	Consultee	Page/Para/Table	Summary of Representation	Council Comments
				Changes to be made to the brief are highlighted in
				bold
1.	Affinity Water	N/A	No comment	N/A
2.	Arriva Depot	Overall comment	No concerns, however interested to understand where a relocated depot could go	Relocation strategy principles to be included in the
			to and concerned about redevelopment happening around them and the unfair	brief but further discussions required with Arriva to
			pressure from residents who may complain about noise/light in unsociable hours	determine specifics and put together a more detailed relocation plan.
3.	Essex County	Overall comment	Comments centre around what a site would have to consist of or contain in order	As above – include paragraphs on relocation of uses
	Council Fire and		for it to be considered a suitable relocation site. This includes access to major	taking into account these requirements. Parcel F
	Rescue Service		roadways and local crews by walking/cycling/public transport, impact on	could also incorporate community facilities and fire
			surrounding uses, inclusion of a drill tower, a command office block and command	station together as an alternative to parcel E and this
			building, breathing apparatus area and a SERV Tank. Furthermore it would be	is already suggested in the brief.
			beneficial to incorporate a modernised fire station with local community facilities,	
			community centres or schools taking into consideration safety of public.	
4.	Thames Water	Section 5.1	Section 5.1 states "However suitable sustainable urban drainage systems will need	Change will be made to section 5.1
			to be considered as part of any development proposal.". The wording can be	
			strengthened to state "However, suitable sustainable drainage systems will need	
			to be incorporated into any development." Incorporating the requirements at an	
			early stage of design can help to ensure that their benefits are maximised and that	
			systems are not added as an afterthought.	
			There is no reference to sewerage infrastructure within the brief. While most of	Changes will be made to reference sewerage
			the sites are not anticipated to result in concerns the impacts can vary dependent	infrastructure in the brief
			on the final scale of development, timing of delivery and point of connection to	
			the existing networks and cumulative impacts of development both within the	

			Development Brief area and outside need to be considered. As such it would be	
			beneficial to add reference to the importance of early engagement with Thames	
			Water to discuss wastewater infrastructure requirements that may be needed to	
			support development to ensure that proposals accord with Policy PL11 of the	
			adopted Local Plan. Where there are concerns it may be necessary for phasing	
			conditions to be used to ensure the relevant phase of development is not	
			occupied until any necessary wastewater infrastructure upgrades are in place.	
		Wych Elm Land	Likely to require upgrades to wastewater due to scale of development. It is	Wording has been added to this Land Parcel in the
		Parcel F	recommended that the Developer and the Local Planning Authority liaise with	brief
			Thames Water at the earliest opportunity to agree a housing and infrastructure	
			phasing plan. The cumulative impact of other developments within close proximity	
			needs to be considered as they drain to the same network.	
		All 11		N
		All other parcels	On the information available to date we do not envisage infrastructure concerns	Noted
			regarding wastewater networks in relation to this development/s. It is	
			recommended that the Developer and the Local Planning Authority liaise with	
			Thames Water at the earliest opportunity to advise of the developments phasing.	
			The cumulative impact of other developments within close proximity needs to be	
			considered as they drain to the same network.	
5.	Natural England	N/A	No comment	N/A
6.	National	N/A	No comment	N/A
	Highways			
	-			
7.	Mr Harris	Overall	Safety is currently an issue due to darkness and pavements	1. Agree and noted
		comment	2. The abutment to the (dark at night) woods will continue so there is a certain risk from there. Can this be addressed in some way?	The aim of the brief is to turn development onto the path in order to provide natural surveillance
			Car parking is needed for the various medical practices opposite (Addison	and better lighting as well as other public realm
			House). Their own parking is very limited. The close at hand parking at Wych	improvements
			Elm is vital.	3. The brief looks at options of retaining parking in
			4. Good lighting is needed generally	this area
				4. Agree and noted.

