quality built environments which are well connected to revitalised fully accessible green spaces'.

Change To Plan:

Full Reference: C - 6411 - 7887 - 3. SPATIAL VISIONS AND LOCAL PLAN STRATEGIC OBJECTIVES - None

6430 Comment **Respondent:** STOP Harlow North [8588] **Agent:** Mr Jed Griffiths [8576]

Summary: The spatial vision set out in this section of the Local Plan is heavily dependent on the delivery of the Harlow and Gilston Garden Town, which is opposed by STOP Harlow North (SHN). From the summary of infrastructure projects, it would appear that the only real certainty is the provision of the additional interchange on the M11 (Junction 7A). Government commitment to Cross Rail 2 has not been finalised. The four tracking of the West Anglia main line is also in doubt, because of costs and construction difficulties.

Change To Plan:

Full Reference: C - 6430 - 8588 - 3. SPATIAL VISIONS AND LOCAL PLAN STRATEGIC OBJECTIVES - None

6568 Comment **Respondent:** Canal & River Trust (Ms Tessa Craig) [8612] **Agent:** N/A

Summary: Strategic Objective 1 promotes built environments well connected to green spaces. The Trust sees the River Stort as a key green space for Harlow providing connectivity for sustainable travel and open space for recreation and wellbeing. Along sections of the River Stort are areas identified in the Policies Map as employment land. Links from the proposed 3,000 new homes at Gilston Garden Town to the north of the employment land can be made via the towpath, which feeds into Strategic Objectives 13 and 14.

Strategic Objective 13 encourages sustainable modes of transport and objective 14 seeks to improve sustainable transport links to community facilities. Again, the River Stort and its towpath is an important transport route with the potential to link up people with open space and facilities. The Trust supports these strategic objectives.

Strategic Objective 3 relates to climate change. Waterways are able to be used for heating and cooling of buildings, and the Trust have been involved in many successful projects on our network, where developments have found the system to be more efficient than air source pumps. Developers should be encouraged to explore this and other innovative technology where their site is adjacent to the River Stort.

Change To Plan:

Full Reference: C - 6568 - 8612 - 3. SPATIAL VISIONS AND LOCAL PLAN STRATEGIC OBJECTIVES - None

6622 Comment **Respondent:** GLADMAN (Mr Phill Bamford) [8618] **Agent:** N/A

Summary: Gladman support the Council's Spatial Vision and particularly the provision of sufficient new homes to meet local need and significantly increase the provision of affordable housing. This clearly reflects the Council's Corporate Priorities with more and better housing sitting at the top of the Council's stated aims. This priority is reflected in the Council's Strategic Objectives 4, 5 and 6 which are also supported. Harlow also is located within the London Stansted Cambridge Corridor (LSCC) and is clearly key to the delivery of substantial growth over the Local Plan period that will support the economic objectives of the LSCC.

Change To Plan:

Full Reference: C - 6622 - 8618 - 3. SPATIAL VISIONS AND LOCAL PLAN STRATEGIC OBJECTIVES - None

6667 Comment**Respondent: Hertfordshire County Council (Mr Martin Wells) [8622]****Agent: N/A**

Summary: Figure 3.1: Spatial vision for Harlow to 2033, based on the Harlow Corporate Plan 2017. Improvements to sustainable modes would not conflict with HCC's Local Transport Plan (LTP). However, the proposed route of a northern bypass or whether it would in fact be in East Herts District is unknown. If this is the case it may need to be considered further.
Figure 3.3: Local Plan Strategic Objectives. Reducing the need to travel by car and improving options for sustainable travel that are outlined in paragraphs 13 and 14, are approaches that are reflected in HCC's LTP.

Change To Plan:

Full Reference: C - 6667 - 8622 - 3. SPATIAL VISIONS AND LOCAL PLAN STRATEGIC OBJECTIVES - None

6751 Comment**Respondent: Quod Planning (Mr Philip Murphy) [7958]****Agent: N/A**

Summary: HDC identifies the pressing need for the urgent economic and social regeneration of Harlow which can only be delivered through a combination of housing and economic development. This is clearly articulated in HDC's evidence base which explains that insufficient land exists within Harlow (given its tight administrative boundaries) to satisfy growth and regeneration requirements. As a result, it is incumbent on surrounding Council's to work collaboratively with HDC to assist in meeting the development requirements that cannot wholly be met within Harlow's administrative boundary.
PfP strongly support the need for regeneration within Harlow which has been a strategic objective of regional and local planning policy and guidance for over a decade. The New local Plan and the initiatives being brought forward under the wider 'Garden Town' banner can help support the long-awaited delivery of these objectives. The London-Stansted-Cambridge Consortium lists Harlow as an integral economic location and labour market needed to support the prosperity of the corridor (LSCC, An Agenda for Jobs, Growth and Improved Liveability, 2014).
Development at GPE will deliver substantial new housing comprising a broad mix of unit types and tenures that can help support the economic stimulus of this part of the M11 corridor, building on relationships with Stansted airport and the Enterprise Zone at Harlow, as well as supporting existing travel to work patterns.
PfP therefore strongly support Harlow's overall ambition set out within the Pre-Submission District Plan, in particular Harlow's role as an employment location and the need for a Skills Strategy (Policies ED1, ED2, and ED3). Harlow's role as a retail centre is also encouraged. A residential led mixed-use development at GPE will help support the economic and social regeneration of Harlow and enable the strategic objectives to be achieved.

Change To Plan:

Full Reference: C - 6751 - 7958 - 3. SPATIAL VISIONS AND LOCAL PLAN STRATEGIC OBJECTIVES - None

6877 Comment**Respondent: Essex County Council (Mr Rich Cooke) [8452]****Agent: N/A**

Summary: In response to the evidence base on Harlow health and well-being issues, the Local Plan vision, Local Plan themes and Local Plan objectives need revising and substantial content added to frame the overall Local Plan approach to Health and Well-being, including the current (brief) references to
* Harlow's residents will be more active, taking advantage of Harlow's excellent
* Sporting, leisure and cultural facilities
* Major progress will have been made to address Harlow's health and wealth inequalities as well as addressing localised deprivation across the district's deprived neighbourhoods
* The current 'Lifestyles' Objective also needs review and revision:
* '11. To provide and enhance sporting, leisure, recreational facilities and cultural opportunities in the district'

Change To Plan: ECC (Public Health) recommends adding content in Figure 3.1 and 3.3 to address these matters in response to the evidence base.

A form of wording is not proposed yet but ECC suggests that it will collate this, review best practice approaches suggested to other authorities and review this collaboratively with HC in order to set out agreed Local Plan content prior to Local Plan submission and in collaboration with HC.

Full Reference: C - 6877 - 8452 - 3. SPATIAL VISIONS AND LOCAL PLAN STRATEGIC OBJECTIVES - None

6688 Support

Respondent: Historic England (Ms Debbie Mack) [8623]

Agent: N/A

Summary: Welcome reference to maintaining and enhancing the special character of the area including the locally distinctive historic character of its market towns and rural settlements.

Change To Plan:

Full Reference: S - 6688 - 8623 - London Stansted Cambridge Consortium - None

6431 Comment

Respondent: STOP Harlow North [8588]

Agent: Mr Jed Griffiths [8576]

Summary: As stated in representation 6428 above, the London-Stansted-Cambridge Corridor vision and strategy has not been subject to any formal public consultation. The Consortium is an unelected association of both public and private sector organisations. Its overall policy for growth, with Harlow as part of a "core" area has not been part of any meaningful public debate, yet it underpins the concept of the Harlow and Gilston Garden Town. This is anti-democratic.

Change To Plan:

Full Reference: C - 6431 - 8588 - London Stansted Cambridge Consortium - None

6878 Comment

Respondent: Essex County Council (Mr Rich Cooke) [8452]

Agent: N/A

Summary: ECC recommends that wording of objective 13 should be enhanced and clarified, to make clear the form of transport that needs targeting.

Objective 14 needs revision to expand its scope beyond just travel to access 'community facilities'.

Change To Plan: ECC (Highways suggests amending Local Plan objectives as follows:

"13. Reduce the need to travel, in particular by private single occupancy vehicle, and ensure new development is sustainably located and/or accessible by sustainable and innovative modes of transport

Amend objective 14 to read:

'14. Improve transport links, particularly for sustainable modes of transport, to access all facilities, including social, leisure, community, health facilities, education and jobs

Full Reference: C - 6878 - 8452 - London Stansted Cambridge Consortium - None

6465 Support **Respondent: Miller Strategic Land [5769]** **Agent: Andrew Martin - Planning (Mr Olivier Spencer) [5533]**

Summary: Our client, Miller Homes, controls 251 hectares (ha) of agricultural land, bounded by Gilden Way / Sheering Road, the M11, Church Langley and New Hall Farm, to the east of Harlow.
Our client supports the three key aims of the Spatial Development Strategy.

Change To Plan:

Full Reference: S - 6465 - 5769 - 4. SPATIAL DEVELOPMENT STRATEGY - None

6506 Support **Respondent: Miller Strategic Land [5769]** **Agent: Andrew Martin - Planning (Mr Olivier Spencer) [5533]**

Summary: Our client, Miller Homes, controls 251 hectares (ha) of agricultural land, bounded by Gilden Way / Sheering Road, the M11, Church Langley and New Hall Farm, to the east of Harlow.
Our client supports the three key aims of the Spatial Development Strategy.

Change To Plan:

Full Reference: S - 6506 - 5769 - 4. SPATIAL DEVELOPMENT STRATEGY - None

6669 Comment **Respondent: Hertfordshire County Council (Mr Martin Wells) [8622]** **Agent: N/A**

Summary: Paragraphs 4.21 and 4.22. The wording within the paragraphs would not conflict with HCC's LTP. However, there is no wording within the paragraphs as to how connectivity with the new Garden Cities will be achieved or ensured. In addition, paragraph 4.22 mentions the cycle and pedestrian paths that will contribute to leisure and sporting needs. Such options would also contribute to health and wellbeing as well as having environmental (and air quality) benefits, if it enables people to make more journeys via non-car modes.

Change To Plan:

Full Reference: C - 6669 - 8622 - 4. SPATIAL DEVELOPMENT STRATEGY - None

6792 Comment **Respondent: Hallam Land Management & Commercial Estates Group (Mike Newton) [7646]** **Agent: N/A**

Summary: We support the provision of the Strategic Infrastructure required as part of the Latton Priory site and the principle of Key Gateway Locations

Change To Plan:

Full Reference: C - 6792 - 7646 - 4. SPATIAL DEVELOPMENT STRATEGY - None

CHAPTER: CONTEXT, VISION AND OBJECTIVES

Placeshaping

6689 Object **Respondent: Historic England (Ms Debbie Mack) [8623]** **Agent: N/A**

Summary: Suggest changing managed to enhanced in line with the wording in the NPPF.

Change To Plan: Suggest changing managed to enhanced in line with the wording in the NPPF.

Full Reference: O - 6689 - 8623 - Placeshaping - None

6668 Comment **Respondent: Hertfordshire County Council (Mr Martin Wells) [8622]** **Agent: N/A**

Summary: Paragraph 4.8. The wording within this paragraph would not conflict with HCC's LTP. However, the wording within this paragraph does not mention joint working with neighbouring authorities to ensure connections between future areas such as Gilston that would join up facilitating movement into Harlow particularly by sustainable modes.

Change To Plan:

Full Reference: C - 6668 - 8622 - Placeshaping - None

6879 Comment **Respondent: Essex County Council (Mr Rich Cooke) [8452]** **Agent: N/A**

Summary: This paragraph sets out Gibberd's master plan principles, but does not refer to the (Town & Country Planning Association) Garden City principles, which do not appear to be referenced in the LDP until section 5.14. ECC strongly suggest these should be specifically referenced in the Placeshaping chapter of the Local Plan.

Change To Plan: ECC recommends a revision reflecting the need to set out the Garden City principles early, to avoid any misunderstanding that only the New Town / Gibberd principles apply where new development is to be contemplated and designed.

Amend paragraph 4.6 to also reference the Garden City principles.

Full Reference: C - 6879 - 8452 - Placeshaping - None

6467 Object

Respondent: Miller Strategic Land [5769]

Agent: Andrew Martin - Planning (Mr Olivier Spencer) [5533]

Summary: Although our client is broadly supportive of Garden Town design principles, the Spatial Vision and Design Charter referred to in paragraph 4.13 has not been published for consultation purposes. With this in mind, our client wishes to raise a holding objection to paragraph 4.13 and to reserve the right to raise further comments or objections at Examination in Public, once the final Spatial Vision and Design Charter is available.

Change To Plan: Only a holding objection is raised at this stage.

Full Reference: O - 6467 - 5769 - Housing - iii

6466 Support

Respondent: Miller Strategic Land [5769]

Agent: Andrew Martin - Planning (Mr Olivier Spencer) [5533]

Summary: Our client supports reference in paragraph 4.11 to the need to allocate a strategic housing site on open land in the east of the District.

Change To Plan:

Full Reference: S - 6466 - 5769 - Housing - None

6459 Comment

Respondent: NHS West Essex CCG (Mrs Jolene Truman) [8584]

Agent: N/A

Summary: West Essex CCG anticipate that the additional residents in Latton Priory, Sumners and Katherines, although in the Epping Forest District will register with Harlow GP Practices and therefore support the need for sufficient transport infrastructure to enable patient travel from these sites in Harlow. The specifics of the location, timing and size of the additional facilities needed for the additional growth in Harlow, will be subject of further discussion and planning to support self care and virtual management for patients, support development of larger sites and optimise use of space across health an care services to enable integrated services.

Change To Plan:

Full Reference: C - 6459 - 8584 - Housing - None

6700 Comment

Respondent: Home Builders Federation (Mr Mark Behrendt) [8450]

Agent: N/A

Summary: The Council set out in policy a housing requirement for 9,200 new homes between 2011 and 2033. This requirement is greater than the OAN identified in the SHMA due to the redistribution of housing needs agreed between the four authorities that comprise the HMA. For Harlow the housing requirement has been determined by the duty to co-operate and the fact that it is considered a more appropriate location for development within the HMA. Whilst such joint working is positive it is important to ensure that the additional capacity which has been identified by the Council is based on a sound evidence base. We are concerned that the additional capacity in Harlow for further development is a result of a SHMA that underestimates OAN for Harlow, and indeed across the HMA. This would mean that whilst Harlow would appear to be meeting its housing needs we do not consider the authority to have additional capacity to meet development needs arising in the rest of the HMA. Our two key concerns regarding the SHMA is the use of a ten-year migration trend and the level of uplift being proposed to address market signals.

Change To Plan:

Full Reference: C - 6700 - 8450 - Housing - None

6880 Comment

Respondent: Essex County Council (Mr Rich Cooke) [8452]

Agent: N/A

Summary: In this section, explicitly stated considerations do not include the word 'Sustainable'. ECC therefore suggests inclusion of this to strengthen the current wording in paragraph 4.13. This would reflect the emphasis in NPPF (section 4 on Promoting sustainable transport); ECC transport modelling and the planned 60:40 sustainable travel modes aim identified for Harlow, together with specific measures such as the sustainable transport corridors.

Change To Plan: ECC (Highways) recommends that wording is added in paragraph 4.13:

"... new communities will be able to have direct sustainable access to jobs ..."

Full Reference: C - 6880 - 8452 - Housing - None

CHAPTER: CONTEXT, VISION AND Prosperity
OBJECTIVES

6412 Comment

Respondent: Essex Bridleways Association (Mrs Sue Dobson) [7887]

Agent: N/A

Summary: Include provision for equestrians within the new Garden Communities so that the Plan is consistent throughout.

Change To Plan:

Full Reference: C - 6412 - 7887 - Prosperity - None

CHAPTER: CONTEXT, VISION AND Infrastructure
OBJECTIVES

6881 Comment

Respondent: Essex County Council (Mr Rich Cooke) [8452]

Agent: N/A

Summary: This does not mention the improvements necessary to other transport networks (other than road and public transport networks).

Change To Plan: ECC (Highways) recommends that wording is added to paragraph 4.25 to read:

"Improvements will be made to the local highway network and to the public transport, footway and cycleway networks to improve connections within Harlow and to areas outside the district."

Full Reference: C - 6881 - 8452 - Infrastructure - None

6422 Object

Respondent: Mr Danny McCaughey [8578]

Agent: N/A

Summary: I object to the indicative new sustainable transport corridor linking to the garden communities.

This proposed link would cut a line directly through the green wedge disrupting local communities, businesses and residential areas including cycle tracks from Fern Lane right through to the town centre. The town already has strong links and an easy route into the town centre. This green wedge would also not benefit from the creation of new green wedges in other areas of the town.. This would simply destroy the land creating more pollution (including near two schools and cycle/walking tracks).

Change To Plan: Scrap this indicative link and recognise that the current transport links, services and routes are more than suitable for the local and general area. The addition of a new junction on the M11 and the improved roads around Kao Park and the link to the town centre are in excellent working order. It is also worth mentioning the main junction on the entry of the town from the A414 which flows very well.

Full Reference: O - 6422 - 8578 - Key Diagram - i, ii, iii, iv

6468 Object

Respondent: Miller Strategic Land [5769]

Agent: Andrew Martin - Planning (Mr Olivier Spencer) [5533]

Summary: Our client is broadly supportive of the Key Diagram presented at Figure 4.1, but would like to raise a specific objection in respect of:

- (i) the new east-west Green Wedge shown permeating through the East Harlow site;
- (ii) the New Allotment provision in the same location; and
- (iii) lack of any Indicative New Accesses for East Harlow to the north, in Epping Forest District.

Change To Plan: Our client respectfully requests that the Key Diagram is amended to show the following:

- an "Indicative Green Wedge" rather than a "Green Wedge" on-site at East Harlow; "Indicative New Allotments" rather than "New Allotment" on-site at East Harlow; and
- two additional "Indicative New Access for the East of Harlow Strategic Housing Site" on the East Harlow land in Epping Forest District, one near Mayfield Farm and the other from the new link road roundabout leading to M11 J7A.

Full Reference: O - 6468 - 5769 - Key Diagram - ii

6471 Object **Respondent:** Miller Strategic Land [5769] **Agent:** Andrew Martin - Planning (Mr Olivier Spencer) [5533]

Summary: Our client wishes to raise a holding objection to part (a) of Policy PL1 and to reserve the right to raise further comments or objections at Examination in Public, once the final Spatial Vision and Design Charter has been published.

Change To Plan: Only a holding objection is raised at this stage.

Full Reference: O - 6471 - 5769 - 5. HARLOW AND GILSTON GARDEN TOWN - iii

6847 Object **Respondent:** Miss Mary Wiltshire [6026] **Agent:** N/A

Summary: Object garden town concept, as Harlow town already struggling with overloaded infrastructure.

Change To Plan: Any future consultation should show the Harlow residents how the costs would be shared

Full Reference: O - 6847 - 6026 - 5. HARLOW AND GILSTON GARDEN TOWN - None

6657 Support **Respondent:** Hertfordshire County Council (Mr Martin Wells) [8622] **Agent:** N/A

Summary: Housing growth within the Harlow and Gilston area is in excess of 16,000 homes within the plan period. It is recognised that the delivery of the Gilston Garden Town is fundamental to achieving the Harlow Local Plan objectives, notably infrastructure and the regeneration and expansion of sustainable transport infrastructure such as the Sustainable Transport Corridors and green infrastructure proposals. HCC has been continuously engaged with the Garden Town Group and encourages the continued relationship and engagement in the development process, this is supported by MOU's. As Highway Authority, HCC support the Garden Town proposal due to the fundamental shift towards the use of sustainable travel, with an ambitious sustainable modal split target. This is reliant on transport infrastructure within Harlow, such as North/South and East/West sustainable transport corridors and increased connectivity for walking and cycling through improved green infrastructure. HCC support the inclusion of active travel infrastructure within green infrastructure to enable good connections and permeability between Gilston and Harlow along the county border, which is stated in paragraph 10.15.

Change To Plan:

Full Reference: S - 6657 - 8622 - 5. HARLOW AND GILSTON GARDEN TOWN - None

6602 Comment **Respondent:** East Herts District Council (Mr George Pavey) [8616] **Agent:** N/A

Summary: It is noted that the policies in HGT1 are similar to those in the East Herts District Plan (Policy GA1) and reflect a set of values that the Harlow and Gilston Garden Town share. However, East Herts questions the legal basis for including policies that relate to development entirely outside of Harlow's administrative boundary.

Change To Plan:

Full Reference: C - 6602 - 8616 - 5. HARLOW AND GILSTON GARDEN TOWN - None

6623 Comment**Respondent: GLADMAN (Mr Phill Bamford) [8618]****Agent: N/A**

Summary: Concern is also expressed over the identification of a number of new Garden Communities which will provide growth not just for Harlow, but for Epping Forest and East Hertfordshire.

Whilst Gladman do not object in principle to the identification of Garden Communities, considerable care should be exercised when establishing their deliverability and viability, especially in terms of the trajectory of housing delivery.

In addition, any new Garden Communities should form part of a package of sites which provide a wide range of sites, of varying sizes, in a variety of locations that can be delivered in the short to medium term to ensure that a rolling 5-year housing land supply can be maintained in line with Government guidance.

Issues surrounding the identification of large scale Garden Communities have been examined in some detail at the recent North Essex Local Plan Examination. It is suggested that the Council review the Inspector's Advice in relation to this Examination to ensure that the issues raised have been addressed through the HLDP.

The HLDP identifies that delivering an improved Junction 7 and a new Junction 7a on the M11 are critical to the delivery of growth within Harlow District. Significant infrastructure projects such as these should not be under-estimated and it is essential that the timeframes set for the delivery of these projects is realistic and the subsequent implications for housing delivery are appropriate.

Paragraph 5.11 of the HLDP states that the Harlow and Gilston Garden Town represents a major opportunity to deliver approximately 16,000 new dwellings up to 2033. This is a highly ambitious target, especially as the delivery of the scheme requires the delivery of Junction 7a on the M11 and the preparation of a strategic masterplan. These issues will have implications for the speed of housing delivery and this should be fully reflected in the subsequent housing trajectory.

Change To Plan:

Full Reference: C - 6623 - 8618 - 5. HARLOW AND GILSTON GARDEN TOWN - None

6655 Comment**Respondent: Hertfordshire County Council (Mr Martin Wells) [8622]****Agent: N/A**

Summary: Children's Services-Schools Planning

Hertfordshire County Council (HCC) notes the two strategic Garden Town Communities that are planned within the District, along with further communities located to the east in Epping Forest District and the Gilston Area to the north in East Herts District. The Gilston Area includes a total of 10,000 new dwellings within and beyond the current Plan Period. The development area sits solely within East Herts District and HCC would expect a development of this size to provide its own school infrastructure within the development itself. HCC's response to the East Herts District Plan Regulation 19 pre-submission consultation (December 2016) outlines the education requirements for the District, which can be viewed here:

http://consult.eastherts.gov.uk/common/search/advanced_search.jsp?id=482550&sortMode=response_date&lookingFor=representations&tab=list

We are working with both the District and developers on ensuring the delivery of sufficient and appropriate education infrastructure to meet the needs of those new communities. We welcome the design, development and phased delivery principles outlined within the Pre-Submission Local Plan and the need for continued joint working in order to deliver sustainable infrastructure provision.

Change To Plan:

Full Reference: C - 6655 - 8622 - 5. HARLOW AND GILSTON GARDEN TOWN - None

6665 Comment**Respondent: Hertfordshire County Council (Mr Martin Wells) [8622]****Agent: N/A**

Summary: Minerals & Waste Planning

The Gilston development to the north of Harlow in East Herts District is proposed within the Mineral Safeguarding Areas and Consultation Areas in the Hertfordshire Minerals Local Plan in a location where it has the potential to affect mineral reserves. There is a need to ensure that potential and known mineral reserves are safeguarded from development which may 'sterilise' or prejudice the opportunity to extract them now or in the future. Where a proposed development has the potential to affect mineral reserves, appropriate consultation with the county council must take place and ways to avoid the unnecessary sterilisation of minerals should be demonstrated.

As the sand and gravel belt covers a significant area, the issue of mineral sterilisation could be an important consideration for the other strategic locations proposed in the Pre-submission Harlow Local Plan. However, this would be determined by Essex County Council as mineral planning authority for Essex.

Change To Plan:

Full Reference: C - 6665 - 8622 - 5. HARLOW AND GILSTON GARDEN TOWN - None

6670 Comment**Respondent: Hertfordshire County Council (Mr Martin Wells) [8622]****Agent: N/A**

Summary: Paragraph 5.2 should be amended to include Hertfordshire County Council (HCC), as it is both a service provider and Highway Authority.

Change To Plan:

Full Reference: C - 6670 - 8622 - 5. HARLOW AND GILSTON GARDEN TOWN - None

6680 Comment**Respondent: Historic England (Ms Debbie Mack) [8623]****Agent: N/A**

Summary: Reference is made to the Harlow and Gilston Design Charter throughout the Plan. This underpins many of the policies. However, we understand that this document is not yet available to view. Without sight of this document it is not possible to say whether sufficient protection has been given to the historic environment in policy

Change To Plan:

Full Reference: C - 6680 - 8623 - 5. HARLOW AND GILSTON GARDEN TOWN - None

6754 Comment

Respondent: Quod Planning (Mr Philip Murphy) [7958]

Agent: N/A

Summary: The Pre-Submission Plan outlines that development of the Gilston Area should be "framed by the objectives set out in the Town and Country Planning Association's nine key guiding Garden City principles" (paragraph 5.14), one of which is that "new Garden Cities should aspire to a tenure split of 30% of homes being available for social rent [with] other forms of submarket housing, such as shared-equity and low-cost or discounted ownership forming a further 30% of homes". The term 'frame', suggests consideration of a much greater proportion of affordable homes than that proposed. For consistency, it is suggested that Paragraph 5.14 is updated to include the following:
"...framed by the objectives set out in the Town and Country Planning Association's nine key guiding Garden City principles but having regard to the local specific affordable housing requirements as set out in the Harlow Local Development Plan".

PfP support the principle that the costs of strategic infrastructure should be shared (as proposed by Policy HGT1(2.n). The mechanism for doing so should be specified and it should be noted that the share of the costs of the listed infrastructure to be borne by each development will need to be carefully assessed. PfP are concerned that the plan refers to the requirement for four-tracking of the West Anglia Mainline. There has been no publication of evidence that supports the necessity of such provision within the plan period, even though it may be desirable. Given the uncertainties over deliverability it would not be appropriate to make such provision a requirement of the plan and PfP suggest this is removed. Supporting text can still refer to the desirability of such provision and that HDC along with others will work with the rail stakeholders to assist its delivery. Reference should also be made to the capacity enhancements that will come about due to new trains being introduced within the current franchise, and a more positive framework should be set for improvements around the station. PfP will be sponsoring the applications for the Central and Eastern Stort Crossings and will if necessary be providing the funding to ensure their delivery in line with the agreed development triggers for the Gilston Area. However, the Crossings are required to meet existing demand and to accommodate the planned growth of Harlow and the wider area. In particular, the Central Crossing is required to meet existing need, and the Eastern Crossing is required to meet the need of future growth in the Harlow area as a whole. The IDP will need to be clear that the Crossings serve a strategic transport purpose and contributions are required from all new development. In addition, the emerging EHDC District Plan notes that whilst the Eastern Crossing is the highway authorities preferred option for a new river crossing, a western option remains a possibility, and this should be clearly acknowledged within the HDC plan.

Change To Plan:

Full Reference: C - 6754 - 7958 - 5. HARLOW AND GILSTON GARDEN TOWN - None

6764 Comment

Respondent: Lawson Planning Partnership (Miss Kathryn Oelman) [8532]

Agent: N/A

Summary: The Trust welcomes the cross-boundary support provided by Harlow, Epping and East Hertfordshire District Councils, pledging to work co-operatively to facilitate the optimum provision of high quality healthcare facilities to serve the wider area (as referenced in paragraphs 5.38 & 5.39 of the draft Local Plan).

As referred to in paragraph 5.38, the Trust shares the aspiration that its future location will maximise use of sustainable transport modes. However, it must be noted that there are myriad of economic, operational and land use considerations which also influence the final outcome and the availability of locations for a new hospital. It would not be right therefore that sustainability alone drives this judgement. The Trust notes that text relating to its Strategic Outline Business Case (sections 5.38 & 5.39) are contained within Chapter 5: "Harlow & Gilston Garden Town". These references are suitable within this context, but the allocation of the existing site for housing, and absence of reference to support for the redevelopment option within the Development Management Policies, implies the relocation v's redevelopment options are not being given equal standing, which necessarily must be the case at this stage. However, once a firm option has been confirmed, the Trust would welcome a proposed change to the Plan to reflect the up to date position.

Change To Plan: In order to reflect the fact that redevelopment of the existing site is still an option which remains under detailed consideration, the Trust requests the inclusion of a masterplanning policy in the document. This would allow the Trust to be best placed to pursue whatever option would best meet the demand arising in the future, should it be decided that hospital relocation is not the optimal solution.

Full Reference: C - 6764 - 8532 - 5. HARLOW AND GILSTON GARDEN TOWN - None

6771 Comment **Respondent: Roydon Parish Council (Janet Ballard) [5434]** **Agent: N/A**

Summary: The Plan acknowledges that highway and transport improvements are required (paragraph 5.32). These are to include "works to the Water Lane roundabout, A1025/Abercrombie Way signals and traffic calming along the A1169".

A large increase in the volume of traffic in the area is inevitable and we believe will mean unsustainable pressures on local roads. There is an assumption that traffic will travel through Harlow for onward journeys - so improvements are being made there and towards the M11 - but this is unrealistic

Change To Plan: We suggest that these minor measures will have minimal effect (and are at a loss to understand how traffic calming is intended to improve the situation)

inevitable that 'back roads' will be used. This in turn will result in congestion, not just along the B181 but on other roads through Roydon Parish particularly Epping Road (through Roydon Village), Tylers Cross/Hamlet Hill/Sedge Green and Dobbs Weir (towards Hertfordshire) as well as Common Road (towards Nazeing).

Full Reference: C - 6771 - 5434 - 5. HARLOW AND GILSTON GARDEN TOWN - None

6772 Comment **Respondent: Roydon Parish Council (Janet Ballard) [5434]** **Agent: N/A**

Summary: Paragraph 5.16 states that the Councils' aspirations for sustainable transport include a "modal travel shift towards 60% by sustainable modes of transport". This a laudable aim but in our view is currently completely unrealistic. The 60% figure is an aspiration but should not be a serious basis for planning unless there is evidence that this is achievable. Alternative transport has not happened at other new developments in Harlow, to our knowledge, and the trend seems to be towards decreasing, rather than increasing, local bus services. We believe the Plan to be unsound in this respect.

Change To Plan:

Full Reference: C - 6772 - 5434 - 5. HARLOW AND GILSTON GARDEN TOWN - None

6851 Comment **Respondent: Redrow Homes (Ms Kate Holland) [8640]** **Agent: Redrow Homes (Ms Kate Holland) [8640]**

Summary: It is understood that the Design Charter and Spatial Vision are being developed by a design consultancy on behalf of the three authorities but is unlikely to undergo any public consultation. Policies HTG1 and HS3 require compliance with the strategic documents, however, it is understood these documents will not be published in advance of adoption of the Local Plan. It therefore is not possible to consider the potential implications of compliance with these documents upon viability of the development. Further, Paragraph 174 of the NPPF seeks the cumulative impacts of local standards to be assessed as part of the Council's evidence base to ensure the implementation of the plan is not at serious risk. No such evidence has been prepared.

Change To Plan: Policies HGT1 and HS3 are amended to remove reference to the need for development solely to reflect the overarching design principles of the Spatial Vision of Design Charter and instead include for flexibility for development to be brought forwards in advance or absence of the documents.

Full Reference: C - 6851 - 8640 - 5. HARLOW AND GILSTON GARDEN TOWN - None

6884 Comment**Respondent: Essex County Council (Mr Rich Cooke) [8452]****Agent: N/A**

Summary: Paragraph 5.27

ECC recommends removing reference in this paragraph to the number of FE. Plans should not refer to specific numbers of forms of entry as the precise need will depend on the, as yet unknown, unit mix of the development. The number of pupils using the schools will also change over time, with the need for bulge groups common in relation to new developments.

Change To Plan: ECC (Education) recommends that
Each allocation should specify:

- a) the area(s) of D1 use land included in it for school use to avoid the whole allocation being attributed residential land value and
- b) that the land given over for schools must meet the criteria set out in Essex County Council's 'Developer's Guide to Infrastructure Contributions'.

Full Reference: C - 6884 - 8452 - 5. HARLOW AND GILSTON GARDEN TOWN - None

6885 Comment**Respondent: Essex County Council (Mr Rich Cooke) [8452]****Agent: N/A**

Summary: Paragraph 5.27

This currently states:

'The Strategic Housing Site East of Harlow extends across the administrative boundary between Harlow District Council and Epping Forest District Council. The land within Harlow will provide 2,600 dwellings and land within Epping Forest will provide 750 dwellings. The development is required to provide community facilities including Early Years facilities, a two-form entry primary school and appropriate contributions (including the provision of land) towards a new secondary school.'

The Plan needs to instead reference:

Two primary schools will be required to serve 3,350 homes. Sites of 2.1ha & 2.9ha should be allocated.

The secondary school will require around 9ha of land.

ECC also wishes to highlight the need for further joint working and a statement of common ground to address cross-boundary education matters, applying in particular to this development but also more widely across Harlow, with regard to cross-boundary growth and new education provision for the Garden Town. Whilst it is important to ensure adequate and timely education provision, an element of flexibility in approach is also considered necessary around this.

Change To Plan: ECC (Education) recommends that (since the proposed wording appears to apply to the entire development across both local authorities) the wording of paragraph 5.27 is revised to reflect the full primary education requirement, as follows:

.....The development is required to provide community facilities including Early Years facilities, two primary schools and appropriate contributions (including the provision of land) towards a new secondary school.'

