

Town Centre North Development Brief – Schedule of summary of representations received				
	Consultee	Page/Para/Table	Summary of Representation (full representations can be made available)	Council Comments Changes to be made to the brief are highlighted in bold
1.	Canals & Rivers Trust	Overall comments	<p>The sites covered by the Development Brief would be some distance from the waterway (River Stort and associated footpath) and the Trust therefore have no specific comments. We advise that the towpath is an important traffic free route for walking /cycling for both leisure and utility walkers and represents a multifunctional asset, providing linkages to local facilities, recreational opportunities, and a safe, convenient, and attractive walking and cycling network to promote health and well-being, consistent with the aims of the NPPF. The Trust has previously responded to the Harlow Town Centre Masterplan SPD which seeks to promote safe and sustainable modes of transport with new and enhanced networks, in particular better linkages to the Garden Town. The towpath would form an integral part of this connected network and, where appropriate, any development should be required to contribute towards this enhanced network through measures such as the provision of new/improved signage/wayfinding.</p>	<p>No specific changes to make to the brief. The Council notes the Trust's comments in relation to the towpath and if appropriate will seek contributions towards it. The brief refers to local walking and cycling projects as potentially requiring infrastructure contributions.</p>
2.	Davood Ghadami	General comments	<p>We support the decision to include more residential space in the Town Centre North development. With the changing shopping habits and the need to adapt to evolving lifestyles, incorporating residential components into the area can bring vitality and a sense of community. However, we also believe that there is a strong desire from the public for high-quality leisure and shopping facilities. Therefore, we envision a mixed-use regeneration of our sites that combines residential, leisure, and retail spaces. By creating a diverse and balanced environment, we can cater to the needs and preferences of both current and future residents while ensuring that the town centre remains an attractive destination for leisure and shopping activities.</p> <p>One particular aspect that we would like to highlight is an opportunity for the former cinema site which presents a unique opportunity to establish a pedestrian corridor from Kitson Way through to Market Square via Eastgate. Currently, this linkage is not provided by the proposed Strawberry Star</p>	<p>The Council agrees with the comments and the mix of proposes uses and an important pedestrian corridor linking Kitson Way to Market Square via East Gate. The site brief for this site and neighbouring buildings refers to ground floor mix of uses as well as potential workspaces. It also refers to this site, as set out in the Town Centre Masterplan SPD (TCMF SPD), as being redeveloped to incorporate the link through and some design elements to consider. Therefore, it is not considered necessary to make changes to the brief.</p>

			development, and it was a concern we raised in our objections during the planning application phase. We strongly believe that creating this pedestrian corridor would greatly enhance connectivity within the area, promoting a more walkable and accessible environment for residents and visitors alike.	
3.	Edward Vine	Impact of development on wind tunnelling	Looking at the artists sketches of the design of the buildings ie due to the shapes, there will be winds generated by the simple barrier effect that'll add to winds caused by narrowing and channeling (Bernouli Effect) and the effects caused by sharp corners. With Climate Change weather events will be more extreme and so will wind and storms, the cluster of moderate to 16 story high rise buildings will magnify the effects with possibly extremely bad consequences. I would strongly urge the Council to focus on these concerns when examining any proposals and insist on evidence from both through and rigors wind tunnel and virtual computer modelling.	
