

## CONSULTATION STATEMENT

### Design Guide Addendum Supplementary Planning Document



## **1. Background**

- 1.1. The Council already has an adopted Design Guide SPD which is used to assist Officers in examining design principles in new development, when determining planning applications.
- 1.2. The existing Design Guide was adopted in 2011 and although most of it is still relevant, it does not include guidance on a range of subject matters which are now addressed by recently-updated national planning policy and guidance. Many of these issues are now becoming relevant to Harlow.
- 1.3. Officers prepared a draft Addendum to the existing Design Guide which seeks to amplify and aid the effective and consistent implementation of the design, amenity and climate change policies in the HLDP, specifically Policies PL1, PL2 and PL3.
- 1.4. The draft Design Guide Addendum SPD includes five sections. Sections 1, 2, 3 and 5 are new supplements to the Design Guide. Section 4 provides additions to the existing Householder section of the Design Guide

## **2. Town and Country Planning Regulations**

- 2.1. The draft SPD was produced in accordance with the Town and Country Planning (Local Planning) (England) Regulations 2012. The relevant regulations relating to the consultation process are set out below.
  - Regulation 12:
    - (a) Requires the Council to produce a consultation statement before adoption of the SPD, this must set out who was consulted, a summary of the issues raised, and how these issues were incorporated in to the SPD.
    - (b) Requires the Council to publish the documents for a minimum 4 week consultation, specify the date when responses should be received and identify the address to which responses should be sent.
  - Regulation 35:
    - Requires the Council to make documents available by taking the following steps;
    - Make the document available at the principal office and other places within the area that the Council considers appropriate;
    - Publish the document on the Council's website.

## **3. Consultation and Responses Received**

- 3.1. The consultation period started on Thursday 22 July 2021 and closed on Sunday 17 October 2021, having been extended.
- 3.2. The Council complied with the legislative requirements for consulting on an SPD, as well as the requirements set out in the Council's adopted Statement of Community Involvement.

- 3.3. This included:
- notifications being sent to 210 people, organisations and businesses who have either recorded an interest in SPDs or are statutory consultees (see Appendix 3 for a full list);
  - a notice being published in the local newspaper (see Appendix 4);
  - posts about the consultation being made on the Council's social media channels;
  - hard copies of the SPD being available at the Civic Centre, Latton Bush Centre and libraries in Harlow; and
  - an online version being available on the Council's website.
- 3.4. Additionally a questionnaire was published on the Council's website (and advertised via social media) for members of the public to complete and return (see Appendix 5). Results of the questionnaire are detailed in Appendix 2.
- 3.5. In total, 51 people, organisations or companies responded to the consultation, including members of the public who completed and returned the questionnaire.
- 3.6. From these responses, 221 points were extracted which are detailed, along with a Council response to each, in Appendices 1 and 2.
- 3.7. The table below summarises the main issues raised during the consultation which required amendments to the draft Addendum.

Issue	Amendment
Guidance on how tall buildings can be designed to encourage physical activity should be added	Relevant text added
Impact of tall buildings on assets further afield should be considered	Relevant text added
Dual aspect requirement for tall buildings should be increased from 80% to 100%	Requirement changed to 90%, but flexibility allowed where strong justification provided
Dual aspect requirement for tall buildings should be lowered	See above
Green walls/roofs on tall buildings should be referenced	Relevant text added
18-metre privacy rule between houses not relevant in all areas	Amendment made to allow exceptions where the existing character of the area deviates from this, e.g. in the Town Centre
Guidance on how amenity space should be multi-functional to encourage physical activity should be added	Relevant text added
Minimum garden standards too high	Text amended to say that flexibility may

and onerous	be given where viability is an issue, subject to the submission of an independent viability assessment
There are some instances where it is not appropriate to provide a flat with private external amenity space (i.e. a balcony)	Amendment made to state that when reduced provision of balconies is sufficiently justified, high-quality communal amenity space should be provided to offset the lack of private amenity space
Importance of sustainable design in retrofitting (e.g. change of use) should be added	Relevant text added
Required level of internal planning is unlikely to be possible for all developments	Text amended to add that flexibility on this may be allowed where there are site-specific constraints
Climate change section not referenced enough in other sections, particularly the Tall Buildings section	Additional references added
Reference to community engagement needed	Relevant text added
Cross-reference to the Town Centre Masterplan needed	Cross-references have been added. However, these cannot be in great detail due to the Masterplan currently being in draft format. The full update to the Design Guide will be able to contain further cross-references and consistency after the Masterplan has been adopted
Other minor issues including requirement of clarifications or changes to wording to ensure consistency throughout the Addendum	Text amended/added where necessary

3.8. The following issues were raised which will be addressed in the full update of the main Design Guide (some of these are already present in the main Design Guide but would benefit from being updated):

- Guidance needed on:
  - providing Green Infrastructure and features beneficial to wildlife within development
  - impact of lighting on landscape and biodiversity
  - minimum distances between habitable rooms in flats as well as balconies
  - minimum distances for setbacks which are deemed insufficient in size
  - access from a dwelling to its garden
- Requirement needed for submission of landscape characterisation and

townscape assessments, and sensitivity and capacity assessments (may be addressed in the forthcoming Local Plan Review instead)

- Need identification of spatial areas most suited to tall buildings (likely to be addressed in the forthcoming Local Plan Review instead)
- Need clarification of the relationships between the various Essex, Garden Town, Harlow, etc. Design Guides
- Need good practice examples/illustrations of:
  - each category of tall building
  - boundary conditions
  - side elevations of housing
  - householder development, including well-proportioned works
  - high quality sustainable development

3.9. Other issues were also raised which did not require an amendment to the Addendum (or consideration in the full update to the Design Guide).

## Appendix 1: Schedule of Representations and Responses

Council Response key: **Amendment to Addendum made** **Issue will be covered in full update to main Design Guide (or other document)**

Consultee	Section/ Topic	Summary of representation	Council Response and Proposed Amendment
<b>Natural England</b>	GI	This SPD could consider making provision for Green Infrastructure (GI) within development. This should be in line with any GI strategy covering your area. <i>Info supplied on NPPF's approach to GI, benefits of urban green space and opportunities to retrofit GI in urban environments</i>	<b>1.</b> Green Infrastructure is a topic which will be covered in more detail in the forthcoming full update to the Design Guide and already covered in existing Design Guide.
	Natural resources	You could also consider issues relating to the protection of natural resources, including air quality, ground and surface water and soils within urban design plans.	<b>2.</b> This will be covered in the full update to the Design Guide and supplemented within policies contained in the HLDP.
	Wildlife	This SPD could consider incorporating features which are beneficial to wildlife within development, in line with paragraph 118 of the National Planning Policy Framework. You may wish to consider providing guidance on, for example, the level of bat roost or bird box provision within the built structure, or other measures to enhance biodiversity in the urban environment.	<b>3.</b> This will be covered in the full update to the Design Guide or other relevant SPD that may be prepared.
	Environmental character	The SPD may provide opportunities to enhance the character and local distinctiveness of the surrounding natural and built environment; use natural resources more sustainably; and bring benefits for the local community, for example through green infrastructure provision and access to and contact with nature. Landscape characterisation and townscape assessments, and associated sensitivity and capacity assessments provide tools for planners and developers to consider how new development might make a positive contribution to the character and functions of the landscape through sensitive siting and good design and avoid unacceptable impacts.	<b>4.</b> The Council will consider including a requirement for the submission of landscape characterisation and townscape assessments, and sensitivity and capacity assessments, in the full Design Guide update and/or revised versions of the Local Plan.
	Other	Other design considerations: The NPPF includes a number of design principles which could be considered, including the impacts of lighting on landscape and biodiversity (para 180).	<b>5.</b> The Council will consider addressing this in the full update to the Design Guide.

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<b>Sport England</b>	Tall Buildings	<p>Including guidance on how tall buildings can be designed to encourage physical activity would be consistent with the Local Plan as well as Government policy. Consideration should therefore be given to amending the guidance to cover:</p> <p>Designing rooftop gardens, podiums and other communal amenity spaces within tall buildings so that they encourage physical activity e.g. through including space that is multi-functional where possible to encourage use by a range of users, has circular routes that are suitable for walking/running, incorporates outdoor gym equipment where appropriate and provides supporting infrastructure such as seating to allow resting after exercise.</p> <p>Tall buildings should be designed so that the use of the stairs is promoted for those that are able to use stairs and that this is supported by the prominent position of stairs, appropriate signage and stairwells that are spacious and welcoming.</p> <p>Cycle storage should be appropriately designed, secure and prominent and communal storage should be adequate to serve the number of dwellings in the building.</p>	<b>6.</b> Guidance on how tall buildings can be designed to encourage physical activity has been added, to ensure full compliance with the Local Plan and government policy.
	Amenity Space	<p>Consideration should be given to covering the following matters:</p> <p>Amenity space should be multi-functional to encourage physical activity by all groups within the community e.g. space suitable for informal sport to encourage use by children and young people, space suitably designed to accommodate small community pop-up events to encourage people to visit the open space, circular walking/running/cycling routes around the open space to encourage activity close to people's homes etc.</p> <p>Amenity space should be supported by seating and other infrastructure (e.g. drinking fountains and signage) to encourage people to visit the space.</p>	<b>7.</b> Guidance on how amenity space should be multi-functional to encourage physical activity has been added, to ensure full compliance with the Local Plan and government policy. This will also be outlined in a forthcoming Open Spaces SPD that will be prepared by the Council.