Provision of two sites of 2.1ha. and a site of approximately 9ha. will accordingly be allocated, all within use class D1

The latter point does not dictate any particular Local Plan content response but a reference in this paragraph may prove helpful for completeness of information and to ensure other interests are aware of this.

Full Reference: C - 6885 - 8452 - 5. HARLOW AND GILSTON GARDEN TOWN - None

6886 Comment Respondent: Essex County Council (Mr Rich Cooke) [8452]**Agent: N/A**

Summary: Paragraph 5.28

The Plan needs to instead reference:

Highway and transport improvements for the East of Harlow strategic site should include direct bus/walk/cycle access and linkage to/through Newhall site as part of Sustainable Transport Corridor improvements.

Paragraph 5.29

South of Harlow (Latton Priory)

This currently states:

Harlow South will provide around 1,050 dwellings, community facilities including Early Years facilities, a new two-form entry primary school and appropriate contributions towards a secondary school to serve new development.....

The plan needs instead to refer to a 2.1ha primary school site and not to specify 2 forms of entry.

A new secondary school site is to be included in this allocation, as well as contributions, Around 9ha of land should be allocated.

Change To Plan: ECC (Highways) recommends that wording is added in paragraph 5.28 to include direct bus/walk/cycle access and linkage to/through Newhall site - as part of Sustainable Transport Corridor improvements.

ECC (Education) recommends that paragraph 5.29 is revised as follows:

Harlow South will provide around 1,050 dwellings, community facilities including Early Years facilities, a new site (of 2.1 ha. in area) for a primary school, a site of approximately 9ha. of D1 land for a secondary school and appropriate contributions towards the secondary school to serve new development.....

Full Reference: C - 6886 - 8452 - 5. HARLOW AND GILSTON GARDEN TOWN - None

6887 Comment Respondent: Essex County Council (Mr Rich Cooke) [8452]**Agent: N/A**

Summary: ECC has identified an apparent inconsistency between the Harlow and EFDC Local Plans

Regarding employment land associated with Latton Priory, EFDC Local Plan (Submission Version) states at paragraph 5.169: "There is also an existing employment site that is allocated for a further 5,120sqm of B2/B8 class use (general industrial/storage and warehousing): RUR.E19 - Dorrington Farm, Rye Hill Road (1.85ha)"

This is at odds with both EFDC Local Plan table 3.1, and the HDC Local Plan text, which both state 1ha of B1a/B1b employment land will be provided at Dorrington Farm.

Change To Plan: ECC recommends checking to assess which position is most accurate and if necessary, revise the Local Plan text (at paragraph 5.30) accordingly.

Full Reference: C - 6887 - 8452 - 5. HARLOW AND GILSTON GARDEN TOWN - None

6888 Comment Respondent: Essex County Council (Mr Rich Cooke) [8452]**Agent: N/A**

Summary: The text does not mention where Latton Priory would gain access to the highway network. The stated preference of EFDC and site promoters is access onto Rye Hill Road (and other unsuitable local residential roads), which would result in impact on Southern Way. ECC recommends instead that the main site access should be off B1393 London Rd, with a link road through to Rye Hill Road, and with Rye Hill Road closed to general traffic south of the western access.

Change To Plan: This matter indicates the need for a constructive dialogue between ECC (Highways), HC, EFDC and the site promoters / developers. Depending on the outcome of that, this might require a revision adding to the current Local Plan text (paragraphs 5.29 - 5.31) and addressing through the Latton Priory masterplan process.

Full Reference: C - 6888 - 8452 - 5. HARLOW AND GILSTON GARDEN TOWN - None

6889 Comment Respondent: Essex County Council (Mr Rich Cooke) [8452]**Agent: N/A**

Summary: Although the Latton Priory development is located within EFDC district and addressed chiefly by that Local Plan, ECC advises that highway and transport improvements required for Latton Priory site should include direct linkage with north-south sustainable transport corridor.

Change To Plan: Revise (descriptive text of) paragraph 5.31 to state requirement for Latton Priory development to include direct linkage to the north-south sustainable transport corridor

Full Reference: C - 6889 - 8452 - 5. HARLOW AND GILSTON GARDEN TOWN - None

6890 Comment

Respondent: Essex County Council (Mr Rich Cooke) [8452]

Agent: N/A

Summary: This currently states:

Harlow West will provide around 2,100 dwellings, community facilities including Early Years facilities, a new two-form entry primary school and appropriate contributions towards a secondary school to serve new development.

The plan needs instead to refer to a 2.1ha primary school site and not to specify 2 forms of entry.

Change To Plan: ECC (Education) recommends that paragraph 5.29 is revised as follows:

Harlow West will provide around 2,100 dwellings, community facilities including Early Years facilities, a new site (of 2.1 ha. in area) for a primary school and appropriate contributions towards a secondary school to serve new development.

Full Reference: C - 6890 - 8452 - 5. HARLOW AND GILSTON GARDEN TOWN - None

6432 Object

Respondent: STOP Harlow North [8588]

Agent: Mr Jed Griffiths [8576]

Summary: Policy HGT1 includes a number of projects and sites which are beyond the administrative boundaries of Harlow. In upper case policy terms, a Local Plan can only contain references to land use proposals which are within the area covered by the document. Any other elements should be included in lower case supporting text.

Change To Plan: The policy should be reduced in its coverage, to refer only to spatial policies and land use proposals which are within the administrative area of Harlow District.

Full Reference: O - 6432 - 8588 - HGT1 Development and Delivery of Garden Town Communities in the Harlow and Gilston Garden Town - i, iii

6470 Object

Respondent: Miller Strategic Land [5769]

Agent: Andrew Martin - Planning (Mr Olivier Spencer) [5533]

Summary: Our client is broadly supportive of Policy HGT1 and particularly part 1(c) which seeks to deliver approximately 3,350 dwellings at East of Harlow. However, our client objects to the following criteria in Policy HGT1: 2(c) in relation to the timing of a supporting statement setting out long-term governance and stewardship arrangements for the community assets on-site; 2(d) pending publication and review of the completed Spatial Vision and Design Charter; 2(k) regarding the need for Garden Town-wide parking standards; and, 2(m) in relation to addressing climate change through construction methods.

Change To Plan: Our client respectfully requests that Policy HGT1 is amended as follows:

- Part 2(c) to be revised to read "Prior to the commencement of development, developers must submit a supporting statement..." instead of "Prior to the submission of outline planning applications, developers must submit a supporting statement..."
- Part 2(d) is subject to a holding objection, pending publication and review of the completed Spatial Vision and Design Charter.
- Part 2(k) to be revised to read "Develop specific Garden Town-wide parking standards which recognise that car ownership will need to be accommodated without impacting the quality place whilst making the best use of land and which have been subject to a formal period of public consultation.
- Part 2(m) delete reference to "and construction methods".

Full Reference: O - 6470 - 5769 - HGT1 Development and Delivery of Garden Town Communities in the Harlow and Gilston Garden Town - ii, iii

6691 Object

Respondent: Historic England (Ms Debbie Mack) [8623]

Agent: N/A

Summary: 2c suggest the addition of heritage assets in the list of stewardship arrangements

2d At the present time the Harlow and Gilston Garden Town and Design Charter is not available to view. Without sight of this document it is not possible to assess whether there is sufficient protection for the historic environment in the policy. In the absence of this, we must conclude that the Policy is unsound. We would suggest that an additional bullet point is added to Policy HGT1, part 2 to read 'Conserve and where appropriate enhance the historic environment'.

Change To Plan:

Full Reference: O - 6691 - 8623 - HGT1 Development and Delivery of Garden Town Communities in the Harlow and Gilston Garden Town - None

6770 Object

Respondent: Roydon Parish Council (Janet Ballard) [5434]

Agent: N/A

Summary: Policy HGT1, page 38, sets out proposals for Garden Town Communities. The proposals for West of Harlow (Water Lane Area) will have a major impact on the village of Roydon. This area is predominantly located in Roydon Parish and will result in the Parish having a disproportionate number of new homes (2,100) when compared with other urban extensions, especially considering the area's proximity to the settlements of Roydon and Broadley Common.

Change To Plan:

Full Reference: O - 6770 - 5434 - HGT1 Development and Delivery of Garden Town Communities in the Harlow and Gilston Garden Town - None

6569 Support**Respondent: Canal & River Trust (Ms Tessa Craig) [8612]****Agent: N/A**

Summary: The Trust supports stakeholder involvement in the design and delivery of the Garden Towns and would consider itself to be a key consultee for the Garden Towns, particularly Gilston due to its proximity to the River Stort. The Trust considers towpath improvements (as a Sustainable Transport Corridor) necessary to meet the needs of residents (existing and future) to support sustainable travel.

The development of a significant number of new homes at Gilston Garden Town to the north of the River Stort Navigation and improved access to the River Stort means it is highly likely there will be an increase in the usage of the towpath for recreational and possibly commuting purposes the impact of which we would wish to see mitigated through the appropriate use of planning obligation or other suitable mechanisms. We therefore note and welcome reference in Policy HG1 to a funding mechanism for future stewardship, management, maintenance and renewal of community infrastructure and assets and the need for developers to set out a sustainable long term arrangement for governance and stewardship arrangement for community assets including green infrastructure

Point 5.36 of the policy justification identifies a widened Central Stort Crossing and a Second Stort Crossing. The Trust has provided pre-application advice on these proposed crossings and in that advice, referred to the HS2 Design Principles for Bridge Crossings and the Code of Practice for Works Affecting the Canal & River Trust. Whilst the Trust has no objection in principle to the proposed crossings it has raised a number of concerns in relation to the alignment of the Eastern Crossing and detailed design and would wish to be consulted further in respect of the detailed design of any proposed works

The Trust welcomes policy point HGT1(m) on mitigation from and adaption to climate change through design and construction. Our waterways can play a part in such mitigation through, for example, use for heating and cooling of development and surface water drainage where appropriate.

Change To Plan:

Full Reference: S - 6569 - 8612 - HGT1 Development and Delivery of Garden Town Communities in the Harlow and Gilston Garden Town - None

6690 Support**Respondent: Historic England (Ms Debbie Mack) [8623]****Agent: N/A**

Summary: Welcome strategic Objective 2 and reference to protecting and enhancing the district's historic environment.

Change To Plan:

Full Reference: S - 6690 - 8623 - HGT1 Development and Delivery of Garden Town Communities in the Harlow and Gilston Garden Town - None

6788 Support**Respondent: Hallam Land Management & Commercial Estates Group (Mike Newton) [7646]****Agent: N/A**

Summary: Support the proposed strategic allocations at Harlow in the form of the new Garden Town Communities and in particular the allocation of Latton Priory, although the policies relating to these allocations would benefit from further refinement and clarification to ensure they are effective. We recommend that Harlow District Council aligns its draft policy HGT1 with Epping Forest District Council's draft policy SP4 to maintain consistency in the principles for the Garden Town Communities in the Harlow and Gilston Garden Town.

Change To Plan:

Full Reference: S - 6788 - 7646 - HGT1 Development and Delivery of Garden Town Communities in the Harlow and Gilston Garden Town - None

6827 Support**Respondent: Epping Forest District Council (Ms Alison Blom-Cooper) [8637]****Agent: N/A**

Summary: Policy HGT1 covers the development and delivery of the Garden Town Communities.

EFDC strongly support the identification of Latton Priory, Water Lane Area and East of Harlow sites within Epping Forest District as Garden Town Communities. However, it is suggested that it would be more appropriate to refer to sites that are not within the Harlow District boundary in the supporting text of the policy and therefore focus the policy on the approach to the development and delivery of the Garden Town Communities and sites within Harlow District. Policy HGT1 provides a commitment for Strategic Masterplans to become Supplementary Planning Documents (SPDs). EFDC note that the Epping Forest District Local Plan Submission Version 2017 only requires Strategic Masterplans to be capable of adoption as SPDs in order to ensure flexibility when implementing the most sustainable strategy for the Garden Town Communities in Epping Forest District. It is also suggested that, in the interests of effectiveness, the Plan makes it clear that, notwithstanding the fact that the East of Harlow site as a whole lies within two local authority areas, a single Masterplan (to be agreed by both local authorities) should be produced to ensure the site in its entirety is developed as one community. This would help to ensure that a fully integrated community is delivered. This comment is also relevant to the comments made below on Policy HS3.

EFDC welcome reference to the Garden Town Spatial Vision and Design Charter and the independent Quality Review Panel in the policy. EFDC fully supports the ambition of achieving 60% modal shift and the inclusion of subsection k) of Policy HGT1 with regard to the development of specific parking standards and that paragraph 17.5 identifies that parking provision may be reduced in sustainable locations.

Change To Plan:

Full Reference: S - 6827 - 8637 - HGT1 Development and Delivery of Garden Town Communities in the Harlow and Gilston Garden Town - None

6413 Comment**Respondent: Essex Bridleways Association (Mrs Sue Dobson) [7887]****Agent: N/A**

Summary: Page 39 Policy HGT1 point (l): this paragraph relates to Green Infrastructure and it does not include any provision for it being fully accessible by all users.

To make this Plan sound, we suggest that this paragraph is reworded thus: Create distinctive, fully accessible environments which relate to the surrounding area...'

Change To Plan:

Full Reference: C - 6413 - 7887 - HGT1 Development and Delivery of Garden Town Communities in the Harlow and Gilston Garden Town - None

6453 Comment**Respondent: Deanery of Harlow (Anglican) (Revd Martin Harris) [8586]****Agent: N/A**

Summary: I welcome the requirement under HGT1 that community services and facilities be accessible for all residents (2 (j)). Would this be befitted by spelling out that such access should be available on foot. The Harlow principle of everyone within a few minutes walk of a pint of milk provides a good model.

Change To Plan:

Full Reference: C - 6453 - 8586 - HGT1 Development and Delivery of Garden Town Communities in the Harlow and Gilston Garden Town - None

6671 Comment**Respondent: Hertfordshire County Council (Mr Martin Wells) [8622]****Agent: N/A**

Summary: Development and Delivery of Garden Town Communities in the Harlow and Gilston Garden Town. The wording within paragraph 2(i) in this policy does not conflict with HCC's LTP. As some of the linkages referred to (ie those to the proposed Gilston development) would cross the Essex/Herts county boundary, joined up working would be required to achieve comprehensive and worthwhile links.

Change To Plan:

Full Reference: C - 6671 - 8622 - HGT1 Development and Delivery of Garden Town Communities in the Harlow and Gilston Garden Town - None

6677 Comment**Respondent: Hertfordshire County Council (Mr Martin Wells) [8622]****Agent: N/A**

Summary: The pre-submission local plan proposes an additional 6,500 dwellings within the plan area, along with an additional 750 dwellings allocated within neighbouring Epping Forest District and a total of 10,000 dwellings in the Gilston Area to the north of Harlow in East Herts District. This significant increase in population requires additional capacity to be added to the existing recycling centre network (known as Household Waste Recycling Centres (HWRC) in Hertfordshire) in both Harlow and East Herts District.

The pre-submission plan does not mention the need to increase the current HWRC capacity, which is considered to be an important service provision which should be integrally planned from the outset of these new growth areas coming forward.

Options for delivering the additional capacity required include developing or upgrading two separate facilities that would serve the proposed housing growth in Harlow and the Gilston development in East Herts District, or a combined facility that serves both of these developments. Work is ongoing to consider the appropriateness and suitability of this option.

Whilst it is recognised that Essex County Council is the relevant minerals and waste planning authority, covering the Harlow local plan area, waste management uses should still be reflected in the Pre-Submission Harlow Local Plan. It is therefore considered that in the light of the need to increase HWRC capacity within this area, the following wording should be inserted into Policy HGT1: Development and Delivery of Garden Town Communities in the Harlow and Gilston Garden Town, in order to reflect this:

"Essex County Council and Hertfordshire County Council will work collaboratively to consider and deliver greater capacity, where appropriate, for the local management of household waste which serves the new communities that are planned in Harlow and the Gilston Area. Any facilities should be of a sufficient size and capacity that meets the needs of this growth and situated within an easily accessible location within the catchment area of the new communities."

Change To Plan: the following wording should be inserted into Policy HGT1: Development and Delivery of Garden Town Communities in the Harlow and Gilston Garden Town, in order to reflect this:

"Essex County Council and Hertfordshire County Council will work collaboratively to consider and deliver greater capacity, where appropriate, for the local management of household waste which serves the new communities that are planned in Harlow and the Gilston Area. Any facilities should be of a sufficient size and capacity that meets the needs of this growth and situated within an easily accessible location within the catchment area of the new communities."

Full Reference: C - 6677 - 8622 - HGT1 Development and Delivery of Garden Town Communities in the Harlow and Gilston Garden Town - None

6730 Comment**Respondent: Natural England (Ms Sarah Fraser) [8628]****Agent: N/A**

Summary: This policy sets out the strategic sites allocated in the Local Plan. Whilst there is much we support in the policy, notably references to Green Infrastructure and biodiversity under (c) and (l) Natural England has outstanding concerns relating to the Habitats Regulations Assessment ('HRA'). Since this policy needs to be informed by the conclusions of the updated HRA and may require further amendment we cannot, at this time, advise that this policy is sound. Our concerns will be set out in more detail below. Also we would recommend that given the scale of development proposed there should be a policy commitment to ensuring development deliver net gains for biodiversity and the environment.

Housing allocations should also consider potential impacts on Harlow Woods Site of Special Scientific Interest ('SSSI') which may be impacted in combination with allocations near Harlow from neighbouring Local Plans. A strategic solution is also being prepared for Hatfield Forest SSSI. Initial visitor surveys imply that the catchment is likely to be relatively large and may include parts of Harlow District. The plan needs to ensure that such impacts are considered appropriately through the plan and Sustainability Appraisal ('SA') and that solutions are provided for in policy.

Change To Plan:

Full Reference: C - 6730 - 8628 - HGT1 Development and Delivery of Garden Town Communities in the Harlow and Gilston Garden Town - None

6753 Comment**Respondent: Quod Planning (Mr Philip Murphy) [7958]****Agent: N/A**

Summary: Policy HGT1 intends to provide a framework to ensure a consistent approach to the consideration of development proposals in Harlow, as well as those development proposals within the Garden Town in EHDC and EFDC. However, proposals such as GPE that fall in another administrative boundary will not be determined under Policy HGT1 but will be guided by the relevant planning policy within the appropriate district e.g. in respect of GPE Policy GA1 of the EHDC District Plan. Policy HGT1 should therefore be amended to make clear that the requirements of the policy do not apply to all four strategic Garden Town Communities, and instead only apply to proposals that fall within the administrative boundary of Harlow. This is not to say that we do not support these objectives, but that they should instead be delivered through co-operation under the Garden Town governance arrangements, and through planning decisions in each of the three Districts. It is not appropriate to include this in policy HGT1 as it cannot be enforced and will fail to meet the soundness test of 'Effectiveness'.

Policy HGT1 (2i) intends to "Create a step change in modal shift by contributing to the delivery of the Sustainable Transport Corridors and establishing an integrated, accessible and safe transport system which maximises the use of the sustainable high-quality transport modes of walking, cycling and the use of public and community transport to promote healthy lifestyles and provide linkages to and from Harlow and the new Garden Town Communities". In order to do this, Harlow indicates an aspiration of a modal travel shift towards 60% by sustainable transport modes.

PfP supports the aspiration towards more sustainable transport modes and is working with HDC, EFDC, EHDC and ECC on the HIF bid to help enable the early delivery of the crossings which are needed to deliver the Sustainable Transport Corridor (STC). However further detail is needed from Harlow to demonstrate how the STC will be delivered and the 60% modal shift target achieved. For example, how will appropriate contributions to be secured from all new development and what positive measures will HDC put in place to encourage existing residents (as well as residents from future development) to use sustainable transport modes.

The policy should also recognise that the introduction of improved public transport corridors may require a balance to be drawn between the benefits of changing modes of travel and existing green spaces and landscaping.

Change To Plan: This infrastructure is not 'justified' based upon proportionate evidence, nor needed to deliver the draft Plan, and therefore references to the same should be removed.

Full Reference: C - 6753 - 7958 - HGT1 Development and Delivery of Garden Town Communities in the Harlow and Gilston Garden Town - None

6882 Comment**Respondent: Essex County Council (Mr Rich Cooke) [8452]****Agent: N/A**

Summary: ECC has concerns that the expression of HGT1 suggests a fragmentation of approach towards the GT. This refers to four 'Garden Communities', instead of one collective and cohesive 'GT' - as was the case previously. This comment is in line with ECC's comments in response to the EFDC Submission Version Local Plan..

Change To Plan: ECC is reviewing the potential for how current wording and approach used for both the HC and EFDC Local Plans might be revised in order to ensure the integrity and cohesion of the GT as a whole is maintained and suggests a discussion with the two district councils accordingly in order to resolve whether an agreed solution is achievable. This discussion is needed before submission stage in order to shape Statement(s) of Common Ground.

Full Reference: C - 6882 - 8452 - HGT1 Development and Delivery of Garden Town Communities in the Harlow and Gilston Garden Town - None

**CHAPTER: STRATEGIC GROWTH
STRATEGY FOR THE****HGT1 Justification****6438 Comment****Respondent: STOP Harlow North [8588]****Agent: Mr Jed Griffiths [8576]**

Summary: In paragraph 5.11 and elsewhere in the Local Plan, there is reference to a dwelling total of 16,000 units in the plan period to 2033. There is scant consideration to what happens beyond that point. In East Hertfordshire, in the so-called Gilston Area, the District Plan provides for 3,000 dwellings in the plan period and an additional 7,000 units beyond 2033. The cumulative impact of these developments on the whole area, in particular the transport system, water and drainage capacity, has not been fully considered.

Change To Plan:

Full Reference: C - 6438 - 8588 - HGT1 Justification - None

6472 Object **Respondent: Miller Strategic Land [5769]** **Agent: Andrew Martin - Planning (Mr Olivier Spencer) [5533]**

Summary: Our client wishes to raise a holding objection to paragraph 5.16 and to reserve the right to raise further comments or objections at Examination in Public, once the final Sustainable Transport Corridor Study has been published.

Change To Plan: Only a holding objection is raised at this stage.

Full Reference: O - 6472 - 5769 - HGT1 Implementation - iii

6473 Object **Respondent: Miller Strategic Land [5769]** **Agent: Andrew Martin - Planning (Mr Olivier Spencer) [5533]**

Summary: Our client would welcome further clarification, prior to EiP, as to the scope of the Garden Town Programme's remit. Although it is appropriate to seek to a coordinated approach and consistent placemaking objectives across the Garden Town, this should not involve an overarching delivery programme which could otherwise delay the delivery of some strategic sites and stall housing delivery in the early parts of the Plan period. Until such clarification is forthcoming, our client would like to raise a holding objection to paragraph 5.20.

Change To Plan: Only a holding objection is raised at this stage.

Full Reference: O - 6473 - 5769 - HGT1 Implementation - iii

6474 Object **Respondent: Miller Strategic Land [5769]** **Agent: Andrew Martin - Planning (Mr Olivier Spencer) [5533]**

Summary: Our client objects to the timing of a supporting statement setting out long-term governance and stewardship arrangements for the community assets on-site.

Change To Plan: Our client respectfully requests that paragraph 5.23 is amended to read "... prior to the commencement of development ..." instead of "... prior to outline planning permission..."

Full Reference: O - 6474 - 5769 - HGT1 Implementation - ii

6475 Object **Respondent: Miller Strategic Land [5769]** **Agent: Andrew Martin - Planning (Mr Olivier Spencer) [5533]**

Summary: In order to reflect the current options available to the PAH Trust, paragraph 5.39 should be expanded to refer to the possibility of the hospital redeveloping its existing site.

Change To Plan: Our client respectfully requests that the following is added to the end of paragraph 5.39: "... Alternatively the Princess Alexandra Hospital may decide to remain at its existing site and redevelop new hospital facilities in-situ."

Full Reference: O - 6475 - 5769 - HGT1 Implementation - ii

6692 Object **Respondent: Historic England (Ms Debbie Mack) [8623]** **Agent: N/A**

Summary: We note the reference to the TCPA guiding garden city principles. It is important to highlight that whilst these principles are useful and do embody a number of modern town planning concepts, they do not address the historic environment. It is therefore unclear how the TCPA principles can be reconciled with the N PPF's definition of sustainable development in terms of its environmental strand which requires the conservation and enhancement of the historic environment. Whilst the TCPA Garden Cities Principles are silent on the historic environment, their 2017 publication "The Art of Building a Garden City" does provide a further level of detail, particularly with regards to the siting of new settlements. This publication states that, "locations for new garden cities should not only avoid damaging areas that are protected for their ecological, landscape, historic or climate-resilience value but should actively be located in areas where there can be a positive impact on these assets. Underpinning the consideration of sites for new garden cities or towns should be the extent to which each one will allow for positive impacts on assets of historic value". (Emphasis added, page 100)In drafting your principles for the development of new garden communities, we would suggest that you ensure that reference is made to the need to conserve and enhance the historic environment in line with the NPPF.

Change To Plan:

Full Reference: O - 6692 - 8623 - HGT1 Implementation - None

- 6414 Comment** **Respondent: Essex Bridleways Association (Mrs Sue Dobson) [7887]** **Agent: N/A**
- Summary: Page 41 para 5.18: this paragraph mentions joint working with both public and private stakeholders in the planning and delivery of these new Garden Communities, and we would wish it noted that both Essex Bridleways Association and the British Horse Society are keen to have an input at the masterplanning stage of these new communities.
The test of soundness of the Plan will include the provision for such consultation with stakeholders and the inclusion of representatives from all user groups - equestrian, cycling, pedestrians and the disabled - will meet the soundness requirements. Paragraph 5.23 also is relevant here.
- Change To Plan:
- Full Reference: C - 6414 - 7887 - HGT1 Implementation - None
- 6415 Comment** **Respondent: Essex Bridleways Association (Mrs Sue Dobson) [7887]** **Agent: N/A**
- Summary: Page 42 para 5.25: we fully support the aspiration to maintain the connection of Harlow's existing Green Infrastructure, including footpaths, cycleways and bridleways; however, this aspiration needs to be embedded within all sections of the Plan and not just in selected areas.
To be sound, this Plan needs to be consistent throughout therefore the need to include all user groups within it is required.
- Change To Plan:
- Full Reference: C - 6415 - 7887 - HGT1 Implementation - None
- 6416 Comment** **Respondent: Essex Bridleways Association (Mrs Sue Dobson) [7887]** **Agent: N/A**
- Summary: Page 44 para 5.28: we note the intention to provide 'linkages into walking and off-road cycle networks'.
To make this Plan sound, this paragraph should include provision for equestrians and should be reworded thus: 'linkages into walking and off-road cycle and equestrian networks'.
- Change To Plan:
- Full Reference: C - 6416 - 7887 - HGT1 Implementation - None
- 6417 Comment** **Respondent: Essex Bridleways Association (Mrs Sue Dobson) [7887]** **Agent: N/A**
- Summary: Page 44 para 5.29: we note the intention to include 'open space, walking and cycling routes'.
To make this Plan sound, this paragraph should include provision for equestrians and should be reworded thus: 'open space, walking, cycling and equestrian routes'.
- Change To Plan:
- Full Reference: C - 6417 - 7887 - HGT1 Implementation - None
- 6418 Comment** **Respondent: Essex Bridleways Association (Mrs Sue Dobson) [7887]** **Agent: N/A**
- Summary: Page 44 para 5.32: we note the intention to include 'open space, walking and cycling routes'.
To make this Plan sound, this paragraph should include provision for equestrians and should be reworded thus: 'open space, walking, cycling and equestrian routes'.
- Change To Plan:
- Full Reference: C - 6418 - 7887 - HGT1 Implementation - None
- 6419 Comment** **Respondent: Essex Bridleways Association (Mrs Sue Dobson) [7887]** **Agent: N/A**
- Summary: Page 44 para 5.35: we note the intention to include 'open space, walking and cycling routes'.
To make this Plan sound, this paragraph should include provision for equestrians and should be reworded thus: 'open space, walking, cycling and equestrian routes'.
- Change To Plan:
- Full Reference: C - 6419 - 7887 - HGT1 Implementation - None

6439 Comment **Respondent: STOP Harlow North [8588]** **Agent: Mr Jed Griffiths [8576]**

Summary: The delivery of the Local Plan is too dependent on external factors and the successful co-operation between the public and private sectors. There are too few certainties in the provision of infrastructure. Long term drainage capacity is too dependent on the Rye Meads Waste Water Treatment Plant, which is adjacent to a designated wildlife site of European importance.

Change To Plan:

Full Reference: C - 6439 - 8588 - HGT1 Implementation - None

6672 Comment **Respondent: Hertfordshire County Council (Mr Martin Wells) [8622]** **Agent: N/A**

Summary: Paragraph 5.22. HCC would welcome inclusion in any consultation on Plans covering areas on, or around the county boundary. Paragraph 5.36. It is assumed that HCC would be involved in any study, as mentioned within this paragraph.

Change To Plan:

Full Reference: C - 6672 - 8622 - HGT1 Implementation - None

6883 Comment **Respondent: Essex County Council (Mr Rich Cooke) [8452]** **Agent: N/A**

Summary: ECC advises the benefits to the Plan of reflecting the TCPA work on Garden Communities, including its Reuniting Planning and Health work and guidance. The Garden Town (long term transformational growth) presents an opportunity to promote healthier populations and lifestyles and embed improved wellbeing, working with GT partners, taking advantage of wider cross boundary growth and the existing assets of the Harlow area (e.g. greenspace provision, off road networks and River Stort valley).

This is also important to ensure that health and well-being issues are taken into account fully when considering the future design and delivery of the Garden Town growth.

Change To Plan: ECC recommends early joint work, prior to Local Plan submission, on a positive and collaborative basis to review the learning from the guidance mentioned and to jointly develop and agree appropriate Plan content and responses to integrate health and well-being fully within the Garden Town part of the Local Plan (and other parts). This could shape any SoCG(s) to resolve this matter.

Full Reference: C - 6883 - 8452 - HGT1 Implementation - None

CHAPTER: STRATEGIC GROWTH SD1 Presumption in Favour of Sustainable Development STRATEGY FOR HARLOW

6476 Object **Respondent: Miller Strategic Land [5769]** **Agent: Andrew Martin - Planning (Mr Olivier Spencer) [5533]**

Summary: In order to be consistent with national policy (particularly paragraph 14 in the National Planning Policy Framework (NPPF)), the second paragraph in Policy SD1 should recognise that development also will normally be supported "where relevant policies are out-of-date".

Change To Plan: The second paragraph in Policy SD1 should be amended to read:
"Where there are no policies specifically relevant to the proposed development or relevant policies are out-of-date, development will normally be supported, unless..."

Full Reference: O - 6476 - 5769 - SD1 Presumption in Favour of Sustainable Development - iv

6624 Support **Respondent: GLADMAN (Mr Phill Bamford) [8618]** **Agent: N/A**

Summary: Gladman support Policy SD1 in that it reflects clearly the key aim of the Framework to deliver sustainable development.

Change To Plan:

Full Reference: S - 6624 - 8618 - SD1 Presumption in Favour of Sustainable Development - None

6653 Comment

Respondent: Harlow Alliance Party (Mr Nicholas Taylor) [8621]

Agent: N/A

Summary: There is no doubt that more and new homes are required to meet the needs of Harlow's existing residents and those that will need to live in the town as new employment opportunities arise in the future. There is already enough evidence to show that for many the new homes being constructed are beyond the means of those living locally who are most in need of a home. The Harlow Alliance Party believe that Harlow Council must play a pivotal role in providing homes which local people can afford to live in and not live a life on Housing Benefit. It should give a commitment to provide council homes at council rent levels on any public land used in the future for new housing.

Change To Plan:

Full Reference: C - 6653 - 8621 - 7. HOUSING STRATEGY AND GROWTH LOCATIONS - None

6656 Comment

Respondent: Hertfordshire County Council (Mr Martin Wells) [8622]

Agent: N/A

Summary: HCC as Highway Authority have engaged throughout the Local Plan as demonstrated through the MoU for transport, and support the evidence baseresulting from the joint work. The modelling work conducted by Essex County Council using the VISUM transport model has been shared with HCC. The VISUM transport modelling work has demonstrated that private vehicle trips from both new and existing development in the Harlow area need to be reduced to avoid unacceptable impacts on the M11 junction 7a corridor. Further VISUM testing has been undertaken to identify the levels of mode shift required to enable acceptable network operation and growth beyond 3,000 dwellings at Gilston. The conclusion to this work was that an ambitious target of 60% sustainable mode share from new developments is required to enable development of 10,000 homes at Gilston (along with the provision of associated transport measures such as a 2nd Stort Crossing and other highway upgrades). HCC have a countywide model COMET. A Local plan forecast run (2031) has been developed to look at the implications of Local Plan growth across Hertfordshire (including 3,000 dwellings at Gilston) and also includes local plan growth in the wider Harlow, Epping and Uttlesford areas. The developments have been tested with standard mode share / trip generation assumptions. The modelling work assumes that junction 7a will be in place along with the 2nd Stort Crossing, improvements to the Central Stort crossing and upgrades to the A414 junctions in Harlow and M11 junction 7. It is difficult to identify the specific impact of Local Plan growth in Harlow but the model results indicate the potential for a significant increase in delay (extra 3-5 minutes) at the Eastwick junction and the risk of diversion of traffic onto less suitable routes in the area. We also have concerns over the increases in traffic evident on the A414 corridor through Hertford and the A10 corridor through southern Broxbourne. This evidence supports the need for a significant shift in travel mode from the car to more sustainable modes of travel.