		Cultural place, facilities and design	<p>Harlow does have a tremendous potential to develop as a cultural festival centre like Cheltenham we are accessible, have the space, the town park , the Playhouse, Henry Moore, Parndon Mill and so much more capable of development as Arts and entertainment Centres and still a country town set in the Stort Valley..... We need park and ride and the centre to be leisure, sport and entertainment. Shopping has already gone online and to centres around the perimeter of the town by natural and popular patterns of behaviour.....The architectures of St Paul's Church (now Pentecostal Church), the Playhouse, the Multistory Car Park, the Harvey Centre, the original Town Hall, Terminus House and Joseph Rank House are a completely random and very unappealing mix that actually drives people, visitors and shoppers away from the town.</p> <p>The greater the number of shops in the town centre greater the problem....of congestion... Hence put the shops around the perimeter of the town with Park and Ride blocking commuters traffic.</p> <p>The advantage of making the town centre leisure, entertainment, culture and sport with restaurants and some shops and a redeveloped pah is that the capacity needed does not need to be as great as a full on shopping centre.</p>	Harlow Council notes concerns over wind tunnelling that may occur with high rise buildings and the Council has set stringent guidance on how this should be managed and considered in the design of buildings (set out in the TCMF SPD and amenity policies in the HLDP). This will be an important consideration when determining an application and appropriate information will need to be provided by an applicant to evidence this. The brief notes that there needs to be a mix of uses in the town centre including leisure and entertainment and that Town Centre North should be attractive to these uses, but it is also important that it still serves retail needs as a sub- regional centre and given the amount of new homes being delivered. The potential for park and ride will be considered for the HGGT but there needs to be a level of attraction to commuters as well as shoppers to make this viable and working from home will impact this. Putting shops around the town will still create unsustainable transport movements such as those made to the retail parks. We note the comments made and concerns, but no change will be required to the development brief

				itself.
4.	Environment Agency	Green and open spaces	<p>We welcome the provisions for pedestrian access.... the identification of a 'green link' to connect the Wych Elm area to the Town Centre North area..... welcome the objective to significantly 'green'.... as well as the introduction of formal and informal Green Infrastructure.</p> <p>We note that more could be done to improve biodiversity....like green roofs and green walls, as well as the use of bee bricks, bat bricks or bird nest boxes throughout new buildings. To help create resilience places, the development brief's commitment to delivering 10% Biodiversity Net Gain should also be strengthened.... Natural England have recently published new guidance known as the Green Infrastructure Framework...includes a Green Infrastructure Planning and Design Guide....and should be used to inform your development brief for Town Centre North.</p>	<p>We appreciate the comments made about biodiversity with examples as well as Biodiversity Net Gain. The Council has a separate GI and Open Spaces SPD which includes all of these elements ensuring they are considered and delivered in new developments. The TCMF SPD also includes several GI schemes for this area within it as well as a section on public realm. These SPDs have more weight in the brief which itself refers to both SPDs as important material considerations. However, as it is recently published, the Council will include reference to Natural England's Green Infrastructure Framework in the supporting documents section of the brief.</p>
		Sustainable drainage systems (SuDS)	<p>We recommend the use of Sustainable Urban Drainage Systems (SuDS)..... Ponds, reedbeds and seasonally flooded grasslands can (also) be particularly attractive features within public open spaces. SuDS involve a range of techniques including soakaways, infiltration trenches, permeable pavements, grassed swales, green roofs, ponds and wetlands. As such, virtually any development should be able to include a scheme based around these principles. In doing so, they'll provide multiple benefits and will reduce costs and maintenance needs.</p>	<p>The Council notes the comments and agrees with this. The brief refers to the need for suitable drainage systems being in place and the Council's GI and Open Space SPD refers to SuDS features as important for mitigating drainage but also for Blue Infrastructure. No specific additional text is to be included in the brief.</p>