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<b>Affinity Water</b>	Water reuse	Guidance relating to rainwater harvesting and greywater reuse, alongside related policies within the Local Plan to reduce water consumption within new developments, is welcomed.	<b>8.</b> Noted.
<b>Historic England</b>	Tall Buildings	While we agree that developers should undertake their own visual assessments, we consider that tall building development within Harlow should be genuinely plan-led as required by the NPPF, and to this end the SPD should establish the strategic policy context and identify (spatially) areas where tall buildings might, and might not, be appropriate.	<b>9.</b> The Council does not consider that the identification of spatial areas for tall buildings is an issue which can be covered by an SPD. This is an issue which can be addressed in a Development Plan Document and may be considered in the next version of the Local Plan.
	Tall Buildings	Given that the heights of tall buildings vary markedly (a six-storey building might be regarded as tall in a two-storey neighbourhood), it may be necessary to identify general appropriate building heights in those areas. Applications for development within these areas can then be overlaid with the criteria set out in the SPD addendum.	<b>10.</b> The addendum states that a building is regarded as tall if it is at a height of 6m or more above existing surrounding buildings. The Council considers this ensures the scale of existing surrounding buildings is taken into account when assessing applications for tall buildings.
	Tall Buildings	In considering the possible impact of tall buildings in Harlow it is important to think about the place of Harlow as a town within the landscape. It is broader than simply considering impact upon designated and non-designated heritage assets.... It is about considering the setting of Harlow as a place. Further afield other designated heritage assets may be affected and so would require closer assessment... It is the general experience within these assets - not just particular views but an animated view progressing through spaces. It is about considering not just where things are not possible, but also where things may be possible.	<b>11.</b> The Addendum has been amended to state the importance of considering the effects of tall buildings on important assets which are located further afield.



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<b>Epping Forest DC</b>	General	The response provided is primarily with regards to Garden Town sites that are located within Epping Forest District but that may be impacted by the Harlow SPD.	<b>12.</b> Noted.
	General	The addendum is a useful opportunity to provide clarification on the relationship between the Harlow Design Guide and the Harlow and Gilston Garden Town Design Guide, and could expand further on the relation between the two documents.	<b>13.</b> Clarification of this relationship will be provided in the full Design Guide update.
	Tall Buildings	In principle, the additional guidance in the Harlow Design SPD related to the design of tall buildings is welcome as it supports and provides further detail to the principles of high quality design as outlined in the EFDC Local Plan	<b>14.</b> Noted.
	Tall Buildings, para 1.7	This is aligned with EFDC Local Plan policy DM9. The Strategic Site Guidance within the HGGT Design Guide notes that development within Latton Priory however should be limited to two-storeys.	<b>15.</b> Noted.
	Tall Buildings, para 1.11	Massing Studies are critical to understanding the impact that proposed development, especially when of significant massing, will have on its surroundings. We recommend this becomes a definite requirement for any new tall building application.	<b>16.</b> The Council considers this an important element of the submission of a planning application which has a tall building element. It will be decided on a case-by-case basis whether a massing study. The requirement will form part of the Council's validation checklist which is currently being updated.

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<b>Epping Forest DC cont.</b>	Tall Buildings, para 1.12	What is meant by ‘aesthetically-pleasing’ should be clarified, as well as how this is going to be determined.	<b>17.</b> The Council considers that, given the subjective nature of appreciating building design, the term “aesthetically-pleasing” should be retained without further definition to ensure design and contextual issues can be considered on a case-by-case basis.
	Tall Buildings, para 1.12	The National Model Design Code encourages community engagement in the processes of design and place-shaping. It would be good to incorporate this reference in to the SPD.	<b>18.</b> Reference has been added to the relevant part of the forthcoming new Statement of Community Involvement, which will encourage applicants to carry out significant engagement with the community at the pre-application stage.
	Tall Buildings, para 1.17	Proposals for tall buildings within Harlow may have an impact on key viewpoints as seen from within Epping Forest District – please clarify how EFDC will be consulted with regards to these proposals.	<b>19.</b> The Council is intending to publish an updated Statement of Community Involvement which will detail the level of engagement that will be undertaken in respect of applications. In some cases this will be dealt with on a case-by-case basis and it is not appropriate to set this out in the Design Guide Addendum.

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<b>Epping Forest DC cont.</b>	Tall Buildings, para 1.20	The requirement of 80% of flats in a tall building to be dual aspect is supported as a minimum but this could be increased to 100%. London Plan seeks to maximise dual aspect dwellings and avoid single aspect ones.	<b>20.</b> This requirement has been amended to 90%, but with allowance for flexibility where strong justification can be provided. It is not necessarily appropriate to be in accordance with the London Plan on this, given the contextual and design differences between Greater London and Harlow.
	Tall Buildings, para 1.27	Wind mitigation measures should be well designed and integrated in the overall design of the scheme.	<b>21.</b> The text has been clarified to ensure this point is made.
	Tall Buildings, para 1.28	The term 'negative climatic impact' is at the risk of sounding vague and should be clarified. Without the specification of which potential negative impacts a tall building may have on its immediate environment, an applicant may not feel the need to address this matter proactively.	<b>22.</b> The text has been amended to remove this reference to avoid repetition of earlier wording.
	Privacy and Overlooking	In principle, the additional guidance is welcome as it supports and provides further detail to the principles of high quality design as outlined in the EFDC Local Plan	<b>23.</b> Noted.
	Privacy and Overlooking, Pg 9	Neither of these images are related directly to the chapter's subject of 'privacy and overlooking'. The chapter's message would be better communicated if the cover images illustrated principles of privacy and overlooking.	<b>24.</b> The images have been changed accordingly.
	Privacy and Overlooking, para 2.2	The minimum distances set out in this section are supported by EFDC for habitable rooms in houses – however it would be useful to provide distances between habitable rooms in flats as well as flat balconies.	<b>25.</b> The main Design Guide update will address this.
	Privacy and Overlooking, para 2.5	This is an important and useful section that would benefit from clarification and expansion. It would be good to clarify what are the minimum distances for setbacks that are deemed insufficient in size?	<b>26.</b> The main Design Guide update will address this.

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<b>Epping Forest DC cont.</b>	Privacy and Overlooking, para 2.5	Could the section be expanded with good practice examples of boundary conditions that would be favoured by the Council?	<b>27.</b> The Council will consider providing examples of boundary conditions as part of the full Design Guide Update.
	Privacy and Overlooking, para 2.5	Has the 'Streets for All' chapter in the Building for a Healthy Life guidance document been referred to?	<b>28.</b> The Addendum has been amended to refer to this.
	Privacy and Overlooking, para 2.6	Best practice design for side elevations of housing is important to mitigate issues of overlooking and privacy. We recommend this becomes a definite requirement for any new residential development.	<b>29.</b> The Council will consider providing examples of side elevations, in the context of privacy and overlooking, as part of the full Design Guide Update.
	Amenity Space and Gardens	In principle, the additional guidance in the Harlow Design SPD related to amenity space and gardens is welcome as it supports and provides further detail to the principles of place-shaping and high quality design as outlined in the EFDC Local Plan	<b>30.</b> Noted.
	Amenity Space and Gardens, Table 1	These minimum standards are not considered appropriate for all dwelling/settlement types, and prescribing different ranges of sizes should be considered for different characters of development. The space standards as currently stated in the draft SPD risk creating low density suburban character neighbourhoods and do not allow for the variety and diversity of housing types set out within the HGGT Design Guide (which includes a range of types such as mews, semi-detached and family homes). The Essex Design Guide also currently sets out a range of garden sizes that varies by the nature of development, starting at a minimum of 25sq.m. The Essex Design Guide also states – "Private gardens larger than 40sq.m may be possible where they make use of awkward site shapes and where there are privacy issues relating to existing development. Elsewhere, however, larger gardens should be avoided." EFDC recommends the revision of Table 1.	<b>31.</b> In paragraph 3.2 of the Addendum, it is explained that the space can include communal/amenity areas etc., plus a lower standard may be considered if there is suitable green space nearby. The importance of access to gardens etc. has also been amplified by the pandemic. The Council considers, therefore, that the minimum standards and associated text are appropriate.

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<b>Epping Forest DC cont.</b>	Amenity Space and Gardens, para 3.5	The sentence appears to have a grammatical error and should be reviewed.	<b>32a.</b> This has been corrected.
	Amenity Space and Gardens, para 3.5	The BRE 'Site Layout Planning for Daylight and Sunlight: A Guide to Good Practice' handbook stipulates in section 3.3 that – "It is recommended that for it to appear adequately sunlit throughout the year, at least half of a garden or amenity area should receive at least two hours of sunlight on 21 March." It is difficult to compare the sunlight requirement as put forward by the Harlow SPD with BRE best practice as the standards refer to different conditions – it would be helpful if the SPD adopted BRE guidelines.	<b>32b.</b> The Addendum has been amended to use the suggested wording from the BRE handbook.
	Householder Guidance	In principle, the additional guidance in the Harlow Design SPD related to householder extensions is welcome as it supports and provides further detail to the principles of place-shaping and high quality design as outlined in the EFDC Local Plan.	<b>33.</b> Noted.
	Householder Guidance	Generally, the chapter would benefit from the inclusion of exemplar householder development projects (with images) in the District (or other Districts of similar character) that promote principles of high quality design.	<b>34.</b> Exemplar householder development projects will be included in the full update of the Design Guide.
	Householder Guidance, para 4.4 ii	Prescribing the use of materials that <i>match</i> the original dwelling risks not leaving room for innovative or contemporary design within householder development. This item should be revised to say materials that <i>complement</i> the original dwelling, or that <i>takes cues from</i> the materials / form / appearance of the original dwelling.	<b>35.</b> The Addendum has been updated to reflect this wording.
	Climate Change	Generally, the recommendations of the chapter are not as ambitious as the standards put forward by the HGGT Sustainability Guidance and Checklist in terms of environmental targets, therefore we would recommend that where quantitative targets are involved, the HGGT Sustainability Guidance is referred to.	<b>36.</b> The Addendum has been amended so the Checklist is referred to.