8.	Bus Station/ Car Parks Supervisor – Harlow Council	Overall comment	Would like to be kept involved of any future discussions on the car park in particular. Please consider the original design features of the bus depot building which reflects the heritage of bus depots built between 1930s and 1960s.	Noted
9.	Harlow and Epping Co- operative Party	General comments	Building height — Permitting more high-rise residential blocks risk over development. Affordable homes — chronic need for affordable homes which are good quality and should be built in larger numbers and consider delivery of this on this site positive. Infrastructure — impact on infrastructure is a concern, provision for health and education. Addison House and PAH are already overstretched. Significant pressure on local water supplies and what will happen when effects of Climate Change are felt locally. Sustainability — homes should be efficient as possible, with solar panels, harvest rainwater as examples. Roads - Although public transport and the National Cycle Network are within easy reach of the site, and people should be encouraged to use them to the full, we cannot believe that each dwelling will result in an average of any less than at least one car per household. How will local roads cope? Contributions - those undertaking or profiting financially from the development should be compelled to pay for the majority of the necessary upgrades to local services to support the new community being built in the longer term. Displaced services — must ensure that vital services at Wych Elm are relocated to suitable accommodation or incorporated into new developments. It would be unsatisfactory for services to be re-houses in vastly more expensive premises.	Building height – the town centre masterplan SPD identified appropriate areas for tall buildings across the centre and provided detailed guidance on how tall buildings can be successfully delivered. The brief has been guided by these principles and applications will need to ensure they have taken this into account and the Design Guide addendum tall buildings guidance. Affordable homes – additional wording will be added about affordable homes being required – this is already a policy requirement in the Local Plan although this is subject to viability. Infrastructure – the Council will work closely with the infrastructure providers to ensure that the right infrastructure is provided across the town from developments coming forward including the preparation of an up-to-date Infrastructure Delivery Plan. The brief already considers the potential for health facilities if required and it has been determined that a new school is not required although contributions towards education provision will be. Sustainability – there is already enough guidance in Local Plan Policy PL3, the Design Guide addendum, HGGT Sustainability checklist and Building Regs to ensure buildings mitigate against climate change and are efficient. Roads – the reduction in parking levels is to encourage people to use more sustainable modes of transport thereby reducing congestion on the roads.

				The mode share target is set out in the HGGT Transport Strategy. <u>Displaced services</u> – note comments and paragraphs on relocating uses to be included in the brief. Although more detailed requirements for each use will need to be established outside of the development brief process working with the individual businesses. The brief already considers options to maintain existing uses within new development schemes on the site.
10.	Separate comments from Cllr Chris Vince (in addition to rep 9. above)	General comments	Building Height - Concerns about the height of the building that could potentially be erected The highest building should not be an eyesore for residents in these areas still have concerns about the 14 storey proposal for land parcel C and local businesses share these concerns. Types of housing - Welcome seeing social rent being considered in this scheme. Design and effect of piecemeal development - Concern with a piecemeal approach to regeneration is that the new development will be less successful due to the undeveloped areas. Supporting existing services/organisations - Wych Elm is home to some important local services, not least the ambulance station, fire station, Rainbow services and Streets2homes. These organisations are vital to the wellbeing of our town and alternate accommodation must be provided if they are not to maintain premises in the area. Personally I would be against relocation as I believe this is a good location for them to be in. PAH – New hospital has been pushed back and in the meantime we must ensure that the redevelopment does not lead to any disruption to the hospital or to the ambulance station itself. Any development should consider how they can make it easier for ambulances and other vehicles can traverse the area. The current one way system must be maintained. I would like to see a walk in centre reintroduced	Building Height - Please see comments made under rep 9. in respect of ensuring appropriate building heights. Types of housing - Will add reference to affordable housing to the brief but the product will be determined through applications and not stipulated specifically in the brief. Design and effect of piecemeal development - The brief promotes and champions a comprehensive approach but is flexible to the fact that some sites could be delivered quicker so as long as the requirements of the brief are considered. Additional paragraphs on phasing have been added. Supporting existing services/organisations - please see comment sunder rep 9. in respect of maintaining or relocation existing uses. The Council has consulted the Fires and Rescue Service who have stipulated requirements for a relocated site. The fire station, and ambulance station, will remain where they are if this is still the most suitable site for them.