Change To Plan:

Full Reference: C - 6656 - 8622 - 7. HOUSING STRATEGY AND GROWTH LOCATIONS - None

6647 Object

Respondent: Harlow Alliance Party (Mr Nicholas Taylor) [8621]

Agent: N/A

Summary: The Plan is full of assumptions and conclusions without any meaningful evidence, using information which becomes out of date almost as it is written and with little if any widespread consultation with the most important people of all, the residents of Harlow. This Plan, which is clearly only supported by one of the political parties in Harlow, should not be used as a basis for the long-term planning of the future of Harlow. Assumptions about housing need for the Harlow area are made without giving any evidence of this need. Restrictions on who can apply for Council homes in Harlow and neighbouring authorities mean that they cannot give accurate evidence of housing need in the area. The Plan makes assumptions about the number of homes needed to support the regeneration of Harlow's Town Centre. Similar claims were made in the 1980's and 1990's, since when thousands of homes have been built in the area but little or no regeneration has taken place. The rapid increase in the population of London is fuelling the need for building homes locally but this may well not continue in future years, indeed the most recent information available shows a net decline in those living in London and the effect of Brexit is predicted to see this decline continue. Many other assumptions have been made without any actual evidence and the almost total lack of resident involvement in gathering evidence during the process leading to this Plan should be of very great concern.

Change To Plan:

Full Reference: O - 6647 - 8621 - HS1 Housing Delivery - None

6702 Object

Respondent: Home Builders Federation (Mr Mark Behrendt) [8450]

Agent: N/A

Summary: The policy is not sound as it is not justified or consistent with national policy. Paragraph 7.6 states that the Council must ensure that there is sufficient supply to meet Harlow's objectively assessed housing need of 7,400 dwellings. As we have set out above we do not consider this to be based on a sound evidence base and the Council's housing requirement should reflect this position. However it must be recognised that compared to the other Boroughs in the HMA Harlow is constrained by the tight boundary which broadly reflects its urban area. This will inevitably limit its ability to deliver further new development. If the Council is not able to allocate further sites to meet this level of housing need it will be necessary for the other authorities in the HMA, who have sought to rely on Harlow to meet their own needs, to come forward with further development opportunities.

Change To Plan: Given that development opportunities within Harlow are more limited due to its tightly drawn boundary we would suggest that the Council work with its partners in the HMA to identify additional allocations across the other three authorities to ensure that housing needs are met in full.

Full Reference: O - 6702 - 8450 - HS1 Housing Delivery - None

6731 Object

Respondent: Natural England (Ms Sarah Fraser) [8628]

Agent: N/A

Summary: Natural England considers this policy to be unsound - not consistent with national policy. This policy sets out the quantity of housing that will be allocated by the Local Plan. Given that Natural England has outstanding concerns relating to the Habitats Regulations Assessment ('HRA') we cannot, at this time, advise that this policy is sound until the updated HRA has been produced. Our concerns will be set out in more detail below. We also recommend that there should be a policy commitment to ensuring development delivers net gains for biodiversity and the environment.

Change To Plan:

Full Reference: O - 6731 - 8628 - HS1 Housing Delivery - None

6477 Support

Respondent: Miller Strategic Land [5769]

Agent: Andrew Martin - Planning (Mr Olivier Spencer) [5533]

Summary: Our client supports the provision in Policy HS1 of at least 9,200 dwellings in Harlow District during the 2011-2033 plan period (i.e. 418 dwellings per annum).

Change To Plan:

Full Reference: S - 6477 - 5769 - HS1 Housing Delivery - None

6824 Support**Respondent: Epping Forest District Council (Ms Alison Blom-Cooper) [8637]****Agent: N/A**

Summary: The Plan provides for 9,200 dwellings over the plan period with 30% affordable housing equating to 3,400 affordable homes. This is in line with the figures included in the signed MoU on Establishing the OAHN of the Housing Market Area. EFDC therefore welcome the commitment in the Pre-Submission Plan to meet the identified level of housing for Harlow in the Local Plan.

Change To Plan:

Full Reference: S - 6824 - 8637 - HS1 Housing Delivery - None

6625 Comment**Respondent: GLADMAN (Mr Phill Bamford) [8618]****Agent: N/A**

Summary: Gladman has considerable concerns that across the Housing Market Area, fewer dwellings are proposed to be delivered than the latest ONS projections based on highway capacity.

The HMA as a whole has substantial issues with worsening affordability and significant population growth. It should therefore not be considered appropriate to deliver less housing than the ONS projections suggest as this will only exacerbate the problems and will not address the Government's fundamental objective of tackling the housing crisis.

Gladman consider that given the recent deliverability issues faced by the Council, it is entirely appropriate to apply a 20% buffer to the 5-year housing land supply calculation

Change To Plan:

Full Reference: C - 6625 - 8618 - HS1 Housing Delivery - None

6743 Comment**Respondent: Persimmon Homes (Mr David Moseley) [8437]****Agent: N/A**

Summary: We also share the HBF's concerns that by under estimating the housing needs for each local authority the OAN for the HMA will not be met in full as required by paragraph 47 of the NPPF. This should be rectified.

Change To Plan:

Full Reference: C - 6743 - 8437 - HS1 Housing Delivery - None

CHAPTER: STRATEGIC GROWTH
STRATEGY FOR HARLOW

HS1 Justification

6442 Comment**Respondent: STOP Harlow North [8588]****Agent: Mr Jed Griffiths [8576]**

Summary: The assumptions made in the SHMA do not reflect the more recent ONS forecasts of a downturn in in-migration to the UK, which imply that the housing projections will have to be adjusted. SHN has raised its concerns at the East Herts District Plan Examination about the limited capacity of the Harlow area to accept large scale housing development. It is noted that the District Council's consultants have advised (in paragraph 7.22) that the upper limit of development across the HMA would be 51,100 dwellings. A higher level of development would exceed the capacity of the highways network.

Change To Plan:

Full Reference: C - 6442 - 8588 - HS1 Justification - None

6651 Object

Respondent: Harlow Alliance Party (Mr Nicholas Taylor) [8621]

Agent: N/A

Summary: It seems that Harlow Council dismisses the fact that windfall sites have occurred since the last plan was put together and that they will continue to be created in the future. Every new home created means another family wanting to use public services, roads, water, doctor's surgeries etc etc. In the last two years or so some 800 homes have been created by the conversion of offices to flats. Since this Plan was completed a developer has been granted permission to build an extra 30 or so homes on a site where a previous permission had been given and other plans in the pipeline, not mentioned in the plan are likely to see over 500 homes created within the next five years.

Change To Plan:

Full Reference: O - 6651 - 8621 - HS1 Implementation - None

6443 Comment

Respondent: STOP Harlow North [8588]

Agent: Mr Jed Griffiths [8576]

Summary: The Local Plan (in paragraphs 7.28 - 7.30) is dismissive of the role of windfall sites in their contribution to housing supply. Other Local Plans in the HMA do provide for a contribution from windfall sites. It is suggested that an allowance of 5% would be realistic.

Change To Plan:

Full Reference: C - 6443 - 8588 - HS1 Implementation - None

6391 Object **Respondent: Mrs Samantha Baldry [8554]** **Agent: N/A**

Summary: I object to the proposed allocation of the Fennells Field for residential development due to:
Destruction of currently used green space for recreation.
This has been used for over 20 years for recreation and I can support this with photographic evidence. It is essential for the 156 families already living here.
Parking issues. Already beyond capacity!
Increased traffic flow causing danger.
The impediment of my 'Right to Light'
Depreciation of value to my property
Negative impact on the natural environment
Distress during construction works due to proximity to my property

Change To Plan: Site should be removed as a proposed allocation.

Full Reference: O - 6391 - 8554 - HS2 Housing Allocations - i, ii, iii, iv

6396 Object **Respondent: Mr Ethan Baldry [8559]** **Agent: N/A**

Summary: I would like to object to the Fennells Field being an allocated residential site. I have lived at this address since I was born and this green space has been an integral part of my childhood. I have used this along with my family and friends for recreation extensively throughout all seasons. I have enjoyed family games of football and rounders, played nerf guns with my friends, had picnics, birthday celebrations and built snowman and sledged down the hill. This open space should remain for the enjoyment of present and future children in this community.

Change To Plan: The Fennells field should not been an allocated site for residential housing. The green space should remain for the use of the community for recreation as it has been for many years.

Full Reference: O - 6396 - 8559 - HS2 Housing Allocations - i, ii, iii, iv

6397 Object **Respondent: Miss Erin Rose BALDRY [8560]** **Agent: N/A**

Summary: I would like to object to the Fennells Field being allocated as a residential site. I have lived at this address all of my life and the field has been a massive part of my life. I have played with friends, played with pets, made movies and enjoyed learning about the countryside by playing on the field. I have built snowmen, sledged and chased my brother around playing games. I have even had my birthday parties on the field too! I really want you to reconsider taking this away from me and my friends.

Change To Plan: Please remove this proposal from your document. Its not right and should be left for children to play on.

Full Reference: O - 6397 - 8560 - HS2 Housing Allocations - i, ii, iii, iv

6410 Object **Respondent: Mr Mike Stokes [8551]** **Agent: N/A**

Summary: Objection to Land east of 144 - 154 Fennells (Nature Reserve). Main objection is parking, the Fennells most evenings is crammed with cars, at weekends and special occasions the traffic bottle necks with the crematorium and church parking on occasions it is a complete stand still. My second objection is the playing field has been used by my children (154 Fennells) and now my grandchildren (144 Fennells) and by many residents for many years. If these changes have to happen please make sure the roads are right or there will be funerals delayed due to traffic problems.

Change To Plan: Do not build on the land east of the Fennells.

Full Reference: O - 6410 - 8551 - HS2 Housing Allocations - None

6437 Object**Respondent: Mrs Sarah Gibbins [8582]****Agent: N/A**

Summary: We wish to oppose any plans for potential building. As a young family we chose to live here due to the quietness and safeness of this area which we want to bring our children up in. Why do you feel it necessary to ruin a popular space if you talk highly of Gibberds original plan? So many people, including ourselves use the field for different reasons such as dog walking, children playing, family events, children's parties. The negative impact on the natural environment which currently supports wildlife in our area worries us, our little girl amongst many others enjoy this

Change To Plan: We feel it necessary that the council should consider removing the potential plans to build housing particularly in the area marked land east of 144-154 Fennells.

Full Reference: O - 6437 - 8582 - HS2 Housing Allocations - i

6441 Object**Respondent: Mr Dean Burns [8552]****Agent: N/A**

Summary: HS2/9 LAND EAST OF 144 154 FENNELLS

I TOTALLY OBJECT TO THIS SMALL PARCEL OF LAND IN AN AREA OF LOCAL NATURAL BEAUTY BEING DEVELOPED. THIS LAND WOULD NEED TO BE ACCESSED OF OF THE ROAD LEADING INTO THE CREMATORIUM AND NATURE RESERVE CAUSING MAJOR TRAFFIC/PARKING PROBLEMS IN ADDITION TO THOSE ALREADY CREATED. IN ADDITION, EXISTING HEDGEROWS WOULD NEED TO BE REMOVED TO ACCESS THE AREA DISRUPTING LOCAL BIODIVERSITY. AS A RESIDENT, WE HAVE ALREADY HAD THE RIDICULOUS EARTH BUND BUILT CAUSING MAJOR OPPORTUNITY FOR ANTI SOCIAL BEHAVIOUR. WE WOULD SEE OUR PROPERTY VALUES PLUMMET

Change To Plan: TOTALLY REMOVED FROM THE PROPOSAL

Full Reference: O - 6441 - 8552 - HS2 Housing Allocations - ii

6581 Object**Respondent: Ms Christina Webb [8613]****Agent: N/A**

Summary: Object to the proposed site at Radburn Close as a possible proposal for 36 dwellings.
Harlow consists of many unused derelict land areas and this land is used by the community on a daily basis.

the reason I chose this home was to have the pleasure of looking from my windows to cherish and admire the green space

aware of is the potential flood risks will now increase

what about the local infrastructure and the impact here. Parking in the local area is at its highest I have ever seen it.
Damage has already been caused to green verge, pavements and fencing by car owners trying to find a space, there is no more room for extra , Radburn is full !

Change To Plan:

Full Reference: O - 6581 - 8613 - HS2 Housing Allocations - None

6600 Object

Respondent: Mr David Beavis [8615]

Agent: N/A

Summary: OBJECTION TO BUILDING ON SITE HS2-5 (relating to 10.1 & 10.2)
Paragraph 10.1 acknowledges that it's important to retain and enhance the natural environment for the enjoyment of residents and visitors. If building on the Plot HS2-5 is allowed, it would show a complete disregard for paragraph 10.1

In addition it would be completely contrary to the stated aim of Paragraph 10.2 which states that new developments MUST continue to implement the natural environment principles established by Sir Frederick Gibberd.

The Playing Field identified as HS2-5 is at a substantially higher ground level than the houses in Radburn Close that directly adjoin the field. This could have consequences of which I have serious concerns.

(1) FLOOD RISK (2) OVERSHADOWING(3) LOSS OF PRIVACY (4)INFRINGEMENT OF HUMAN RIGHTS

Additionally, Article 8 of the Human Rights Act states that a person has the substantive right to respect for their private and family life. In the case of Britton vs SOS the courts reappraised the purpose of the law and concluded that the protection of the countryside falls within the interests of Article 8. Private and family life therefore encompasses not only the home but also the surroundings.

Change To Plan:

Full Reference: O - 6600 - 8615 - HS2 Housing Allocations - None

6693 Object**Respondent: Historic England (Ms Debbie Mack) [8623]****Agent: N/A**

Summary: We note the allocations are simply listed in tabular form and marked on the proposals map. Particularly for the larger sites, (sites 1-8) we would expect to see more detail regarding the sites and policy criteria to indicate how the decision maker should react (para 154 and 157 of the NPPF). We suggest that individual policies be included for these sites. We outline below the key heritage assets likely to be affected by development of these sites, any further evidence required and suggested policy wording.

HS2- 1 Princess Alexandra Hospital- This site includes a listed building- Parndon Hall (grade 11) and a scheduled monument (bowl barrow). There are two further bowl barrows close to the site. Development of this site has the potential to impact upon these heritage assets and/or their settings. Any redevelopment of this site will need to conserve and enhance these heritage assets and their settings. This requirement should be included as a criterion in the policy and the supporting text.

HS2- 2 The Stow Service Bays- The Marks Tey Conservation Area lies to the north of this site. Any development of the site may impact upon the setting of the Conservation Area. The policy should indicate that any development of the site will need to preserve or where opportunities arise enhance the setting of the conservation area. This requirement should be included in the policy and the supporting text.

HS2 - 3 Land east of Katherine's Way, west of Deer Park There are no designated heritage assets within or close to the site. Historic England has no comments to make.

HS2 - 4 Lister House, Staple Tye Mews, Staple Tye Depot and The Gateway Nursery- There are no designated heritage assets within or close to the site. Historic England has no comments to make.

HS2- 5 South of Clifton Hatch- Whilst there are no designated heritage assets on site there are two grade II listed buildings to the north east of the site (HUDC Depot and a building to the rear of the Depot). Development of this site has the potential to impact upon the setting of these listed buildings. To that end, the policy should include a criterion to preserve the grade II listed HUDC Depot and adjacent building and their settings. This should also be referenced in the supporting text.

HS2 - 6 Riddings Lane-This site forms part of the wider garden community proposals to the south of Harlow (Latton Priory). Any development in this area will need to give appropriate consideration to the need to protect the scheduled monuments and their settings (Latton Priory and Dorrington Farm Moated Site) and the preserve listed buildings and their settings, Latton Priory listed at grade 11 *and Latton Priory Farmhouse listed at grade 11. This requirement should be included in the policy and the supporting text.

HS2-7 Kingsmoor Recreation Centre- Kingsmoor House (listed at grade 11*) and its Lodge and Coach house (both listed at grade 11) lie to the east of the site. The allocation lies within the wider setting of these assets and provides a connection between the heritage assets and green wedge beyond. Historic England has concerns that development of this site would change and potentially harm the setting of the listed buildings. A heritage impact assessment should be undertaken, prior to the EiP, to establish the significance of the assets, and the potential impact of development upon that significance in accordance with Historic England's guidance (HE Good Practice Advice in Planning 1-the historic environment in local plans: <https://historicengland.org.uk/imagesbooks/publications/gpa1-historic-environment-local-plans/> HE Good Practice Advice in Planning 2- managing significance in decision-taking in the historic environment: <https://content.historicengland.org.uk/images-books/publications/gpa2-managingsignificance-in-decision-taking/gpa2.pdf> HE Good Practice Advice in Planning 3- the setting of heritage assets: (Dec 2017) <https://content.historicengland.org.uk/images-books/publications/gpa3-setting-heritage-assets/he-gl80-gpa3-setting-heritage-assets.pdf> HE Advice Note 3- site allocations in local plans: <https://historicengland.org.uk/imagesbooks/publications/historic-environment-and-site-allocations-in-local-plans/>) This will help to determine whether this allocation is suitable in terms of the historic environment. If the allocation is found to be acceptable in principle in heritage terms, a criterion should be included in the policy to ensure the protection of these listed buildings and their settings. This should also be included in the supporting text.

HS2 - 8 The Evangelical Lutheran Church, Tawneys Road - The Harlow Tye Green Village

Conservation Area lies to the west of this site .. Any development of the site may impact upon the setting of the Conservation Area. The policy should indicate that any development of the site will need to preserve or where opportunities arise enhance the setting of the conservation area. This requirement should be included in the policy and the supporting text.

We have not reviewed the smaller sites or indeed the employment allocations in ED1 or the hatches identified for mixed use in Figure 9.1. We request that you review these allocations again in a similar way to the above, identifying whether there are any heritage assets (or their settings) that would be affected by the proposed development. Where a potential impact is identified, wording should be included in the policy and supporting text to this effect.

Typical wording might include:

combination of heritage assets - 'Development should conserve and where appropriate enhance heritage assets and their settings.'

This is based on the wording in the Planning Practice Guidance Paragraph: 003 Reference ID: 18a-003-20140306 Revision date: 06 03 2014

listed building 'Development should preserve the listed building and its setting'.

This is based on the wording in Part 1, Chapter 1, paragraph 1 (3) (b) of the Planning (Listed Buildings and Conservation Areas) Act 1990.

conservation area 'Development should preserve or where opportunities arise enhance the character or appearance of the Conservation Area and its setting'.

This is based on the wording in Part 2, paragraph 69 (a) of the Planning (Listed Buildings and Conservation Areas) Act 1990 and para 137 of the NPPF.

Note that if you refer to character ... appearance use the word 'or' not 'and'

registered park and garden- 'Development should protect the registered park and garden and its setting.'

scheduled monument 'Development should protect the scheduled monument and its setting.'

Ideally, the policy should also mention the specific asset and any potential mitigation required.

Change To Plan:

Full Reference: O - 6693 - 8623 - HS2 Housing Allocations - None

6713 Object

Respondent: Mr James Humphreys [8561]

Agent: N/A

Summary: I currently live in Greygoose Park (backing on to the playing fields and Katherines Way) and I am very concerned about the council plans to build 69 homes on this land. While the minor inconvenience of the losing a view and house value decline are understandable, I do have additional concerns that I don't think have been taken into account when the council looked at this area. It is also disappointing that a council that prides Harlow on having green space and puts covenant control on residents and their homes, is actually flying in the face of its own rules and planning to build on every last bit of green land space. We bought our home three years ago so do have a fairly recent environmental report which leads me to ask the following questions.

Change To Plan:

Full Reference: O - 6713 - 8561 - HS2 Housing Allocations - None

6714 Object**Respondent: Mr James Humphreys [8561]****Agent: N/A****Summary: Flooding**

With the brook running parallel to Katherines Way, there is a flood risk. While the flooding at the moment is low risk and is mainly confined to the allotments (as you may be aware some are unusable due to the ground conditions and constant saturation), additional housing on this land which may act as an area for water to be drained into will put extreme pressure on this brook and leave the surrounding land liable to flooding as there will be no run off areas for water to go except for into the brook. This will place enormous pressure on a small stream that will flood repeatedly should this part of the plan go ahead. This flood risk was mentioned in our environmental impact report when buying our home. Your own flood impact report dated 2016 shows an existing flood risk on this area (page 4), so what would happen should houses be built there? This assessment has not been carried out in full.

Wildlife impact

There is a vast array of wildlife in the field next to Katherines Way including mice, shrews, hedgehogs, owls, amphibians, foxes and most importantly bats. As you may be aware bats are an incredibly protected species and any developments or changes to their natural habitat require a licence from Natural England. With the removal of trees and food sources for the bats, I feel that the plans to build housing in this area will severely impact this native and protected species. Your evidence base is from 2010/11. That is eight years old and it is not localised to specific parts of Harlow, meaning you have no idea what is living in the areas that have been earmarked for development. This is quite the assumption to make.

Road access

Currently, road access to Greygoose, Fir and Deer park is very limited and is off Kingsmoor Road at three points. Should additional housing be added to this area, more access points will need to be considered as the current roads are currently very narrow and or congested at peak times. While not a legal requirement it is often advised that large emergency vehicles should be able to pass through roads easily. At the current council access point to this land (for maintenance and mowing) that is not something that is achievable, with residents parking off the pavement and on the road. While residents are perfectly within their rights to do so, it shows that the long term view of putting extra housing in was not considered for this area and would not be able to cope with additional traffic for residents, let alone the large lorries and equipment needed to build additional houses. The road surfaces are not suitable nor are the streets wide for large equipment needed to build new homes. Also, with Public Health England bringing 10,000 jobs to the GSK site, the pressure that will be put on the roads in that area will be extreme already, let alone with the strain of building additional homes. Worryingly, there is no link up to Epping council who will also see some of these problems given their proximity to the area and roads that feed into Harlow, this may put Harlow council on a collision course with another authority. What plans do the council have to either build more roads, improve existing roads or improve public transport to deal with an extra 10,000 people in this small area?

Change To Plan:

Full Reference: O - 6714 - 8561 - HS2 Housing Allocations - None

6715 Object**Respondent: Mr James Humphreys [8561]****Agent: N/A****Summary: Existing unoccupied housing**

There is already unoccupied housing in Harlow, which is not being utilised. Will the council prioritise filling these homes before building new ones? In addition, existing unused offices and brownfield sites are being converted into homes, yet this is not accounted for in the plan. Is this additional housing considered in an earlier plan or has this been overlooked as part of the target for new homes?

Lastly green space

As you will be aware, green spaces have a strong link to happiness and healthcare outcomes. This has been known since Victorian times and has been referenced many times by government - <http://researchbriefings.files.parliament.uk/documents/POST-PN-0538/POST-PN-0538.pdf> Getting rid of Green space and actual green belt land is a backwards step for Harlow and will add to the problems that currently exist with health deprivation. Your own council planning eludes to protecting environmental assets, not build on them. As a side point, the space in question beside Katerines Way is currently poorly maintained and there has been a noticeable decline in the management in this land. I'm currently having to fend off brambles, bind-weed and small trees starting to grow into my garden from your land.

Change To Plan: I therefore ask that you will consider opening these plans to a full public consultation across Harlow, given the size of the proposed developments. I have no issues with creating more homes in Harlow, but it has to be done in a logical and sustainable way with infrastructure considered hand in hand. This development plan has none of these things.

Full Reference: O - 6715 - 8561 - HS2 Housing Allocations - None

6719 Object**Respondent: Ms Jennifer Bedford [8557]****Agent: N/A**

Summary: I write concerning Jocelyns field and its inclusion in the Harlow local plan (location HS2-15) as a potential building plot. I believe it is an inappropriate site on many counts: it being part of green wedge - a key design feature of Harlow; it acts as a natural buffer to the A414; it is a place for recreation by local residents; and importantly, it is an essential and rich wildlife habitat with mature trees and varied ground cover. I also note that the plan quotes selectively from the historic documentation appertaining to the development of Harlow, taking such statements out of context to provide a validation for your proposals. There are many fundamental principles within the original town vision, both design and philosophical, which run counter to your assertions, and that should not be overlooked.

Change To Plan:

Full Reference: O - 6719 - 8557 - HS2 Housing Allocations - None

6720 Object**Respondent: Mrs Karen Garrod [8596]****Agent: N/A**

Summary: I can't readily see listed the land between the A414 and the M11 roundabout junction. The area beyond the BP garage and up to the roundabout at Hastingwood does not appear to be mentioned. Maybe this land does not fall in the Harlow boundary, but it does look like it is part of Harlow as it is before the junction. If denser and higher rise development is desired as it seems on reading the plan, this would appear to be an ideal site as there is no neighbouring residential area that would be adversely affected by higher rise blocks. This would be ideally situated for many car using commuters without impacting on the local highways in the town. Improved bus services to the train station would be an added benefit. I was dismayed to see valuable playing fields identified for development. Among the many benefits to residents young and old and our wildlife, these areas provide important breathing space and thinking space for contemplation too (open space=open mind).

Change To Plan:

Full Reference: O - 6720 - 8596 - HS2 Housing Allocations - None

6727 Object**Respondent: Mr MASOUD ESKANDARIAN [8625]****Agent: N/A**

Summary: I disagree and do object the proposed development plan and find that the Pre-Submission Local Development Plan is NOT legally compliant and NOT sound. Reference has been also made under page 5 & 6 of AECOM Sustainability Appraisal (SA) for the Harlow Local Development Plan May 2018, which has been announced as the framework of sustainable appraisal with the following criteria.

Change To Plan: I hope my concerns and objections are well received and understood, will be considered by Harlow Council who would decide to avoid proceeding with the development of HS2-5 land. I disagree with the development of HS2-5 greenfield land and suggest, Council should use alternative sites which have been already developed but do not currently perform well. The council should consider the expansion capacity and options of those sites rather than destroying this kind of natural habitats of South of Clifton Hatch neighbours (HS2-5 land) and wildlife. If the need for new housing developments demands the use of greenfield lands, then the outskirts of Harlow should be considered and suggested and not such a natural habitable greenfield land (HS2-5, South of Clifton Hatch) within Harlow.

Full Reference: O - 6727 - 8625 - HS2 Housing Allocations - None

6732 Object**Respondent: Natural England (Ms Sarah Fraser) [8628]****Agent: N/A**

Summary: Natural England considers this policy to be unsound - not consistent with national policy. This policy sets out the specific sites on which housing allocations are to be delivered. This policy sets out the quanta of housing that will be allocated by the Local Plan. Given that Natural England has outstanding concerns relating to the Habitats Regulations Assessment ('HRA') we cannot, at this time, advise that this policy is sound. Our concerns will be set out in more detail below. Housing allocations should also consider potential impacts on Harlow Woods Site of Special Scientific Interest ('SSSI') which may be impacted in combination with allocations near Harlow from neighbouring Local Plans. A strategic solution is also being prepared for Hatfield Forest SSSI. Initial visitor surveys imply that the catchment is likely to be relatively large and may include parts of Harlow District. The plan needs to ensure that such impacts are considered appropriately through the plan and Sustainability Appraisal ('SA') and that solutions are provided for in policy.

Change To Plan:

Full Reference: O - 6732 - 8628 - HS2 Housing Allocations - None

6742 Object**Respondent: Ms Nikki Kellman [8629]****Agent: N/A**

Summary: Object to proposed Development on Playground west of 93-100 Jocelyns

As a regular visitor to Jocelyns I feel the parking situation needs to be addressed before more properties are developed
As a Harlow resident at present there are other development sites currently on the go eg: Gilden Way, old Rugby Club site, and extension to Newhall why are the council insistent of building on every bit of green land within Harlow, there are other priorities that need to be addressed.
I DO NOT THINK THIS IS A VIABLE AREA TO BUILD ON.

Change To Plan:

Full Reference: O - 6742 - 8629 - HS2 Housing Allocations - None

6766 Object**Respondent: Mr Ray Goodey [8580]****Agent: N/A**

Summary: We, as residents were informed that a land was required in order to prevent flooding in the kingsmoor area
No mention was made that the field would then change statues and form part of land for housing.
the field as a natural green space and as used by many residents, not only feunnells residents. the Loral church use it, dog walkers, joggers , personal trainers/ It would be a real shame to lose it

Change To Plan: the council should be more open and with their information regarding the plans for the field. the council website has these plans well hidden within the site

Full Reference: O - 6766 - 8580 - HS2 Housing Allocations - None

6769 Object**Respondent: Mr Ricky Goldblatt [8631]****Agent: N/A**

Summary: I would like register our objection to proposed Development plan of 12 new houses on Development of playground west of 93 - 100 jocelyns Every household tends to have at least 2 cars per household now plus any visitors we feel this new plot will makes things worse then it already is as we struggle anyway. We also feel the wildlife will be disturbed and ruined as all the trees and bushes would need to be cut away to gain access on your proposed entrance on the A414, which by the way is a very dangerous road to put an entrance an we feel there will be dangerous accidents imminent.
There has been a massive decrease in parks in harlow and although there isnt one there a nice bit of greenary is just a good for him to play on without venturing to far from the House.

Change To Plan:

Full Reference: O - 6769 - 8631 - HS2 Housing Allocations - None

6775 Object**Respondent: Mrs Samantha Baldry [8554]****Agent: N/A**

Summary: Residents of the Fennells and surrounding areas are serious and passionate to protect this area for those who use and enjoy it now and for future generations.
This green space is widely used by the Fennells residents and surrounding community. It is used by children, their friends and family throughout the year for recreation such as games of football, playing Frisbee, picnics, dog walking, large family games of rounders and building snowmen and snowball fights in the winter. It is a space for young children to play and exercise safely and to enjoy the outside environment. Many families bought their properties in this area because of this green space, knowing their children, or children they hope to have, had access to this wonderful space that would allow those that activities that small gardens will not allow. The building of 26 homes what will cost the loss of this widely used space that is integral to this community, seems unbalanced and unsound.

Change To Plan:

Full Reference: O - 6775 - 8554 - HS2 Housing Allocations - None

6845 Object **Respondent: Mr Nigel Bangert [8638]** **Agent: N/A**

Summary: Object HS2-5 South of Clifton Hatch with concern about the flood risk, as during heavy rain, garden has flooded.

I cannot see a way to make this plan or reasonable.

Change To Plan:

Full Reference: O - 6845 - 8638 - HS2 Housing Allocations - None

6862 Object **Respondent: De Merke Estates (Ms Emma Gladwin) [8643]** **Agent: Barton Willmore (Miss Emma Gladwin) [8399]**

Summary: HS2-1 Princess Alexandra Hospital

The first allocation is for 650 dwellings on the current Princess Alexandra Hospital Site. However, the LDP continually refers to the 'possible relocation' of the hospital, including at Paragraphs 4.28, 5.17, 5.28 and so on. Paragraph 5.29 states two potential locations are being considered through a Strategic Outline Business Case, one in the Gilston area north of Harlow and one to the east of Harlow within Epping Forest.

No evidence has been published as part of the LDP or its evidence base, including the Infrastructure Delivery Plan, to demonstrate that there is agreement from any other partners or bodies, such as the NHS, to relocate the hospital. There is also no indication of the cost of relocating the hospital and how this is to be funded, or any timescale.

Change To Plan: Given the lack of information as set out above, it has not been demonstrated that the site at Princess Alexandra Hospital is developable as set out in the NPPF. As such, it should not be allocated for housing development within the current LDP as it is contrary to Paragraph 47 and fails to be positively prepared, justified, effective or consistent with national policy.

Full Reference: O - 6862 - 8643 - HS2 Housing Allocations - None

6919 Object **Respondent: Peter Mountstevens [5553]** **Agent: N/A**

Summary: As a local resident of Fennells (since 1987), I have been concerned at the above proposal for 23 dwellings for the land east of 144-154 Fennells in community beneficial use as a children's play area into the 21st Century, now proposed to be allocated for housing by 2032.

I understand that a six figure sum has been spent on the importation of inert material to provide four ox-bow like earth bunds to prevent surface water run-off from the southern portion of the site and flooding of Parndon Wood Road at its junction with the main Fennells access road which has occurred at least once in 10 years since 1987. I was given to understand at a public consultation regarding the flood prevention measures last November at Parndon Wood Nature Reserve HQ that felled logs from the coppiced neighbouring woodlands would be used as part of the surface water holding bund system, although there is no sign of that happening to date.

I would object to the principle of the proposed change of use at site HS2-9 as this would create a perilous precedent for urban development immediately adjacent to Fennells Field, the open part of Parndon Wood Nature Reserve, an SSSI, which contains several healthy mature oak trees, all arguably of greater public amenity value than the preserved ash trees within the 1972-built Fennells housing area. Tony Morton and I tried to enhance the wildflowers present with ex-3M cowslips! Whilst the bunding operation will be effective in preventing motocross access by travellers as at Latton Common, I would suggest that the surface water flood risk would remain - if developers remove the bunds - given that the site still forms a feeder area to the culverted Parndon Brook north of Kingsmoor House and Milwards, thus ruling out the creation of habitable rooms at ground floor level - as at Ducketts Mead, Roydon (N. of the village green) within the River Stort floodplain.

Change To Plan:

Full Reference: O - 6919 - 5553 - HS2 Housing Allocations - None

6920 Object

Respondent: Peter Mountsteven [5553]

Agent: N/A

Summary: There is a local belief that HS2-3 site west of Deer Park is "derelict land" as a former recreational area, although I doubt that it would be as "derelict" as a Durham D village of yore (1960's) during the decline of the Northumberland and Durham coalfields. Has the Planning Inspectorate in succession to the Department of the Environment withdrawn the guidance that local authorities should provide 4 acres of recreational i.e. functional open space per 1000 head of population? If this standard still applied, the Deer Park recreational area would best remain reserved for informal outdoor pursuits.