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<b>Epping Forest DC cont.</b>	Climate Change	The document does provide more detailed design guidance under certain topics not covered by the Sustainability Guidance, and is therefore welcomed as additional information on how to translate Sustainable Design principles into architectural and place-shaping decisions.	<b>37.</b> Noted.
	Climate Change	The SPD currently only makes reference to operational carbon in a net-zero carbon approach to building, but this should be expanded to include embodied carbon.	<b>38.</b> The Addendum has been amended to include this.
	Climate Change	Generally, the chapter would benefit from the inclusion of exemplar projects (with images) in the District (or other Districts of similar character) that promote principles of high quality and sustainable design.	<b>39.</b> Relevant exemplar projects will be included in the full update of the Design Guide.
	Climate Change	It would also benefit from emphasis on the importance of sustainable design when it comes to the retrofit of existing buildings including when there is a use change (e.g. conversion of office into residential).	<b>40.</b> The Addendum has been amended to include this.
	Climate Change, para 5.3	Further examples of types of renewable energy should be provided beyond just solar panels. These could include – EV charging points low-temperature district heating and heat pumps	<b>41.</b> The Addendum has been amended to include further examples.
	Climate Change, para 5.9	Providing floor plan dimensions that illustrate what is considered too deep of a floor plan would help clarify this point to a reader.	<b>42.</b> The Council considers that providing floor plan dimensions could be too prescriptive.
	Climate Change, para 5.31	Providing examples of water use minimisation measures would be helpful – for example, low flush toilets, smaller baths, taps and showers with flow regulators.	<b>43.</b> The Addendum has been amended to include examples.

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<b>Essex County Council</b>	General	<p>The proliferation of design advice and guidance for the Harlow area needs careful consideration .</p> <p>This includes considering the relationship of this addendum with the existing Harlow Design Guide (since this addition will sit alongside the existing main guide), together with the related documents covering Harlow &amp; Gilston Garden Town (HGGT) which include HGGT Vision document; HGGT Design Guide; HGGT Sustainability Checklist.</p> <p>This means that landowners, developers, designers &amp; planning applicants in principle need to consider and refer to at least five design related guidance documents. This appears an overload of guidance of similar purpose and its overall effectiveness and practical application need consideration as a result. A question arises as to how far it is realistic that these users of the planning system will be aware of all these disparate design guide sources and work through them all in developing their proposals.</p>	<b>44.</b> The Design Guide Addendum is specifically relevant to Harlow and considers factors such as its New Town heritage. The Council website and the Validation Checklist (which is in the process of being updated) signpost applicants to the various guidance which is available. However, the Council will consider this issue carefully as part of the overall Design Guide Update including the need to simplify the number of design based guidance, working alongside HGGT partners.
	Climate Change	Section welcomed - good deal of useful and practical content and advice. The format of this would benefit from further consideration and review since it is currently set out as a series of text paragraphs, although the sub-headings for each area of subject matter are considered useful for document users and could prove helpful (to HDC) as a prompt for further sub-division of this section. Alternatively, there is an option to integrate this content within the other content of the design document in the interest of ensuring that climate change and sustainability of buildings are considered at all stages and parts of the design process as an integral element, rather than it appearing as an add on subject set out at the end of the document.	<b>45.</b> The Addendum has been amended to ensure other sections signpost to the Climate Change section where appropriate. The Council considers it important to have Climate Change as a standalone section to ensure its importance is emphasised.
	Amenity Space and Gardens	This could benefit from a broader incorporation of good green infrastructure principles and design and how to bring this into the design of buildings and schemes. Helpful information on this could be sourced from the Essex Green Infrastructure Strategy 2020 and it could be developed / supplemented by good practice examples drawn from Harlow and the surrounding area.	<b>46.</b> The Design Guide Update will consider Green Infrastructure as part of the main update and any other related SPDs it may prepare for Green Infrastructure in Harlow.

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<b>Essex County Council</b> <i>cont.</i>	General	For the purposes of making the Addendum more comprehensive as an information and guidance source, it could benefit from links to other sources of more in-depth information – such as Building Research Establishment; the Gov.UK website; Royal Institute of British Architects (RIBA) etc.	<b>47.</b> These will be included in the main update of the Design Guide.
<b>Turley o.b.o. SSRE Investment 4 Ltd.</b>	General	SSRE Investment 4 Limited is the applicant for a key town centre regeneration application for 'HereHarlow' (the land North of the Harvey Centre) (application ref. HW/OUTAM/21/000251, pending). These representations are therefore made in the context of SSRE Investment 4 Limited being a key landowner, investor and developer in Harlow town centre.	<b>48.</b> Noted.
	Tall Buildings	We consider it is not appropriate to try and define a tall building for the District of Harlow as a whole, as what will constitute a tall buildings in the town centre will be different to what is a tall building on a suburban street.	<b>49.</b> This point is addressed by the statement "...tall buildings are defined as structures that are more than 6 metres taller in height above that of surrounding buildings...", which considers context of the area.
	Tall Buildings	In terms of the town centre, it is important to note (as already done so in paragraph 1.1 of the Draft Addendum SPD) that Harlow Town Centre currently has a number of extant planning permission or submitted planning applications for buildings ranging in 11-15 storeys. Furthermore, it is understood from the Council's draft Town Plan (as presented to Cabinet in September 2021) that the planning vision is for "ambitious plans for the regeneration and rebuilding of our town centre..." (paragraph 8.1, draft Town Plan) and that "height will be a key consideration with the anticipation that the regeneration will include new tall buildings" (paragraph 8.3, draft Town Plan). In this context, what will constitute a 'tall building' in Harlow Town Centre is likely to evolve and it is therefore considered appropriate to also account for planned building heights when defining a tall building in its locality.	<b>50.</b> See response #49.



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<b>Turley o.b.o. SSRE Investment 4 Ltd. cont.</b>	Tall Buildings	The definition should therefore be changed to “in the round, tall buildings are defined as structures that are over 30 metres in height”.	<b>51.</b> See response #49.
	Tall Buildings	The understanding of ‘Tower Buildings’ and the benefits they can achieve is welcome.	<b>52.</b> Noted.
	Tall Buildings	In terms of ‘Townscape Buildings’, it is considered this is currently quite poorly defined and is not considered appropriate to be classed as a ‘tall building’ if only “slightly higher than their context”. Instead, ‘Townscape Buildings’ should be more appropriately considered as buildings that are generally 2-7 storeys taller than their context (subject to location) – the taller end of the range should be considered for the likes of the town centre.	<b>53.</b> Paragraph has been amended to state that such buildings are generally at least a few stories taller than their context (deliberately not prescriptive to allow for flexibility).
	Tall Buildings	Finally, it is not considered that ‘Slab Blocks’ are adequately defined and it is not appropriate for them to be so sweepingly negatively portrayed considering that they currently form a key characteristic of the Town Centre. Whilst it is acknowledged that broader tall blocks can have greater sensitivities to consider, when designed to a high quality they can still have a key role to play in placemaking, contributing to local character and optimising the use of land depending on the location and context of a site. As such, allowance should be given for the inclusion of ‘slab buildings’ subject to quality of design, townscape / character contribution and site context.	<b>54.</b> The wording reflects the aspiration for the town centre to have a differing mix of buildings compared to many of the existing buildings, which are recognised as not necessarily performing well in design terms.
	Tall Buildings	It is also recommended that precedent images are included in the draft Addendum SPD to better demonstrate what is considered to be each category of ‘Tall Building’.	<b>55.</b> Such images will be included in the main Design Guide update.
	Tall Buildings	The Council’s vision for Harlow Town Centre (as per its draft Town Plan, September 2021) plans for the ambitious regeneration of the Town Centre, including tall buildings. This is considered appropriate and is welcome. Furthermore, it is reflective of how Frederick Gibberd , the architect of the original Harlow New Town, envisioned the future of the Town Centre ... In this context, it is considered that the Draft Addendum SPD should be more specific in the Town Centre being considered appropriate for tall buildings in principle.	<b>56.</b> It is important that the Design Guide Addendum is recognised as an SPD which covers the whole of the district. The town centre will be addressed by the Town Centre Masterplan (SPD).