			to the area as it would relieve pressure on the A and E of PAH which we know is under huge pressure. The fire station must be maintained at the current site and I would fervently oppose any alternative proposal. Community safety - The current cycle path which runs down the back of Wych Elm and backs on to Rectory wood is unsafe due to all buildings opening up on to Wych elm with their backs to it. This is something that could be considered, particularly with the ambulance station which is used 24 7. Green areas - There is little green area except at the front of the area and what there is not maintained and often has parking on it. This should be considered but it must be maintained. The areas between bus station and underpass is inaccessible and wasted.	Reference to uses remaining on their sites if alternative suitable sites are not available has been added to the brief. Officers are in contact with the Herts and West Essex Integrated Care System about a potential healthcare hub in this location as set out in the brief. It is noted that a one-way system may assist in ambulances in this area and this will be noted in the brief. Community safety - Noted and the brief aims to tackle the issue of the northern path through
			Accessibility - It is also hugely important that the area is accessible for wheelchair users. Currently there is no pedestrian walkway around Wych elm and people have to go on the road to get from one side to the other which is potentially hazardous, particularly for wheelchair users. Clearly this isn't helped by cars parking on the pavement around the current site of the gym. Traffic flow - Huge issue as mentioned in various sections above. This needs to be considered in final proposal but also when work is going on. Current construction work has been very disruptive to local businesses, this is particular concern for businesses.	development opportunities. Green areas - Noted and the brief aims to tackle this issue. Accessibility - Noted and brief will make reference to wheelchair users and other users who may find it more difficult to move around the area. Traffic flow - Noted but no changes will be made to the brief
11.	Lawson Planning Partnership on behalf of Herts and West Essex	Policy Context	Target of 50% mode share and a higher percentage for Wych Elm is noted by flexibility of this target for patient and healthcare staff needs should be applied. Retained or re-provided healthcare facilities may not be in a position to meet this target but would work towards it. A decked/surface car park should be retained.	Comments are noted and some more flexible wording around mode share for healthcare facilities will be included in the brief.

	Integrated Care	Objectives for	Reference to healthcare services, safer and more attractive environment for	Noted
	System	the Wych Elm walkers and cyclists and improvements to GI is supported. area		
		Land Parcel A Strategy	Welcome recognition of parcel A for potential healthcare facility. Relocation of ambulance station would free up more space but would need to be confirmed with Ambulance Service Trust.	Noted
		Land Parcel B Strategy	Some patients vising healthcare facilities, and NHS staff members who work during unsocial hours, would require parking provision. The option to re-provide the existing multi-storey car park within Parcel B is supported but we would object against its relocation. Parking space numbers is dependent upon floorspace requirements and flexible wording in the brief is supported.	Noted – the brief included options for car parking provision in this area and the Council will work with H&WE ICS on future development proposals.
		Land Parcels C, E and F Strategies	Flexible active frontages at ground floor are considered acceptable and therefore suitable for health. This is supported subject to suitable car parking	Noted
		Climate Mitigation and Sustainability	Do the requirements of Local Plan Policy PL3 and Design Guide Addendum are superseded by recently amended Building Regs – further clarity required.	Will refer to Building Regulations in the brief as well as PL3 and Design Guide Addendum which are still of relevance.
		Vehicle Parking	Note the intention to encourage a low level of dedicated parking for new commercial workspace as well, potentially car free. But intentions for healthcare proposals is not considered appropriate and a flexible approach to parking is applied to health facilities in this area.	Noted and will be considered as part of further discussions with H&WE ICS in the future.
12.	Hybrid Planning and Development on behalf of 4, 5 and	Land Parcel C	Ripped Gym welcomes heights shown in Town Centre Masterplan SPD of 15 storeys. Proposed uses in the brief are supported and green link between Rectory Wood and Fourth Avenue will be considered as part of resubmission proposals	Noted
	10 Wych Elm	Land Parcel E – 5 & 10 Wych Elm	It is considered that residential uses at ground floor at 5 Wych Elm (brief states flexible uses) should be supported to avoid vacant commercial units and provide	It is considered that active ground floor uses provide a more pleasant and interactive environment and a mix of active uses could provide both day and night-