Two other sites within the HS2 Housing Allocations section could also be deleted from the final submission without compromising the final total of new housing sites. HS2-15: Land to the north-west of Jocelyns which would bring that Old Harlow housing area unnecessarily close to the A414; and HS2-19: Stewards Farm which remains in beneficial and popular use for riding stables, a use compatible with the former farmhouse - a Grade II Listed Building. I have spoken to the family who run the stables and gather they have 5 years to run on their lease. The nearest alternative stables are at Nazeing and Barnfield, north of Roydon Hamlet. My fondest memory of the Harlow Town Show in the Town Park in the 1970's and 1980's is of the International standard show jumping with riders such as Harvey Smith, David Broome and Caroline Bradley over the August bank Holiday weekend. It's a shame that Hickstead have monopolised show jumping since then in the South-East.

Three sites not included within the Housing Allocations section of the HLDP all capable of beneficial residential use are The Square/YWCA hostel site adjacent to the Princess Alexandra Hospital site now earmarked for 650 dwellings, Wych Elm, and the former Motorsales site off Elizabeth Way, east of the 130 dwelling site at Ram Gorse (ex-Rugby Football club) off Parndon Mill Lane, formerly a "clean, green, safe" setting to St.Mary's, Little Parndon - the listed parish church.

Mention of PAH and re-siting of the District Hospital prompts me to support Cllr Danny Purton's suggestion that Hollingson Meads ex-sand and gravel workings would be the largest available site for the hospital within Harlow District to the north of River Way subject to a second Stort Valley road crossing.

In conclusion, I would echo Dr. Mervyn Miller's suggestion when viewing Orchard Croft townhouses in December 1998, short-listed for Grade II listing by the then English Heritage that Phase 1 of The Stow Shopping Centre featuring double stretcher bond facing brickwork (as at The Lawn) be given at least Character Area status, a status I have previously recommended for Standingford, Keefield and Archers at Sumners Farm (East).

Change To Plan:

Full Reference: O - 6920 - 5553 - HS2 Housing Allocations - None

6986 Object

Respondent: Harlow Alliance Party (Mr Nicholas Taylor) [8621]

Agent: N/A

Summary: Object to the proposed Local Plan for the future development of the land identified in section HS2 Housing Allocations

- 3. Land to the West of Deer Park
- 5. South of Clifton Hatch
- 6. Ridding Lane
- 9. East of 144-155 Fennells
- 10. Pollard Hatch, garages and land attached
- 11. Land between 2nd Avenue and St Andrews Meadow
- 15. Playground West of 93-100 Jocelyns
- 20 Land between Five Acres and Barn Mead

These sites are not suitable for housing development. Access to many of these sites is through nearby housing estates on roads that were never designed to take such traffic.

Change To Plan: These areas of land have been used for recreational purposes for many decades and should remain so
Numerous other sites around the town which could be used for housing which would not be to the detriment of other residents

Full Reference: O - 6986 - 8621 - HS2 Housing Allocations - None

6444 Comment **Respondent: STOP Harlow North [8588]** **Agent: Mr Jed Griffiths [8576]**
Summary: Policy HS2 and its delivery is dependent on the release of the Princess Alexandra Hospital site for housing. At the time of drafting, this has not been assured.
Change To Plan:

Full Reference: C - 6444 - 8588 - HS2 Housing Allocations - None

6478 Comment **Respondent: Miller Strategic Land [5769]** **Agent: Andrew Martin - Planning (Mr Olivier Spencer) [5533]**
Summary: It will be important to adopt a flexible approach at East Harlow, so that if for any reason M11 J7A is delayed, a first phase of development can be allowed to commence ahead of the new motorway junction and in turn release land for a new hospital as soon as possible.
Change To Plan:

Full Reference: C - 6478 - 5769 - HS2 Housing Allocations - None

6492 Comment **Respondent: Harlow Civic Society (Mr John Curry) [5318]** **Agent: N/A**
Summary: The table on Page 57 - HS2 Housing Allocations lists 21 sites where development is considered possible within the existing built & green environment. In general we accept the proposals; indeed we consider that all but four of these sites as eminently suitable for re-development. In particular, we suggest that the "hatches" listed could become subjects of architectural competition, thus following in the tradition of appointing up-coming architectural practices to provide interesting locations within the existing townscape.
The four sites that we would not wish to appear on this list are:
Ref 3. Ref 9. Ref 15.
Ref 19.
Change To Plan:

Full Reference: C - 6492 - 5318 - HS2 Housing Allocations - None

6626 Comment **Respondent: GLADMAN (Mr Phill Bamford) [8618]** **Agent: N/A**
Summary: Paragraph 7.32 of the Local Plan suggests that the allocations in the Local Plan provide 105 dwellings over the remaining housing requirement of 3,642 dwellings. This amounts to a total flexibility of almost 3%. This is not considered to be sufficient flexibility to ensure that the minimum housing requirement is met.

Recent research suggests that in order to ensure that the Housing requirement set out in Local Plans is met or surpassed, flexibility of between 10% and 20% should be built into the Plan. It is therefore considered that additional flexibility is required in the HLDP.
Change To Plan:

Full Reference: C - 6626 - 8618 - HS2 Housing Allocations - None

6681 Comment **Respondent: Historic England (Ms Debbie Mack) [8623]** **Agent: N/A**
Summary: There is a lack of a detailed and proportionate historic environment evidencebase underpinning the Plan and the Sustainability Appraisal. This is a particular issue for the strategic site at East Harlow and also site HS2-7 (Kingsmoor). Therefore we have provided more detail on these policies. We suggest that HIAs are prepared for both of these sites in advance of the EiP to test the suitability of these sites in terms of the potential impact on the historic environment. It is important to establish the suitability of the site per se prior to allocation. Paragraph 158 of the NPPF requires a proportionate evidence base for Plans. WE also have suggested the inclusion of a concept diagram for Policy HS3.
Change To Plan:

Full Reference: C - 6681 - 8623 - HS2 Housing Allocations - None

6682 Comment **Respondent: Historic England (Ms Debbie Mack) [8623]**

Agent: N/A

Summary: The site allocations in Policy HS2 require more detail. At the moment, the site address is simply listed. Paragraph 154 of the NPPF makes it clear that policies should provide a clear indication of how a decision maker should react to a development. The policies (particularly for the larger sites should be re-worded to include criteria for clarity and to provide greater protection for the historic environment and robust policies that provide the decision maker and developers with a clear indication of expectations for the sites.

Change To Plan:

Full Reference: C - 6682 - 8623 - HS2 Housing Allocations - None

6763 Comment **Respondent: Lawson Planning Partnership (Miss Kathryn Oelman) [8532]**

Agent: N/A

Summary: Policy HS2 will need to have regard for the possibility that the Mental Health Trust may not relocate alongside PAH and may therefore remain on site. Furthermore, it should be noted that the constraints listed in paragraph 9 of this letter prevent development in certain areas of the site. Initial estimates undertaken by PAH suggest the site would provide circa 8ha of net developable area once these factors are accounted for.

The site planning exercise concerning disposal of the existing site produced a number of draft layouts (the most relevant of these are included in Appendix 2 to this letter). The study suggests that the site could realise circa 400-450 dwellings at a density of approx. 50dph. PAH wishes to stress that these layouts have not been prepared with a commitment to redeveloping the existing site for housing; thus, their only value is to identify a realistic site capacity from which disposal costs/revenue can be calculated to inform the financial exercise that is being routinely applied to all of the three OBC options.

Change To Plan: In view of the above, PAH requests that the indicative dwelling capacity on the site is reduced to reflect the above constraints to a figure in the region of circa 450 dwellings. Retaining a figure of 650dwellings may result in unrealistic expectations of what can be provided on the site or affect the soundness of this policy when scrutinised by the Inspectorate.

Full Reference: C - 6763 - 8532 - HS2 Housing Allocations - None

6828 Comment **Respondent: Epping Forest District Council (Ms Alison Blom-Cooper) [8637]**

Agent: N/A

Summary: It is noted that the existing Princess Alexandra Hospital (PAH) site has been allocated for housing within Policy HS2 and would make a significant contribution to the delivery of the Local Plan's Housing target. EFDC has sought to support the relocation of the Hospital by way of Policy SP 5 of its Local Plan Submission Version which provides for the potential relocation of PAH within that part of the East of Harlow site within Epping Forest District. However, EFDC has some concerns regarding the deliverability for housing of the existing site within the period of the Local Plan bearing in mind work is still on-going with regard to finalising where or whether PAH would be relocated or indeed refurbished on the current site. It is not clear what the 'fallback' situation would be should the site, or the quantum of development indicated, not be delivered within the period of the Local Plan period.

Change To Plan:

Full Reference: C - 6828 - 8637 - HS2 Housing Allocations - None

6832 Comment **Respondent: Sandra Beavis [5035]**

Agent: N/A

Summary: HS2-5 Land south of Clifton Hatch is one of the locations as a 'Reasonable Alternative'. Whichever Option was considered, building 36 dwellings will substantially increase the levels of traffic and if it is not known if there could be further improvements to transport infrastructure, then this site should not be built on.

Change To Plan:

Full Reference: C - 6832 - 5035 - HS2 Housing Allocations - None

6863 Comment

Respondent: De Merke Estates (Ms Emma Gladwin) [8643]

Agent: Barton Willmore (Miss Emma Gladwin) [8399]

Summary: The SHLAA itself states that deliverability references the ability of the site to be developed within the next 5-years. To be considered developable, the definition within Footnote 12 of the NPPF was used, as set out above.

A total of 7 No. of the allocations are included in HDC's trajectory as delivering dwellings within the next 5-years. Of these, 4 No. are identified in the SHLAA as not being deliverable. HDC has not published any evidence reconsidering the sites or finding them deliverable, so there is a discrepancy between the LDP and its evidence base with the inclusion of these sites being contrary to Paragraph 47 of the NPPF.

Change To Plan:

Full Reference: C - 6863 - 8643 - HS2 Housing Allocations - None

6390 Object

Respondent: Ms Angela Parish [8550]

Agent: N/A

Summary: I very much object to the proposed housing on the field in front of my house. Firstly, the we will lose the wildlife which is rich in this area. Secondly, the parking around the estate is ridiculous at best especially when we have to put up with the Christian centre encouraging parking on the road up to the Crematorium making it very dangerous for the public to access the Nature Reserve and estate. Thirdly, the building of houses right in front of my house is NOT what I bought my house for. NO CONSULTATION HAS BEEN GIVEN-I'M VERY ANGRY!

Change To Plan: ABOLISH ALL PLANS TO BUILD ON THIS FIELD

Full Reference: O - 6390 - 8550 - HS2 Justification - i

6409 Object

Respondent: Mr Mike Stokes [8551]

Agent: N/A

Summary: This area (HS2-9) is widely used by the local community. we have a lot of children living In the area & building houses on here would remove their recreational area at a time when we are encouraging children to be outdoors & more active. It would also have a negative impact on the local wildlife and the already overcrowded parking. Residents of the Fennells area have in no way been informed of the intention to build additional housing in this land and we have not appropriately advised of our rights to have access to these plans and make comment.

Change To Plan: The plan to build on the site named HS2-9 should be abolished.

Full Reference: O - 6409 - 8551 - HS2 Justification - ii

6421 Object

Respondent: Gillian Atkins [8577]

Agent: N/A

Summary: Object to land between Barn Mead & Five Acres used for housing. Area floods in winter & many cars, several lorries and 2 tow trucks have been stuck in the mud. Risk of flooding being transferred to existing properties. Proposal is against Green Wedge Review 2014. Proposal against Gibbard Principals

Change To Plan: Remove this area from the housing proposal

Full Reference: O - 6421 - 8577 - HS2 Justification - None

6550 Object

Respondent: Miss Aimee Turvill [8607]

Agent: N/A

Summary: object to the above proposed development of 12 new houses on the above plot as we feel very strongly that the infrastructure of the roads and lack of parking as it is cannot accommodate for the additional houses

Change To Plan:

Full Reference: O - 6550 - 8607 - HS2 Justification - None

6551 Object

Respondent: Ms Angela Parish [8550]

Agent: N/A

Summary: never being made aware of any plans or consultation period so this is all rather disappointing to say the least. Also the extra traffic on to the estate would be horrendous. really disappointing that in my area we have the Nature Reserve where the wildlife will really suffer.

Change To Plan:

Full Reference: O - 6551 - 8550 - HS2 Justification - None

6552 Object

Respondent: B.K. & J.T. Drabble [8611]

Agent: N/A

Summary: object to the above proposed development of 12 new houses on the above plot as we feel very strongly that the infrastructure of the roads and lack of parking as it is cannot accommodate for the additional houses.

Change To Plan:

Full Reference: O - 6552 - 8611 - HS2 Justification - None

6479 Object

Respondent: Miller Strategic Land [5769]

Agent: Andrew Martin - Planning (Mr Olivier Spencer) [5533]

Summary: Our client supports the allocation in Policy HS3 for 2,600 dwellings and associated infrastructure at East Harlow (in Harlow District). However, our client objects to the following specific criteria: HS3(a) pending publication and review of the completed Spatial Vision and Design Charter; HS3(b) regarding detailed wording on transport / highway impacts; HS3(c) pending publication of an updated Infrastructure Delivery Plan; HS3(f) regarding revised wording in relation to new neighbourhood centres; HS3(g) again pending publication of an updated Infrastructure Delivery Plan; and, HS3(i) on the basis that public art is not strictly necessary.

Change To Plan: Our client respectfully requests that Policy HS3 is amended as follows:

- Part (a) is subject to a holding objection, pending publication and review of the completed Spatial Vision and Design Charter.
- Part (b) should be reworded to read "provide highway improvements which cost effectively mitigate any significant impacts from development to ensure that there are no severe residual cumulative impacts on the road network;"
- Part (c) should be revised to read "provide necessary infrastructure, including, but not limited to, land and pro rata contributions for new health and education provision, as set out in the latest Infrastructure Delivery Plan (IDP);"
- Part (f) should be revised to read "provide for appropriate local retail, employment and other supporting uses, similar to neighbourhood centres elsewhere in Harlow;"
- Part (i) should be deleted in its entirety.
- The following sentence should be added to the end of the second paragraph: "For the avoidance of doubt, the Master Plan should provide sufficient flexibility to enable development to come forward at East of Harlow, in the event that a decision on the Princess Alexandra Hospital's relocation is delayed or deferred for any significant length of time."

Furthermore, the IDP should be updated prior to Examination in Public (EiP) to include further information on overall infrastructure costs and how those costs will be apportioned across the wider Garden Town.

Full Reference: O - 6479 - 5769 - HS3 Strategic Housing Site East of Harlow - iii, iv

6502 Object

Respondent: Environment Agency (Miss Lisa Mills) [8443]

Agent: N/A

Summary: Buffer zone for the Harlowbury Brook, opportunities for enhancement and reference to WFD.

Change To Plan: We are pleased that this policy gives reference that development must provide sustainable drainage solutions and flood mitigation measures for areas of the site which are identified in the Strategic Flood Risk Assessment. However, this policy should be strengthened to give specific mention the Harlowbury brook that runs through this site. Providing a minimum 8m undeveloped buffer zone river enhancements such as removing or restoration will be strongly encouraged. Opportunities should always be sought to improve waterbodies where possible under the Water Framework Directive (WFD). Actions such as de-culverting, providing minimum eight metre undeveloped buffer zones adjacent to watercourses, removing hard banks and re-naturalising watercourses will all provide benefits and can help to achieve the aims of the WFD.

Full Reference: O - 6502 - 8443 - HS3 Strategic Housing Site East of Harlow - iv

6694 Object **Respondent: Historic England (Ms Debbie Mack) [8623]** **Agent: N/A**

Summary: There are a number of heritage assets adjacent to, or surrounded by or close to the site. These include a number of listed buildings (House 20m NW of Stephen's Cottages, Hatches, Thatched Cottages, Spiers Farm, Pump, Franklins Farmhouse, Hubbards Hall and range of two service buildings and two barn s at Sheeri ng Hall all listed at grade 11 as well as Sheering Hall itself to the north of the site which is listed at grade 11 *). We note that in the Harlow Strategic Sites Assessment AECOM report, the site scores red in terms of the historic environment. Given this sensitivity, as part of the evidence base for the Local Plan, for a site of this size with nearby heritage interest, we would expect a Heritage Impact Assessment prior to allocation to assess the suitability of the site for allocation. Without such evidence in place, the policy is not justified and is not in accordance with the NPPF. This needs to be prepared in advance of the EiP to inform the extent and capacity of the site. Please contact us to discuss the nature and extent of the work required to inform the Local Plan. Please also refer to our advice notes above.

As currently worded the policy includes no protect ion for the historic environment. Therefore, this does not comply with the NPPF. Whilst the design Charter (criterion) may include reference to the historic environment, at the present time the Harlow and Gilston Garden Town and Design Charter is not available to view. Without sight of this document it is not possible to assess whether there is sufficient protection for the historic environment in the policy. In the absence of this, we must conclude that the Policy is unsound. We would also suggest the addition of a bullet point to provide protection to the historic environment. This might read, "Conserve and where appropriate enhance the historic environment including (list key heritage assets) and t heir settings through careful design, landscaping heritage buffer zones. We would also recommend the inclusion of a concept diagram to graphically portray the principles and requirements of the policy. We find this a helpful approach as a picture tells a thousand words.

Change To Plan:

Full Reference: O - 6694 - 8623 - HS3 Strategic Housing Site East of Harlow - None

6673 Comment **Respondent: Hertfordshire County Council (Mr Martin Wells) [8622]** **Agent: N/A**

Summary: Strategic Housing Site East of Harlow. Wording within this policy should be amended to include Hertfordshire County Council (HCC), as it is both a service provider and Highway Authority

Change To Plan:

Full Reference: C - 6673 - 8622 - HS3 Strategic Housing Site East of Harlow - None

6733 Comment **Respondent: Natural England (Ms Sarah Fraser) [8628]** **Agent: N/A**

Summary: We also recommend that there should be a policy commitment to ensuring that masterplanning delivers net gains for biodiversity and the environment.

Change To Plan:

Full Reference: C - 6733 - 8628 - HS3 Strategic Housing Site East of Harlow - None

6829 Comment **Respondent: Epping Forest District Council (Ms Alison Blom-Cooper) [8637]** **Agent: N/A**

Summary: Policy HS3 covers the Strategic Housing Site East of Harlow as providing 2,600 dwellings and associated infrastructure. EFDC is pleased to note that the number of dwellings accords with our understanding of the overall capacity for the East of Harlow site as 3,350 dwellings with 750 dwellings located within Epping Forest District. The policy would benefit from a clear reference to the location of the East of Harlow site as between the administrative boundaries of Epping Forest District and Harlow District, and therefore requiring close joint-working between the two authorities to ensure the coordinated delivery of sustainable development. EFDC would also welcome clarity in the Plan as to how Policy HS3 and Policy HGT1 align, especially with regard to the production of a Strategic Masterplan for the whole East of Harlow site. With regard to infrastructure provision on the East of Harlow site, Paragraph 5.27 of the Plan sets out the key infrastructure required to support housing on the site. EFDC note that it would be useful to include definition on how the need for such infrastructure has been calculated based on both Harlow District and Epping Forest District needs. EFDC look forward to further discussing such matters in partnership with Harlow Council through the Harlow and Gilston Garden Town Infrastructure Delivery Plan.

Change To Plan:

Full Reference: C - 6829 - 8637 - HS3 Strategic Housing Site East of Harlow - None

6853 Comment **Respondent: Redrow Homes (Ms Kate Holland) [8640]** **Agent: Redrow Homes (Ms Kate Holland) [8640]**

Summary: Policies HGT1 and HS3 are amended to remove reference to the need for development solely to reflect the overarching design principles of the Spatial Vision of Design Charter and instead include for flexibility for development to be brought forwards in advance or absence of the documents.

Change To Plan: To allow the Site at Land South of Moor Hall Road to be delivered earlier in the Plan period and before the wider allocation would provide for additional housing within the first 5 years of the Trajectory. This would compensate for issues of deliverability of the smaller sites allocated under Policy HS2. As a consequence, this would assist in making the Plan "Effective", "Consistent with National Policy" and "Positively Prepared" and could therefore be considered "Sound" in accordance with Paragraph 182 of the NPPF.

Full Reference: C - 6853 - 8640 - HS3 Strategic Housing Site East of Harlow - None

6891 Comment **Respondent: Essex County Council (Mr Rich Cooke) [8452]** **Agent: N/A**

Summary: This policy makes no specific reference in policy or supporting text to connections with/delivery of the (East-West) Sustainable Transport Corridor.

ECC work has established that this site must achieve high levels of sustainable mode share or its capacity may be compromised in order to prevent unacceptable impacts on the local road network.

Change To Plan: ECC (Highways) recommends that wording is added to the policy (criterion (b)) to make reference to connections with/delivery of the (East-West) Sustainable Transport Corridor.

Full Reference: C - 6891 - 8452 - HS3 Strategic Housing Site East of Harlow - None

CHAPTER: STRATEGIC GROWTH HS4 Justification
STRATEGY FOR HARLOW

6451 Support **Respondent: Deanery of Harlow (Anglican) (Revd Martin Harris) [8586]** **Agent: N/A**

Summary: I welcome the work to restore pitches for the Travelling Community locally.

Change To Plan:

Full Reference: S - 6451 - 8586 - HS4 Justification - None

CHAPTER: STRATEGIC GROWTH 8. ECONOMIC DEVELOPMENT AND PROSPERITY STRATEGY
STRATEGY FOR HARLOW

6648 Object **Respondent: Harlow Alliance Party (Mr Nicholas Taylor) [8621]** **Agent: N/A**

Summary: Those of us who live in Harlow should know only too well how the present infrastructure and indeed public services are stretched to their limit here. Many of the roads, designed in the 1950's and 1960's, can no longer cope with the amount of traffic on them. Even roads built on estates in the last five years are so clogged up with traffic that they have become unofficial one-way systems. The plans for the odd new road and junction improvements are wholly inadequate for the massive increase in traffic which will be created by this plan, which will see the number of homes in the area increase by some 35%. Added to this are the Local Plans of neighbouring authorities which will see hundreds of new homes in places such as Sawbridgeworth, North Weald, Epping and many others, adding to the problems in Harlow as people from the above areas come into the town for shopping and leisure activities. It should be noted that there are no plans for a new secondary school, which will mean hundreds of children living just outside as well as within Harlow's borders will need to get to schools in Harlow, creating even more congestion.

Change To Plan:

Full Reference: O - 6648 - 8621 - 8. ECONOMIC DEVELOPMENT AND PROSPERITY STRATEGY - None

6734 Object

Respondent: Natural England (Ms Sarah Fraser) [8628]

Agent: N/A

Summary: Natural England considers this policy to be unsound - not consistent with national policy
This policy allocates sites for employment uses. Given that Natural England has outstanding concerns relating to the Habitats Regulations Assessment ('HRA'), particularly in relation to air pollution impacts we cannot therefore, at this time, advise that this policy is sound. Our concerns will be set out in more detail below.

Change To Plan:

Full Reference: O - 6734 - 8628 - ED1 Future Employment Floorspace - None

6787 Object

Respondent: Weston Homes Plc (Mr David Poole) [8590]

Agent: N/A

Summary: Weston Homes Plc object to the proposed extent and protection of the Burnt Mill Employment Area as indicated in the Harlow Local Development Plan Policies Map Pre-Submission Publication (May 2018). As illustrated, this designation washes over land from to the east of Mill Lane, north of Elizabeth Way and bounded by the railway line to the north, extending eastwards towards the roundabout with Fifth Avenue and Edinburgh Way and continuing eastwards, north of Edinburgh Way to include Pearson House and its associated car park. In total the designated land extends to just over approximately 11ha. The area is not identified as suitable to accommodate Future Employment Floor space pursuant to Policy ED1.
The designation fails to take into account the now built out Harlow Gateway Development around the Harlow Town Station (Mill Court) which introduced mixed-use residential, hotel and restaurant floorspace on the site of the former Longman Publishers office HQ building. The designation neither takes into account recent development on the corner of Fifth Avenue/ Elizabeth Way (Ref.No HW/FUL/17/00563) nor the cessation of employment activity at Pearson House and which is subject to change of use from office to residential pursuant to Permitted Development rights (HW/COUOR/17/00295) for 258 dwellings.
The evidence base supporting the continued and unaltered employment land designation fails to adequately consider the up-to-date health, vitality and the current use and activity on the site and, for example, the vacancy rates of offices or the success of other B-Class uses in the vicinity but in particular, to the west of Fifth Avenue.

Change To Plan: As such the proposed extent of the employment allocation should be reviewed and rationalised to exclude land in the vicinity of the station, in particular the former Pearson House car park.

Full Reference: O - 6787 - 8590 - ED1 Future Employment Floorspace - None

6825 Support

Respondent: Epping Forest District Council (Ms Alison Blom-Cooper) [8637]

Agent: N/A

Summary: The Pre-Submission Plan provides for 18-20 hectares of additional employment floorspace as recommended in the HMA Assessment of Employment Needs (2017) evidence base document. This provision is supported by EFDC. EFDC is pleased to note the inclusion of developing a visitor economy as set out in Policy ED4 and expresses support for this not only at the District scale but also recognising the strategic opportunity for the visitor economy, such as through the London Stanstead Cambridge Corridor Core Area. HDC may want to further stress the strategic scale visitor economy in Policy ED4.

Change To Plan:

Full Reference: S - 6825 - 8637 - ED1 Future Employment Floorspace - None

6782 Comment

Respondent: Weston Homes Plc (Mr David Poole) [8590]

Agent: N/A

Summary: The NPPF clearly states that Councils should avoid the long term protection of sites if there is no reasonable prospect of the site coming forward for employment purposes. The Harlow Employment Land Review (2013) suggests that demand for employment land is set to fall between 2011-31. However, contrary to this the West Essex and East Hertfordshire Assessment of Employment Needs has suggested that demand is going to increase between 2016-33. Although these documents reach different conclusions there is general agreement that B class uses should only be located in suitable areas. There is no evidence or understanding that the site remains suitable any longer for B class employment uses and in any case cannot viably deliver such uses either currently or in the foreseeable future.

More specifically we assert the following conclusions in relation to the land adjacent to Pearson House, in particular as part of the Burnt Mill allocated employment site which should be reviewed and redefined as:

- ☐ Retaining a site for B class uses does not mean developers or occupiers will be attracted to the site in this location or the site will come forward for such uses. Indeed, for the reasons given there is no reasonable prospect of the site being used for 'B' purposes in the future.
- ☐ The application site is situated to the north of the town centre, where it has been recognised the vacancy rates remain the highest along with the west of the town centre.
- ☐ Office rents in Harlow are too low to justify office development and given increasing supply levels in preferred locations (such as London) rents in Harlow will be 'capped' for the foreseeable future.
- ☐ The Harlow Employment Land Review recognises that it is predicted that there will be a fall in demand for industrial space during the plan period and Harlow is not a recognised office location. Therefore the site should be released as there will still be sufficient B class space available in the market area.
- ☐ The application site is not of high quality, particularly given the granting of consent for Pearson House to be converted to residential use. This will cause a number of issues for B class users including noise and hours of use restrictions.
- ☐ It is demonstrated that there is a sufficient supply of both vacant B class units and vacant employment land. Additionally, many of these sites are superior to the subject site and as a result, are more likely to come forward should there be an increase in demand for B class development. We have demonstrated through the marketing of other units that there is a demonstrable lack of demand for office units..
- ☐ The application site is not suitable for large scale B8 use given the adjacent residential occupiers.
- ☐ Through our viability assessment we have demonstrated that it is not viable to develop the site for B class uses. The negative figures are so apparent that this position (of a lack of viability) will remain indefinitely. As a result if the site is retained for such uses this will be contrary to national planning policy as set out within the NPPF.

Change To Plan: we have demonstrated that there is no reasonable prospect of the site being developed for employment purposes. Paragraph 22 of the NPPF states that "planning policies should avoid the long term protection of sites allocated for employment uses where there is no reasonable prospect of the site being used for that purpose". The application site should therefore be released for the proposed scheme otherwise it will remain vacant and unused. Alongside the designation of the potential extent of employment land in the locality of Burnt Mill the wording of other policies including ED2 and PR1 should also be reviewed, latterly to ensure that any policy remains compatible with the NPPF with regard to release for other uses, not only employment generating purposes.

Full Reference: C - 6782 - 8590 - ED1 Future Employment Floorspace - None

6790 Comment

Respondent: Hallam Land Management & Commercial Estates Group (Mike Newton) [7646]

Agent: N/A

Summary: The potential to provide strategic employment land at the Garden Town Communities and at Latton Priory in particular which is close to junction 7 of the M11, warrants further examination to maximise the sustainability benefits of the development and make a major contribution to the delivery of new jobs in an accessible and marketable employment location. The employment land opportunities at Latton Priory should be reconsidered by both Harlow and Epping Forest in particular, given that Harlow has not specified in the pre-submission local plan how it intends on meeting its significant B2/B8 employment need over the plan period. The pre-submission plan also does not specify how the unallocated employment need across the FEMA (as identified in the Employment Needs Assessment 2017) is going to be accommodated. We consider Latton Priory to be the least constrained of the strategic site allocations, the site that is most capable of early delivery and that it has potential to accommodate housing additional to the current allocation.

Change To Plan:

Full Reference: C - 6790 - 7646 - ED1 Future Employment Floorspace - None

CHAPTER: STRATEGIC GROWTH
STRATEGY FOR HARLOW

ED2 Protecting Existing Employment Floorspace

6892 Comment

Respondent: Essex County Council (Mr Rich Cooke) [8452]

Agent: N/A

Summary: ECC is supportive of Harlow DC's aspirations of protecting Neighbourhood Service Areas and encouraging the provision of smaller start-up units, shared spaces and workhubs in these areas. (Policy ED2). However, it is considered necessary to also ensure that any resulting B1 class uses that are developed in these locations are adequately served by suitable broadband infrastructure (with consideration given to a minimum speed requirement)

Change To Plan: ECC (Economic Growth) recommends adding text to Policy ED2 to ensure that as a minimum, adequate broadband provision is ensured to meet modern business needs
ECC will work collaboratively with HC to discuss and agree appropriate detailed wording.

Full Reference: C - 6892 - 8452 - ED2 Protecting Existing Employment Floorspace - None

CHAPTER: STRATEGIC GROWTH
STRATEGY FOR HARLOW

ED3 Developing a Skills Strategy for Harlow

6725 Comment

Respondent: Mrs Karen Garrod [8596]

Agent: N/A

Summary: Harlow is lacking in quality employment opportunities which will affect sustainability.

Change To Plan:

Full Reference: C - 6725 - 8596 - ED3 Developing a Skills Strategy for Harlow - None

CHAPTER: STRATEGIC GROWTH
STRATEGY FOR HARLOW

ED4 Developing a Visitor Economy

6570 Support

Respondent: Canal & River Trust (Ms Tessa Craig) [8612]

Agent: N/A

Summary: The Trust welcomes the recognition given to the importance of the River Stort to the visitor economy of Harlow and to the need for improvements to Green Infrastructure links to connect the river with other attractions. People come from near and far to visit our waterways. They can have a beneficial impact on the local economy by providing sustainable active travel routes and attractive settings for waterside and on-water businesses. By encouraging these uses in appropriate locations, development plans can help the waterway attract more people and support the local economy.

Change To Plan:

Full Reference: S - 6570 - 8612 - ED4 Developing a Visitor Economy - None

6462 Support **Respondent: The Theatres Trust (Tom Clarke) [216]** **Agent: N/A**

Summary: The Trust supports the protection of existing cultural, community and sporting facilities which bring people into the town, as we would consider this to include the town's theatres.

Change To Plan:

Full Reference: S - 6462 - 216 - ED4 Implementation - None

6420 Comment **Respondent: Essex Bridleways Association (Mrs Sue Dobson) [7887]** **Agent: N/A**

Summary: Page 69 para 8.28: we note the aspiration to improve Green Infrastructure links and connectivity, especially with Lea Valley and Hatfield Forest. We would like to see this aspiration extended to include access for ALL user groups, including equestrians, where possible - especially as Hatfield Forest is already open to equestrian use and further connectivity will enhance the network open to those users.

Change To Plan:

Full Reference: C - 6420 - 7887 - ED4 Implementation - None

6433 Comment **Respondent: Mr David Naylor [8579]** **Agent: N/A**

Summary: The visitor economy in Harlow would benefit for a comprehensive mapping of footpaths and pedestrian routes within Harlow and to recreation and green assests. The sculpture trail provides an example of how such a mapping could raise the profile of harlow as a town friendly to walkers

Change To Plan:

Full Reference: C - 6433 - 8579 - ED4 Implementation - None

6456 Comment **Respondent: STOP Harlow North [8588]** **Agent: Mr Jed Griffiths [8576]**

Summary: This chapter of the Local Plan claims to have embodied a network of Green Wedges and Green Fingers, respecting the principles of Sir Frederick Gibberd's Master Plan. As far as the internal structure of the town may be concerned, these principles seem to hold. Beyond the boundaries, however, there is a direct conflict with the Master Plan. An essential part of the design was the linking of the network of green spaces with "the Hertfordshire Hills beyond". This principle has been breached with the proposal to develop the area to the north of Harlow with housing.

Change To Plan:

Full Reference: C - 6456 - 8588 - 10. LINKING DEVELOPMENT SITES TO THE WIDER ENVIRONMENT - None

6398 Object

Respondent: Miss Erin Rose BALDRY [8560]

Agent: N/A

Summary: The proposal to include the Fennells field appears to take away a beautiful green space within the town. This field is part of my childhood and is used by lots of people including dog walkers and the church. I also do not want to be scared walking to school because of lots of additional cars using the roads near me. It is already dangerous crossing the roads now.

Change To Plan: Please remove the fennells field from your plans.