## Appendix 1: Schedule of Representations and Responses

Council Response key: **Amendment to Addendum made** **Issue will be covered in full update to main Design Guide (or other document)**

Consultee	Section/ Topic	Summary of representation	Council Response and Proposed Amendment
<b>Turley o.b.o. SSRE Investme nt 4 Ltd. cont.</b>	General	It is also considered appropriate to cross reference the emerging Town Centre Masterplan in helping to differentiate how height should be treated in the designated town centre in comparison to the wider Harlow area.	<b>57.</b> Given the Masterplan is at an early stage of production as an SPD, the Addendum has been amended to signpost it, but not cross-reference in too much detail. It may be more appropriate for the full Design Guide update to provide more cross-referencing.
	General	Specifically in regard to SSRE Investment 4's land interest, North of the Harvey Centre, this is one of the specific sites in the Town Centre best suited for accommodating tall buildings (7-12 storeys with 18+ storey elements) in townscape and regeneration terms.	<b>58.</b> Noted.
	Tall Buildings	In order to adequately landmark the Town Centre, encourage regeneration and growth, and account for the range of 7-20+ storey buildings that have already been approved or are subject to live planning applications, it is considered appropriate that the Town Centre allows for clusters of tall buildings (appropriately located and designed) rather than individual tall buildings. There are already a number of tall buildings that have been approved, particularly in the peripheries of the Town Centre and north of Fourth Avenue, which means that further tall buildings will be necessary to better landmark the true heart and entrances into the Town Centre and, as such, requires the need for a cluster approach.	<b>59.</b> Noted.
	Tall Buildings	It is considered that what is an appropriate proposed height for a scheme is dependent on the context of its location and its immediate surroundings (both existing and planned). It is, therefore, recommended that the draft Addendum SPD should not seek to be overly prescriptive on the classification of tall buildings and what is considered to be an appropriate height as this will vary on a site by site basis.	<b>60.</b> Noted.
	Tall Buildings	Notwithstanding, considering the Council's aspiration to regenerate the Town Centre and the scale of development that currently exists and that is anticipated to come forward through extant planning permissions and live planning applications, it would be appropriate for a tall building on certain sites within the Town Centre to be as follows:	<b>61.</b> This will be addressed in the Town Centre Masterplan (SPD).

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<b>Turley o.b.o. SSRE Investment 4 Ltd. cont.</b>	Tall Buildings	Townscape Building – 8-12 storeys are considered an appropriate height in the town centre. It is considered that Westgate House (at 8 converted commercial storeys) and Joseph Rank House (at 12 converted commercial storeys) are all appropriate to be classed as ‘Townscape Buildings’	<b>62.</b> See response #61.
	Tall Buildings	Tower Building – 18+ storeys (where justified and designed of a high quality). It is considered this scale is necessarily to viably achieve the ‘slender’ profile sought. Less than 20 storeys can result in a more squat profile that will not ‘stand out’ and ‘add interest’ in the context of growing number of 10-15 storey buildings that currently exist or are consented / submitted for approval. It is for this reason that buildings such as Joseph Rank House is not appropriate for being classed as a ‘Tower Building’. Only a select few sites in the Town Centre would be appropriate in townscape terms to accommodate Tower Buildings of 18+ storeys, for which SSRE Investment 4’s land situated to the North of the Harvey Centre is considered to be one of them.	<b>63.</b> See response #61.
	Tall Buildings	Slab Buildings – It is considered that what are classed as ‘Slab Buildings’ still have a place in the Town Centre, subject to the context of a site and the quality of design of the scheme. The appropriate height of these buildings will depend on their length/breadth and orientation but could range from 8-12 storeys.	<b>64.</b> See response #61.
	Tall Buildings	However, care should be taken in defining appropriate storey heights, as this will vary depending on whether the use is commercial or residential.	<b>65.</b> See response #61.
	Tall Buildings, para 1.7	...should be made clear to not relate to the designated Town Centre. [It] presents challenges to the regeneration aspirations of the Town Centre, which in some parts is uncharacteristically low-rise / low-density, particularly for the draft Town Plan’s vision for Harlow to be of a scale of a ‘small city’.	<b>66.</b> The line “...unless there is evidence of strong mitigating circumstances or significant visual reasons and associated aesthetic townscape advantages” allows for some greater flexibility in the Town Centre.

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<b>Turley o.b.o. SSRE Investment 4 Ltd. cont.</b>	Tall Buildings, para 1.10	... recommended that this is changed to specifically relate to existing low rise and low density areas outside of the designated Town Centre.	<b>67.</b> Given the Addendum applies to the whole district and para 1.7 provides flexibility regarding the Town Centre, the Council considers amending this paragraph is not necessary.
	Tall Buildings, para 1.11	The draft Addendum SPD does not specify what a 'Massing Study' is or what it should comprise beyond what can already be expected within a Design and Access Statement and Townscape Assessment – this should be removed as a requirement or at the least better clarified.	<b>68.</b> Further text has been added to clarify what would be required in the Massing Study.
	Tall Buildings, para 1.20	Whilst it is acknowledged that it is right to encourage and optimise the delivery of dual aspect units, this drafted requirement is overly prescriptive and onerous to the potential hindrance of housing delivery. It is not made clear what studies have been undertaken to inform the 80% target and how deliverable this level of dual aspect provision is for all forms of tall building categories the draft Addendum SPD identified (i.e. Townscape, Tower and Slab). Furthermore, the wording does not allow much in the way of flexibility depending on site and design specific circumstances, which is inappropriate. Alternatively, the following options are recommended:	<b>69.</b> Based on experience with relevant planning applications in the district, and in response to a representation made by an adjoining LPA (see response #20), it is considered appropriate to retain the dual aspect requirement and make an amendment to increase it to 90%, but with allowance for flexibility where strong justification can be provided.
	Tall Buildings, para 1.20	It is expected for all categories of tall buildings to maximise the provision of dual aspect units, where appropriate to the overall form and design and subject to the constraints of the site. Point towers in particular are expected to achieve a high provision of dual aspect units. Single aspect north facing dwellings should be avoided where possible subject to specific site constraints, orientation. Where single aspect dwellings are proposed, it will need to be demonstrated at detailed design stage that it achieves an adequate level of ventilation, privacy, daylight and thermal comfort. The use of façade insets or pop-outs may be an appropriate design feature to consider.	<b>70.</b> See response #69.

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<b>Turley o.b.o. SSRE Investme nt 4 Ltd. cont.</b>	Tall Buildings, para 1.26-1.27	It is not appropriate to completely discount the mitigation measures that can be achieved by trees and soft landscaping, particularly if the draft Addendum SPD instead allows the likes of awnings, which can be retractable and temporary. Furthermore, this position in paragraphs 1.26 and 1.27 directly contradict what is later written in paragraphs 5.6 and 5.10 of the Climate Change section, where tree planting is highlighted as being an appropriate way for managing wind microclimate.	<b>71.</b> This has been amended to ensure it accords with the Climate Change section regarding Green Infrastructure being used to manage wind microclimate.
	Tall Buildings, para 1.26-1.27	Leeds and the City of London (CoL) are the only other local authorities that have previously set out guidelines that dissuade against allowing landscaping in baseline wind assessments, though this does not equate to landscape features being prohibited. While CoL prefer baseline assessments – an initial benchmark to identify the underlying, unmitigated potential windiness upon introduction of a new structure – to exclude landscaping, this does not inevitably preclude the use of landscaping during subsequent stages of assessment, and permission has been granted since the publication of the CoL guidelines in 2019 where landscaping has formed a key part of the wind mitigation strategies employed for tall buildings, 2 Finsbury Avenue, for example. The recently released Draft Wind & Micro-climate Toolkit for Leeds (July 2021) now makes no reference to either landscaping or trees. The continued, careful use of soft landscaping as one of many tools to shape a microclimate should not be so readily dismissed. Outside the built environment the benefit of tree planting is well known for managing wind and other critical microclimate variables with windbreak and shelterbelt application taking exclusive advantage of the benefits of trees as effective measures to alleviate the effects of wind.	<b>72.</b> See response #71.

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<b>Turley o.b.o. SSRE Investme nt 4 Ltd. cont.</b>	Tall Buildings, para 1.26-1.27	The City of London's comprises a number of very tall buildings ranging from circa 30 to 62 storeys and it is acknowledged in the City of London's guidelines that it is "tailored for building proposals in the City of London" and "may not be suitable for other parts of London or other cities where the height of general surroundings is lower than the typical building stock in the city". It is, therefore, not considered appropriate to be directly applying guidelines equivalent to the City of London to Harlow Town Centre as the two are considered to be in no way comparable. As such, the draft Addendum SPD should be amended to allow trees and soft landscaping to be used for wind mitigation.	<b>73.</b> See response #71.
	Privacy & Overlooking, para 2.2	Figure 2.1 demonstrates a situation between two houses with gardens and not in a town centre / urban setting between flatted developments. It is therefore considered appropriate that the 18 metre rule is not stringently applied in such locations, such as Harlow Town Centre, and this should be stated explicitly. It is recommended that the wording of Paragraph 2.2 is amended to the following "Directly facing habitable room windows will normally require a minimum separation distance of 18 metres, except where the existing character of the area varies from this (see figure 2.1 below), such as potentially in the Town Centre"	<b>74.</b> An amendment has been made accordingly.
	Privacy & Overlooking, para 2.3	Combined with paragraph 2.6 relating to angles and glazing of windows, it is welcome that appropriate design mitigation measures are allowed in guidance to address potential overlooking conflicts, particularly for enabling opportunities to optimise sites for housing delivery in more built up areas.	<b>75.</b> Noted.
	Privacy & Overlooking, para 2.5	This design approach is supported for encouraging the integration of active frontage residential and appropriate town centre uses with public spaces to promote activity and safety in public spaces.	<b>76.</b> Noted.