		Groundwater and contaminated land	<p>We are pleased to see the Harlow Town Centre North introduction and background report acknowledges the presence of Secondary Aquifers and associated drinking water abstractions at the site. However, the constraints list should be updated to include the Source Protection Zone 3 (SPZ3) located across the site, and the associated sensitivity to groundwater. Site specific geology will need to be considered for developments where deep piles foundations are proposed. Should deep foundations penetrate through the London Clay to deeper, more sensitive aquifers, then it is likely that a Foundation Works Risk Assessment (FWRA) would be required to ensure that the risks to groundwater are minimised. It should be ensured that any preliminary risk assessment and subsequent site investigation and remediation strategies at sites with land affected by contamination should</p>	<p>The brief will be updated to refer to the Source Protection Zone (SPZ3) as part of the constraints section and further details of when a Risk Assessment may be required. Reference to infiltration SuDS not being located in unsuitable and unstable areas will also be included.</p>

			<p>be undertaken by a competent person.</p> <p>Infiltration SuDS should not be located in unsuitable and unstable ground conditions such as land affected by contamination or solution features. Where infiltration SuDS are to be used for surface run-off from roads, car park and public or amenity areas, they should have a suitable series of treatment steps to prevent the pollution of groundwater.</p>	
		Site Allocations	<p>The following advice relating to the protection of groundwater should be considered for all site allocations: • Specific National Planning Policy Framework (NPPF) paragraphs 174 and 183 should be considered. • Relevant guidance such the Environment Agency’s Approach to Groundwater Protection and Land Contamination Risk Management (LCRM) should be promoted. • The Approach to Groundwater Protection should be considered with regard to development proposals that we would object to in principle. • Policies should require developers to submit a Preliminary Risk Assessment (PRA) together with a planning application where land is potentially contaminated. • Policies should require developers to ensure sites are suitable or made suitable for intended use. • Policies should require developers to prevent discharges to ground through land affected by contamination.</p>	<p>The Council notes the comments and the advice for specific sites and will ensure that when detailed applications come in that these are considered, and the Environment Agency notified where appropriate. However it is considered that these comments are too detailed to be included in the site specifics at this time and instead will form part of the pre-application discussions or application requirements.</p>
		Kitson Way Petrol Station	<p>With respect to the proposed redevelopment of the petrol station, we recommend the removal of all underground storage tanks (USTs) that are unlikely to be reused. Once the tanks and associated pipelines have been removed, samples of soil and groundwater should be taken to check for subsurface contamination. If soil or groundwater contamination is found, additional investigations (possible including a risk assessment) should be carried out to determine the need for remediation. Please refer to ‘Pollution Prevention Advice and Guidance on Storing and handling materials and products’ and ‘Defra - The Groundwater Protection Code: Petrol stations and other fuel dispensing facilities involving underground storage tanks - for England and Wales’, specifically those sections relating to decommissioning redundant underground fuel storage tanks and infrastructure</p>	<p>There is an existing planning consent for the Kitson Way Petrol Station and it is assumed that these elements have or will be considered for the site. However, the Council agrees that some additional wording will be included in the site briefs that include this site to reference the requirement for samples and possible investigations/risk assessments may be required once tanks and pipelines are removed.</p>
5.	Essex County	Infrastructure	<p>The document currently refers to the potential need for developer contributions to fund additional primary school places (within the town). ECC</p>	<p>The brief will be amended within the Infrastructure Contributions section to also refer to the potential</p>


	Council	Contributions	advises that this need may equally apply to a need to fund and provide additional secondary school places through developer contributions, so ECC recommends making this change through minor additional wording. This change will be of benefit to users of the Brief (applicants, developers etc.), to HDC and to ECC. Please also retain the word 'potential' in this context, since we anticipate that there may be instances when this requirement would not necessarily apply in every case.	need for secondary school places.