Full Reference: O - 6398 - 8560 - WE1 Strategic Green Infrastructure - i, ii, iii, iv

6571 Support

Respondent: Canal & River Trust (Ms Tessa Craig) [8612]

Agent: N/A

Summary: The Trust generally supports the protection and enhancement of green infrastructure in Harlow. Towpaths make excellent places for people to walk and cycle considerably. Not only is this great for recreation, it can be an attractive way for people to commute, reducing congestion, carbon emissions and poor air quality in the wider area and supporting people to lead healthier lives. The Trust is supportive of connecting key locations with other infrastructure and recognises individual waterways and water spaces need to be viewed as an integral part of a wider network, and not in isolation. New development often brings new people onto the waterways, particularly the towpaths. Improvements to signage and wayfinding is therefore also seen as a positive enhancement to help with connectivity of networks. The policy describes a new linear 'Stort Riverpark'. As the owner and navigation authority of the river, the Trust would expect to be engaged in this proposal from an early stage and should be identified as a partner at point 10.15. The Trust is already working with other local authorities and partners to improve the River Stort environment elsewhere and is able to provide a strategic link between the Harlow area and surrounding areas.

Change To Plan:

Full Reference: S - 6571 - 8612 - WE1 Strategic Green Infrastructure - None

6735 Comment

Respondent: Natural England (Ms Sarah Fraser) [8628]

Agent: N/A

Summary: Natural England is encouraged to see the plan taking a positive, strategic approach to Green Infrastructure. We commend the commitment to protection and enhancement of green fingers and wedges and to the delivery of a new linear 'Stort Riverpark.'

Change To Plan:

Full Reference: C - 6735 - 8628 - WE1 Strategic Green Infrastructure - None

6755 Comment

Respondent: Quod Planning (Mr Philip Murphy) [7958]

Agent: N/A

Summary: Policy WE1 states "...Green Fingers which are identified on the Policies Map... will be protected and enhanced". It is suggested that this policy acknowledges that this does not apply in areas with Strategic Infrastructure Requirements, identified within policies SIR1-3. Policy WE1 also references that "The new linear 'Stort Riverpark' connecting the Lee Valley Regional Park to Bishop's Stortford through Harlow, will be delivered by contributions from new development." PfP consider it sensible to include this on the Plan's associated Proposals Map in order to define this strategic green infrastructure.

Change To Plan: This infrastructure is not 'justified' based upon proportionate evidence, nor needed to deliver the draft Plan, and therefore references to the same should be removed.

Full Reference: C - 6755 - 7958 - WE1 Strategic Green Infrastructure - None

6783 Comment**Respondent: Weston Homes Plc (Mr David Poole) [8590]****Agent: N/A**

Summary: In respect of protecting Green Belt land, the NPPF states at paragraph 83 that "once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan."

The Council's current approach fails to identify how it is demonstrated that very special circumstances are determined. At this stage, the evidence base for the Council has not established or set out any selective criteria to set out how, it will provide a site by site justification for any Green Belt release by way of "very special circumstances" to support the Pre-Submission District Local Plan. This approach is not currently considered sound, and it should undertake a further full review of the Green Belt functions in light of other sites put forward or now know to be available within the town and which might also deliver other regeneration benefits, making better use of previously developed land within the settlement boundary as a priority.

Change To Plan:

Full Reference: C - 6783 - 8590 - WE1 Strategic Green Infrastructure - None

CHAPTER: STRATEGIC GROWTH WE1 Implementation
STRATEGY FOR HARLOW

6494 Comment**Respondent: Environment Agency (Miss Lisa Mills) [8443]****Agent: N/A**

Summary: We welcome the inclusion of the "new linear 'Stort Riverpark'" in this policy. However, we would like to highlight that the Water Framework Directive has set out a number of actions and measures which, if implemented, will improve the Ecological Status/Potential of these environments. It is recommended that these be used as an identified tool to help shape the opportunities for development of the Stort Riverpark.

Change To Plan:

Full Reference: C - 6494 - 8443 - WE1 Implementation - None

6392 Object **Respondent: Mrs Samantha Baldry [8554]**

Agent: N/A

Summary: The proposed allocation of the Fennells field for residential housing is in complete contradiction of the proposal to protect green wedges and fingers. This green space has been extensively used for recreation by members of the Fennells estate and surrounding areas for well over 20 years. It has been used for dog walking, football, kite flying, family games of rounders, picnics, snow man building and general exercise and enjoyment. It is an essential part of this community used by all ages and provides a safe place for children to be active and play. Do not remove!

Change To Plan: Remove the Fennells Field as a proposed site for residential housing.

Full Reference: O - 6392 - 8554 - WE2 Green Wedges and Green Fingers - i, ii, iii, iv

6399 Object **Respondent: Mr Ethan Baldry [8559]**

Agent: N/A

Summary: The Fennells Field as shown in HS2 needs be removed from this document as it proposes to take away an integral green wedge within the town. This document talks about protecting Harlow's green spaces yet you intend to remove them. I consider this the rape of the natural environment.

Change To Plan: This site needs to be removed from the local plan and the green space be protected. Harlow has proposed significant housing growth and i question why this site needs to be included considering the impact is minimal. I beg that you consider protecting the green wedge that has been an integral part of my childhood.

Full Reference: O - 6399 - 8559 - WE2 Green Wedges and Green Fingers - i, ii, iii, iv

6401 Object **Respondent: Miss Erin Rose BALDRY [8560]**

Agent: N/A

Summary: The proposed allocation of the Fennells field is not acceptable and does not protect the wonderful bio-diversity I have near my home. I have seen so many animals here and the thought that this will be taken away is horrible. As we are near the nature reserve the proposed allocation does not take into account that nature will be impacted. Houses on this land will ruin a wonderful environment and must not be allowed to happen.

Change To Plan: This site needs to be removed from the local plan and the green space be protected. Harlow has proposed significant housing growth and i question why this site needs to be included considering the impact is minimal. I beg that you consider protecting the green wedge that has been an integral part of my childhood.

Full Reference: O - 6401 - 8560 - WE2 Green Wedges and Green Fingers - i, ii, iii, iv

6649 Object **Respondent: Harlow Alliance Party (Mr Nicholas Taylor) [8621]**

Agent: N/A

Summary: The Plan involves building on green belt land and land that was left as open spaces by the town's designer Sir Frederick Gibberd. In respect to the former, land is being taken out of Green Belt status for reasons which cannot be justified. In respect of the latter, seven play areas and or large open green spaces are being designated for future housing use. The loss of many of these areas (site numbers 3, 5, 9, 10, 11, 15 and 20) will mean the end of safe play or recreational activities on sites which have been enjoyed by residents for decades. In recent times Harlow Council have deliberately left many of them off their maintenance schedules making it difficult for residents to use these areas, in the hope that less objections to the proposals would be made. The proposal for a busway cutting through the very large open space from The Leisurezone to Fernhill Lane is completely at odds with Harlow's Masterplan, changing the whole area forever. It would need new junctions crossing Commons Road and Southern Way, adding yet more congestion on these roads whilst at the same time taking away other recreational space in its path. At the heart of this matter is how Harlow Council has identified the list of 21 sites for future housing development from the list of many dozens of parcels of land it listed in an earlier document. The Harlow Alliance Party believe that areas other than those used for play and recreation (site numbers above) should be reclassified for future housing use.

Change To Plan:

Full Reference: O - 6649 - 8621 - WE2 Green Wedges and Green Fingers - None

- 6736 Support** **Respondent: Natural England (Ms Sarah Fraser) [8628]** **Agent: N/A**
 Summary: Natural England generally supports this policy.
 Change To Plan:
- Full Reference: S - 6736 - 8628 - WE2 Green Wedges and Green Fingers - None
- 6756 Support** **Respondent: Quod Planning (Mr Philip Murphy) [7958]** **Agent: N/A**
 Summary: In support of Policy WE2, it would be appropriate for the policy's supporting text, to include further detail on the future Green Wedge within the Stort Valley.
 Change To Plan:
- Full Reference: S - 6756 - 7958 - WE2 Green Wedges and Green Fingers - None
- 6793 Support** **Respondent: Hallam Land Management & Commercial Estates Group (Mike Newton) [7646]** **Agent: N/A**
 Summary: We support the provision designation of the Green Wedges, and will work with the Council and the other authorities involved to deliver Strategic Green Infrastructure which will connect with the Green Wedge adjoining the Latton Priory site.
 Change To Plan:
- Full Reference: S - 6793 - 7646 - WE2 Green Wedges and Green Fingers - None
- 6627 Comment** **Respondent: GLADMAN (Mr Phill Bamford) [8618]** **Agent: N/A**
 Summary: Whilst it is appreciated that these designations have played a role in defining the form of Harlow as a settlement, the Council must ensure that they do not act as a constraint to development which prevents the district from meeting its overall housing requirement.
 Change To Plan:
- Full Reference: C - 6627 - 8618 - WE2 Green Wedges and Green Fingers - None
- 6717 Comment** **Respondent: Jean Wright [5878]** **Agent: N/A**
 Summary: To add insult to injury the main footpath across the site has been closed which was a great recreational source for people in Old Harlow. We have some open spaces here but in the main use of these is restricted to sport use. We will be very lacking now in green space. When the footpath reopens we will not be able to enjoy our once green area.
 Change To Plan:
- Full Reference: C - 6717 - 5878 - WE2 Green Wedges and Green Fingers - None
- 6830 Comment** **Respondent: Epping Forest District Council (Ms Alison Blom-Cooper) [8637]** **Agent: N/A**
 Summary: Policy WE2 on the Role of Green Wedges and Fingers provides a strong commitment to the provision of high quality open spaces in Harlow. EFDC note that for the purposes of clarity it would be useful to align this policy's approach with the aspirations to introduce new varied uses to these as part of the Sustainable Transport Corridors associated with the Garden Town Communities. Policy PL4 permits small-scale development on Green Wedges and Fingers while ensuring that the roles and functions of the Green Wedges and Fingers and wider landscape setting are preserved. It would therefore be beneficial for the Plan to provide further clarification on how these policy requirements align, particularly in the context of Sustainable Transport Corridors.
 Change To Plan:
- Full Reference: C - 6830 - 8637 - WE2 Green Wedges and Green Fingers - None

6434 Comment

Respondent: Mr David Naylor [8579]

Agent: N/A

Summary: Currently the footpaths and pedestrian access route to and through green wedges and fingers are signposted inconsistently for example the walkway from the junction of Elizabeth Way and Parndon Mill Lane to the town centre has no signposts.
Access to the green wedge in the north east of Harlow (including the Golf Club) is difficult. the footpaths are not signposted and so the benefit for local residents is limited. These footpaths are PRow and Harlow DC must be more assertive when dealing with Essex CC Highways to ensure that the county does not compromise the aspirations for walking in Harlow.

Change To Plan:

Full Reference: C - 6434 - 8579 - WE2 Implementation - None

6436 Comment

Respondent: Mr David Naylor [8579]

Agent: N/A

Summary: I do not think the monitoring section of the LDP is clear on how to review and judge the quality of footpaths and pedestrian ways in Harlow. there appears to be no specific criteria for judging such things as amenity value, access value, nor is the guidance on judging possible diversions of footpaths clear. The aspiration expressed in the LDP for footpaths are to be applauded but the implementation would be helped by creating an overseeing group of interested parties perhaps as a subcommittee of the SIT environmental group.

Change To Plan:

Full Reference: C - 6436 - 8579 - WE2 Implementation - None

6395 Object

Respondent: Mrs Samantha Baldry [8554]

Agent: N/A

Summary: The Fennells Field needs to be removed as a proposed allocated site for residential development as the biodiversity of the area is threatened by this proposal. We have many visiting birds, snakes, newts, deer, frogs, toads, voles, bees and a variety of beautiful wild flowers and the nesting hedgerows that are under threat from this proposal.

Change To Plan: Site needs to be removed from the local plan proposals

Full Reference: O - 6395 - 8554 - WE3 Biodiversity and Geodiversity - i, ii, iii, iv

6400 Object

Respondent: Mr Ethan Baldry [8559]

Agent: N/A

Summary: The proposed allocation of the Fennells field is not acceptable and does not protect the wonderful bio-diversity I have near my home. I have seen so many species including newts, badgers, deer, toads, birds of prey, hare, rabbits and voles in my time and the thought that this will be taken away is simply unacceptable. As we are located near to a SSSI site the proposal clearly does not take into account that nature will ultimately find a way to spread. Houses on this land will detrimentally affect such a wonderful environment and must not be allowed to happen.

Change To Plan: This site needs to be removed and kept to support the natural and bio-diverse environment. In addition the potential pollution from cars entering this environment will have an irreversible impact on the wider environment which I don't believe has been considered.

Full Reference: O - 6400 - 8559 - WE3 Biodiversity and Geodiversity - i, ii, iii, iv

6402 Object

Respondent: Miss Erin Rose BALDRY [8560]

Agent: N/A

Summary: The proposed allocation of the Fennells field is does not protect the wonderful bio-diversity I have near my home. Houses on the field will ruin affect such a wonderful environment and must not be allowed to happen. I am also worried that the increase in traffic will cause damage that will not be reversible as pollution from increased traffic will harm the natural environment

Change To Plan: This site needs to be removed and kept to support the natural and bio-diverse environment.

Full Reference: O - 6402 - 8560 - WE3 Biodiversity and Geodiversity - i, ii, iii, iv

6737 Object

Respondent: Natural England (Ms Sarah Fraser) [8628]

Agent: N/A

Summary: Natural England considers this policy to be unsound - not consistent with national policy (paragraphs 113, 17 and 118 of the NPPF)
This policy does not reflect the hierarchy of the different levels of protection afforded to international protected sites, national protected sites and local sites as required by paragraph 113 of the NPPF. Paragraph 113 of the NPPF requires that 'distinctions should be made between the hierarchy of international, national and locally designated sites, so that protection is commensurate with their status. Currently no distinctions are made.
In addition the policy doesn't reflect the Avoid, Mitigate Hierarchy as required by paragraph 118 of the NPPF. The policy also doesn't include any reference to the need to "promote the preservation, restoration and re-creation of priority habitats ,ecological networks and the protection and recovery of priority species populations, linked to national and local targets, and identify suitable indicators for monitoring biodiversity in the plan".
Natural England considers this policy therefore requires significant rewording and strengthening to address these issues. It also requires reference to international sites (specifically Epping Forest SAC), priority habitats and priority species. With regards to Epping Forest policy wording should be influence by the updated HRA. Depending on the conclusions of the updated HRA this policy may also need to be strengthened to ensure there is a policy commitment to the delivery of any required Mitigation Strategy and that this is in place by the time the local plan is adopted. This will ensure the local plan and its proposals are compliant with the Habitats Regulations
We would also recommend that there is a policy commitment to ensuring that biodiversity net gain is delivered as required by paragraph 109 of the NPPF.

Change To Plan:

Full Reference: O - 6737 - 8628 - WE3 Biodiversity and Geodiversity - None

6628 Comment**Respondent: GLADMAN (Mr Phill Bamford) [8618]****Agent: N/A**

Summary: Gladman object to Policy WE3 as it acts as a complete embargo on any development which has an impact on biodiversity and geodiversity assets. This Policy is therefore contrary to the Framework as biodiversity and geodiversity issues are considerations which should be should be taken into account by the decision maker in the planning balance.

Change To Plan:

Full Reference: C - 6628 - 8618 - WE3 Biodiversity and Geodiversity - None

6757 Comment**Respondent: Quod Planning (Mr Philip Murphy) [7958]****Agent: N/A**

Summary: It would appear that there is a contradiction between Policy WE3 and Policy PL8. WE3 Biodiversity and Geodiversity requires all biodiversity and geodiversity assets in the district to be preserved and enhanced in contrast to PL8 Biodiversity and Geodiversity Assets which allows for the impacts on the assets providing negative effects are mitigated. Clarification on this contradiction is required.

Clarification is also sought on what is meant by Biodiversity and Geodiversity Assets. Policy WE3 explains that the most important assets have designations, however does not provide any detail on how other biodiversity assets are to be defined.

Change To Plan:

Full Reference: C - 6757 - 7958 - WE3 Biodiversity and Geodiversity - None

6393 Object

Respondent: Mrs Samantha Baldry [8554]

Agent: N/A

Summary: The proposal for the residential allocation of housing on the Fennells field goes against Harlow's Heritage and Sir Frederick Gibberds design principals! His vision was for communities within hatches that was made up of housing, shops and green space. With the proposed removal of this green space it appears that it completely ignores this principle, goes against Harlow's history and is simply a land grab for development.

Change To Plan: The Fennells Field site allocation needs to be removed.

Full Reference: O - 6393 - 8554 - WE4 Heritage - i, ii, iii, iv

6695 Object

Respondent: Historic England (Ms Debbie Mack) [8623]

Agent: N/A

Summary: Change preserved to conserved to better reflect the NPPF Refer to Registered Parks and Gardens (rather than just historic parks and gardens) There are other non-designated heritage assets apart from Locally Listed buildings. These should be included.

Change To Plan:

Full Reference: O - 6695 - 8623 - WE4 Heritage - None

6629 Comment

Respondent: GLADMAN (Mr Phill Bamford) [8618]

Agent: N/A

Summary: Paragraphs 132 to 134 of the Framework relate specifically to designated heritage assets and highlight that the more important the asset, the greater the weight that should be attached to it. The policies in the Local Plan therefore need to make such a distinction so as to ensure they are consistent with the Framework. The Framework states that if the harm to a heritage asset is deemed to be substantial then the proposal needs to achieve substantial public benefits to outweigh that harm. If the harm is less than substantial, then the harm should be weighed against the public benefits of the proposal including securing its optimum viable use. The policies in the Local Plan should therefore make a distinction between the two tests included in the Framework for designated heritage assets to ensure they are sound. Paragraph 135 of the Framework relates specifically to non-designated heritage assets and the policy test that should be applied in these cases is that a balanced judgment should be reached having regard to the scale of any harm and the significance of the heritage asset. Once again, policies in the Local Plan need to reflect this guidance.

Change To Plan: Consequently, Policies WE4 and PL11 should be redrafted to better follow the guidance set out in the Framework as set out above.

Full Reference: C - 6629 - 8618 - WE4 Heritage - None

6663 Comment

Respondent: Hertfordshire County Council (Mr Martin Wells) [8622]

Agent: N/A

Summary: It is considered that the text within Policy WE4: Heritage should be clarified to reflect the fact that archaeological remains are also non-designated heritage assets. In addition, development proposals may have an impact on archaeological remains (heritage assets), and therefore these cannot always be preserved or enhanced. It is suggested that the text should be amended to read:
"Heritage assets and their settings found within the district will be preserved or enhanced, or will otherwise be subject to adequate archaeological investigation and recording."

Change To Plan: It is suggested that the text should be amended to read:
"Heritage assets and their settings found within the district will be preserved or enhanced, or will otherwise be subject to adequate archaeological investigation and recording."

Full Reference: C - 6663 - 8622 - WE4 Heritage - None

6394 Object

Respondent: Mrs Samantha Baldry [8554]

Agent: N/A

Summary: The Fennells Field needs to be removed as a proposed allocated site for Housing. The field is next door to the conservation area of Parndon Wood and should not be taken away from the community. The wildlife that visit this natural habitat appears to be under threat from yet more inappropriate housing development in Harlow.

Change To Plan: Proposed Fennells field housing allocation site to be removed.

Full Reference: O - 6394 - 8554 - WE4 Implementation - i, ii, iii, iv

6435 Comment

Respondent: Mr David Naylor [8579]

Agent: N/A

Summary: The access to heritage sites in Harlow by using footpaths is inconsistent, a extension to the sculpture trail map to include all heritage sites would benefit local residents and visitors

Change To Plan:

Full Reference: C - 6435 - 8579 - WE4 Implementation - None

6445 Object **Respondent: STOP Harlow North [8588]**

Agent: Mr Jed Griffiths [8576]

Summary: Many of the strategic infrastructure requirements are not deliverable. In particular, there is doubt over the Second River Stort Crossing, and the connection in East Hertfordshire District. There are long term concerns over drainage capacity at Rye Meads WWTP, exacerbated by its proximity to wildlife sites of European importance.

Change To Plan: Delete SIR1-3 from policy SIR1 and item 4 of policy SIR2.
Augment paragraphs 11.29 and 11.30 with reference to long term issues at Rye Meads WWTP.

Full Reference: O - 6445 - 8588 - 11. STRATEGIC INFRASTRUCTURE REQUIREMENTS - iii

6493 Comment **Respondent: Harlow Civic Society (Mr John Curry) [5318]**

Agent: N/A

Summary: The Policies Map and Para 11.9(e) shows an STC that goes from N - S through the centre of the town. South of this, the indicative route passes through the N- S Green Wedge from the town centre to the southern boundary. At present the routes along this Green Wedge are reserved for walking, cycling and equestrian traffic. We are therefore extremely concerned that the indicative STC might in fact be a vehicular highway. If our concerns are correct then this policy is wrong. The N - S Green Wedge would never be suitable for a road of any description.

Change To Plan:

Full Reference: C - 6493 - 5318 - 11. STRATEGIC INFRASTRUCTURE REQUIREMENTS - None

6658 Comment **Respondent: Hertfordshire County Council (Mr Martin Wells) [8622]**

Agent: N/A

Summary: HCC as Highway Authority has concern that the wording regarding the widening of the Central Stort Crossing (as referred to in paragraph 11.9(c)) does not contain relevant measures to ensure adequate sustainable travel priority at this access point. The concern is raised due to the impact this may have on delivering a successful sustainable transport corridor between Gilston and Harlow.
Prior to the inception of a full north/south sustainable transport corridor, this concern was also raised by HCC during the emerging strategy consultation (2014) in relation to access to Harlow Town Station.
"In terms of access to Harlow Town Station, and indeed to Harlow town centre, transport links from the north are hampered by the station's proximity to the A414 and the lack of routes over the River Stort. Even if a second Stort crossing was provided, both routes would be heavily trafficked. Bus services from the north are therefore likely to be constrained by slow journey times and unreliability unless some sort of segregated busway can be created. High quality attractive public transport measures would therefore be required between any development allocations on the north and east side of Harlow, including the East Herts proposal for 5,000 to 10,000 homes in the Gilston area. This might include dedicated bus lanes or trams, and is likely to involve significant rail station enhancements potentially including a new point of access on the northern side and the provision of new bus routes. If sustainable transport connections are not of sufficient quality, the impact on the road network would be greater."
The Highway Authority has no objection to sustainable transport measures proposed that support Gilston and are committed to supporting a 60% sustainable mode share for the development.
HCC feel that if suitable policy is not in place for the provision of the sustainable transport corridor, it could impact on the deliverability of the North/South sustainable transport corridor, which is considered an 'essential priority' within the (Infrastructure Delivery Plan) IDP and by HCC to achieving the required uptake of sustainable travel. With regards to the A414, HCC are currently undertaking a detailed study of movement on the A414 including the impact of Harlow/Gilston, and intend to develop an A414 strategy, the current infrastructure provision for sustainable transport is included within that study.

Change To Plan:

Full Reference: C - 6658 - 8622 - 11. STRATEGIC INFRASTRUCTURE REQUIREMENTS - None

6480 Object **Respondent: Miller Strategic Land [5769]** **Agent: Andrew Martin - Planning (Mr Olivier Spencer) [5533]**

Summary: In order for Policy SIR1 to be based on proportionate and robust evidence - i.e. to be "justified" - there is a need to revise the IDP prior to the EiP to address several shortcomings.

Change To Plan: The IDP should be updated prior to EiP to include further information on: (i) overall infrastructure costs; (ii) how those costs will be apportioned across the wider Garden Town; and, (iii) why specific developments are being expected to contribute towards those specific infrastructure costs.

Full Reference: O - 6480 - 5769 - SIR1 Infrastructure Requirements - ii

6601 Support **Respondent: East Herts District Council (Mr George Pavey) [8616]** **Agent: N/A**

Summary: East Herts welcomes Policy SIR1 Infrastructure Requirements which identifies land that will have future infrastructure uses and includes the Second River Stort Crossing.

Change To Plan:

Full Reference: S - 6601 - 8616 - SIR1 Infrastructure Requirements - None

6776 Support **Respondent: Thames Water (Savills) (Mr Chris Colloff) [8433]** **Agent: N/A**

Summary: Thames Water support Policy SIR1 which relates to infrastructure requirements and Policy IN6 which refers to the use of planning conditions to secure requirements. However, it is considered that the policy and supporting text should be amended to make it effective in relation to the delivery of wastewater infrastructure which could require the use of phasing conditions to ensure that any necessary wastewater infrastructure is delivered ahead of development being occupied. Since the 1st April 2018 all off site wastewater network reinforcement works necessary as a result of new development will be delivered by the relevant statutory undertaker. Local reinforcement works will be funded by the Infrastructure Charge which is a fixed charge for each new property connected. Wastewater treatment works infrastructure upgrades will be funded through water companies' investment programmes which are based on a 5 year cycle known as the Asset Management Plan process.

Thames Water will work with developers and local authorities to ensure that any necessary infrastructure reinforcement is delivered ahead of occupation. In some circumstances Thames Water may seek the inclusion of phasing conditions in order to avoid adverse amenity impacts for existing or future users such as internal and external sewer flooding, pollution of land and water courses and / or issues with water supply in the form of no or low water pressure. To minimise the likelihood of requiring such conditions developers are advised to contact Thames Water as early as possible to discuss their development proposals and intended delivery programme.

Change To Plan: In order to ensure that the policy is effective in relation to the co-ordination of wastewater infrastructure requirements and new development it is considered that the following or similar text should be added to Policy SIR1:
Where appropriate planning permission for developments which result in the need for off-site upgrades will be subject to conditions to ensure the occupation does not outpace the delivery of necessary infrastructure upgrades.

In addition it is considered that the following supporting text should be added for Policy SIR1 The Local Planning Authority will seek to ensure that there is adequate wastewater infrastructure to serve all new developments. Developers are encouraged to contact Thames Water as early as possible to discuss their development proposals and intended delivery programme to assist with identifying any potential water and wastewater network reinforcement requirements. Where there is a capacity constraint the Local Planning Authority will, where appropriate, apply phasing conditions to any approval to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of the relevant phase of development.

Full Reference: S - 6776 - 8433 - SIR1 Infrastructure Requirements - None

6808 Support **Respondent: Chelmsford City Council (Ms Jenny Robinson) [8636]** **Agent: N/A**

Summary: infrastructure required to support development has been identified, particularly in relation to highway improvements including a new junction 7a on the M11, and welcomes the ongoing close collaboration with the relevant authorities to deliver these.

Change To Plan:

Full Reference: S - 6808 - 8636 - SIR1 Infrastructure Requirements - None

6501 Comment **Respondent: Environment Agency (Miss Lisa Mills) [8443]**

Agent: N/A

Summary: Infrastructure requirements involving crossing of the Stort should give reference to the TRBMP and policy PL10 Water Quality.

Change To Plan:

Full Reference: C - 6501 - 8443 - SIR1 Infrastructure Requirements - None

6572 Comment **Respondent: Canal & River Trust (Ms Tessa Craig) [8612]**

Agent: N/A

Summary: Policy SIR1 identifies the Central River Stort Crossing and the Second River Stort Crossing at River Way (SIR1-3), as infrastructure projects with land use implications. Whilst the Trust has no objection in principle to such proposals, any works would need to be carefully designed in terms of their impact on our waterway and we would wish to be consulted further in respect of their detailed design.

The Trust has previously provided comments in respect of proposals for the Central Crossing Bridge at which time concern was expressed about its proposed alignment and design which we would wish to see addressed in any future proposal. Policy SIR1 identifies the Central River Stort Crossing and the Second River Stort Crossing at River Way (SIR1-3), as infrastructure projects with land use implications. Whilst the Trust has no objection in principle to such proposals, any works would need to be carefully designed in terms of their impact on our waterway and we would wish to be consulted further in respect of their detailed design.

The Trust has previously provided comments in respect of proposals for the Central Crossing Bridge at which time concern was expressed about its proposed alignment and design which we would wish to see addressed in any future proposal.

Change To Plan:

Full Reference: C - 6572 - 8612 - SIR1 Infrastructure Requirements - None

6765 Comment **Respondent: Lawson Planning Partnership (Miss Kathryn Oelman) [8532]**

Agent: N/A

Summary: Draft Policy SIR1 - Infrastructure Requirements describes how the Council will work with statutory bodies and neighbouring local authorities to deliver the timely provision of infrastructure necessary to support development in the Harlow & Gilston Garden Town. An Infrastructure Delivery Plan (IDP) will be the primary means to achieve this and Policy SIR1 seeks to define the infrastructure items which have a land use implication that are initially identified for such funding.

Change To Plan: In view of the stated objectives of the plan, PAH requests an addition to Draft Policy SIR1 to include a hospital redevelopment (or relocation) within the list of Infrastructure developments necessary to make the impacts of the Strategic Growth Agenda acceptable in planning terms.

Full Reference: C - 6765 - 8532 - SIR1 Infrastructure Requirements - None

6893 Comment **Respondent: Essex County Council (Mr Rich Cooke) [8452]**

Agent: N/A

Summary: The text (in sixth paragraph) states:
The Policies Map identifies infrastructure items which have a land use implication.

Schools also have a land use implication and should accordingly be listed.

Change To Plan: ECC (Education) recommends that Policy SIR1 is revised as follows by adding a further entry to the current table of infrastructure items:

Ref. Infrastructure Item
SIR1-1 North-South Sustainable Transport Corridor and River Stort Crossing to
Eastwick Roundabout

.....
SIR1-7 New schools provision

Full Reference: C - 6893 - 8452 - SIR1 Infrastructure Requirements - None

6894 Comment**Respondent: Essex County Council (Mr Rich Cooke) [8452]****Agent: N/A**

Summary: Policy IN1 - this policy states: "All development should have regard to the modal hierarchy as set out in the Strategic policies."

ECC identifies that no such modal hierarchy is set out anywhere in the current Draft Local Plan.

This needs to be added to the Strategic Policies list/section.

Change To Plan: ECC (Highways) recommends adding content to Plan (in paragraphs 11.7 - 11.11) to set out explicitly and clearly (and to explain) the transport modal hierarchy that is alluded to elsewhere in the Plan (in Policy IN1)

Full Reference: C - 6894 - 8452 - SIR1 Infrastructure Requirements - None

6895 Comment**Respondent: Essex County Council (Mr Rich Cooke) [8452]****Agent: N/A**

Summary: ECC advises the following in response to paragraph 11.13:

(1) ECC seeks to ensure that the stated 11.1 FE 'need' refers to the demand generated by housing included in the September 2017 scenario test plus Epping Forest DC's 750 homes east of Harlow

(2) In addition, it is recommended not to refer to a precise number of forms of entry due to the limitations of scenario testing. The text should instead refer to the additional infrastructure requirement to meet this level of growth.

(3) The Water Lane and Latton Priory allocation figures are not included in the above figure and will be served by a further secondary school required within Epping Forest district.

(4) It should be clarified that, the new 'Sir Fredrick Gibberd Academy' planned for Harlow, although contributing some capacity to meet housing growth, is being established to serve existing (Harlow) population cohort growth

Change To Plan: ECC (Education) recommends that subject to clarification on the first point raised (on validity / currency of the stated need), paragraph 11.13 is revised as follows:

In Harlow there is an overall need to provide additional secondary school places . A new secondary school will be provided in the Epping Forest District, in the new Garden Community to the east of Harlow, and a new 8FE secondary school is being opened in Harlow (the new 'Sir Fredrick Gibberd Academy'). While this contributes some capacity to meet housing growth, this is being established to serve existing population (cohort) growth. There is also additional capacity in some of the existing secondary schools in Harlow.

NB This is an initial suggested form of wording, subject to review and subsequent refinement between ECC and HC.

Full Reference: C - 6895 - 8452 - SIR1 Infrastructure Requirements - None

6896 Comment**Respondent: Essex County Council (Mr Rich Cooke) [8452]****Agent: N/A**

Summary: As above, ECC recommends not to refer to precise forms of entry being required. It is also not clear to the reader the number of homes covered by this figure or the additional infrastructure that is required. Reference to the IDP could be helpful in this respect.

Change To Plan: ECC (Education) recommends that paragraph 11.14 is revised to delete the reference to a specific number of additional FE primary school places and to add reference to the IDP.

Full Reference: C - 6896 - 8452 - SIR1 Infrastructure Requirements - None

6897 Comment**Respondent: Essex County Council (Mr Rich Cooke) [8452]****Agent: N/A**

Summary: This refers to

'Specific infrastructure items that are required to deliver growth locations and development sites will mostly be funded by Section 106 Agreements between the Council and the developer.'

S106 Agreements (where applicable) must include ECC - not just Harlow Council and the developer. This is critical to achieve delivery of education and highway infrastructure in particular and needs to be made clear for clarity, completeness and for the benefit of Plan users / developers, landowners, etc.

Change To Plan: ECC (Education) (Highways) recommends that paragraph 11.14 is revised to add reference to ECC being included within S106 agreements, where applicable.

Full Reference: C - 6897 - 8452 - SIR1 Infrastructure Requirements - None

CHAPTER: STRATEGIC GROWTH
STRATEGY FOR HARLOW

SIR1 Justification

6458 Comment**Respondent: NHS West Essex CCG (Mrs Jolene Truman) [8584]****Agent: N/A**

Summary: Under Healthcare section 11.17 we have amended the statement slightly:

The Council and Harlow Health Centres Trust are working together to expand health facilities for existing population growth and will work with the Clinical Commissioning Groups (West and East and North Hertfordshire) and NHS England to deliver new health facilities as part of planned growth. New healthcare facilities will be delivered, where necessary, as part of new settlements ideally located in accessible locations, situated in a local centre with a range of other community facilities. Increasing capacity within current infrastructure is also an option.