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<b>Turley o.b.o. SSRE Investment 4 Ltd. cont.</b>	Privacy & Overlooking, para 2.9	Firstly, the draft Addendum SPD seems to suggest that the 'nearest habitable room' from which the angle is measured must be located on the ground floor or lowest residential level. For clarity, the draft guidance should specify if 'the nearest habitable room' from which the angle is measured must be located on the ground floor or lowest residential level – considering BRE guidance it is assumed that it should be from the centre of the lowest residential window.	<b>77.</b> Amendment has been made to refer to it being from the centre of the lowest residential window, which is what Fig. 2.3 shows.
	Privacy & Overlooking, para 2.9	Secondly, the adopted Harlow Local Plan, draft Harlow Town Centre Area Action Plan (December 2019) and draft Town Plan (September 2021) outline the Council's ambitions for substantial housing and commercial growth within the town centre. However, the light angle distances draft guidance makes no flexible allowances for how this growth and densification would work with the draft guidance to promote residential locations suitable for densification and tall buildings, such as in the town centre. In its current form, this draft light angle distances guidance would significantly restrict the height of tall buildings in locations that could otherwise be suitable for tall buildings that were able to provide overall acceptable levels of daylight/sunlight in accordance with BRE Guidance.	<b>78.</b> The Addendum has been amended to use the suggested wording from the BRE handbook.
	Privacy & Overlooking, para 2.9	Finally, it is not clear why the 30 degree and 45 degree rules are being referenced in the 'Privacy and Overlooking' section of the draft Addendum SPD as they relate more to daylight/sunlight matters. In potential 'tall building' areas/instances the draft guidance at paragraphs 2.2 and 2.3 specifying separation distances between facing habitable windows or possible reduced distances for frontage buildings should be sufficient to safeguard acceptable levels of overlooking. It is therefore recommended that either the text is removed from this section and instead used solely in Section 4 (Householder Guidance) as currently drafted; or that wording be included in the draft light angle distances guidance along the lines of "Proposals where the 30 degree and 45 degree rules are breached will require the provision of a Sunlight and Daylight Assessment to demonstrate that neighbouring properties receive an acceptable level of daylight/sunlight in accordance with BRE Guidance."	<b>79.</b> See response #78.



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<b>Turley o.b.o. SSRE Investment 4 Ltd. cont.</b>	Amenity Space & Gardens, Table 1	All of these minimum standards for each dwelling type are considered to be significantly too high, particularly for any dwellings within more urban settings. To put some of these figures into perspective, for a 5+ dwelling over two dwellings, the minimum space standards is 110sqm – as such the proposed draft Addendum SPD is looking in some instances for the same provision of internal space to be provided externally, which is unrealistic. How these figures have been reached have not been justified or evidenced and risk posing significant viability constraints, particularly for high density flatted developments, which are already proven under the Council's own Local Plan evidence base to have viability challenges (see 'Local Plan Viability Assessment, Affordable Housing and CIL Review March 2018').	<b>80.</b> These standards are considered appropriate for Harlow, given its New Town heritage and the status of the wider area as a Garden Town, plus the more widely-recognised importance of gardens as a result of the effects of the pandemic and lockdowns, etc. However, the text has been amended to say that flexibility may be given where viability is an issue, subject to the submission of an independent viability assessment.
	Amenity Space & Gardens, Table 1	As well as the requirement being generally too high, the flat requirement being set at 20sqm regardless of number of bedrooms is also wholly inappropriate, particularly considering that the draft guidance for houses does allow for this variation. A studio flat does not have the same external amenity space needs as a 3-bedroom flat, and this should be reflected in the minimum standards. With the above in mind, it is considered that the minimum standards currently quoted should be broadly halved and with different level of standards set for 1 beds, 2 beds and 3 beds (e.g. 5sqm, 10sqm and 15sqm).	<b>81.</b> The blanket requirement for flats is because the requirement can include balcony space and a proportion of communal areas. It is also explained that a lower standard may be considered appropriate if alternative green space is within a 10-minute walking distance.
	Amenity Space & Gardens, para 3.2	This flexible approach for what counts towards the amenity provision is welcomed and supported, however, it is also recommended that: <ul style="list-style-type: none"> <li>• 10 minutes be specified as a walking distance instead, such as 900m.</li> <li>• Internal communal amenity space, which is increasingly being provided in new flatted development, is also allowed to be counted where it is not possible to meet the standards externally.</li> </ul>	<b>82.</b> The text has been amended to provide a distance (800m to accord with similar measurements in the HLDP). The communal amenity space referred to doesn't specify whether it should be internal or external, so no amendment has been made on this point.



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<b>Turley o.b.o. SSRE Investment 4 Ltd. cont.</b>	Amenity Space & Gardens, para 3.2	Recommended that the guidance also recognises that there are some instances where it is not appropriate to provide a flat with private external amenity space (i.e. a balcony), particularly for tall buildings in the Town Centre, where factors such as noise, wind and daylight/sunlight may not result in well used balcony spaces and where architecture / townscape quality (particularly for the delivery of a slender Tower) may be undermined. In these circumstances, when reduced provision of balconies is well justified, it should be required for high quality communal amenity space to be provided to offset the lack of private amenity space.	<b>83.</b> Amendment has been made to state that when reduced provision of balconies is sufficiently justified, high-quality communal amenity space should be provided to offset the lack of private amenity space.
	Amenity Space & Gardens, para 3.5	Again, it is not clear what has informed this targeted standard and why the shortest day of the year is being focused on, when people are less likely to use their outdoor spaces in the depths of winter. It is considered convoluted to apply guidance that deviates from BRE guidelines, and unreasonable to expect a balcony in a built up area to receive direct sun on the 21st December. Instead, it is considered best to align with BRE Guidelines and focus on the 21st March date. Furthermore, whilst this target may be appropriate for open amenity space, such as a private or communal garden / roof terrace, it is not appropriate to apply to balconies, which are of a much more limited size and can be inset rather than protruding. As such, it is recommended the text is amended to the following “Open amenity space (excluding balconies) should be positioned to receive a minimum of 2 hours of direct sunshine on 50% of the area on the spring equinox on the 21st March in accordance with BRE Guidelines”	<b>84.</b> The shortest day is used as an example because this reflects the minimum possible amount of sunlight available in the year. Going beyond the BRE requirements is appropriate for Harlow, given the wider area being designated as a Garden Town.  The text has been amended to say flexibility may be considered for north-facing areas and flat balconies, as at least some receipt of direct sunlight on balconies and north-facing areas – even if just between Spring and Autumn – would clearly be beneficial for wellbeing (and growing plants, etc.).

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<b>Turley o.b.o. SSRE Investme nt 4 Ltd. cont.</b>	Climate Change, para 5.4	“to maximise solar receipts and reduce shading, tall buildings in a development should be located to the north of the Site”. This may not be appropriate for all sites and will depend on other factors such as heritage/townscape and the location of neighbouring residential dwellings. It is, therefore, recommended that the text is amended to the following “It is often the case that to maximise solar receipts and reduce shading, tall buildings in a development should be located to the north of the Site, although the appropriateness/feasibility of this will vary on a site by site basis will need to also be informed by other design factors.”	<b>85.</b> Text has been amended to say “...should normally be located...”
	Climate Change, para 5.4	We do not agree that tall buildings in Harlow Town Centre automatically lend themselves well to vertical axis wind turbines as this needs to be heavily informed by townscape and visual impact.	<b>86.</b> Text has not been amended as it states vertical-axis wind turbines as just being a possibility.
	Climate Change, para 5.6	It is agreed that tree planting as a valuable role to play in managing wind microclimate conditions, but as mentioned earlier under Section 1, this directly contradicts what is set out in paragraphs 1.26 and 1.27 where it is stated that wind mitigation cannot include trees and soft landscaping. It is recommended that 1.26 and 1.27 are amended to allow for trees and soft landscaping in addressing wind conditions.	<b>87.</b> See response #71.
	Climate Change, para 5.14	In addition to this, it is considered that recognition should be given to the benefits of an electric energy strategy that takes advantage of the decarbonisation of the National Grid, thereby allowing the building to be net zero enabled.	<b>88.</b> Text has been amended accordingly.

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<b>Turley o.b.o. SSRE Investme nt 4 Ltd. cont.</b>	Climate Change, para 5.16	Furthermore, paragraph 5.23 sets out details on preferred passive ventilation strategies. However, there are instances, particularly in urban settings such as town centres, where environmental factors such as noise and air quality means that it is not possible for a development to solely rely on passive measures such as openable windows and it is thereby necessary to incorporate supporting mechanical ventilation. Paragraph 5.16 should be amended to reflect this as follows (or similar to): "The need for mechanical cooling can be avoided or lessened by designing-in passive ventilation and passive cooling measures. Developments should not incorporate mechanical cooling unless passive measures have been fully explored and appraised and proposals that include mechanical cooling should clearly demonstrate that passive measure would not be adequate. For instance, if noise or air quality conditions mean that openable windows cannot be relied upon and need to be supported by a mechanical ventilation system. This could be the case for instances in and around the Town Centre or along Harlow's major road networks".	<b>89.</b> Text has been amended to include "For instance, if noise or air quality conditions mean that openable windows cannot be relied upon and need to be supported by a mechanical ventilation system."
	Climate Change, para 5.19	This level of internal planning is unlikely to be possible for all developments, particularly large flatted regeneration schemes, and will depend on a number of site specific matters such as orientation, aspect, proximity and nature of neighbouring buildings etc. "Allowing variation for site specific contexts, it is generally considered that rooms that are most frequently occupied should benefit from a southerly aspect, but with appropriate measures to avoid overheating. Rooms that include a concentration of heat generating appliances (e.g. kitchens) or are less frequently occupied (e.g. bathrooms) should be located in the cooler part of the building, generally the northern side"	<b>90.</b> Text has been amended to add "Flexibility on this may be allowed where there are site-specific constraints relating to matters such as orientation, aspect, proximity to and nature of neighbouring buildings".