6.	Essex County Fire and Rescue Service	General comments	<p>Having reviewed the consultation document, at this time Essex County Fire and Rescue Service would ask that the following are considered during the continued development of Harlow Town Centre North:</p> <ul style="list-style-type: none"> • Use of community spaces as a hub for our Prevention teams to deliver Fire Safety and Education visits, with the shared use of an electric charging point. • Adherence to the requirements of the Fire Safety Order and relevant building regulations, especially approved document B. The inclusion of decorative architectural features to reflect the original New Town design should also be selected so as to reduce fire spread. • Installation of smoke alarms and/or sprinkler systems at suitably spaced locations throughout each building. • Implementation of vision zero principles where there are introductions of or changes to the road and pedestrian network. • Appropriate planning and mitigations to reduce risks around outdoor water sources. This in particular reference to keeping members of the community safe around outdoor water spaces preventing death or injury to those who may enter the water either deliberately or accidentally. • With the area being within a Secondary Aquifer we would urge serious consideration of how the wastewater network can be designed to minimise risk from water run off from a significant fire or chemical incident. • Suitable principles in design of buildings and the built environment to avoid deliberate fire setting. • Consideration for road widths to be accessible whilst not impeding 	<p>The Council welcomes the detailed comments that the Essex County Fire and Rescue Service has submitted and this has been considered carefully to determine if the brief requires any amendments. The brief already makes reference to implementing New Town designs and the consideration of the secondary aquifer in relation to the submission of applications.</p> <p>The other comments made are very important factors when considering the development of individual sites and the area as a whole (in respect of public spaces and how road improvements are delivered). The Council considers the comments to be too detailed for this stage of the development brief and some of these requirements are already set out in the Council's Validation Checklist (also referred to in the brief). However we will work closely with Essex Fire and Rescue during masterplanning, pre-application and planning application stages to ensure that these elements are fully considered and form part of the development of any scheme. This includes Council led regeneration projects and public realm improvements.</p>

			<p>emergency service vehicle response through safe access routes for fire appliances including room to manoeuvre (such as turning circles).</p> <ul style="list-style-type: none"> • Access for Fire Service purposes must be considered in accordance with the Essex Act 1987 – Section 13, with new roads or surfaces compliant with the table (<i>within submitted response</i>) to withstand the standard 18 tonne fire appliances used by Essex County Fire and Rescue Service. • Implementation of a transport strategy to minimise the impact of construction and prevent an increase in the number of road traffic collisions. Any construction activity and the subsequent finished development should not negatively impact on the Service’s ability to respond to an incident in the local area. We note the mention of a dedicated bus link via Velizy Avenue – consideration of how this may effect emergency service response throughout the development should be considered. • A risk reduction strategy to cover the construction and completion phases of the project. • Implementation of a land management strategy to minimise the potential spread of fire either from or towards the development site. • Consideration of the design and location of electric vehicle charging points and battery energy storage systems throughout the development so that malfunction in these systems does need lead to the escalation of the incident. • Consideration of the design and layout of public performance spaces so as to minimise the risk of terrorist attack but enable an appropriate emergency response in the event of an attack. 	
7.	Essex Police	General comments	<p>We have reviewed the content of the draft development brief and although we have no direct comment to make on the proposed brief at this time we have attached for your information, the Essex Police considerations to development and infrastructure change which forms part of the organisations strategic planning considerations.</p> <p>As a key emergency service provider, this document outlines information on</p>	<p>The Council welcomes the comments and the document provided on Essex Police considerations – the document refers to Designing out Crime which we consider as part of planning applications and principles set out in the Essex Design Guide which also inform our decision making and is referred to within our Harlow Local Development Plan. Although we do not recommend</p>

			Essex policing priorities and provides the organisation's initial considerations to development and infrastructure proposals within the county.	making changes to the brief, we welcome working together with Essex Police on more detailed proposals as they come forward.
8.	Harlow Civic Society	Overall comments	Harlow Civic Society welcomes the production of the Town Centre Masterplan Framework and this Development Brief for the north part of the Town Centre. We believe that these documents are essential to mitigate the risk of piecemeal and inconsistent development of this area. In our view, this area is the part of the Town Centre most in need of regeneration that is not already planned. This is particularly challenging given the range of sites and buildings and different land ownership. Broadly, we support the objectives, approach and principles set out in the draft Development Brief. We welcome the recognition that there are important buildings in this area strongly representing the architectural qualities of the New Town, in particular, The Rows, Market House and Adams House	The Council notes the comments made.
		Comprehensive Development Schemes	We note the comments that comprehensive schemes covering some adjacent sites would be supported. This applies to Development sites A and B and the Kitson Way Petrol Station, car park and Joseph Rank House sites. We agree with this and suggest that more emphasis should be given to the desirability of comprehensive schemes to minimise incremental and incoherent developments coming forward. Certainly, the need for schemes to consider the relationships and designs of adjacent schemes should be stated. We recognise the challenges of achieving comprehensive schemes across differing land ownership and with some sites having existing planning permission.	The Council notes the comments made and the brief ensures neighbouring sites are considered when bringing forward development sites – this is set out within the individual site brief notes.