Change To Plan:

Full Reference: C - 6458 - 8584 - SIR1 Justification - None

6777 Comment**Respondent: Thames Water (Savills) (Mr Chris Colloff) [8433]****Agent: N/A**

Summary: In relation to the comment that further network modelling is being undertaken to understand sewer capacity in the area we can update with the progress as follows. The study where our delivery partner is assessing the impact of proposed development in and around Harlow has been terminated. We have received a high quality hydraulic sewer model and some assessment of the effect of the proposed development on the sewer network back from the project team. We intend to complete the work with internal staff ensuring that we assess those sites specified by the Planning Authority for the full extent of the plan period (and beyond in the case of Gilston Park). We are keen to work collaboratively with the relevant Planning Authorities to ensure that development is aligned with any necessary infrastructure upgrades required to support it.

It is stated that "it is anticipated that solutions to improving the network will be jointly funded by the utility providers and developers". In relation to sewerage network reinforcement works required to support any growth, these will be delivered by Thames Water and funded through the Infrastructure Charge.

Change To Plan:

Full Reference: C - 6777 - 8433 - SIR1 Justification - None

6678 Comment **Respondent: Hertfordshire County Council (Mr Martin Wells) [8622]** **Agent: N/A**

Summary: It is also considered that paragraph 11.32 is amended to include both Essex and Hertfordshire County Councils' role as service providers in terms of waste disposal, youth services and fire and rescue: "The Council will need to work closely with a number of partners and organisations to bring forward both strategic and local infrastructure schemes in the district and the Harlow and Gilston Garden Town. This includes Essex County Council and Hertfordshire County Council who are responsible for the local highway networks, education provision, fire & rescue, youth services, waste disposal, particular health and social care needs and other community facilities such as libraries. The Council will also liaise with other statutory bodies and site developers to bring forward other supporting infrastructure and ensure the delivery of development sites."

Change To Plan:

Full Reference: C - 6678 - 8622 - SIR1 Implementation - None

CHAPTER: STRATEGIC GROWTH SIR2 Enhancing Key Gateway Locations
STRATEGY FOR HARLOW

6573 Comment **Respondent: Canal & River Trust (Ms Tessa Craig) [8612]** **Agent: N/A**

Summary: Whilst the Trust has no objection in principle to such a proposal works would need to be carefully designed in terms of their impact on our waterway and we would wish to be consulted in respect of their detailed design.
The Trust has previously provided comments in respect of works relating to the Eastern Stort Crossing which enters Templefields Employment Area at River Way (number 4), at which time concerns were expressed about the proposed alignment and design of the bridge. We would wish to be consulted further in respect of the detailed design of any proposed works.
We would also request that paragraph 11.36 should be amended to refer to discussion with landowners and statutory consultees for completeness.

Change To Plan:

Full Reference: C - 6573 - 8612 - SIR2 Enhancing Key Gateway Locations - None

6784 Comment **Respondent: Weston Homes Plc (Mr David Poole) [8590]** **Agent: N/A**

Summary: In this regard the context of Policy SIR2 (Enhancing Key Gateway Locations) also fails to reference the train station or the sustainable transport links albeit that elsewhere the improvement of the railway infrastructure, or extension of Crossrail 2 to the site appears to be supported including with the with Spatial Vision and Strategic Objectives which also notes the need to make best use of underutilised land. This would include land on the former Pearson House site. This approach would identify and prioritise more sustainable, highly accessible sites in the vicinity of the train station and which would otherwise accord with the provisions of the NPPF, notably, the presumption of sustainable development.

Change To Plan:

Full Reference: C - 6784 - 8590 - SIR2 Enhancing Key Gateway Locations - None

6898 Comment **Respondent: Essex County Council (Mr Rich Cooke) [8452]** **Agent: N/A**

Summary: In referring to key gateway locations to be enhanced, the policy is not clear whether '4 Eastern Stort Crossing' refers to (existing) A1184 Cambridge Rd crossing, or the proposed additional (new) Stort Crossing from Gilston to River Way. This needs clarification for Plan users, although ECC suggest that both are included thus and listed.

Change To Plan: ECC (Highways) recommends that Policy SIR2 is reviewed and revised to clarify this ambiguity to prevent misunderstanding.

ECC recommends that this could be done by both revising the existing wording and adding further wording to ensure both crossings are included (as Key Gateway Locations).

Full Reference: C - 6898 - 8452 - SIR2 Enhancing Key Gateway Locations - None

CHAPTER: STRATEGIC GROWTH SIR3 Waste and Minerals
STRATEGY FOR HARLOW

6630 Comment **Respondent: GLADMAN (Mr Phill Bamford) [8618]** **Agent: N/A**

Summary: Paragraph 143 of the Framework states that in preparing Local Plans, Local Planning Authorities should set out policies to encourage the prior extraction of minerals, where practicable and feasible, if it is necessary for non-mineral development to take place.

A blanket policy that seeks to refuse development where it is demonstrated that minerals will be sterilised is therefore contrary to this guidance as an exercise should be carried out to assess whether it is practicable and feasible to extract the mineral before a decision can be made on the application.

Change To Plan:

Full Reference: C - 6630 - 8618 - SIR3 Waste and Minerals - None

CHAPTER: DEVELOPMENT 13. PLACESHAPING
MANAGEMENT

6684 Comment **Respondent: Historic England (Ms Debbie Mack) [8623]** **Agent: N/A**

Summary: A policy to address Heritage at Risk should be included.

Change To Plan: A policy to address Heritage at Risk should be included.

Full Reference: C - 6684 - 8623 - 13. PLACESHAPING - None

- 6481 Object** **Respondent: Miller Strategic Land [5769]** **Agent: Andrew Martin - Planning (Mr Olivier Spencer) [5533]**
- Summary: Our client wishes to raise a holding objection to part (a) of Policy PL1 and to reserve the right to raise further comments or objections at Examination in Public, once the final Spatial Vision and Design Charter has been published.
- Change To Plan: Only a holding objection is raised at this stage.
- Full Reference: O - 6481 - 5769 - PL1 Design Principles for Development - iii
- 6574 Comment** **Respondent: Canal & River Trust (Ms Tessa Craig) [8612]** **Agent: N/A**
- Summary: Part (b) should include protection, enhancement and improvement of the River Stort as a distinctive environmental feature, natural asset and leisure and recreation attraction of Harlow. The Trust would expect development alongside the River Stort to be of a high standard of urban and architectural design.
- Change To Plan:
- Full Reference: C - 6574 - 8612 - PL1 Design Principles for Development - None
- 6696 Comment** **Respondent: Historic England (Ms Debbie Mack) [8623]** **Agent: N/A**
- Summary: Again, at the present time the Harlow and Gilston Garden Town and Design Charter is not available to view. Without sight of this document it is not possible to assess whether there is sufficient protection for the historic environment in the policy.
We welcome criterion b.
Harlow New Town is based upon the Gibberd masterplan. It is important that new development respects this masterplan and protects the distinctive townscape which in itself is part of the historic environment
- Change To Plan:
- Full Reference: C - 6696 - 8623 - PL1 Design Principles for Development - None
- 6855 Comment** **Respondent: Redrow Homes (Ms Kate Holland) [8640]** **Agent: Redrow Homes (Ms Kate Holland) [8640]**
- Summary: The Policy refers to design rationale being required to take into consideration the Adopted Harlow Local Design Guide SPD, the Harlow and Gilston Garden Town Spatial Vision and Design Charter and relevant national guidance.
- As highlighted earlier in these Representations, the Harlow and Gilston Design Charter and the Spatial Vision have not yet been produced or published. It is also understood from discussions with the Council that it is unlikely there will be direct public consultation in respect of either document.
It is therefore not possible at this point to assess whether compliance with these documents would place overly onerous requirements upon developers which may affect overall viability of a scheme.
- Change To Plan: if reference to the Design Charter and Spatial Vision is removed we would be supportive of the Policy as a whole.
- Full Reference: C - 6855 - 8640 - PL1 Design Principles for Development - None
- 6899 Comment** **Respondent: Essex County Council (Mr Rich Cooke) [8452]** **Agent: N/A**
- Summary: ECC acknowledges that the policy references several key (locally focused) good design guides. In order to ensure that all the new elements of the Essex Design Guide are publicised for the benefit of designers (including increased emphasis on public health & well-being; digital design factors; etc.) ECC would wish to see a reference included to the new EDG
- Change To Plan: Add reference to the newly updated Essex Design Guide, preferably within text of Policy PL1
- Full Reference: C - 6899 - 8452 - PL1 Design Principles for Development - None

6403 Object

Respondent: Miss Erin Rose BALDRY [8560]

Agent: N/A

Summary: The proposed allocation of the Fennells field does not reflect this proposal. My privacy and my home are being impacted by this proposal and i am fearful of being overlooked and losing daylight and sunlight. These proposals detrimentally impact my aspect and outlook and i dont believe that any consideration has been given to the properties affected by this proposal.

Change To Plan: The proposed allocated site needs to be removed.

Full Reference: O - 6403 - 8560 - PL2 Amenity Principles for Development - i, ii, iii, iv

6703 Object

Respondent: Home Builders Federation (Mr Mark Behrendt) [8450]

Agent: N/A

Summary: The policy is unsound as it is not consistent with national policy

It is not clear what this policy is trying to achieve. Our reading of the policy is that the Council will support applications that meet existing standards required by building regulations in relation to energy efficiency. However, whether or not a building meets existing building regulations is not a planning matter and as such cannot be considered as part of an application for planning permission. Our concern is that the policy could be used erroneously to refuse planning permissions that the Council determines are insufficiently sustainable. We therefore consider that this policy is not consistent with the principles, established in paragraphs 17 and 154 of the NPPF, that any policy within the plan should ensure that decision making is predictable and provide a clear indication as to how the decision maker should react to a development proposal.

Change To Plan: The policy PL3 and its associated paragraph 13.13 to 13.19 are deleted.

Full Reference: O - 6703 - 8450 - PL3 Sustainable Design, Construction and Energy Usage - None

6744 Object

Respondent: Persimmon Homes (Mr David Moseley) [8437]

Agent: N/A

Summary: The policy is unsound as it is not consistent with national policy

It is not necessary to stipulate adherence to Building Regulations. Furthermore, the policy lacks precision or measure when referring to 'high standards' of sustainable design and efficient energy usage. The supporting text refers to developers providing evidence of carbon dioxide reduction but does not detail any standard. Furthermore, the Local Plan does not have regard to the cost of meeting a (unspecified) standard over and above meeting Building Regulations.

This policy is not precise or consistent with the principles, established in paragraphs 17 and 154 of the NPPF, that any policy within the plan should ensure that decision making is predictable and provide a clear indication as to how the decision maker should react to a development proposal.

Change To Plan: The policy should be deleted or adapted to state that; 'Design should have regards to a range of measures to reduce energy consumption'.

Full Reference: O - 6744 - 8437 - PL3 Sustainable Design, Construction and Energy Usage - None

6575 Comment

Respondent: Canal & River Trust (Ms Tessa Craig) [8612]

Agent: N/A

Summary: We note the reference to onsite low carbon/ renewable energy technology in the justification to policy PL3 and would advise that our waterways provide readily available opportunities for developments to incorporate innovative technologies to make use of its water such as hydropower and the abstraction of water for the heating and cooling of buildings, and we have been involved in many successful projects on our network, where developments have found the system to be more efficient than air source pumps.

Change To Plan:

Full Reference: C - 6575 - 8612 - PL3 Sustainable Design, Construction and Energy Usage - None

6404 Object **Respondent: Miss Erin Rose BALDRY [8560]**

Agent: N/A

Summary: This proposal talks about small scale development yet 23 properties are being proposed on the allocation of the Fennells field. HOW IS THIS SMALL SCALE!!!! 23 homes will equate to 46 parking spaces increasing traffic on an estate road that is full to capacity with the existing 152 homes on the estate. I fear for my safety now let alone with additional homes added!

Change To Plan: The proposed allocation of the Fennells field for housing needs to be removed.

Full Reference: O - 6404 - 8560 - PL4 Green Wedges and Green Fingers - i, ii, iii, iv

6482 Object **Respondent: Miller Strategic Land [5769]**

Agent: Andrew Martin - Planning (Mr Olivier Spencer) [5533]

Summary: To be consistent with national policy and the most appropriate strategy when considered against the reasonable alternatives (i.e. justified), Policy PL4 should be amended to allow a wider range of uses in the Town's Green Wedges and Green Fingers.

Change To Plan: Our client respectfully requests that Policy PL4 is amended to include a new bullet point after (a) stating:
- "it is for social club, sports club, education or allotment related development, or public open space;"

Full Reference: O - 6482 - 5769 - PL4 Green Wedges and Green Fingers - ii, iv

6576 Comment **Respondent: Canal & River Trust (Ms Tessa Craig) [8612]**

Agent: N/A

Summary: Small-scale development referred to in point 13.23 should include facilities and services associated with an existing use including moorings and other waterway uses as required.

Change To Plan:

Full Reference: C - 6576 - 8612 - PL4 Green Wedges and Green Fingers - None

6631 Comment **Respondent: GLADMAN (Mr Phill Bamford) [8618]**

Agent: N/A

Summary: Whilst it is appreciated that these designations have played a role in defining the form of Harlow as a settlement, the Council must ensure that they do not act as a constraint to development which prevents the district from meeting its overall housing requirement.

Change To Plan:

Full Reference: C - 6631 - 8618 - PL4 Green Wedges and Green Fingers - None

6864 Comment **Respondent: De Merke Estates (Ms Emma Gladwin) [8643]**

Agent: Barton Willmore (Miss Emma Gladwin) [8399]

Summary: HDC is proposing the release of over 110 ha of land from the Green Belt for the strategic housing site east of Harlow, being a substantial amount of Green Belt release. HDC is amenable to releasing Green Belt land despite the high national test to do so but is restricting development on Green Wedges with no justification or allowing a site-by-site analysis. Such an approach is not consistent with national policy and HDC should amend Policy PL4 to allow this siteby- site approach.

Change To Plan: The current wording of Policy PL4 is overly restrictive and does not allow for any consideration of whether a site contributes towards the roles and functions of the Green Wedge on a site-by-site basis, unduly giving a high level of protection to all land contained within the Green Wedge.

Full Reference: C - 6864 - 8643 - PL4 Green Wedges and Green Fingers - None

6900 Comment **Respondent: Essex County Council (Mr Rich Cooke) [8452]**

Agent: N/A

Summary: In order to recognise the wider importance of the green wedges / green fingers a relatively minor wording improvement is recommended

Change To Plan: ECC recommends a revision in wording of Policy PL4 (e) as follows:

"It demonstrates that the roles, functions and historic significance of the Green Wedges and Green Fingers are preserved...."

Full Reference: C - 6900 - 8452 - PL4 Green Wedges and Green Fingers - None

CHAPTER: DEVELOPMENT
MANAGEMENT

PL4 Justification

6498 Comment **Respondent: Environment Agency (Miss Lisa Mills) [8443]**

Agent: N/A

Summary: We strongly recommend the inclusion of rivers and canals to be recognised as green infrastructure, and this policy to be cross-referenced with PL10 ' Water quality', specifically WFD.

Change To Plan:

Full Reference: C - 6498 - 8443 - PL4 Justification - None

CHAPTER: DEVELOPMENT
MANAGEMENT

PL5 Justification

6499 Comment **Respondent: Environment Agency (Miss Lisa Mills) [8443]**

Agent: N/A

Summary: We strongly recommend the inclusion of rivers and canals to be recognised as green infrastructure, and this policy to be cross-referenced with PL10 ' Water quality', specifically WFD.

Change To Plan:

Full Reference: C - 6499 - 8443 - PL5 Justification - None

CHAPTER: DEVELOPMENT
MANAGEMENT

PL5 Implementation

6405 Object **Respondent: Miss Erin Rose BALDRY [8560]**

Agent: N/A

Summary: This proposal talks about supporting the Gibberd principles and the protection of informal recreation areas. The proposed allocation of the Fennells field for housing does not promote this principle and i am appalled by this. This proposal needs to be reconsidered as i do not understand that how this proposal is compliant with this proposal.

Change To Plan: The proposed allocation of the Fennells field needs to be removed.

Full Reference: O - 6405 - 8560 - PL5 Implementation - i, ii, iii, iv

CHAPTER: DEVELOPMENT
MANAGEMENT

PL6 Trees and Hedgerows

6406 Object

Respondent: Miss Erin Rose BALDRY [8560]

Agent: N/A

Summary: The proposed allocation of the Fennells Field will ultimately remove the historic hedgerows. This proposal is therefore ridiculous and the site needs to be removed. The thought that development will be permitted to remove the historic hedgerows is unacceptable.

Change To Plan: The proposed residential allocation of the Fennells Field needs to be removed from this proposal.

Full Reference: O - 6406 - 8560 - PL6 Trees and Hedgerows - i, ii, iii, iv

CHAPTER: DEVELOPMENT
MANAGEMENT

PL7 Green Infrastructure and Landscaping

6738 Support

Respondent: Natural England (Ms Sarah Fraser) [8628]

Agent: N/A

Summary: Natural England supports the inclusion of a policy relating to Green Infrastructure and the content therein but advises that environmental enhancement and biodiversity net gain should be added as an additional criteria.

Change To Plan:

Full Reference: S - 6738 - 8628 - PL7 Green Infrastructure and Landscaping - None

CHAPTER: DEVELOPMENT
MANAGEMENT

PL7 Justification

6500 Comment

Respondent: Environment Agency (Miss Lisa Mills) [8443]

Agent: N/A

Summary: We strongly recommend the inclusion of rivers and canals to be recognised as green infrastructure, and this policy to be cross-referenced with PL10 'Water quality', specifically WFD.

Change To Plan:

Full Reference: C - 6500 - 8443 - PL7 Justification - None

6739 Support

Respondent: Natural England (Ms Sarah Fraser) [8628]

Agent: N/A

Summary: Natural England supports the inclusion of a policy relating to Biodiversity and Geodiversity. The policy should be enhanced by reference to 'net gain' in keeping with paragraph 109 of the NPPF. This policy is likely to require alteration depending on the outcomes of the HRA to ensure the deliverability of any agreed mitigation strategy.

Change To Plan:

Full Reference: S - 6739 - 8628 - PL8 Biodiversity and Geodiversity Assets - None

6901 Comment

Respondent: Essex County Council (Mr Rich Cooke) [8452]

Agent: N/A

Summary: ECC recommends revising Policy PL8 to follow the mitigation hierarchy and Government's Natural Environment White Paper

Change To Plan: ECC recommends that this policy is re-structured:

- a) Conserve and enhance existing biodiversity and geodiversity assets
- b) Where the above is not possible, appropriate and effective measures must mitigate the negative effects on these assets
- c) Where there is a residual impact, compensatory measures will need to be secured offsite.
- d) Creates new biodiversity and creates links to existing biodiversity and geodiversity assets to deliver net gain for biodiversity.

Full Reference: C - 6901 - 8452 - PL8 Biodiversity and Geodiversity Assets - None

6407 Object

Respondent: Miss Erin Rose BALDRY [8560]

Agent: N/A

Summary: The proposed allocation of the Fennells field for housing does not in any way protect the the existing bio-diversity. The proposal to build 23 homes on this land and enhance the environment does not add up and this proposal is not fit for purpose.

Change To Plan: The proposed allocation of the Fennells field needs to be removed.

Full Reference: O - 6407 - 8560 - PL8 Justification - i, ii, iii, iv

6902 Comment

Respondent: Essex County Council (Mr Rich Cooke) [8452]

Agent: N/A

Summary: ECC advises that the Government supports "Net Gain for biodiversity" rather than "halting decline" Para 111 NPPF which is necessary to add compensatory measures in the requirements for sustainable development.

Change To Plan: ECC recommends revising paragraph 13.46 to replace the existing aims described as "halting decline" with the words "to achieve a net gain for biodiversity"

Full Reference: C - 6902 - 8452 - PL8 Justification - None

CHAPTER: DEVELOPMENT
MANAGEMENT

PL8 Implementation

6503 Support

Respondent: Environment Agency (Miss Lisa Mills) [8443]

Agent: N/A

Summary: We welcome the inclusion of reference to invasive non-native species and their management, including biosecurity measures. Development sites should be checked for invasive species and measures should be put in place to follow biosecurity and eradicate the invasive species on site.

Change To Plan:

Full Reference: S - 6503 - 8443 - PL8 Implementation - None

6903 Comment

Respondent: Essex County Council (Mr Rich Cooke) [8452]

Agent: N/A

Summary: ECC advises that a reference to locally designated sites eg Local Wildlife Sites (LoWS) and Local Nature Reserves (LNRs) would be appreciated and a commitment to declaration of LNRs to provide opportunities for people to enjoy nature.

Change To Plan: ECC recommends adding reference to LoWS and LNRs, together with a commitment to declaration of LNRs to provide opportunities for people to enjoy nature. These improvements would help deliver the previously stated aim of helping to achieve a net gain in biodiversity, in line with NPPF objectives.

Full Reference: C - 6903 - 8452 - PL8 Implementation - None

6904 Comment

Respondent: Essex County Council (Mr Rich Cooke) [8452]

Agent: N/A

Summary: Best practice for implementation of Policy PL8 would include a validation checklist for developments likely to affect biodiversity and geodiversity. Reference to the Essex Biodiversity Validation Checklist in Para 13.49 would enable biodiversity to be considered at the earliest stage in planning a development which de-risks it and avoids delays.

Change To Plan: ECC recommends adding a reference to the Essex Biodiversity Validation Checklist in Paragraph 13.49

Full Reference: C - 6904 - 8452 - PL8 Implementation - None

CHAPTER: DEVELOPMENT
MANAGEMENT

PL9 Pollution and Contamination

6740 Comment

Respondent: Natural England (Ms Sarah Fraser) [8628]

Agent: N/A

Summary: This policy is likely to require alteration depending on the outcomes of the HRA to ensure the deliverability of any agreed mitigation strategy for air quality.

Change To Plan:

Full Reference: C - 6740 - 8628 - PL9 Pollution and Contamination - None

6504 Object **Respondent: Environment Agency (Miss Lisa Mills) [8443]** **Agent: N/A**

Summary: More weight should be given to groundwater to ensure the implementation of groundwater protection eg: including PRA's and steering development away from SPZ's

Change To Plan: Whilst we strongly support the inclusion of this policy, we believe that the justification and implementation could give more weight to groundwater. This is to ensure the risks to groundwater are minimised as much as possible, where contaminated sites have the potential to mobilise contaminants and consequently cause pollution.

Specific mention should be made that all land which is considered to be contaminated will require a Preliminary Risk Assessment (PRA) to be submitted as part of the planning application, and that where necessary further site investigations, detailed risk assessments, remediation strategies, long term maintenance regimes, and validation reports may be required if contamination is found. It should be explicit that planning permission will not be granted for development that poses a threat to the quality of surface and/ or groundwater, and should specifically reference the importance for all development to not detrimentally impact upon Source Protection Zones (SPZ) in particular, which are areas designated for the abstraction of clean drinking water. This should be cross referenced with PL10 (water quality). It should also mention avoiding high risk development proposals within vulnerable groundwater areas, specifically petrol stations and cemeteries.

Full Reference: O - 6504 - 8443 - PL9 Implementation - iv

6495 Object

Respondent: Environment Agency (Miss Lisa Mills) [8443]

Agent: N/A

Summary: This policy should be strengthened through reference to the RMBP. It should include non-residential development to adopt the housing standard of number of litres per day, and reference evidence from your recent WCS. SUD's implementation needs to be made stronger. Minor wording additions to strengthen the policy.

Change To Plan: Water Quality

We recommend that the sentence 'Must not adversely affect water quality' should be reworded to 'Development should not cause deterioration to water quality and aim to improve it in line with Thames River Basin Management Plan (TRMBP) objectives.'

We welcome the policy reference to deculverting. This policy should be strengthened further by specifically stating that where deculverting or other river enhancements are shown to be unfeasible, the council will seek a financial contribution to restore another section of the same watercourse.

Whilst it is mentioned that 'development adjacent to water courses should seek to include restoration', this policy should be strengthened to include the requirement for all new development adjacent to designated main rivers to provide and maintain a minimum undeveloped 8 metre buffer zone to the watercourse. This is to enhance and protect local biodiversity and wildlife corridors, provide space for flood waters, and provide access for maintenance works. This distance is in line with our Flood Risk Activity Permit, which is legally required for certain works within 8 metres of a main river. The buffer zone will provide a naturalised buffer free of built development, be designed for the benefit of biodiversity (including the planting of locally appropriate, UK native species) and be 'undisturbed' by development (i.e. no fencing, footpaths, lighting or other development). Such proposals must also include a long term scheme put in place to protect and enhance the conservation value of the watercourse, in line with the requirements of the WFD and the TRBMP.

Water Management

Whilst it is positive to see Harlow adopt the Optional Technical Housing Standard of no more than 110litres per person per day, this only relates to residential buildings. As a result, it is noted that there is no reference to water efficient measures within non-residential buildings. It is expected that the growth planned for Harlow will include non-residential buildings. As a result, we would strongly encourage the requirement of a BREEAM 'Excellent' rating for water efficiency of non-residential buildings. This is referenced and evidenced in your recent WCS.

Additionally, there may be opportunities to regenerate existing properties through development. As older buildings are the least efficient with resource use, where regeneration does occur, we would strongly encourage retrofitting these buildings to increase their water efficiency. It is suggested that Harlow develop this policy to include these aspects.

Foul sewage is not referenced in this policy. Your WCS recommends 'early developer engagement with water companies is essential to ensure that sewerage capacity can be provided without delaying development.' This should also be addressed to relevant policy text for strategic site allocations.

Flooding

We are pleased with the amendments of this policy to include reference to Flood Risk Assessments (FRA's) and the increased emphasis on climate change and safe access and egress. However, we would still like to see mention of no inappropriate development will be permitted within Flood Zone 3b, as defined by your own Strategic Flood Risk Assessment (SFRA). The only development types that are considered compatible with Flood Zone 3b are 'water compatible' and 'essential' development, as defined within Tables 2 and 3 of the Planning Practice Guidance Flood Risk and Coastal Change section. The policy should also state that the functional floodplain should be restored wherever possible through a reduction of footprint within Flood Zone 3b as a result of development proposals.

Reference to WFD should be moved up to the Water Quality section of this policy. Specific reference to the legislative requirements of the WFD and the actions required by the TRBMP need to be included within the outline of PL10.

After the sentence 'it must not increase the risk of flooding elsewhere', its should be added 'and aim to reduce flood risk overall'.

'c) flood levels' should be replaced with 'finished floor levels'.

SUD's

This policy could be more robust by also including Natural Flood Management techniques. This could be very effective for developments near ordinary watercourses or smaller main river tributaries to slow the flow in low-order events, and provide habitat and multiple benefits.

6704 Object**Respondent: Home Builders Federation (Mr Mark Behrendt) [8450]****Agent: N/A**

Summary: Part 4(c) of this policy is unsound as it is not consistent with national policy.

Part 4(c) of this policy states that post development run off rates should be the equivalent of greenfield run off rates. On many brownfield sites it may be impossible to achieve this level of run off. Guidance by Defra5 on this matter also suggests that brownfield development must achieve close as is practicable to greenfield run off rates. This recognises that in some situations a development will not be able to deliver green field run off rates but that it should seek an improvement over the current site. Given the Government's focus on delivering more development on brownfield sites we would suggest it is essential that greater flexibility is provided in this policy.

Change To Plan: That the policy is amended to read:

"(c) Post-development run off rates should be reduced as far as practicable below existing run off rates for that site."

Full Reference: O - 6704 - 8450 - PL10 Water Quality, Water Management, Flooding and Sustainable Drainage Systems - None

6577 Comment**Respondent: Canal & River Trust (Ms Tessa Craig) [8612]****Agent: N/A**

Summary: The quality of water in canals and rivers can affect how attractive they are as spaces for people to be on, in or alongside and impact on the plants and wildlife that rely on it. It is therefore important that new developments are appropriately located, designed to minimise risk and do not adversely affect our assets. We therefore welcome reference in Policy PL10 to development not adversely affecting the water quality of waterways.

We note reference to surface water discharge to surface water bodies in para 13.68. and advise that our waterways present a number of opportunities to support and enhance urban development, with particular reference to water management. With careful design and assessment, our waterways may be able to receive runoff from future development sites, providing sustainable options for site drainage (although mitigation works to the canal infrastructure may be necessary to cope with this.) The Trust is not however a land drainage authority and any such discharge would be subject to an agreement with the Trust's Utilities Team and appropriate controls to protect water quality.

Change To Plan:

Full Reference: C - 6577 - 8612 - PL10 Water Quality, Water Management, Flooding and Sustainable Drainage Systems - None

6723 Comment**Respondent: Mrs Karen Garrod [8596]****Agent: N/A**

Summary: The report acknowledges that Harlow is at severe risk of water shortage being in the driest region in the country. The proposed number of new homes appears too high in the circumstances for this region. Other regions of the UK do not have such a high demand for water supplies.

On the flipside of this, with the number of green spaces having been identified for potential development, there is also a high risk of flash flooding during heavy downpours which seem to be on the increase. Would measures be taken on new housing developments to mitigate this risk? Would new homes be required to have water butts to collect rainwater, particularly during heavy rainfall to prevent it flowing into the drainage system causing the drainage system to be overwhelmed?

When designing new flats which have landscaped areas and gardens, could it be a requirement that rainwater collection/re-distribution equipment be installed? For instance, industrial sized water butts connected to agricultural watering hoses that trail around the landscaped/planted beds so that excess water filters into these areas rather than into the drainage system?

Maybe, new plumbing systems could provide for rainwater to be harnessed and stored for water to fill WC cisterns?

Change To Plan:

Full Reference: C - 6723 - 8596 - PL10 Water Quality, Water Management, Flooding and Sustainable Drainage Systems - None

6778 Comment**Respondent: Thames Water (Savills) (Mr Chris Colloff) [8433]****Agent: N/A**

Summary: Policy PL10 makes reference to SuDs and that where they are required they will provide the most sustainable option from the SuDs hierarchy. Thames Water support the use of SuDs and it is suggested that the policy should be expanded to encourage their use even where not required by national policy. In addition the retrospective use of SuDs should also be supported by policy as such practices could help remove surface water from existing sewers freeing up capacity.

Change To Plan: It is therefore suggested that Policy PL10 should be amended to include the following text at the end of Section 4:

"The council encourage the use of SuDS on all development proposals due to the environmental benefits they can deliver. In addition, the Council will support the retrofitting of SuDS."

Full Reference: C - 6778 - 8433 - PL10 Water Quality, Water Management, Flooding and Sustainable Drainage Systems - None

6905 Comment**Respondent: Essex County Council (Mr Rich Cooke) [8452]****Agent: N/A**

Summary: ECC (as LLFA) advises that a number of changes to this policy would be beneficial and assist in its use.

(1) Re-order so that current part 1. Water Quality is dealt with further down the policy sequence, since this area is considered to be less capable of effective regulation and enforcement than other subject areas of the policy.

The policy (or text) currently does not mention Critical Drainage Areas (in respect of surface water flood risk) and thus does not signpost the valuable work that the LLFA has produced for the Harlow urban area and its development implications

(3) revise wording of part 3 (c)

(4) revise wording of part 3 (g)

(5) revise wording of part 3 (h)

(4) revise wording of part 4 (c)

Change To Plan: ECC (LLFA) recommends revising Policy PL10 in the interests of improved wording, clarity and policy implementation, as follows:

Re-order the policy so that current part 1 (Water Quality) is dealt with later on in the policy. ,This could be achieved conveniently if this part becomes the new final part (at new part 4)

Add reference to Critical Drainage Areas (to support the policy) - this could be done at paragraph 13.61, which already mentions surface water flooding.

Revise part 3 (c) as follows:

development in Flood Zones 2 and 3 should be situated above the 1% (1 in 100 years) plus climate change predicted maximum water level, plus a minimum finished floor level of 300mm above the predicted water level;

Revise part 3 (g) as follows:

flood flow routes should be configured to enable surface water to drain;

Revise part 3 (h) as follows:

where necessary, planning permission will be conditional upon the submission and approval of a drainage management strategy that addresses all forms of flood risk.

Revise wording of part 4 (c) as follows:

achieve runoff rates in line with the guidance of the non-statutory technical standards for sustainable drainage;

Full Reference: C - 6905 - 8452 - PL10 Water Quality, Water Management, Flooding and Sustainable Drainage Systems - None

CHAPTER: DEVELOPMENT
MANAGEMENT

PL10 Justification

6497 Comment**Respondent: Environment Agency (Miss Lisa Mills) [8443]****Agent: N/A**

Summary: Specific mention for WFD. SUD's policy should be strengthened using evidence from WCS.

Change To Plan:

Full Reference: C - 6497 - 8443 - PL10 Justification - None

6496 Comment **Respondent: Environment Agency (Miss Lisa Mills) [8443]** **Agent: N/A**

Summary: Specific mention needed for TRBMP. Inclusion of floodplain compensation and strengthening of SUD's policy.

Change To Plan:

Full Reference: C - 6496 - 8443 - PL10 Implementation - None

6779 Comment **Respondent: Thames Water (Savills) (Mr Chris Colloff) [8433]** **Agent: N/A**

Summary: Section 13.68 sets out the drainage hierarchy. It is considered that discharge of rainwater to a combined sewer should only ever be done as an absolute last resort once it has been demonstrated that all other options are not possible. With regard to the hierarchy set out in this section it is considered that the hierarchy should be expanded to include other options such as storage of rainwater for later use and attenuation of rainwater. This approach is adopted in Policy 5.13 of the London Plan.

Change To Plan: It is therefore suggested that the hierarchy set out in Section 13.68 is revised to read as follows:
"1. store rainwater for later use
2. use infiltration techniques, such as porous surfaces in non-clay areas
3. attenuate rainwater in ponds or open water features for gradual release
4. attenuate rainwater by storing in tanks or sealed water features for gradual release
5. discharge rainwater direct to a watercourse
6. discharge rainwater to a surface water sewer/drain
7. discharge rainwater to the combined sewer."