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<b>Iceni Projects Ltd. o.b.o. CI Ltd.</b>	General	<p>CIL is a key stakeholder within Harlow Town Centre, being the freehold landowner of a key asset on Broad Walk. CIL is a longstanding investor and stakeholder within the town centre, having owned the site since 1963.</p> <p>CIL's site is currently occupied by a mix of commercial uses and comprises approximately 0.45 hectares. It occupies a prominent position within Harlow Town Centre, bound by Broad Walk (to the west), East Walk (to the north), Terminus Street (to the East) and another small passageway to the south. It is located opposite the Harvey Centre and adjacent to a number of other retail and commercial uses. Broad Walk is the main thoroughfare through the town centre, running from north to south and leading directly to the main Market Square at the northern end.</p> <p>There are a number of other surrounding development sites, all at different stages within the planning process. Our client's site represents a significant piece of Harlow, assisting the Council to transform the town centre from decline, into a thriving new mixed-use community.</p>	<b>91.</b> Noted.
	General	<p>CIL strongly supports the overall objectives of the SPD and considers the included topics appropriate to assist the future vitality of Harlow. However, the SPD could go further in terms of providing support for tall buildings within the town centre. Additionally, whilst the provision of amenity space is especially important following the recent pandemic, the policy as it stands could provide a greater level of flexibility for proposals within town centre locations, given that these sites are typically constrained, and that viability can often be problematic. These points are discussed in further detail below.</p>	<b>92.</b> Noted.
	Tall Buildings, para 1.1	<p>As a point of clarification, Paragraph 1.1 of the emerging SPD states that applications have been approved within the town centre of schemes up to 15 storeys. It is worth noting that planning permission was granted for the redevelopment of the Harvey Centre, which comprised heights of up to 16 storeys (LPA Ref: HW/FUL/00097).</p>	<b>93.</b> Text has been amended accordingly.

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<b>Iceni Projects Ltd. o.b.o. CIL cont.</b>	Tall Buildings	The SPD states that tall buildings are defined as structures that are more than 6 metres taller in height above that of surrounding buildings or that are over 30 metres in height. This is considered to be a reasonable definition of a tall building in the context of Harlow Town Centre, however setting out a strict definition can restrict quality development and each proposal should be considered on its individual merits.	<b>94.</b> Noted.
	Tall Buildings	It is CIL's view that the SPD could go further in terms of actively supporting tall buildings within certain areas, such as the town centre. Confirming support for tall buildings within the town centre would align the SPD with the Council's Draft Town Centre Area Action Plan.	<b>95.</b> The support of tall buildings in the Town Centre is provided in the emerging Town Centre Masterplan (SPD). The Council may consider support for tall buildings in other areas as part of the forthcoming review of the HLDP.
	Tall Buildings	It is considered that there should be strong support within the SPD for additional height within the town centre (subject to the consideration of design and technical matters set out above), in order to assist the Council in meeting its annual housing targets, to support growth in Harlow and to drive footfall which will contribute to the overall vitality and viability of the town centre.	<b>96.</b> See above.
	Tall Buildings	CIL supports the majority of the commentary in [the height, scale, massing and materials] section, including the requirement for tall buildings to make a positive contribution to their surroundings and an expectation that they will improve and enhance the character and appearance of the local area, by providing an aesthetically pleasing design and creating a landmark building.	<b>97.</b> Noted.
	Tall Buildings	The SPD states the unique design heritage of Harlow should be supported, in regard to scale, massing, colours, materials and proposals should take cues from the features and typical palette of materials of Harlow's original New Town character. These are all positive comments that our client supports the inclusion of within the SPD.	<b>98.</b> Noted.

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<b>Iceni Projects Ltd. o.b.o. CIL Ltd. cont.</b>	Tall Buildings, para 1.20	The intentions behind this wording in relation to providing good quality homes and protecting views are supported by our client. However, being so prescriptive on the number of dual aspect flats to be provided could significantly prohibit development, particularly in constrained town centre locations. Whilst the aspiration should be always to provide as many dual aspect dwellings as possible, the requirement to meet 80% may be unviable for many developments – schemes should be assessed on a site-by-site basis. Depending on the constraints of the site, it could potentially result in the scheme being limited to five units per core (i.e. 4 dual aspect flats and 1 single aspect), which incurs design challenges to produce viable schemes in the town centre.	<b>99.</b> Based on experience with relevant planning applications in the district, and in response to a representation made by an adjoining LPA (see response #20), it is considered appropriate to retain the dual aspect requirement and make an amendment to increase it to 90%, but with allowance for flexibility where strong justification can be provided.
	Tall Buildings, para 1.20	To better reflect this, the wording should be amended to state that ‘dual aspect flats should be encouraged and maximised’. To reflect the commercial realities associated with issues that often occur in town centre locations (e.g. constrained sites and also viability issues), the requirement for 80% should be removed. This will enable dual aspect units to be maximised, whilst also ensuring practical and viable design solutions to take place.	<b>100.</b> See response #99.
	Tall Buildings, para 1.23	CIL fully supports the inclusion of adequate and usable open space to ensure high-quality developments, however stipulating that open space should be provided ‘in front of the building’ could prohibit development coming forward in constrained town centre locations where there may not be sufficient space to do this. The wording should be amended to provide a greater level of flexibility, by stating that applicants should ensure adequate provision of amenity space, either in front of the building or in other suitable locations (for example internal courtyards, podiums and roof terraces).	<b>101.</b> Text has not been amended as it says “around the building, especially in front of the building” and does not stipulate “in front of the building”.
	Tall Buildings, para 1.27	Whilst CIL acknowledges and agrees that developments should result in safe wind conditions, it is not clear from the current wording as to what the requirements of this Report are, and standard of acceptability would be. Therefore, to remove ambiguity, it is requested that the requirement for a Quantitative Study Report is either removed from the SPD, or that further clarity is provided to assist applicants on the scope of such Report.	<b>102.</b> Text has been amended to clarify the requirements of the report.

## Appendix 1: Schedule of Representations and Responses

Council Response key: **Amendment to Addendum made** **Issue will be covered in full update to main Design Guide (or other document)**

Consultee	Section/ Topic	Summary of representation	Council Response and Proposed Amendment
<b>Iceni Projects Ltd. o.b.o. CI Ltd. cont.</b>	Tall Buildings, para 1.30	CIL supports the intention behind this paragraph in that it is important for this impact to be a positive one. However, it is important to note that tall buildings may not always have a major impact on a skyline – it depends on the surrounding context and can also differ significantly from various viewpoints. CIL requests this sentence is amended to ‘tall buildings can potentially have a major impact on a skyline’.	<b>103.</b> Text has been amended accordingly.
	Privacy and Overlooking	The majority of this section seems most applicable to low level development, rather than to tall buildings – on this basis, clarification should be provided throughout this section as to the type of development the requirements relate to.	<b>104.</b> Text has not been amended, to ensure flexibility in application (also some other text is being amended – see other responses.)
	Privacy and Overlooking, para 2.2	It states that directly facing habitable room windows will normally require a minimum separation distance of 18 metres, except where the existing character of the area varies from this. This requirement and supporting caveat are considered to be reasonable.	<b>105.</b> Noted.
	Privacy and Overlooking, para 2.2	The paragraph also goes onto state that a distance of 9 metres should be kept between gardens and habitable rooms. It is presumed that this is in relation to low level suburban developments rather than tall buildings in town centre locations. Clarity on this within the SPD would be useful to avoid ambiguity.	<b>106.</b> This is apparent from the diagrams and the text.
	Privacy and Overlooking, para 2.9	To avoid ambiguity, it would be useful if a definition of ‘habitable room window’ could be provided either as part of the main text or within a Glossary.	<b>107.</b> See response #77.