		Specific site comments	<ol style="list-style-type: none"> 1. <u>Stone Cross Square</u> We agree that this is a priority area for regeneration. 2. <u>Post Office Road Car Park</u> We strongly support the creation of an urban park and gardens on this site. Existing trees should be retained. A meaningful link from Market square is essential for this to work. This area must be retained as a public space. We suggest that the full realisation of this requires the redevelopment of the Royal Mail Delivery Office so that the current parking of delivery vehicles here can be removed. 3. <u>West Square</u> Gibberd had the idea of a 'Winter Garden' here and we believe that this proposal should be resurrected as part of improvements. 4. <u>Adams House</u> We strongly agree with the statements about the importance of the clock and tiling on Adams House. We believe that the original colonnade on the west side should be reinstated and linked to a new, 	<u>Stone Cross Square</u> – Note comments <u>Post Office Road Car Park</u> – Note comments <u>West Square</u> – proposals are already in place to improve this area through the Strawberry Star scheme <u>Adams House</u> – agree that some form of shelter will be required to encourage more seating and a café culture but this may not be in the form of a new colonnade <u>Royal Mail Delivery Office</u> – The site brief for the Delivery Office suggests a 4-6 storey building which would reflect the part 3/5 storey Adams House. Reference to the potential demolition of the

			<p>wider access between Market House and the former Post Office to provide the meaningful link to the proposed Post Office Road urban park.</p> <p>5. <u>Royal Mail Delivery Office</u> We agree that this should be relocated as it currently forms an impenetrable barrier. We would support a residential block on the east of this site, no higher than Adams House. The standalone units in Post Office Walk, currently unoccupied, should be demolished as part of this.</p> <p>6. <u>Development Site A</u> We agree that the development here next to the Velizy/5th Avenue roundabout must be exemplary and suggest that it could be the subject of an architectural competition.</p> <p>7. <u>The Rows</u> The access to Post Office Road by Bird Cage walk would require little improvement to make it attractive. The proposed demolition of 21 The Rows should benefit access here.</p> <p>8. <u>Joseph Rank House</u> Again, we suggest an architectural competition for the building that will replace the current one.</p> <p>9. <u>The Old Cinema</u> This must be redeveloped, and we agree that its relation to the adjacent sites must be considered.</p>	<p>standalone units will be noted subject to suitable relocation of any uses in there.</p> <p>Development Site A – Agree that this site with Development Site B could be subject to an architectural competition of delivered together or just site B if delivered independently due to its scale. Wording to refer to this to be included.</p> <p><u>The Rows</u> – Note comments</p> <p><u>Joseph Rank House</u> – as above, amendments will be made to refer to an architectural competition if brought forward comprehensively with the car park</p> <p><u>The Old Cinema</u> – Note comments</p>
		Health Uses	A number of sites mention possible Health uses, including the provision of a Health Hub. This could be provided on the Addison House site nearby, where we understand that accommodation may become available.	Further work is required with the HWE ICB on this. But the brief will remain as it is to provide the flexibility of uses and potential locations if this is considered a requirement in the town centre and other sites are unable to accommodate the hub.
		Relation to Sites to the North of the Town Centre	The brief does not include areas to the north of Fourth Avenue. More detail about links for pedestrians to this area, from the Telephone Exchange in the east to the former site of the Square in the west should be added. In particular, there is a need for a proper at-grade crossing to the Sainsbury site.	The brief only refers to opportunity area 3 in the TCMF SPD. The TCMF SPD provides a comprehensive masterplan for the town centre which looks at improving connections across the entire area including between opportunity areas. This includes improved crossing points to Sainsbury's which is also referred to in the site brief for Development Site B.