			better surveillance particularly along the footpath during evening as well as day. This is supported by Town Centre Masterplan Framework SPD drawings (Fig 165). Consider 10 storeys for 5 and 10 Wych Elm are most effective in this location and should be deemed acceptable in context of 4 Wych Elm and Wych Elm House. Tall buildings facilitate regeneration opportunities and enable them to be built viably.	time surveillance and use. This should be considered first before a solely residential scheme is put forward. Taller buildings may be considered acceptable, and the brief does refer to taller buildings potentially being acceptable fronting Fourth Avenue and the footpath. No further changes are therefore necessary to the brief.
		Land Parcel H	The Green Finger is supported and will be considered as part of proposals for 4, 5 and 10 Wych Elm. A masterplan showing this is included in the representation.	Noted
13.	Essex County Council	Table 1	Existing floorspace areas and jobs at Wych Elm are unclearit is not evident how existing uses relate 12,700sqm of non-resi in table 2. Lack of clarity on relocating off-site vs reprovision on-site. To resolve this it would be helpful to set out which existing uses are considered 'town centre uses'	The floorspace figures in table 2 are taken from the Town Centre Masterplan Framework SPD and are indicative and show what may be available on ground floors/first floors as shown in an indicative masterplan layout in the SPD. They do not entirely reflect the existing uses in Wych Elm in table 1 as no decisions have been made on what uses could relocate or form part of a redevelopment scheme. This is because officers still need to agree whether other suitable sites are available. The Council will add wording in the brief to make it clear that table 2 is indicative.
		Table 2	Not clear how floorspace figure in table (taken from TCMF) was derived at and may be insufficient	These are considered indicative (see response above). Will make this clear in the brief.
		Para 6.9	The requirements in this para are supported and considered appropriate	Noted
		Vision and objectives	Appears to be an opportunity to pursue an Innovation District for the town centre as a new asset and driver of growth. This would impact quantum of workspace required.	No further details provided on what an Innovation District entails, what it would include, how it would be delivered, floorspace requirements etc. Further

			discussions with ECC are required before this can be considered.
	Vision and objectives No. 1	Ground floor uses are to be prioritised for non-residential uses subject to evidence led approach. Also confirmed that a new primary school is not required for this location on the basis of projections of growth in this area and surrounding area. However, school expansion will be required and contributions required to fund this.	Changes to be made to the brief to remove the need for a new primary school in this location. Ground floor uses noted and already included in the brief. Contributions towards education to be noted in a planning contributions table which will be added to the brief.
	Objectives No. 1	Childcare requirements – funding will be required from developments for 17 spaces but this may need to be revisited in September 2022 and if provision at PAH site (in the grounds) is required to close then an extra 45 spaces will be required.	Will include additional wording in a new table on the need for contributions towards childcare spaces but the number of places is subject to the applications and final housing numbers that will come forward.
	Objectives No. 3	ECC suggests that this objective is also considered in context of establishing and maximising attractive, safe and direct walking and cycling safe routes to school & EYCC facilities (plus services including PAH and Sainsbury's superstore and Harlow Town Park)	The objective does refer to other services and facilities but will be expanded to refer to examples such as schools, town park etc.
	Development Strategy	A more specific delivery strategy should be added promotion of land equalisation between landowners/promoters/applicants. A phasing plan showing the short, medium and long term would be helpful to show prioritisation / compatibility of uses / quality of environment at each stage It is considered that developing a phasing plan with a rational narrative could help demonstrate how the overall vision and transformation could be achieved and to provide some prioritisation and realism to the development / delivery strategy.	Will add wording in a new delivery strategy section to refer to land equalisation and some info around phasing although this may be subject to change and the brief does already refer to which sites are short, medium, long term within individual parcel tables. A relocation section will also be included setting out what the requirements may be for a relocated site, although further detailed discussions will be required with landowners and businesses to set out specific requirements.