## Appendix 1: Schedule of Representations and Responses

Council Response key: **Amendment to Addendum made** **Issue will be covered in full update to main Design Guide (or other document)**

Consultee	Section/ Topic	Summary of representation	Council Response and Proposed Amendment
<b>Iceni Projects Ltd. o.b.o. CI Ltd. cont.</b>	Amenity Space and Gardens	The emerging SPD states a requirement for 20 sq. m of garden space/amenity space per flat. This quantum of amenity space per flat is high and, in many cases, particularly in town centre locations, would likely result in developments being unviable due to the inclusion of this quantum of amenity space which would likely have an impact on the number of residential dwellings which could be included within the scheme. It is important to note that there are various examples of design standards for other local planning authorities, which stipulate a requirement of 5 sq. m private amenity space for each dwelling, with an uplift of this figure based on occupancy. Whilst these relate to other areas, it does provide some indication on what is often considered to be acceptable in terms of minimum amenity space requirements in urban areas.	<b>108.</b> The blanket requirement for flats is because the requirement can include balcony space and a proportion of communal areas. It is also explained that a lower standard may be considered appropriate if alternative green space is within a 10-minute walking distance.
	Amenity Space and Gardens	The 20 sqm minimum standard set out in this design guidance is considered to be inappropriate for flatted developments and in practically cases will be unviable, especially when looking to provide affordable housing. Our client thus requests that this figure is amended within the final SPD.	<b>109.</b> See above.
	Climate Change, para 5.38	Further clarification needs to be provided within the SPD in regard to what green and blue features could include.	<b>110.</b> Text has been amended to provide clarification.
	Climate Change, para 5.39	To avoid ambiguity, it would be useful if the Council could clarify how an applicant should demonstrate that the urban heat island effect has been assessed – are there relevant standards that the scheme should be assessed against?	<b>111.</b> Text says “addressed” rather than “assessed” – i.e. it has been considered.



## Appendix 2: Questionnaire Results and Responses

Council Response key: Amendment to Addendum required To be covered in full Design Guide update

Section 1: Tall Buildings	
Question	Council Response and Proposed Amendment
<p><b>Do the definition and categories of tall buildings reflect what you consider tall buildings to be?</b></p> <p>Yes = 17 respondents No = 14 N/A = 2</p>	<p><b>112.</b> The results of this reflect the differing views on what a tall building is. The Addendum requires the consideration of the context of the surrounding area when defining whether a building is 'tall'.</p>
<p><b>How many storeys do you feel a building should have to be called a tall building?</b></p> <p>2 to 3 = 6 respondents 4 to 5 = 18 6 to 7 = 8 8 to 11 = 5 12 to 17 = 4 20 = 1</p>	<p><b>113.</b> See response #112.</p>
<p><b>Thinking about the height and scale of tall buildings, are there any specific places in Harlow which you think would benefit from them?</b></p> <p>Town Centre = 11 respondents Industrial Areas = 1 No = 26 A414/Edinburgh Way = 1 Railway Station = 3 Neighbourhood Centres = 1 Hospital = 1 Car parks = 1</p>	<p><b>114.</b> The results of this show that there is understanding regarding the benefits that tall buildings can bring to Harlow, particularly in the Town Centre, to assist with factors such as regeneration. It is important to note that the Design Guide Addendum and other Forward Planning documents will (or already do) provide policies which will ensure tall buildings will provide benefits and any possible negative impacts are mitigated against or avoided.</p>

## Appendix 2: Questionnaire Results and Responses

Council Response key: Amendment to Addendum required To be covered in full Design Guide update

<p><b>In the town centre specifically, would you prefer clusters of ones which are at different heights or individual tall buildings?</b></p> <p>Clusters = 21 respondents Individual = 16 N/A = 6</p>	<p><b>115.</b> Noted.</p>
<p><b>What heights do you think are acceptable (in storeys)?*</b></p> <p><i>Where a range is specified, the maximum from the range is included below.</i></p> <p>No bigger than existing = 2 respondents 2 to 3 = 4 4 to 5 = 7 6 to 7 = 8 8 to 9 = 3 10 to 11 = 8 14 to 15 = 4 16 to 19 = 2 20 = 4*</p> <p>*One response gave no figure but stated “no higher than the fire brigade can deal with” **One response stated 15 in Neighbourhood Centres; one response stated “20+”</p>	<p><b>116.</b> See response #112.</p>
<p><b>Aside from the points mentioned in Chapter 1, are there any other potential impacts of tall buildings which should be addressed?</b></p> <p><i>Responses sorted by number of respondents making the point; no number given means one respondent made the point.</i></p>	
<p>7. Negative impact on local greenery (inc. woodland) and wildlife</p>	<p><b>117.</b> Local Green Infrastructure, including greenery, woodland and wildlife, is protected through HLDP policies.</p>
<p>7. Increased car parking required</p>	<p><b>118.</b> Car parking will be provided in accordance with district or county parking standards, which are currently being updated.</p>
<p>6. Overcrowding of people</p>	<p><b>119.</b> Building Regulations ensure overcrowding within buildings is avoided.</p>

## Appendix 2: Questionnaire Results and Responses

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6. Strain on local services/infrastructure (health, police, school, drainage, etc.)	<b>120.</b> Local infrastructure will be upgraded as part of the wider improvements to the district Garden Town, set out in both the district and Garden Town Infrastructure Delivery Plans. Funding will be sourced through the relevant mechanisms (e.g. Section 106) to ensure new development financially contributes to new or upgraded infrastructure.
5. Cause overshadowing/overlooking and loss of light/views	<b>121.</b> The Design Guide Addendum ensures that tall buildings would not result in significant overshadowing/overlooking & loss of light/views.
4. Fire risk (inc. associated with cladding)	<b>122.</b> Building Regulations ensure a building is safe with regards to fire and reducing the risk of fire.
4. Increase in crime/anti-social behaviour	<b>123.</b> Modern buildings are designed in such a way that crime is minimised, for example by ensuring areas are well-lit with natural surveillance. More information is in the main Design Guide.
4. Lack of gardens and areas for children's play	<b>124.</b> The Design Guide Addendum and policies in the HLDP will ensure sufficient communal open space areas, including those for children's play, are provided.
3. Negative impacts on existing residents	<b>125.</b> The Design Guide Addendum and policies in the HLDP will ensure any negative impacts on existing residents are mitigated against and kept to a minimum.

## Appendix 2: Questionnaire Results and Responses

Council Response key: **Amendment to Addendum required** **To be covered in full Design Guide update**

3. Risks Harlow feeling like a city	<b>126.</b> A certain amount of growth in Harlow, as set out in the adopted HLDP, is needed to ensure there is sufficient critical mass to support regeneration of the town, in particular the town centre.
2. Need to consider young/disabled on upper floors	<b>127.</b> This is a consideration for Building Regulations and the owners of a building when it is in use; however, policies in the HLDP ensure buildings are accessible. Regarding children and young people, the Design Guide Addendum and policies in the HLDP will ensure sufficient communal open space areas, including those for children's play, are provided.
2. Overall congestion increased	<b>128.</b> See responses #120 and #126.
2. Eyesores	<b>129.</b> The Addendum ensures tall buildings are aesthetically pleasing.
2. Outside space between buildings must be secure with no alleyways	<b>130.</b> Modern buildings are designed in such a way that crime is minimised, for example by ensuring areas are well-lit with natural surveillance. More information is in the main Design Guide.
2. Car charging points are required	<b>131.</b> The HLDP contains a policy regarding car charging points.
2. Tall buildings could make use of sustainable energy creation to contribute to energy requirement, e.g. solar power	<b>132.</b> This is addressed in the Design Guide Addendum.
Will sufficient critical mass be provided to improve local infrastructure?	<b>133.</b> See response #126.
Other LAs could use tall buildings for emergency housing	<b>134.</b> This is not an issue for the Design

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Council Response key: Amendment to Addendum required To be covered in full Design Guide update

	Guide Addendum.
Negative effect on the landscape	<b>135.</b> The policies in the adopted HLDP, Design Guide Addendum and main Design Guide, which is due to be updated in full, ensure any negative effects on the landscape are mitigated against and kept to a minimum.
Increased noise	<b>136.</b> Policies in the HLDP ensure noise in new developments is addressed.
Creation of tall buildings leads to increased climate change	<b>137.</b> Any carbon emissions relating to the construction of a building, etc., will be offset by other factors, especially if renewable energy technologies are installed, as outlined in the Design Guide Addendum.
Use of town centre for shopping/entertainment could become limited	<b>138.</b> The increased population in the town centre, for example resulting from new tall buildings, would ensure greater opportunities for shopping and entertainment.
Issues with narrow staircases and lifts	<b>139.</b> This is a consideration for Building Regulations; however, policies in the HLDP ensure buildings are accessible.
Para 1.15 regarding light manipulation – this could cause extra energy usage and light pollution	<b>140.</b> Manipulation of light would not necessarily cause extra lighting to be installed. For example, lighting which would be required anyway could be installed in such a way that accentuates particular features of the building.