9.	Historic England	General comments	Welcome the numerous references to the special qualities of the New Town of Harlow, and its unique post-war heritage assets.	Note comments
		Detailed comments	Development within the Town Centre North area has the potential to enhance the setting (and appreciation) of the Grade II listed sculptures via improvements to the public realm. Conversely, inappropriate development here could harm the significance of these designated heritage assets via changes to their setting.....having reviewed the Brief it is not clear how	Note comments and will add additional information that development proposals will be expected to conserve and enhance the sculptures and that a proportionate HIA will be required to inform and accompany any development.

			would-be developers should respond to these important designated heritage assets. We therefore recommend that the Development Brief is amended to make explicit that Development proposals will expected to conserve and enhance the significance of the Grade II Listed sculptures, and to stipulate that a proportionate Heritage Impact Assessment (HIA) will be required to inform and accompany any development proposals which could affect these designated heritage assets via a change in their setting.	
10.	Hybrid on behalf of Martorana Properties	Aylmer House Site	<p>The proposed enhancement to the building, the inclusion of residential floorspace and the additional 1-2 storeys is supported façade of Aylmer House is supported.</p> <p>It is emphasised that regeneration opportunities which contribute to housing growth, is a significant consideration when looking at development options for Aylmer House. NPPF para 120 states that it is especially important that planning policies support opportunities to use airspace above existing residential & commercial premises for new homes. Likewise, and in light of changing fire regulations and increased build costs, flexibility must be given in terms of proposed heights to ensure homes are viably delivered.</p>	Comments are welcomed and noted. No changes to the brief are required.
11.	Joe Ephgrave	General comments	<p>Worried we won't get those revolutionary aspects that were originally proposed to completely transform the Town Centre and particularly that part of the town centre such as the: Open cinema, A Thriving Market for tradespeople, High end bars, pubs, restaurants, coffee shops.</p> <p>New modern facade for nearly all buildings in this part of town is needed including Market House but retain the historic clock and tiles.....new natural play parks and areas for 12-18 year olds etc. green spaces etc. would help to completely transform that area if executed with high ambition. A thriving market would need to have low pitch fees to attract quality traders/businesses, well marketed/promoted to rival effective markets such as North Wield, would also need to be on Saturdays and Sundays (as well as during the week)....helping to increase footfall.</p> <p>A proper Outdoor Cinema has the chance to be one of its kind with nothing similar in nearby regions which would show ambition of Harlow to strive to be the best.</p> <p>Are all of those things above still on the plan of action?</p> <p>In addition to this, when you look at the forums, people young and old have</p>	The intention of this development brief is to identify regeneration and development proposals, which will seek to stimulate investment in this area from developers, retailers and businesses so we can attract the uses identified in the comments. The TCMF SPD and Future Towns Fund work identified the potential uses for Stone Cross Square and feasibility work on various uses for Stone Cross Square will be undertaken to make sure that the space is utilised properly and not left redundant. This includes the potential for live outdoor space, seating and potential market stalls (if viable). The Council cannot directly control the amount of police that would patrol an area but our Community Safety team work closely with them and the proposals that come forward in this area will follow Secure by Design principles and Designing Out Crime to ensure spaces feel more safe to move around in. No specific changes will be made to the brief as a result of the

			<p>suggested we need to attract: Zara, Waterstones, Lush, M&S, Footlocker, Foot Asylum, Bravissimo, Flying Tiger, Disney, Lego, TGI Fridays, IKEA (but not necessarily in the Town Centre), Indoor Market, Market</p> <p>Basically, everything that is in this image is needed:</p>  <p>Taking from Future High Streets Funds Proposals document</p> <p>The Strawberry Star D&A Statement also has a fantastic plan for Harlow: Lastly, real Police Patrolling the area 24/7 is also needed (even if only 1-2). People want to see police patrolling the streets proactively to feel safe.</p>	<p>comments but we note the response and options of what we could do in this area and how design could be improved (which is a big focus of the brief).</p>