Full Reference: C - 6779 - 8433 - PL10 Implementation - None

6450 Support **Respondent: Deanery of Harlow (Anglican) (Revd Martin Harris) [8586]** **Agent: N/A**

Summary: Thank you for the inclusion of Public Benefit as regard Heritage Assets (PL11)

Change To Plan:

Full Reference: S - 6450 - 8586 - PL11 Heritage Assets and their Settings - None

6683 Comment **Respondent: Historic England (Ms Debbie Mack) [8623]** **Agent: N/A**

Summary: Reference to enabling development in Policy PL11 should be deleted.

Change To Plan: Reference to enabling development in Policy PL11 should be deleted.

Full Reference: C - 6683 - 8623 - PL11 Heritage Assets and their Settings - None

6697 Comment **Respondent: Historic England (Ms Debbie Mack) [8623]** **Agent: N/A**

Summary: We welcome the changes made to the policy since the previous consultation.

We continue to suggest that the policy should include a requirement for a desk based assessment or field evaluation to be submitted where proposals affect sites or are within or adjacent to sites of known archaeological interest or sites where there is reason to suggest there is archaeological interest Whilst this is mentioned in paragraph 13.88, it should also be included in policy.

We suggest the deletion of the final paragraph in the policy. By definition within the NPPF, enabling development is development that is not otherwise in accordance with adopted policy. We are therefore of the view that a policy on enabling development is not a necessary component of a local plan document A local plan should adequately set out a positive strategy for the historic environment without the need to include such a policy.

Paragraph 140 of the NPPF and Historic England's suggested framework for enabling development contained within Enabling Development and conservation of the significant places, revised 2012 consider this matter. The Historic England advice predates the adoption of the NPPF and should be considered in the context of Paragraph 140 of the NPPF which states the following: Local planning authorities should assess whether the benefits of a proposal for enabling development, which would otherwise conflict with planning policies but which would secure the future conservation of a heritage asset, outweigh the disbenefits of departing from those policies.

We appreciate that the final paragraph of your policy is an attempt to have a policy to address Heritage at Risk. However, as we previously commented a policy effectively on enabling development is not the best way to achieve this. We continue to advise that a policy on heritage at risk rather than enabling development would better achieve the desired outcome.

Change To Plan:

Full Reference: C - 6697 - 8623 - PL11 Heritage Assets and their Settings - None

6906 Comment

Respondent: Essex County Council (Mr Rich Cooke) [8452]

Agent: N/A

Summary: ECC advises that in respect of Policy PL11 (a) 'setting' is not an asset itself upon which harm can be caused but rather development within an asset's setting can cause harm to the asset's significance if the setting contributes to its historic/architectural interest of aesthetic/historic/evidential/communal value.

On part (b) ECC advises that It would be advantageous to use a word other than 'harmonises' as this can be seen to inhibit modern design / architecture. Instead, 'respond to' or 'reflect' would likely be more engaging.

On part (c) ECC advises that this element could reference the Harlow New Town Master Plan, in effect testing development to see if it respects the fundamental principles of the New Town. For example the green wedges, neighbourhoods, connectivity, grain etc. This could be integrated into the bracket of examples. ECC also suggests a further consideration by which to assess these proposals (in terms of revealing an asset better)

Change To Plan: ECC recommends that Policy PL11 (a) is revised as follows:

"the impact of development upon the character, appearance, setting, or any other aspect of the significance of the asset"

Revise part (b) replacing the current word 'harmonises' with either 'respond to' 'or otherwise 'reflect'.

ECC also advises the consideration of including reference to Harlow New Town Master Plan within this criterion, where it could sit within the bracketed text that provides examples of relevant considerations

Revise part (d) as follows:

"The extent to which the development would enhance, or better reveal, the significance of a heritage asset".

Full Reference: C - 6906 - 8452 - PL11 Heritage Assets and their Settings - None

6907 Comment

Respondent: Essex County Council (Mr Rich Cooke) [8452]

Agent: N/A

Summary:

ECC advises that It is not clear what the third paragraph is requesting or the reasoning behind it - it appears to be slightly confused about the difference between a Heritage Statement and a Management Plan and of the correct time to request these.

Change To Plan: ECC recommends two relatively minor amendments to the third and fourth paragraphs respectively, as follows:

"Where development has the potential to affect a heritage asset..."

And, revise the final paragraph as follows:

"...it must be demonstrated that the development presents the asset's optimum viable use and is necessary...."

Full Reference: C - 6907 - 8452 - PL11 Heritage Assets and their Settings - None

CHAPTER: DEVELOPMENT MANAGEMENT

PL11 Implementation

6908 Comment

Respondent: Essex County Council (Mr Rich Cooke) [8452]

Agent: N/A

Summary: ECC suggests additional wording for completeness of this paragraph, in respect of locally listed assets.

Change To Plan: ECC recommends adding additional content to paragraph 13.78, as follows:

Designated heritage assets can include listed buildings, curtilages of listed buildings, conservation areas, archaeological remains, Scheduled Monuments and historic parks and gardens. Locally listed buildings and those archaeological sites that are not Scheduled are known as non-designated assets and also contribute to the overall significance of the historic environment of Harlow. Historic England administers national designations which include all designated heritage assets apart from conservation areas'.

Full Reference: C - 6908 - 8452 - PL11 Implementation - None

6724 Comment

Respondent: Mrs Karen Garrod [8596]

Agent: N/A

Summary: Developers- housing quality

It would be pleasing to see some new high quality housing developments in Harlow. Some housing developments in other areas have not been without their problems resulting in great inconvenience to the owners to resolve the issues. Does Harlow Council consult with other Local Authorities and Housing Associations in neighbouring counties to seek recommendations and reviews and share experiences?

Planning specifications and considerations

There are many specifications and factors specified in the reports to be considered when housing is planned. Many of these are specific to the Town in local historical and traditional planning context. These are very important and should be respected when considering development plans that have been submitted. However, if decisions can be appealed and referred to central bodies and overturned, then these specifications would not amount to much and could become irrelevant. Would this happen?

Proportionate development

Is there any requirement for the size of buildings to be proportionate to the land proposed to build them on? For instance, will sufficient green spaces, verges and gardens be provided for? As acknowledged, green wedges and fingers are intrinsic to Harlow's character. Will new flats and houses be situated far enough away from the roadside to retain this character?

Flat developments

Rather than building flats in square or rectangle blocks with 4 or 6 flats on each floor opposite each other, why not set them out in crescent or horseshoe shape in rows of single flats sited side by side? Communal gardens could be included with flats being designed around the garden areas (like the mews style houses in Bishopsfield). If this style were mirrored for flats, it would lessen the impact of the block on the area as it would only be one flat deep.

Would new trees be planted around new flat developments to minimise the impact and provide screening? Drought resistant types could be used with finer root systems so that when the trees mature, they do not interfere with the structure.

It has been noted that families prefer houses over flats. If there were high quality apartments with 2-3 bedrooms and a large communal garden and garages, they may have wider appeal. Many people desire a garden especially families. If there were a large communal garden this would be a big benefit to bring residents together and for the children to enjoy.

Change To Plan:

Full Reference: C - 6724 - 8596 - 14. HOUSING - None

6483 Object

Respondent: Miller Strategic Land [5769]

Agent: Andrew Martin - Planning (Mr Olivier Spencer) [5533]

Summary: Our client wishes to raise a holding objection to the third paragraph in Policy H1 and to reserve the right to raise further comments or objections at Examination in Public, once the final Spatial Vision and Design Charter has been published.

Change To Plan: Only a holding objection is raised at this stage.

Full Reference: O - 6483 - 5769 - H1 Housing Allocations - iii

6856 Comment

Respondent: Redrow Homes (Ms Kate Holland) [8640]

Agent: Redrow Homes (Ms Kate Holland) [8640]

Summary: We are supportive of the principle of Policy H1 in its assertion that development of the strategic housing Site East of Harlow will be supported. However, the Policy also requires the provision of a Masterplan to be submitted and development must accord with the Harlow and Gilston Garden Town Spatial Vision and Design Charter. As within the comments on Policy PL1, the Design Charter and Spatial Vision are at an early stage and have not yet been produced.

The Policy is therefore not 'Justified' as it is not based upon any supporting viability evidence to demonstrate that these requirements will not affect deliverability of the Plan and cannot be found to be 'Sound' as it is currently worded.

Change To Plan: reference to the Master Plan, Design Charter and Spatial Vision should be removed

Full Reference: C - 6856 - 8640 - H1 Housing Allocations - None

6408 Object **Respondent: Miss Erin Rose BALDRY [8560]** **Agent: N/A**

Summary: The proposed allocation of Fennells Field does not meet this proposal. Any development will have an unacceptable adverse effect on the character of the locality, the appearance of the street scene and the amenities enjoyed by the occupiers of neighbouring dwellings. THIS PROPOSAL IS OUTSIDE MY FRONT WINDOWS! As for parking the proposal to add in another potential 46 spaces off-street parking as well as impacting on existing access arrangements is fundamentally flawed!

Change To Plan: The Fennells field needs to be removed as a proposed housing site in this document.

Full Reference: O - 6408 - 8560 - H2 Residential Development - i, ii, iii, iv

6865 Comment **Respondent: De Merke Estates (Ms Emma Gladwin) [8643]** **Agent: Barton Willmore (Miss Emma Gladwin) [8399]**

Summary: Policy H2 recognises that there has been a small but constant supply of new housing on infill sites and garden plots, which can contribute to meeting local housing need, supporting such development subject to various criteria being met.

Policy H2 recognises the constraints of the District and seeks to support residential development where it would be appropriate, in accordance with the NPPF. As such we support the aims of Policy H2 in encouraging residential development on suitable infill sites, garden plots, minor residential schemes and vacant plots.

Change To Plan:

Full Reference: C - 6865 - 8643 - H2 Residential Development - None

6909 Comment **Respondent: Essex County Council (Mr Rich Cooke) [8452]** **Agent: N/A**

Summary: Policy H1 (Housing Allocations) mentions the requirement for development of allocated sites to meet specified design requirements. This stipulation also needs to apply to any other (unidentified / unallocated) sites that come forward by adding this requirement under Policy H2.

Change To Plan: ECC recommends adding a further criterion to Policy H2:

'(e) Development of all housing sites must accord with the principles of the Harlow and Gilston Garden Town Spatial Vision and Design Charter'

Full Reference: C - 6909 - 8452 - H2 Residential Development - None

6440 Object **Respondent: Morley Grove Residents Association (Sheila Sullivan) [5043]** **Agent: N/A**

Summary: I object to H3.1 because the threshold for number of HMOs in a row should be 1 in 10 (10%) and not 1 in 5 as proposed. Nationally the 1 in 10 threshold is the one most commonly adopted by local authorities. Greater density of HMOs adversely affects community cohesion. It is important for the town that an Article 4 Direction is established to remove permitted development rights for conversion of Use class C3 (single dwelling-house) to C4 (small HMO). This would ensure all such conversions needed prior planning consent.

Change To Plan: Article 4 Direction removing permitted development rights for conversion from C3 to C4 to be included to ensure prior planning consent is required and both neighbours and developers have access to an independent appeals procedure through the Planning Inspector. The threshold for HMOs would not exceed 1 in 10 out of a row or area of units.

Full Reference: O - 6440 - 5043 - H3 Justification - None

6484 Object **Respondent: Miller Strategic Land [5769]** **Agent: Andrew Martin - Planning (Mr Olivier Spencer) [5533]**

Summary: Our client recommends that Policy H5 is amended to limit Part M4(2) to the affordable element only and Part M4(3) to 10% of the affordable element.

Change To Plan: Our client respectfully requests that the first two paragraphs in Policy H5 are amended to read:
 "All new affordable dwellings must be at least Building Control Part M4(2) standard for accessible and adaptable homes to meet the occupiers' future needs.
 In addition, for major residential development, 10% of new affordable dwellings must be Building Control Part M4(3) standard (i.e. wheelchair user dwellings)."

Full Reference: O - 6484 - 5769 - H5 Accessible and Adaptable Housing - iv

6588 Object **Respondent: Barker Parry Town Planning Ltd. (Ms Elizabeth Fitzgerald) [8451]** **Agent: N/A**

Summary: The emerging policy takes this extant policy position much further stating that all new dwellings must be accessible and adaptable dwellings, in accordance with Part M4(2) of the Building Regulations.

There is a requirement under Building Regulations for all properties to meet Part M4(1), with Part M4(2) being an optional requirement. The policy requirement for all dwellings to comply with an optional Building Regulation requirement is not therefore justified and is considered to be unsound.

Change To Plan: This policy is considered to be flawed and therefore unsound, it is recommended that it be deleted to ensure housing development can be readily delivered and the five year housing land supply not brought into question.

Full Reference: O - 6588 - 8451 - H5 Accessible and Adaptable Housing - None

6705 Object **Respondent: Home Builders Federation (Mr Mark Behrendt) [8450]** **Agent: N/A**

Summary: This policy is unsound as it has not been justified

In considering whether to implement the optional technical standards on accessibility PPG sets out in paragraph 56-007 that local planning authorities must take into account the likely future needs for such homes, the type of homes needed to meet evidenced need, the accessibility of existing stock, how needs vary and the overall impact on viability. With regard to need it cannot be considered an appropriate interpretation of Government policy that all new homes should be built to their higher optional standard. Had this been the case then the Government would have made these standards mandatory. The Council's limited evidence solely reflects national concerns regarding an ageing population and as such provides no unique circumstances that warrant all new homes to be built to Part M4(2). It must also be remembered that the majority of the existing elderly and disabled population will already live in the Borough and are unlikely to want to move home. As such to require all new homes to be built to such standards would be inappropriate and largely ineffective in addressing the needs of those requiring a more accessible home. Whilst we recognise that there may be a need for some new homes to be built to M4(2) the evidence does not show that there is a need for all the new homes to be built to this standard. With regard to Part M4(3) the Council indicates within the policy that a proportion of all homes on major development sites should be built to part M4(3) on the basis of the proportion set out in the latest SHMA. This proportion is then set out in paragraph 14.25 of the Local Plan. Firstly, we would disagree that the proportion will be based on the latest SHMA. The impact of this standard on the cost of delivering new homes is significant and cannot be varied on the basis of a new SHMA. The proportion of new homes built to this standard must be set out in policy and if they need to be amended should only be through a review of the local plan and subject to the correct process and scrutiny. Secondly, paragraph 14.25 states that 10% of market housing should be built to M4(3). This is inconsistent with PPG which states at paragraph 56-009: "Local Plan policies for wheelchair accessible homes should be applied only to those dwellings where the local authority is responsible for allocating or nominating a person to live in that dwelling."

Change To Plan: ☐ The requirement for all homes to be built to part M4(2) be substantially reduced
☐ The requirement for market homes to be built to part M4(3) be deleted from paragraph 14.24
☐ Any requirement for affordable homes to be built for part M4(3) be included within the policy and the final sentence of the second paragraph of policy H5 be deleted.

Full Reference: O - 6705 - 8450 - H5 Accessible and Adaptable Housing - None

6745 Object**Respondent: Persimmon Homes (Mr David Moseley) [8437]****Agent: N/A**

Summary: In considering whether to implement the optional technical standards on accessibility PPG sets out in paragraph 56-007 that local planning authorities must take into account the likely future needs for such homes, the type of homes needed to meet evidenced need, the accessibility of existing stock, how needs vary and the overall impact on viability.

It is not an appropriate interpretation of Government policy that all new homes should be built to their higher optional standard. If this was the Government's intention, it would have made these standards mandatory.

We agree with the HBF that the Council's limited evidence solely reflects national concerns regarding an ageing population and as such provides no unique or local circumstances that warrant all new homes to be built to Part M4(2). Whilst there may be a need for some new homes to be built to M4(2) the evidence does not show that there is a need for all the new homes to be built to this standard.

With regard to Part M4(3) the Council indicates within the policy that a proportion of all homes on major development sites should be built to part M4(3) on the basis of the proportion set out in the latest SHMA. We agree with the HBF that the impact of this standard on the cost of delivering new homes is significant and cannot be varied on the basis of a new SHMA. The proportion of new homes built to this standard must be set out in policy and if they need to be amended should only be through a review of the local plan and subject to the correct process and scrutiny.

Paragraph 14.25 states that 10% of market housing should be built to M4(3). This is inconsistent with PPG which states at paragraph 56-009:

"Local Plan policies for wheelchair accessible homes should be applied only to those dwellings where the local authority is responsible for allocating or nominating a person to live in that dwelling."

Change To Plan: The requirement for all homes to be built to part M4(2) be substantially reduced

* The requirement for market homes to be built to part M4(3) be deleted from paragraph 14.24

* Any requirement for affordable homes to be built for part M4(3) be included within the policy and the final sentence of the second paragraph of policy H5 be deleted.

Full Reference: O - 6745 - 8437 - H5 Accessible and Adaptable Housing - None

6857 Object**Respondent: Redrow Homes (Ms Kate Holland) [8640]****Agent: Redrow Homes (Ms Kate Holland) [8640]**

Summary: The Policy should be supported by sufficient evidence to justify each of the standards, with adequate flexibility to take account of site specific circumstances, viability and in particular the need for all apartment buildings to comply with the accessibility standards. We object to these prescriptive requirements as it constitutes an unreasonable and inflexible approach which would not be 'Justified', 'Effective', or 'Consistent with National Policy' and is therefore not 'Sound'.

Change To Plan: Policy H5 implies that a quantum of market housing is also required to comply with Part M4(3). This would not be 'Consistent with National Policy' and therefore the requirement should be removed.

Full Reference: O - 6857 - 8640 - H5 Accessible and Adaptable Housing - None

6866 Object**Respondent: De Merke Estates (Ms Emma Gladwin) [8643]****Agent: Barton Willmore (Miss Emma Gladwin) [8399]**

Summary: HDC has not published any evidence relating to these requirements, which place considerable requirements and restrictions on developers, including the requirement to have level thresholds which is not always achievable.

As the definition of major developments includes the provision of 10 or more dwellings, these requirements could have significant implications for small to medium sized sites and could restrict delivery of smaller sites.

Change To Plan: HDC does not appear to have considered the implications of such standards, which could have a detrimental impact on delivery rates and viability. As such, Policy H5 is not currently justified.

Full Reference: O - 6866 - 8643 - H5 Accessible and Adaptable Housing - None

6632 Comment**Respondent: GLADMAN (Mr Phill Bamford) [8618]****Agent: N/A**

Summary: Policy H5 sets out that all new housing developments should meet Building Regulations Standard M4(2). The Written Ministerial Statement of 25th March 2015 confirms that the optional new national technical standards should only be required through Local Plans if they address a clearly evidenced need and where the impact on viability has been considered. It is therefore important that the Council has undertaken a local assessment which evidences the need for the adoption of Building Regulation Standard M4(2). The Council do not seem to have undertaken such an assessment.

Change To Plan:

Full Reference: C - 6632 - 8618 - H5 Accessible and Adaptable Housing - None

6910 Comment**Respondent: Essex County Council (Mr Rich Cooke) [8452]****Agent: N/A**

Summary: ECC notes and supports in principle that the policy states that:
'The provision of specialist housing developments will be supported on appropriate sites that will meet the needs of older people and other groups.'

However, this makes no reference to the scale of the need involved or any specific means to address this. The evidence position is that ECC assessed a need for 2,825 Independent Living units (available as rental or ownership units) to be delivered by 2020 in the County. In September 2016 ECC assessed a need with Harlow for 150 units to be provided by 2020. The ECC Independent Living programme has been developed by ECC to increase the supply of Independent Living units across Essex.

Change To Plan: ECC recommends addition of reference to this evidential position on scale of need to provide for local needs

This would ideally be referenced within the policy itself (as part of its requirements) and the supporting text (paragraphs 14.23 - 14.27).

Full Reference: C - 6910 - 8452 - H5 Accessible and Adaptable Housing - None

6594 Object **Respondent: Barker Parry Town Planning Ltd. (Ms Elizabeth Fitzgerald) [8451]** **Agent: N/A**

Summary: This proposed policy also sets out the preferred Market Housing mix, again drawn from the SHMA 2015. Unlike the Affordable Housing requirement, this mix has not been re-visited and is now considered to be out of date.

Developers are invariably best placed to understand the most up to date position in the housing market, particularly on larger schemes, where careful consideration has to be given to sales rates to ensure the delivery of the site is viable. The need to be up to date is essential and will always be reflective of the market at the time of the application, as opposed to the SHMA, which is already three years out of date.

Change To Plan: It is strongly recommended that housing mix be left to the developer to ascertain what is required locally and will therefore sell. Dictating, particularly market housing mix, will deter developers from the District as they will not wish to invest and develop sites that they will then struggle to sell. This is likely to impact on the Local Planning Authority's ability to deliver their five-year housing land supply.

Full Reference: O - 6594 - 8451 - H6 Housing Mix - None

6706 Object **Respondent: Home Builders Federation (Mr Mark Behrendt) [8450]** **Agent: N/A**

Summary: Whilst we recognise that the Council will require a range of different types and tenures of housing to be provided within the Borough, it is essential that any policy allows for sufficient flexibility on the basis of both the viability of delivering the Council's required mix of housing. At present the Council will require a very specific mix of development on the basis of figure 14.1 in the local plan. Whilst the viability study concludes that the local plan is broadly viable it does recognise that for more mixed developments viability is not as strong. Whilst this largely relates to the impacts of flatted developments it does show that housing mix can impact significantly on the viability of a development. The NPPF is clear that plans should be viable (paragraph 173) and flexible (paragraph 14) and at present we do not consider this policy to be consistent with these two aims. In order to ensure that this policy is sound it needs to be less rigid in the housing mix required and made more flexible and allow for viability concerns to be considered when agreeing the appropriate mix of housing on any site.

Change To Plan: The policy be amended to read:
"The Council will seek a range of housing types and sizes, across a range of tenures, on all major residential sites that will reflect the needs of the Borough any site specific concerns regarding viability and feasibility."

Full Reference: O - 6706 - 8450 - H6 Housing Mix - None

6746 Object **Respondent: Persimmon Homes (Mr David Moseley) [8437]** **Agent: N/A**

Summary: We share the HBF's concerns regarding the overly prescriptive nature of Policy H6. The NPPF is clear that plans should be viable (paragraph 173) and flexible (paragraph 14) and at present we do not consider this policy to be consistent with these two aims. In order to ensure that this policy is sound it needs to be less rigid in the housing mix required and made more flexible and allow for viability to be considered when agreeing the appropriate mix of housing on any site.

Change To Plan: The policy be amended to read:

"The Council will seek a range of housing types and sizes, across a range of tenures, on all major residential sites that will reflect the needs of the Borough any site specific concerns regarding viability and feasibility."

Full Reference: O - 6746 - 8437 - H6 Housing Mix - None

6485 Comment **Respondent: Miller Strategic Land [5769]** **Agent: Andrew Martin - Planning (Mr Olivier Spencer) [5533]**

Summary: Policy H6 seeks a range of housing types and sizes, across a range of tenures. Below the policy, Figure 14.1 sets out specific percentages for 1-5 bedroom properties, in both market and affordable tenures, based on the SHMA. However, it should be noted that the residential-led development at East Harlow is likely to involve a 10+ year delivery programme. As a result, housing needs will inevitably vary during this period and HDC will need to offer some flexibility in how it applies the housing mix presented at Figure 14.1, based on the latest evidence at the time.

Change To Plan:

Full Reference: C - 6485 - 5769 - H6 Housing Mix - None

6758 Comment **Respondent: Quod Planning (Mr Philip Murphy) [7958]** **Agent: N/A**

Summary: Paragraph 14.30 states with regard to housing type and mix that "The range of housing types, sizes and tenures is based on the current SHMA (see Fig. 14.1) or successor studies". It is however noted that subsequent to this, paragraph 14.41 includes some flexibility for Garden Towns, "The new Garden Communities in the Harlow and Gilston Garden Town also have an important role in diversifying the existing housing market and supporting economic aims. These sites could provide a wide range of types and tenures of homes, informed by site-specific evidence and ensuring that there is a balanced mix of sustainable and high-quality homes across the West Essex and Hertfordshire HMA."

Change To Plan: For clarity, it is suggested that Paragraph 14.30 is updated to include the following:
"....or successor studies, taking account of the latest Strategic Housing Market Assessment and any additional up-to-date evidence, local demographic context and trends; local housing need and demand; and site issues and design considerations."

Full Reference: C - 6758 - 7958 - H6 Housing Mix - None

6858 Comment **Respondent: Redrow Homes (Ms Kate Holland) [8640]** **Agent: Redrow Homes (Ms Kate Holland) [8640]**

Summary: The 2015 SHMA identifies a housing mix at Figure 76; however, at paragraph 5.94 the SHMA states that the spatial distribution, appropriate locations for market and affordable housing, type and size of properties to be provided in different areas will be determined through the planning process. The standardised approach to applying the prescriptive mix across all sites fails to address more localised needs and demands, which may not align with the District wide mix and reduce the ability for the Plan to respond to changing circumstances and market conditions.

Change To Plan: The requirement to provide a housing mix compliant with the 2015 SHMA should therefore be removed because it is not 'Consistent with National Policy', as it fails to respond flexibly to changing circumstances (NPPF, Para 153).

Full Reference: C - 6858 - 8640 - H6 Housing Mix - None

6486 Object **Respondent: Miller Strategic Land [5769]** **Agent: Andrew Martin - Planning (Mr Olivier Spencer) [5533]**

Summary: Our client wishes to raise a holding objection to Policy H8 on the basis that the requirement for 30% affordable housing is not yet based on proportionate evidence (i.e. it is not "justified").

Change To Plan: Only a holding objection is raised at this stage.

Full Reference: O - 6486 - 5769 - H8 Affordable Housing - ii

6707 Object **Respondent: Home Builders Federation (Mr Mark Behrendt) [8450]** **Agent: N/A**

Summary: The affordable housing policy is unsound on the basis that it is ineffective and not consistent with national policy. We consider the policy H8 to be unsound as it sets out a minimum level of affordable housing that the Council expects and as such does not provide a clear statement as required by both Paragraph 17 and 154 of the NPPF. In setting out this target as a minimum the Council are creating unnecessary uncertainty for the house building industry. Developers should be able to cost schemes with a high degree of predictability and this policy does not support this position. At present this policy could be considered to be the starting point of a negotiation and that the Council will seek higher contributions.

Change To Plan: In order to make this policy sound we would recommend that the words "at least" be removed from the policy.

Full Reference: O - 6707 - 8450 - H8 Affordable Housing - None

6597 Comment **Respondent: Barker Parry Town Planning Ltd. (Ms Elizabeth Fitzgerald) [8451]** **Agent: N/A**

Summary: The need for 30% affordable housing to be provided on all major residential sites is however contrary to National Planning Policy Guidance. For the purposes of affordable housing provision, there is a distinct difference drawn between the Town and Country Planning (Development Management Procedure)(England) Order 2015 definition of major development and Government guidance on the 10-unit threshold, which requires affordable housing only to be provided on schemes of 11 units or more. The policy should be amended to reflect the NPPG.

Change To Plan: The policy should be amended to reflect all potential affordable housing types as set out within the draft NPPF and allow for flexibility should the definition be again varied in the future, thus ensuring the plan policy has longevity and remains sustainable. In its current form this policy is considered to be unsound.

Full Reference: C - 6597 - 8451 - H8 Affordable Housing - None

6747 Comment **Respondent: Persimmon Homes (Mr David Moseley) [8437]** **Agent: N/A**

Summary: We agree with the HBF that Policy H8 is unsound as it sets out a minimum level of affordable housing that the Council expects and as such does not provide a clear statement as required by both Paragraph 17 and 154 of the NPPF. The development industry needs to be able to consider the cost schemes with a high degree of predictability and this policy does not enable this to happen.

Change To Plan: In order to make this policy sound we would recommend that the words "at least" be removed from the policy.

Full Reference: C - 6747 - 8437 - H8 Affordable Housing - None

6768 Comment

Respondent: Tetlow King Planning (MEGHAN ROSSITER) [8630]

Agent: N/A

Summary: Policy H8 is a very succinct policy on affordable housing, providing little direction on the Council's tenure or type mix expectations. While the minimum figure of 30% affordable housing on all major residential development provides a strong indication of the Council's requirement, it does not address the potential for higher levels to be delivered in the new Garden Communities, nor for lower levels on smaller developments. Setting zone-specific targets helps to increase the overall level of affordable housing, as well as targeting those areas where a different mix of affordable housing tenures can be delivered. We suggest, in light of the proposed NPPF2 definition of affordable housing, that the policy make explicit reference to the need for a diverse range of affordable housing to be delivered across Harlow, including social and affordable rent, intermediate affordable and affordable rent to buy. We recommend the policy be reworked to include more specific targets for the allocated housing sites, with a paragraph setting out the expectation that developments deliver a range of affordable housing tenures, including those aimed at assisting people into home ownership.

By wording the policy in this way, developments will be encouraged to come forward with a greater diversity of tenures that reflect not only priority needs, but those needs not currently met by the delivery of social, affordable rent, and intermediate affordable tenures. Leaving this expectation for the implementation paragraphs following the policy fails to reflect the Council's ambitions to meet affordable housing needs, and to properly target areas with the greatest scope for high delivery.

Change To Plan: As the Council is a landowner with interest in bringing forward some of the allocated development sites, this Plan should be as ambitious as possible to maximise affordable housing delivery.

Full Reference: C - 6768 - 8630 - H8 Affordable Housing - None

6487 Object **Respondent: Miller Strategic Land [5769]** **Agent: Andrew Martin - Planning (Mr Olivier Spencer) [5533]**

Summary: Our client recommends that HDC adopts a similar approach to that used by its neighbours at EHDC, who agreed at EiP to reduce the proportion of plots dedicated to self-build from 5% to 1%.

Change To Plan: Our client respectfully requests that the first paragraph in Policy H9 is amended to read:
"Development of housing sites greater than 50 dwellings must include 1% of serviced plots for self-build..."

Full Reference: O - 6487 - 5769 - H9 Self-build and Custom-build Housing - ii

6708 Object **Respondent: Home Builders Federation (Mr Mark Behrendt) [8450]** **Agent: N/A**

Summary: This policy is unsound as it has not been justified and is inconsistent with national policy. Whilst we support the encouragement of self-build housing through the local plan we do not consider the requirement for sites of over 50 to provide up to 5% service plots for self and custom house building to be justified or consistent with national policy. Firstly, we could find no analysis as to how many homes are likely to be required based on the self-build register in order to justify the proportions set out in the policy. Based on the allocations to be made in the plan this would deliver around 170 self-build plots however, it is not clear whether this will meet needs or be a significant over provision. Secondly, whilst we recognise that Local Planning Authorities now have a duty to promote self-build housing we do not consider the Council to have looked at sufficient options with regard to how it can provide plots to support self-builders. Paragraph 57-024 of the PPG sets out a variety of approaches that need to be considered - including the use of their own land. This is reiterated in para 57-14 of the PPG which sets out the need for Council's to consider how they can support the delivery of self-build plots through their housing strategy, land disposal and regeneration functions. We cannot find any evidence as to the Council's consideration of other reasonable approaches to delivery as suggested in PPG. Without such consideration it would appear that the Council is seeking to place the burden for delivery of self-build plots on larger sites without looking sufficiently at other delivery mechanisms as set out in national guidance. We also consider the policy to be inconsistent with the third bullet point of paragraph 57-025 of PPG. This outlines that the Council should engage with landowners and encourage them to consider self-build and custom house building. The approach taken by the Council moves beyond encouragement and requires land owners to bring forward plots.

Change To Plan: That the policy be deleted and replaced with a policy that seeks to encourage the provision of self-build plots.

Full Reference: O - 6708 - 8450 - H9 Self-build and Custom-build Housing - None

6748 Object **Respondent: Persimmon Homes (Mr David Moseley) [8437]** **Agent: N/A**

Summary: The requirement for sites of over 50 to provide up to 5% service plots for self and custom house building is not justified or consistent with national policy.

The Council's evidence base does not contain an analysis as to how many homes are required based on the self-build register in order to justify the proportions set out in the policy.

We agree with the HBF that the Council needs to examine the options with regard to how it can provide plots to support self-builders. Paragraph 57-024 of the PPG sets out a variety of approaches that need to be considered - including the use of their own land. This is reiterated in para 57-14 of the PPG which sets out the need for Council's to consider how they can support the delivery of self-build plots through their housing strategy, land disposal and regeneration functions. As detailed by the HBF, the Council does not appear to have provided evidence of the consideration of other reasonable approaches to delivery as suggested in PPG.

Change To Plan: That the policy be deleted and replaced with a policy that seeks to encourage the provision of self-build plots.

Full Reference: O - 6748 - 8437 - H9 Self-build and Custom-build Housing - None

6759 Object**Respondent: Quod Planning (Mr Philip Murphy) [7958]****Agent: N/A**

Summary: Policy H9 Self-build and Custom-build Housing sets out that "Development of housing sites greater than 50 dwellings must include 5% of serviced plots for self-build, as evidenced by the Self-Build Register, unless such inclusion would render the development unviable". The Plan also makes provision for conversion of the serviced plots to other forms of tenure in the event that uptake by the market is subdued.

There is a significant variance between this and the emerging East Herts District Plan Policy HOU8 Self-Build and Custom Build Housing, which only requires one percent of dwelling plots on sites of more than 200 dwellings.

Change To Plan: It would be appropriate for a reduction to 1% on sites over 200 dwellings which would still generate a significant and deliverable quantum of self/custom build plots.