	It is suggested that some form of criteria/guidance is required for relocation/re-provision of important uses such as ambulance station/bus depot/ MSCP. A strategy should be developed. Potential or preferred role of collective public sector and Harlow Investment Fund could be factored into this. Opportunities for larger comprehensive schemes across neighbouring opportunity areas including Sainsbury's where there is a possible relationship with the car par in the meantime. The underpass crossing is also located here and it is unclear what happens before redevelopment is delivered.	It is considered that this area should sit independently from the Sainsbury's site due to the longer scale redevelopment opportunity of the Sainsbury's area and the existing interest in Wych Elm. This also ties in with the Town Centre Masterplan Framework SPD. However, if an opportunity arises to deliver services, such as parking, across both sites then this will be explored.
Land parcels A and B	Both parcels show 800sqm of workspace. It is questionable how these would be viable at this scale without sharing overheads.	These figures are considered indicative and further discussions will be had at planning application stage including the potential sharing of overheads through a comprehensive scheme.
Land Parcel B	Robust justification required for relocation of existing businesses in the interests of minimising disruption to economic activity/promoting economic vibrancy. It is recommended that holistic approach to car parking for Wych Elm and Sainsbury's opportunity areas (regards access and sustainable transport). Lower level parking at Wych Elm given its location to promote lower car ownership. If MSCP is retained its capacity could be reduced with residential above.	The brief already sets out a robust justification for the potential relocation of some uses although it may be favourable to retain some uses and incorporate them where appropriate within a comprehensive scheme. The brief allows this flexibility. Further wording has been added however on the issue around some uses remaining in the area due to the strategic location of Wych Elm close to the town centre and public transport. Please see reference above to holistic car parking approach with Sainsburys. The brief already notes the potential for the car park to include residential or other uses above.

		Additional school places	No section on developer contributions but note that developer contributions may be required to fund school expansion	As noted above reference to contributions to early years and also primary school education will be included in the brief.
		Landscaping, public realm and open space	 Provided further comments enhance section: Provision for 0.43 ha open space noted - potential for green buffers/ improving amenity area/ links to underpass New green link to be safeguarded to form part of the urban forest for the town Green space to be multifunctional Must deliver biodiversity net gain Public realm to be attractive with dual purpose street furniture Identify early stewardship of GI and connect to wider GI of town centre and beyond. Noe garden town wide stewardship model being developed and emerging garden town greenspace / GI plan, which could help to inform 	Noted and have included suggestions where appropriate although most points already included in the brief and in the Council's Green Infrastructure and Public Open Spaces SPD. Stewardship references to be added as well.
14.	Historic England	Scheduled Ancient Monument	Recommend that the Development Brief is reviewed to ensure that opportunities to enhance the setting of the Scheduled Monument – through appropriate design and layout of the development - are explored, and if necessary, inform revised design principles and standards.	Wording to be included to Land Parcels A and B on how they could look at opportunities to enhance the setting of the Scheduled Ancient Monument to the west.
15	Daniel Robinson & Sons Funeral Directors	General comments	Daniel Robinson & Sons were advised of being 'light industrial', and that Wych Elm would be a suitable location for us. We have continuously developed and improved the premises. Today, our business employs 120 people, with 50% of our team coming directly from the Harlow area. We support the nearby Princess Alexandra Hospital Wych Elm makes this extremely valuable and useful for the Hospital. We are the only funeral director in Harlow that has its own on-site, extensive mortuary facilities, enabling people to come to view their loved ones whenever they wish. In the last twenty years alone, we have invested over £1m in providing the community in Harlow with one of the very best funeral homes in the whole of	The Council notes the comments made by the business and that we recognise the existing businesses and operations which are located at Wych Elm and that they play a major part in the success of Harlow as a whole which is why some of the land parcels refer to uses being retained in the Wych Elm area if this is the best option for them – either where they are or as part of a wider improvement/regeneration project. The aim of the brief is to regenerate and improve the Wych Elm area and this will require investment in order to support that. The delivery of housing in this area will

the UK. Our facilities offer a central location in Harlow, therefore making them accessible to people via public transport.