12.	<p>Lawson Planning on behalf of Princess Alexandra Hospital</p>	<p>Parking provision</p>	<p>The Hospital currently relies on the supply of parking provided in part by the multi storey car parks at the north end of the Town Centre, which are proposed to be demolished and redeveloped and a suitable level of re-provision to be provided, within the Hospital site itself in particular. The Trust welcomes the proposal to undertake a parking strategy for the town centre.....and would be pleased to liaise with the Council to identify potential solutions....the Trust is in the process of identifying alternative options to address its parking requirements and would welcome the Council's support to progress these solutions to compensate for the loss of essential public parking spaces within the Town Centre North area. However, there needs to be acknowledgement and general support for compensatory parking to be provided on the Hospital site, including a temporary decked car park and additional surface parking.</p>	<p>The Council notes the comments made about the need for alternative parking provision for the hospital as it remains at its existing site and for any future healthcare presence in this location. The brief will include additional wording to reference the need for alternative provision for PAH and that this may be considered on the existing PAH site. This is still subject however to planning policies, safety etc.</p>

		Healthcare impacts	The Trust wishes to clarify that contributions towards mitigating impacts on healthcare provision would encompass acute healthcare services and facilities, as well as primary and other healthcare provision	Note comments. The brief wording around 'healthcare' will be retained and these detailed discussions on types of healthcare will be had at the point of S106 negotiation.
		Kitson Way Multi-Storey Car Park	As stated above additional interim parking provision will be needed and should be planned for including additional on-site capacity at the Hamstel Road site. In the interest of certainty, it is requested that this position is acknowledged and supported by HDC within the Development Brief... it is likely that a suitable healthcare presence would be retained within central Harlow...there may be an ongoing need for parking provision for staff and visitors to the retained and future healthcare facilities, which should be taken into consideration as part of the proposed parking strategy for the Town Centre	As above, additional wording to be added on reference to parking may be required on existing PAH site as alternative provision will be required. This will form part of the parking strategy for the town centre.
13.	National Highways	General comments	Upon the review of this document, we note that National Highways does not have any significant concerns or comments to raise. However, it is of keynote; National Highways is consulted on a regular basis in relation to any new developments or changes to schemes that could have potential impact on the SRN in the area. As a general rule, we would consider any new development which proposes to generate more than 30 two-way movements per hour on an SRN link to be modelled in order to consider the potential impact and capacity implication of the new development on the existing network, we request this matter be considered if/ when the proposed sites set out within the Individual Site Brief list are taken further forward	Comments are noted. No changes required to the brief.
14.	Natural England	No comments on the brief	N/A	N/A
15	Royal Mail Group Ltd (from Cushman & Wakefield)	General comments	Royal Mail are under some of the highest specification performance obligations for quality of service in Europe. Meeting Universal Service Provider obligations is in the public interest and this should not be affected detrimentally by any highways or development project.....The site is responsible for up to 56 operational delivery vehicles with proposed increase due to introduction of dedicated parcel routes, with 158 members of staff employed at the site and responsible for the loading and unloading of	The Council notes the comments and concerns raised by Royal Mail and will ensure that ongoing discussions and engagement is had with them and their consultants. Additional wording on Development Sites A, B, C and Market House will set out the potential noise impact

		<p>mail.....There are no plans to vacate Harlow DO in the short or medium term and the site is not currently available for redevelopment. However, Royal Mail acknowledges the need for new homes across Harlow and given the plan period is up to 2033, Royal Mail considers the allocation to be appropriate should Royal Mail operations at this site be relocated in the longer term.</p> <p>Royal Mail has concerns around the introduction of residential dwellings in close proximity to the site as these will likely be subject to existing noise from Royal Mail operations, particularly during late night and early morning hours. Furthermore, Site Allocation 'B' would result in the loss of carparking space currently used by Royal Mail...Royal Mail are willing to continue discussions with the council regarding the proposed Town Centre North Development Brief and the possibility of relocating the existing DO.</p>	<p>that the current Royal Mail operations may have and that mitigation measures will need to be put in place.</p>
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