Full Reference: O - 6759 - 7958 - H9 Self-build and Custom-build Housing - None

6633 Comment**Respondent: GLADMAN (Mr Phill Bamford) [8618]****Agent: N/A**

Summary: Policy H9 requires housing developments providing 10 dwellings or more to provide land for self-build and custom build dwellings to help meet identified local demand. Whilst the concept of Self Build and Custom Build Housing is supported, Gladman has concerns regarding Policy H9 as it is written. The inclusion of plots on large scale sites does not add to the supply of houses overall (it merely changes the housing mix from one product to another). It is also difficult to assess how it will be implemented given issues around working hours, site access, health and safety etc. that are associated with large scale development sites. The percentage of provision on sites should also be determined on detailed evidence of need which the Council appears not to have produced and the provision of these plots should also be subject to viability testing.

Change To Plan:

Full Reference: C - 6633 - 8618 - H9 Self-build and Custom-build Housing - None

6859 Comment**Respondent: Redrow Homes (Ms Kate Holland) [8640]****Agent: Redrow Homes (Ms Kate Holland) [8640]**

Summary: The Council has published its SHMA (2015) as part of its evidence base to support the Local Plan consultation. Paragraph 6.43 states that a survey to ascertain levels of demand for self-build could be undertaken in the future. As such, the Council has not produced any robust evidence of the need for self-build and this requirement has not been assessed as part of the Council's SHMA. The Council has also not published any information about the number of people on the Council's Self Build Register.

As a consequence, the Council has not provided any evidence in respect of the specific need for self-build housing in Harlow over the Plan Period to justify the 5% requirement. Policy H9 has therefore not been 'Positively Prepared', 'Justified' or 'Consistent with National Policy'.

Change To Plan: The policy should be deleted.

Full Reference: C - 6859 - 8640 - H9 Self-build and Custom-build Housing - None

**CHAPTER: DEVELOPMENT
MANAGEMENT****H10 Travellers' Pitches and Plots****6728 Comment****Respondent: National Federation of Gypsy Liaison Groups (A. Yarwood) [8627]****Agent: N/A**

Summary: The requirement that evidence of need is a pre-requirement is unacceptable and renders the policy non-compliant with the guidance set out in DCLG's Planning Policy for Traveller Sites (PPTS). Paragraph 10 of PPTS requires that Local Plans set out criteria for dealing with applications even where no need has been identified. Thus the Plan is unsound and the reference to evidence of need should be deleted. Furthermore criteria (i) is incompatible with the statement supporting policy HS4 which recognises that provision needs to be made for Gypsies who do not meet the definition.

Change To Plan:

Full Reference: C - 6728 - 8627 - H10 Travellers' Pitches and Plots - None

CHAPTER: DEVELOPMENT
MANAGEMENT

H10 Implementation

6505 Comment

Respondent: Environment Agency (Miss Lisa Mills) [8443]

Agent: N/A

Summary: We welcome the inclusion of the policy that new pitches and plots must not pose risk of land contamination or flooding. This policy could be strengthened further in the implementation section by referring to the sequential test for site allocations and cross referencing with policy PL10.

Change To Plan:

Full Reference: C - 6505 - 8443 - H10 Implementation - None

CHAPTER: DEVELOPMENT
MANAGEMENT

PR1 Development within Employment Areas

6560 Comment

Respondent: BOC (Glen Jenkins) [8571]

Agent: N/A

Summary: (c) the development provides a complementary benefit to the employment area or an ancillary benefit to an existing business, and would not have an adverse effect on the overall provision of employment land for example by the introduction of a noise sensitive occupier;

Change To Plan: (c) the development provides a complementary benefit to the employment area or an ancillary benefit to an existing business, and would not have an adverse effect on the overall provision of employment land for example by the introduction of a noise sensitive occupier;

Full Reference: C - 6560 - 8571 - PR1 Development within Employment Areas - None

CHAPTER: DEVELOPMENT
MANAGEMENT

PR3 Employment Development Outside Employment Areas and Neighbourhood Service Areas

6564 Comment

Respondent: BOC (Glen Jenkins) [8571]

Agent: N/A

Summary: Add the following to PR3

(d) the proposed use would not have an adverse effect on the overall provision of employment land, for example by the introduction of a noise sensitive occupier

Change To Plan: Add the following to PR3

(d) the proposed use would not have an adverse effect on the overall provision of employment land, for example by the introduction of a noise sensitive occupier

Full Reference: C - 6564 - 8571 - PR3 Employment Development Outside Employment Areas and Neighbourhood Service Areas - None

CHAPTER: DEVELOPMENT
MANAGEMENT

PR4 Improving Job Access and Training

6488 Object

Respondent: Miller Strategic Land [5769]

Agent: Andrew Martin - Planning (Mr Olivier Spencer) [5533]

Summary: Although our client supports the principle behind this policy, i.e. to get local residents back into work and to improve their skills level, additional information is required: to explain how these obligations could work in reality; to set out the level of obligation likely to be sought; and, to assess the viability implications of these requirements.

Change To Plan: Our client respectfully requests that part (1) in Policy PR4 is deleted and further evidence is presented to justify the inclusion of parts (2) to (4)

Full Reference: O - 6488 - 5769 - PR4 Improving Job Access and Training - ii

CHAPTER: DEVELOPMENT
MANAGEMENT

PR5 The Sequential Test and Principles for Main Town Centre Uses

6773 Comment

Respondent: Indigo Planning Limited (Mr Diogo Duraes) [8632]

Agent: N/A

Summary: Proposed Policy PR5 suggests the requirement for an impact assessment to be submitted with proposals of more than 500 sq m on sites outside town centres. We consider that the threshold should be increased to bring it in line with the NPPF threshold (paragraph 26).

Change To Plan:

Full Reference: C - 6773 - 8632 - PR5 The Sequential Test and Principles for Main Town Centre Uses - None

CHAPTER: DEVELOPMENT
MANAGEMENT

PR7 Sub-division and Internal Alteration of Town Centre Units

6774 Object

Respondent: Indigo Planning Limited (Mr Diogo Duraes) [8632]

Agent: N/A

Summary: Proposed Policy PR7 states that the sub-division of retail units in the town centre must (for units of 2,500 sqm or more) provide two years' worth of marketing evidence. Two years' worth of evidence is an unreasonable requirement and could result in a unit being vacant for up to two years whilst the evidence is gathered thus harming the vitality and viability of the town centre. This requirement will put businesses under more pressure, preventing them from using their retail floorspace flexibly and ensuring it can be occupied.

Change To Plan: this policy requirement should be removed.

Full Reference: O - 6774 - 8632 - PR7 Sub-division and Internal Alteration of Town Centre Units - None

CHAPTER: DEVELOPMENT
MANAGEMENT

16. LIFESTYLES

6452 Comment

Respondent: Deanery of Harlow (Anglican) (Revd Martin Harris) [8586]

Agent: N/A

Summary: Does Lifestyle need a section on green issues eg efficient energy use?
Sustainable development refers to a clean and green environment. Does more work need to be done so as to ensure that there is a real focus on this, one which combines with a priority for local development. Though there is the presumption, unless this is fleshed out there is danger that this would easily be ignored.

Change To Plan:

Full Reference: C - 6452 - 8586 - 16. LIFESTYLES - None

6911 Comment

Respondent: Essex County Council (Mr Rich Cooke) [8452]

Agent: N/A

Summary: This chapter on Lifestyles addresses provision / access to open space, recreation and sports facilities - but does not reference broader healthy / active lifestyles and behaviours and the need to enable and promote these. This needs to make clear how the Plan strategy and actions will address the needs of current and future local populations.

These things mean that the NPPF requirements around Health and Wellbeing (NPPF, paragraphs 70 and 171) are not currently met.

Change To Plan: ECC (Public Health) recommends that this section is reviewed comprehensively to build upon its existing content that provides a useful, initial basis for the active lifestyles element of health and wellbeing.

ECC will review appropriate Local Plan content and suggestions used elsewhere and recommends early joint working with HC to agree the form of content and new approaches to include

Full Reference: C - 6911 - 8452 - 16. LIFESTYLES - None

6599 Object **Respondent: Barker Parry Town Planning Ltd. (Ms Elizabeth Fitzgerald) [8451]** **Agent: N/A**

Summary: It is considered that this policy lacks a robust evidence base to ensure developments deliver facilities that meet a demonstrable need. The content of the policy should be revisited to enable a more appropriate and flexible approach to be taken to provision of open space and sports facilities etc, to enable improved facilities to be provided, as well as meeting a demonstrable need.

Change To Plan:

Full Reference: O - 6599 - 8451 - L1 Open Spaces, Play Areas and Sporting Provision and Facilities in Major Development - None

6867 Comment **Respondent: De Merke Estates (Ms Emma Gladwin) [8643]** **Agent: Barton Willmore (Miss Emma Gladwin) [8399]**

Summary: Policy L1 states that in major development public open space and play space are required, with allotments and sporting provision and facilities required where appropriate. This is not always achievable in smaller sites, particularly if a scheme just falls within the definition of major development.

Change To Plan: Policy L1 should be amended to require public open space and play space where appropriate. This is further pertinent given that HDC is proposing the loss of public open space and play space for housing allocations. These sites are all owned by HDC, with HDC potentially significantly profiting from the loss of open space with developers currently required to subsequently make up the shortfall.

Full Reference: C - 6867 - 8643 - L1 Open Spaces, Play Areas and Sporting Provision and Facilities in Major Development - None

6463 Support **Respondent: The Theatres Trust (Tom Clarke) [216]** **Agent: N/A**

Summary: As set out in our representation at the previous stage, the Trust welcomes this policy and the protection it will afford to Harlow's valued local facilities.

Change To Plan:

Full Reference: S - 6463 - 216 - L2 The Provision and Loss of Recreational, Sporting, Cultural and Community Facilities - None

6454 Comment **Respondent: Deanery of Harlow (Anglican) (Revd Martin Harris) [8586]** **Agent: N/A**

Summary: I welcome the reference to places of worship under L2 (Lifestyle Implementation). Could there be a specific reference somewhere to s106 monies being available for local including adjoining community etc activities. Could there also be a reference to places of worship under 4.20? Thus would reflect the original vision of the Master Plan for Harlow.

Change To Plan:

Full Reference: C - 6454 - 8586 - L2 The Provision and Loss of Recreational, Sporting, Cultural and Community Facilities - None

6464 Comment **Respondent: The Theatres Trust (Tom Clarke) [216]** **Agent: N/A**

Summary: Although we support the policy, we consider it could be strengthened by setting out criteria by which proposals for the loss of facilities will be assessed. We would recommend this to include evidence of marketing for an appropriate period (at least one year) at a rent/sale price appropriate to the condition and existing use of the facility, and that it has been marketed through appropriate channels relevant to the nature of the facility.

Change To Plan:

Full Reference: C - 6464 - 216 - L2 Implementation - None

- 6489 Object** **Respondent:** Miller Strategic Land [5769] **Agent:** Andrew Martin - Planning (Mr Olivier Spencer) [5533]
- Summary: If HDC is minded to retain Policy L3 in the Local Plan, it should prepare and present evidence to demonstrate where there are public art deficiencies in the Town, how those deficiencies should be addressed and the level of contribution / obligation likely to be necessary to do so.
- Change To Plan: Our client respectfully requests that part (1) in Policy L3 is deleted.
- Full Reference: O - 6489 - 5769 - L3 Development Involving the Provision or Relocation or Loss of Public Art - ii, iv
- 6709 Object** **Respondent:** Home Builders Federation (Mr Mark Behrendt) [8450] **Agent:** N/A
- Summary: Part 1 of this policy is unsound as it is unjustified and inconsistent with national policy
Planning Practice Guidance sets out the situation with regard to existing legislation on planning obligations. In particular it states that:
"Planning obligations assist in mitigating the impact of unacceptable development to make it acceptable in planning terms. Planning obligations may only constitute a reason for granting planning permission if they meet the tests that they are necessary to make development acceptable in planning terms, directly related to the development and fairly and reasonably related in scale and kind" (Ref: 23b-001-20161116).
The Council have not established within the plan or the supporting evidence base how it considers public art to meet any of these tests. Whilst we recognise that public art can play a role in making interesting and exciting public spaces if the Council is to require all major developments to have public art it must have evidence to show how this policy meets the required tests in relation to all such sites.
- Change To Plan: Part of this policy should be deleted
- Full Reference: O - 6709 - 8450 - L3 Development Involving the Provision or Relocation or Loss of Public Art - None
- 6868 Object** **Respondent:** De Merke Estates (Ms Emma Gladwin) [8643] **Agent:** Barton Willmore (Miss Emma Gladwin) [8399]
- Summary: The justification for this is to continue the legacy of Harlow as a town of public art and sculpture. However, there is no consideration regarding the viability impact that this may have, particularly on smaller sites.
Policy L3 is not currently justified or consistent with national policy, with Paragraph 174 of the NPPF stating Councils should assess the likely cumulative impacts of proposed local standards on new developments. HDC has not done this
- Change To Plan: Policy L3 should be amended to require public art where appropriate to be meet the tests of 'soundness'.
- Full Reference: O - 6868 - 8643 - L3 Development Involving the Provision or Relocation or Loss of Public Art - None
- 6455 Support** **Respondent:** Deanery of Harlow (Anglican) (Revd Martin Harris) [8586] **Agent:** N/A
- Summary: I welcome the focus on the provision of local art.
- Change To Plan:
- Full Reference: S - 6455 - 8586 - L3 Development Involving the Provision or Relocation or Loss of Public Art - None
- 6912 Comment** **Respondent:** Essex County Council (Mr Rich Cooke) [8452] **Agent:** N/A
- Summary: ECC notes that Public Art is an important part of Harlow's historic environment and not all of it is protected by national designation. As such a clause should be added stating that the loss of public art will only be permitted where it can be demonstrated that the loss will not cause harm to the historic significance of the art work or its setting.
- Change To Plan: Revise and strengthen Policy L3 (2) by adding a clause stating that the loss of public art will only be permitted where it can be demonstrated that the loss will not cause harm to the historic significance of the art work or its setting.
- Full Reference: C - 6912 - 8452 - L3 Development Involving the Provision or Relocation or Loss of Public Art - None

6674	Comment	Respondent: Hertfordshire County Council (Mr Martin Wells) [8622]	Agent: N/A
	<div>Summary: Paragraph 17.4. HCC has the equivalent documentation that is listed within this paragraph. This applies to the development within Herts (ie Gilston) and therefore its plan should also be considered where relevant. Paragraph 17.10 should be amended, as shown below, to reflect both HCC and Essex County Council (ECC) as Local Highway Authorities, as the developments within Harlow are linked to the proposed Gilston Area in East Herts District.</div> <div>Change To Plan:</div>		
	Full Reference: C - 6674 - 8622 - 17. INFRASTRUCTURE - None		

6749 Object

Respondent: Persimmon Homes (Mr David Moseley) [8437]

Agent: N/A

Summary: The Policy states; 'Development must provide electric vehicle charging points (EVCPs) in accordance with the latest government guidance'. It is not clear what government guidance is being referred to. Policy IN1 is unsound as it refers to an unspecified standard that could be amended and as such does not provide a clear statement as required by both Paragraph 17 and 154 of the NPPF.

The impact of a (unspecified) standard on the cost of delivering new homes could be significant and should not be varied on the basis of unspecified future guidance. If necessary, the standard must be set out in policy and if they need to be amended should only be done so through a review of the local plan.

Change To Plan: That the policy be deleted and replaced with a policy that specifies a standard that has been fully accounted for within viability assessments and that should only be sought where practicable.

Full Reference: O - 6749 - 8437 - IN1 Development and Sustainable Modes of Travel - None

6869 Object

Respondent: De Merke Estates (Ms Emma Gladwin) [8643]

Agent: Barton Willmore (Miss Emma Gladwin) [8399]

Summary: there is no Government guidance that sets standards or requirements for such charging points

Change To Plan: Policy IN1 is therefore not justified and should be removed.

Full Reference: O - 6869 - 8643 - IN1 Development and Sustainable Modes of Travel - None

6578 Comment

Respondent: Canal & River Trust (Ms Tessa Craig) [8612]

Agent: N/A

Summary: Waterway corridors provide an ideal environment for sustainable active travel and we welcome reference in Policy IN1 to new development being required to link with and where appropriate improve the existing network of cycleways and paths. The list of routes identified in Policy IN1 could however usefully be expanded to include reference to towpaths to provide clarity on this matter.

The River Stort provides a flat, direct and easy to access route for walking and cycling and close links with the rail network in the Harlow area mean that the towpath can easily be used for the first/last mile of journeys and have a positive impact on congestion as well as the health and wellbeing of local people.

Improved access and relatively simple improvements to the towpath can have a big impact on people's propensity to use it as part of their daily routine.

Whilst Policy IN1 refers to new development contributing to the improvement and development of routes, such reference is missing within the justification of the policy.

The Trusts therefore consider that more emphasis could be placed on the benefits of upgrading existing infrastructure and access to it to support active travel within the policy justification

Change To Plan:

Full Reference: C - 6578 - 8612 - IN1 Development and Sustainable Modes of Travel - None

6661 Comment**Respondent: Hertfordshire County Council (Mr Martin Wells) [8622]****Agent: N/A**

Summary: 1. Sustainable Accessibility is lacking in public transport requirements or links to sustainable transport corridors and does not go far enough to enable real mode shift. The justification of this policy appears lacking and outdated in providing an understanding of how crucial a significant increase to sustainable transport is required within Harlow. Whilst some sections of the justification are encouraging, this does not seem to have been followed through into the policy wording, the result is a poor policy. It is also considered that this policy would not go far enough in supporting policy HGT1 nor the wider objectives set out within the plan. Policy HGT1, Section i states: "Create a step change in modal shift by contributing to the delivery of the Sustainable Transport Corridors and establishing an integrated, accessible and safe transport system which maximises the use of the sustainable high quality transport modes of walking, cycling and the use of public and community transport to promote healthy lifestyles and provide linkages to and from Harlow and the new Garden Town Communities."
HCC fully support the intention of the Local Plan to enable significant mode shift, However, the Highway Authority is concerned with the strength and depth of part 1 of Policy IN1.

Change To Plan:

Full Reference: C - 6661 - 8622 - IN1 Development and Sustainable Modes of Travel - None

6860 Comment**Respondent: Redrow Homes (Ms Kate Holland) [8640]****Agent: Redrow Homes (Ms Kate Holland) [8640]**

Summary: Policy IN1 relates to the need to incorporate sustainable methods of travel within all development proposals. In particular, Part 2 of the Policy requires the provision of Electric Vehicle Charging Points in accordance with latest government guidance.
The consultation draft of the NPPF refers to the planning system being required to support the transition to a low carbon future and support renewable and low carbon energy and associated infrastructure (Paragraph 147). However, the NPPF (2018) makes no direct reference to electric vehicle charging points nor does it set a required standard. Further, the Council has not undertaken an assessment of viability to consider the impact of the imposition of any standards upon development viability.

Paragraphs 157 and 177 of the NPPF (2012) require Local Plans to plan positively for infrastructure needs throughout the Plan Period. The Council has not undertaken any form of assessment as to the need for infrastructure upgrades (which may be wider than the Site) associated with additional demand upon the National Grid.

Change To Plan: It is our experience that the installation of such infrastructure may require reinforcement of the existing electrical network to accommodate additional demand. National Grid require sufficient supply to be made for all households to return home at the same time and plug in their vehicles. In circumstances where there is insufficient supply, developers are required to pay to reinforce electricity supplies which is an extremely costly exercise and can lead to delays in the delivery of housing.

Policy IN1 has therefore not been 'positively prepared' and is not 'justified' or 'consistent with National Policy' and is therefore not 'Sound'. The Policy should therefore be deleted.

Full Reference: C - 6860 - 8640 - IN1 Development and Sustainable Modes of Travel - None

6913 Comment**Respondent: Essex County Council (Mr Rich Cooke) [8452]****Agent: N/A**

Summary: Policy IN1 Sustainable Accessibility does not mention any requirements to link to or provide public transport services. Suggest amendments are made to include this, particularly as the following supporting text refers to trains and buses and public transport.

Change To Plan: ECC (Highways) recommends that a requirement is added to Policy SIR1 to cover this gap:

'New developments including redevelopments, changes of use and Town Centre and transport interchange improvements will be required to link to (or provide) public transport services, the existing cycleway, footway, public right of way and bridleway network, and, where appropriate.'

Full Reference: C - 6913 - 8452 - IN1 Development and Sustainable Modes of Travel - None

6914 Comment

Respondent: Essex County Council (Mr Rich Cooke) [8452]

Agent: N/A

Summary: The thrust of this section is welcomed but this could usefully go further in scope and coverage. Travel Plans are referred to, but it is recommended that the potential for wider Travel Planning co-ordination is referenced to enable more effective encouragement of mode shift of existing and new residents and workers. The Local Plan does not mention the need for behavioural change in order to achieve sustainable travel/step-change. This is considered very important in order to influence travel choices and achieve more sustainable travel

Change To Plan: ECC (Highways) recommends that a reference is added to the potential for wider Travel Planning co-ordination.

Also add a reference to the need for behavioural change (reason: in order to achieve sustainable travel/step-change).

The latter reference could be in the preceding 'Justification' section at paragraphs 17.9 - 17.11.

Full Reference: C - 6914 - 8452 - IN1 Implementation - None

6490 Object

Respondent: Miller Strategic Land [5769]

Agent: Andrew Martin - Planning (Mr Olivier Spencer) [5533]

Summary: Policy IN2 confirms that development will be supported where it meets a number of highway network related criteria, including that it should not cause a 'significant' detrimental impact on highway congestion and movement. However, the corresponding test at paragraph 32 of the NPPF states that development should only be refused on transport grounds where the residual cumulative impacts of development are 'severe'. Therefore to be consistent with national policy, part (a) in Policy IN2 should be amended to refer to 'severe' impacts.

Change To Plan: Our client respectfully requests that part (a) of Policy IN2 is amended to read: 'it would not cause a severe detrimental impact on highway congestion and movement';

Full Reference: O - 6490 - 5769 - IN2 Impact of Development on the Highways Network including Access and Servicing - iv

6861 Comment

Respondent: Redrow Homes (Ms Kate Holland) [8640]

Agent: Redrow Homes (Ms Kate Holland) [8640]

Summary: Paragraph 32 of the NPPF requires all developments that generate significant amounts of vehicular movements to be supported by a Transport Statement or Assessment. Plans and decisions should take account of whether safe and suitable access to the site can be achieved by all people (bullet 2). Further, bullet point 3 states that development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe.

The policy requirement contained within Policy IN2 is therefore a much higher test than that set out within the NPPF Paragraph 32 which sets a severity test. The Policy is therefore not 'consistent with National Policy' and therefore cannot be considered 'Sound'.

Change To Plan:

Full Reference: C - 6861 - 8640 - IN2 Impact of Development on the Highways Network including Access and Servicing - None

6710 Object

Respondent: Home Builders Federation (Mr Mark Behrendt) [8450]

Agent: N/A

Summary: The policy is unsound as it is not consistent with national policy

The Council does not set out in this policy, or elsewhere in the local plan, what is required by an applicant with regard to the actual parking standards. The approach taken by the Council is therefore unsound for two reasons. Firstly it does not comply with legislation that prevents the Council from setting policy in supplementary planning documents, or any other guidance document, which cannot be challenged through an Examination in Public. This principal was most recently tackled in William Davis Ltd & Ors v Charnwood Borough Council [2017] EWHC 3006 (Admin) (23 November 2017) where supplementary planning document strayed into an area that should be considered by a development plan document. This decision quashed an SPD that contained policies that clearly encouraged and imposed development management policies against which a development could be refused. Policy can only be established through the Local Plan.

Change To Plan: Parking standards should be included within the local plan and reference to the Essex Vehicle Parking Standards should be removed.

Full Reference: O - 6710 - 8450 - IN3 Parking Standards - None

6662 Comment

Respondent: Hertfordshire County Council (Mr Martin Wells) [8622]

Agent: N/A

Summary: As commented on, HCC are concerned that the wording of Policy IN3: Parking Standards would not enable the Local Plan to restrict parking in favour of sustainable transport provision. There is also concern that the policy is incongruent with Objective 13.

There is concern that this approach to parking would be open to be interpretation, and would not enable effective parking restriction at sustainable locations as proposed within supporting text of the local plan.

Moving Forward

HCC as Highway Authority does not consider the plan to be unsound. However, modifications could be made to ensure that the deliverability of the required mode shift is achievable and supported by policy, as there is concern that failure to deliver this will have wider impacts on HCC's transport network.

The Highway Authority remains committed to a close working relationship supporting the delivery of the Harlow Local Plan and the Harlow and Gilston Garden Towns.

Change To Plan:

Full Reference: C - 6662 - 8622 - IN3 Parking Standards - None

6675 Comment

Respondent: Hertfordshire County Council (Mr Martin Wells) [8622]

Agent: N/A

Summary: Parking Standards. It should be noted that Essex vehicle parking standards would not apply to development in Hertfordshire ie the Gilston Area.

Change To Plan:

Full Reference: C - 6675 - 8622 - IN3 Parking Standards - None

6711 Object

Respondent: Home Builders Federation (Mr Mark Behrendt) [8450]

Agent: N/A

Summary: The policy is unsound because they are unjustified and contrary to national policy. Following the Government's Housing Standards Review, the Written Ministerial Statement of 25 March 2015 announced that local planning authorities preparing Local Plans "should not set any additional standards or requirements relating to the construction, internal layout or performance of new dwellings". In terms of the construction, internal layout and performance of new dwellings local planning authorities are only allowed to adopt the three optional technical standards, subject to evidence of need and viability. Council's should not seek higher standards than Building Regulations on any other technical standard - including Part R1 Physical infrastructure for high speed electronic communications networks.

Change To Plan: The policy should be deleted.

Full Reference: O - 6711 - 8450 - IN4 Broadband and Development - None

6750 Object

Respondent: Persimmon Homes (Mr David Moseley) [8437]

Agent: N/A

Summary: We agree with the HBF that following the Government's Housing Standards Review, the Written Ministerial Statement of 25 March 2015 announced that local planning authorities preparing Local Plans "should not set any additional standards or requirements relating to the construction, internal layout or performance of new dwellings".

In terms of the construction, internal layout and performance of new dwellings local planning authorities are only allowed to adopt the three optional technical standards, subject to evidence of need and viability. Council's should not seek higher standards than Building Regulations on any other technical standard - including Part R1 Physical infrastructure for high speed electronic communications networks.

Change To Plan: The policy should be deleted.

Full Reference: O - 6750 - 8437 - IN4 Broadband and Development - None

6491 Comment

Respondent: Miller Strategic Land [5769]

Agent: Andrew Martin - Planning (Mr Olivier Spencer) [5533]

Summary: Our client supports the objective in Policy IN4 to provide infrastructure suitable to enable the delivery of high-speed broadband services in all major development across the Harlow area. However, for the avoidance of doubt, it is only the master developer's role to facilitate delivery by providing conduits and other infrastructure - not to provide or ensure that all new dwellings actively take up such a service.

Change To Plan:

Full Reference: C - 6491 - 5769 - IN4 Broadband and Development - None

6579 Support

Respondent: Canal & River Trust (Ms Tessa Craig) [8612]

Agent: N/A

Summary: The Trust notes and welcomes policy IN6 which recognises the impact new development can have on local infrastructure and the need to mitigate any adverse impacts. Development in the vicinity of our waterways can increase the number of users which, whilst generally welcomed, may require existing towpaths to be upgraded or significantly increase on going liabilities for the Trust. We note that the council is intending to produce a Planning Obligations SPD and would welcome the opportunity to comment further on this.

Change To Plan:

Full Reference: S - 6579 - 8612 - IN6 Planning Obligations - None

6741 Comment

Respondent: Natural England (Ms Sarah Fraser) [8628]

Agent: N/A

Summary: This policy is likely to require alteration depending on the outcomes of the HRA to ensure the deliverability of any agreed mitigation strategy. We note that this policy sets out the requirement to provide for 'environmental protection' but advises that 'net gains' for the environment should also be provided by this policy. We note from paragraph that Green Infrastructure, Biodiversity and Wildlife Habitats are considered to fall under the bracket of 'Infrastructure' but feel the policy would benefit from explicit inclusion of environmental enhancement alongside 'protection'.

Change To Plan:

Full Reference: C - 6741 - 8628 - IN6 Planning Obligations - None

6760 Comment

Respondent: Quod Planning (Mr Philip Murphy) [7958]

Agent: N/A

Summary: Policy IN6 explains that "where a planning application extends beyond the district boundary, prior agreement for the provision and location of any necessary obligations will need to be obtained from relevant parties". The justification for this is that 'New development can have wider impacts, such as development generating additional traffic movements outside the district or a larger application straddling the administrative boundary. In these cases, agreement may also be required with the adjoining Council and also Essex and/or Hertfordshire County Councils, as the Highway Authorities, as part of a Section 106 agreement.'
In accordance with the aspirations set out in Policy HGT1 criteria 2n, P&P consider that Harlow requires a robust mechanism for securing planning obligations from new developments coming forward in and around Harlow. It is suggested that pro rata contributions be sought from all developments forming the 16,100 dwellings within the Harlow and Gilston Garden Town that are not currently committed or that consideration be given to the introduction of the Community Infrastructure Levy to more fairly secure contributions from all new development that will benefit from the infrastructure identified in the IDP.
At Paragraph 17.40 there is generic referencing to planning obligations capturing contributions towards transport improvements, and to impacts across border. Harlow should be more explicit about how this will be achieved and make clear that the contributions are to be used to deliver the infrastructure identified in the IDP.

Change To Plan:

Full Reference: C - 6760 - 7958 - IN6 Planning Obligations - None

6915 Comment

Respondent: Essex County Council (Mr Rich Cooke) [8452]

Agent: N/A

Summary: ECC advises that it has concerns that adequate policies are not currently included in the plan to govern the full range of required infrastructure contributions. Further content is considered necessary to ensure that the policy approach is sufficiently comprehensive in its scope and its requirements.
Accordingly, ECC recommends (as previously through the Development Management Policies consultation) that proposed Policy IN6 is replaced with ECC's recommended policy.

Change To Plan: ECC recommends replacing Policy IN6 with ECC's recommended policy - see Appendix 1A for the full text of this.

Reference to ECC's Developers' Guide to Infrastructure Contributions should also be included as part of the supporting text (paragraphs 17.34 - 17.40 refer) to assist in implementation.

Full Reference: C - 6915 - 8452 - IN6 Planning Obligations - None

6676 Comment **Respondent: Hertfordshire County Council (Mr Martin Wells) [8622]** **Agent: N/A**

Summary: New transport infrastructure/provision (including that for sustainable modes) should also be listed within this paragraph, in addition to that of transport improvements, which is already listed.

Paragraph 17.37. It is suggested that the following wording is added at the end of this paragraph, as development may extend beyond the district boundary:
"...or relevant authority for the land on which the site is situated"

Change To Plan:

Full Reference: C - 6676 - 8622 - IN6 Implementation - None

6916 Comment **Respondent: Essex County Council (Mr Rich Cooke) [8452]** **Agent: N/A**

Summary: No indicators or targets have been set with regard to sustainable travel / modal shift, or sustainable travel corridor provision/success. This is a key element, as a step-change in travel mode is required in order to deliver a sustainable garden town and to minimise impact on the highway network.

Change To Plan: ECC (Highways) recommends that, as part of wider transport joint working and support for HC, a constructive dialogue is continued on transport matters to support the Local Plan. This would include joint consideration and development of appropriate transport indicators that meet 'SMART' requirements. It is suggested that the necessary Plan content should be agreed prior to Local Plan submission, whilst some of the more detailed strategy and implementation work will need to continue beyond that point.

Full Reference: C - 6916 - 8452 - 18. MONITORING - None

6917 Comment **Respondent: Essex County Council (Mr Rich Cooke) [8452]** **Agent: N/A**

Summary: ECC advises that Monitoring of change in number of biodiversity and geodiversity designated assets in the district is not a sufficient indicator. Single Data List 160-00 return to Government requires monitoring of the number of Local Sites in Positive Conservation Management.

Change To Plan: ECC recommends revising the existing (biodiversity and geology) indicator stating:

'Change in number of biodiversity and geodiversity designated assets in the district' to 'the number of Local Sites in Positive Conservation Management.'

Full Reference: C - 6917 - 8452 - 18. MONITORING - None

6752 Comment **Respondent: Quod Planning (Mr Philip Murphy) [7958]** **Agent: N/A**

Summary: Paragraph 19.4 refers to the Council using CPO powers to assist with delivering development sites and regeneration. This should be extended to refer explicitly to delivery of the strategic infrastructure identified in the IDP, notably the Eastern Stort Crossing as this infrastructure serves a strategic transport purpose and will be needed to facilitate employment and housing growth in and around Harlow.

There are various references in the plan and IDP to there being support for the 'northern bypass', beyond the plan period, as a potential long-term transport solution. However, the evidence base prepared to support the draft Plan does not appear to include any transport modelling, assessment of feasibility, or evidence concerning land availability for this strategic piece of infrastructure.

Change To Plan: This infrastructure is not 'justified' based upon proportionate evidence, nor needed to deliver the draft Plan, and therefore references to the same should be removed.

Full Reference: C - 6752 - 7958 - 19. IMPLEMENTATION - None

6698 Comment **Respondent: Historic England (Ms Debbie Mack) [8623]** **Agent: N/A**

Summary: Please also mention designated and non-designated assets, locally listed buildings, registered park and garden.

Change To Plan:

Full Reference: C - 6698 - 8623 - GLOSSARY - None

6918 Comment **Respondent: Essex County Council (Mr Rich Cooke) [8452]** **Agent: N/A**

Summary: For completeness of information / evidence base sources, this needs to refer to the Essex Historic Environment Record.

Change To Plan: ECC recommends adding reference to the Glossary to read as follows:

Heritage Asset A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. Heritage asset includes designated heritage assets and assets identified by the Local Planning authority (including local listing) or on the Essex Historic Environment Record.

Full Reference: C - 6918 - 8452 - GLOSSARY - None