Brief is biased for Harlow Council to achieve their aims with no regard for the healthy and thriving businesses that are currently based at this location, even though the area has been aesthetically neglected by Harlow Council for many years, with damaged kerbs and graffiti. The area has also been affected by the poor decision to split the town centre to Harlow Centre North and Harlow Centre South around 20 years ago, effectively resulting in a rundown area in what had previously been a busy trading area of Town Centre North, just over the road from Wych Elm. It now looks as if Wych Elm will be forced to go the same way. These proposals are not reviving a Town Centre, they are removing successful businesses and employment opportunities and creating a high-density housing estate.

Over the last eighteen months we have been badgered by developers seeking to 'sign us up' for their ideas for Wych Elm, to build high rise buildings for housing. We are now presented with this brief, completely out of the blue from Harlow Council, which has been collated with absolutely no consultation with ourselves, it has not been mentioned by any Councillor, Council officer, or external researcher or consultant.

In your Consultation Document our business name and nature doesn't receive a mention, there is no recognition of our business being in existence, something which is frankly quite dismissive and insulting.

I would like to highlight the following points:

- Presumptions are being made about what is and isn't suitable for a town centre location. This is a currently a light industrial area which you are aiming to turn into a housing estate.
- Total disregard has been given to a business that has served the Harlow community for over fifty years, has been in existence for 130 years, which provides vital services to local people, and employs a large number of local

help deliver and provide that investment and provide new homes that the district requires. The vision and objectives for the brief still support commercial uses, active ground floor uses and will support relocation where alternative suitable sites are available or where they are not suitable for town centre locations such as the more industrial uses in Wych Elm. The table on Page 4 of the brief notes the Funeral Directors as a land use in land parcel E. The potential redevelopment of Wych Elm was already identified in the Harlow Town Centre Masterplan Framework and the development brief builds on this adopted document with more detail and guidance for the area.

The Council notes the importance of the Funeral Directors in the community and that it would require access by public transport and be considered a town centre use. The brief has been amended in Land Parcel E to refer to the Funeral Directors as being a potential use to be retained within the Wych Elm site if a suitable alternative site cannot be found. The brief also includes an additional section on delivery including the relocation if uses has included a section within the development brief regarding relocation It notes that some businesses would benefit from being retained in the Wych Elm area including Rainbow Services and the Funeral Directors. If relocation is considered favourable and is supported, this section also sets out what a relocated Funeral

people, or to the other successful businesses that are based here, and have been here for many years.

- The nature of our business appears to be treated with disdain, something that needs to be hidden away from the area adjoining the Town Centre and in an industrial area, a location which we believe to be wholly inappropriate. The document has been prepared without knowledge of the current tenants and their needs being taken into consideration. In fact, our national research and experience concludes that funeral directors are indeed still a High Street location business.
- Our neighbours to either side of us in 'Parcel E' are our tenants, we may well start
 to lose revenue from leasing the properties as they are already showing concern
 about the proposals, they may start to look for new premises before they are
 forced to relocate.
- Wych Elm has needed a 'face lift' and a little care and attention for many years.
 All of the businesses here would actually benefit from support and encouragement in these difficult times, not an intention for the local Council to eradicate them or hide them away to start again in a new location. This area should be for business regeneration not business annihilation.

I would like to ask you, where would you wish to relocate Daniel Robinson & Sons, without detriment to our business and to reimburse the huge investment that we have made here?

This report has been badly proposed and quite frankly I am very disappointed with the high-handed way we have been delivered of these proposals. We have already had many people contact us with great concern about this and how it could impact on the service we have offered to generations of Harlow families.

Directors unit may require as per details in this representation.

The delivery strategy also specifically states: If suitable alternative sites are not identified for these uses and they are not available at the time an application is submitted for the land parcels, then they will remain on their existing sites or incorporated within a development scheme.

The aim of the brief is not to eradicate the businesses that are located in Wych Elm, it is to vastly improve the area and in turn help support trade, investment and business in the town centre as well as draw visitors back to this part of the town centre. The Council will work closely with the existing businesses (some of which would be better located in industrial areas) to ascertain whether a more suitable site can be identified to enable comprehensive schemes to come forward thereby avoiding piecemeal development in the Wych Elm area - as there has been considerable interest in development in the area. If no alternative site can be found then the Council will work with businesses and developers to incorporate uses within schemes or design developments around them carefully to ensure their long term viability is not affected.