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2. Create wind/cause swaying of building	<b>141.</b> As specified in the Design Guide Addendum, developers will be required to consider the impacts of wind on the building, and the impacts that the building could have on wind at street-level, as part of a planning application.
Need car-free walkways	<b>142.</b> The Tall Buildings section of the Addendum addresses street-level consideration, including the safety and movement of pedestrians.
Build with ecofriendly materials	<b>143.</b> This will be addressed in the full update of the Design Guide.
Need greenery on facades	<b>144.</b> Text has been amended to make reference to green walls on tall buildings. The full update of the Design Guide will cover this in more detail.
Services should be net zero in terms of energy use	<b>145.</b> This is not an issue which can be covered by the Design Guide Addendum.
Tall buildings should have lower carbon footprint than lower-rise buildings	<b>146.</b> More-so than lower-rise buildings, tall buildings have significant opportunities for renewable energy generation, such as solar panels and wind turbines, which would aid reduction of the carbon footprint of the building.
Drying facilities are required	<b>147.</b> This is not an issue which can be covered by the Design Guide Addendum.
Bike storage and charging facilities are required	<b>148.</b> This has been addressed by another response and Addendum has been

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	<b>amended accordingly (see response #6).</b>
Increased bus services required	<b>149.</b> This is not an issue which can be covered by the Design Guide Addendum. Improvements to public transport in Harlow are being addressed separately, such as through the creation of the Sustainable Transport Corridor.
Harlow needs own unique trademark, e.g. innovative buildings	<b>150.</b> It is intended that tall buildings in the Town Centre, in particular, will provide innovative trademarks.
Façade and glazing durability needs to be considered	<b>151.</b> This will primarily be addressed by Building Regulations, but the issue of materials will be addressed in the full update of the Design Guide.
Use of old heating methods in individual apartments should be prohibited	<b>152.</b> This will be addressed by Building Regulations.
Satellite dishes should be banned	<b>153.</b> The existing Design Guide already has guidance on satellite dishes, which will be updated when the full update is undertaken.
Windows should be maintainable from inside	<b>154.</b> This is not an issue which can be covered by the Design Guide Addendum.
Need to provide homes for locals	<b>155.</b> This is not an issue which can be covered by the Design Guide Addendum.
Buildings must be insulated well	<b>156.</b> This is primarily a consideration for Building Regulations, but the example of good insulation have been included in the Design Guide as a way to ensure a

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	building is as energy efficient as possible.
<b>Section 2: Privacy and Overlooking</b>	
Question	Council Response and Proposed Amendment
<b>Do the minimum separation distances provide suitable privacy between houses?</b> Yes = 10 respondents No = 33	<b>157.</b> The results of this reflect concerns that people have regarding privacy between houses. The Council considers that the guidance in the Addendum accords with best practice and will ensure that these issues are addressed when new structures are built. There is a balance between protecting privacy and ensuring the most efficient use of available and suitable land. However, the Council may revise this guidance further when the main update to the Design Guide is undertaken.
<b>Do the light angle distances provide suitable protection against impacting neighbouring properties?</b> Yes = 15 respondents No = 26 N/A = 2	<b>158.</b> The results of this reflect concerns that people have regarding the impact of new structures on the light available to properties. The Council considers that the guidance in the Addendum accords with best practice and will ensure that these issues are addressed when new structures are built. There is a balance between protecting light for neighbouring properties and ensuring the most efficient use of available and suitable land. However, the Council may revise this guidance further when the



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	main update to the Design Guide is undertaken.
<b>Comment.</b>	
Publish details in My Harlow as a reminder	<b>159.</b> The Council considers that the most appropriate place for the guidance is on the Council website and in hard copies where appropriate.
Shouldn't be able to look into neighbouring home from a tower block	<b>160.</b> There is a balance between protecting privacy for neighbouring properties and ensuring the most efficient use of available and suitable land.
There is always an impact regardless	<b>161.</b> See response #160.
Living too close to each other is stressful	<b>162.</b> The policies in the HLDP and guidance in the Design Guide and Addendum ensure appropriate densities and designs of housing are achieved to enable comfortable living.
There are impacts on existing properties	<b>163.</b> See further above.
Separation distances are excessive – there should be a sliding scale relative to housing density	<b>164.</b> The Council considers that a sliding scale relative to housing density could become complex to implement and manage and possibly cause unwarranted consequences.
Greater density can bring other benefits	<b>165.</b> Noted.
Privacy can be provided as part of general good design	<b>166.</b> The main Design Guide, which will be updated, contains information on designing privacy into buildings.

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The 30/45 angles are too large	<b>167.</b> The Council considers these are appropriate as they are commonly used angles for this purpose.
The buildings in the drawings are too high in relation to privacy of existing buildings	<b>168.</b> The buildings in the drawing are just to give an example of the angles in practice.
<b>Section 3: Amenity Space and Gardens</b>	
Question	Council Response and Proposed Amendment
<b>Are the minimum acceptable standards for rear gardens for new dwellings appropriate?</b> Yes = 16 respondents No = 25 N/A = 2	<b>169.</b> The responses to this reflect the importance that people place on gardens and amenity spaces. The Council considers the standards accord with best practice and are appropriate, and are higher than those required by some of the other LPAs, due to the importance of Harlow's Green Infrastructure and status of the wider area as a Garden Town.
<b>Explain why/comment.</b> <i>Responses sorted by number of respondents making the point; no number given means one respondent made the point.</i>	
8. Too small	<b>170.</b> See response #169.
7. Encourage use of outdoor space for leisure and gardening, to provide mental health and climate change benefits as well as areas for children's play	<b>171.</b> These are all valid positives relating to the provision and use of outdoor spaces and gardens, and are reflected in the policy and guidance documents produced by Forward Planning, including the main Design Guide and the HLDP.
2. Should use same standards as the 1950s/60s housing	<b>172.</b> Due to the changing nature of

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	housing and road use, it is not always appropriate to repeat standards which have been used in the past. Also see response #169.
High density housing has adverse effects on an area	<b>173.</b> The HLDP, Design Guide and also the Addendum contain policies/guidance which ensure the amenity, privacy, etc. of both new and existing residents is protected when new housing is built.
Good design can result in compact gardens being beautiful	<b>174.</b> Noted. The main Design Guide, which is being updated, will contain more on Green Infrastructure.
In denser areas, small gardens can be acceptable	<b>175.</b> Noted.
Older gardens are too big; newer ones too small	<b>176.</b> See responses #169 and #172.
Some front parking should be sacrificed for increased garden space	<b>177.</b> Car parking will be provided in accordance with district or county parking standards, which are currently being updated.
Lack of privacy	<b>178.</b> See response #173.
Lack of gardens encourages gangs in public spaces, leading to anti-social behavior	<b>179.</b> Harlow benefits from a large network of Green Infrastructure and green, multi-functional open spaces.
Poor access/need statement on access to garden from property	<b>180.</b> The Council will consider including this in the main Design Guide update.
Para 3.2 – needs presumption against lower standards`	<b>181.</b> This is already recognised because the text says a lower standard may be considered if alternative green space is provided nearby.

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Para 3.6 – open fronts should be norm in keeping with existing	<b>182.</b> The Council considers that allowing low railings/walls is suitable for front gardens.
Para 3.3 – 1.5m + 0.5m for ground floor flat front garden is not suitable	<b>183.</b> The overall requirement for open space is 20m <sup>2</sup> per flat, i.e. the front garden is not the only open space available to the flat.
Make gardens spacious to truly be a GT	<b>184.</b> See response #169.
Need minimum depth and width	<b>185.</b> The Council considers that a minimum square metre requirement allows greater flexibility in terms of the shape of a garden.
Need to ensure communal outdoor space for flats is kept in good condition with areas available for gardening activity	<b>186.</b> This is not a consideration for the Design Guide Addendum.
<b>Section 4: Householder Guidance</b>	
Question	Council Response and Proposed Amendment
<b>Do you think the extension principles will ensure houses remain well-proportioned and local character is respected?</b> Yes = 18 respondents No = 24 N/A = 3	<b>187.</b> The results of this reflect concerns that people have regarding impact of extensions. The Council considers that the guidance in the Addendum accords with best practice and will ensure that these issues are addressed when extensions are planned and built. However, the Council may revise this guidance further when the main update to the Design Guide is undertaken.
<b>Do you think the householder guidance provides suitable protection against impacting neighbouring properties?</b>	<b>188.</b> The results of this reflect concerns

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<p>Yes = 17 respondents No = 25 N/A = 1</p>	<p>that people have regarding impact of householder works on neighbouring properties. The Council considers that the guidance in the Addendum accords with best practice and will ensure that these issues are addressed when householder works are carried out. However, the Council may revise this guidance further when the main update to the Design Guide is undertaken.</p>
<p><b>As householder guidance is normally used by individual homeowners when planning work on their property, do you find it easy to understand?</b> Yes = 22 respondents No = 20 N/A = 1</p>	<p><b>189.</b> The results of this reflect concerns people have regarding how easy it is to understand what is required from homeowners. The Council considers that the guidance in the Addendum is as clear as possible, aided with the use of diagrams. However, the Council may revise this guidance further when the main update to the Design Guide is undertaken.</p>
<p><b>Comment.</b> <i>Responses sorted by number of respondents making the point; no number given means one respondent made the point.</i></p>	
<p>4. Council needs better monitoring of extensions as some existing ones are inappropriate</p>	<p><b>190.</b> The Council would only grant planning permission for development which is suitable and accords with material considerations such as the HLDP and Design Guide. However, some extensions may be carried out under 'permitted development rights' which do not need planning permission. The limits</p>

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	of what a householder can do under these rights are set by the Government nationally.
2. Clear and easy to understand	<b>191.</b> Noted.
More examples need on what is well-proportioned	<b>192.</b> These examples will be included in the main update to the Design Guide.
Best-designed extensions often contrast with the main building rather than match it	<b>193.</b> Such examples would be considered on a case-by-case basis.
Need to consider design if it's sustainable, even if it's not in keeping with original building	<b>194.</b> See response #193.
Para 4.4 – Lack of creativity can lead to blandness	<b>195.</b> The Council does not consider that the guidance hinders creativity. Any 'unusual' development proposals would be considered on a case-by-case basis.
Need to consider maintainability of existing structure (and neighbours') with access plan	<b>196.</b> This is not an issue which can be covered by the Design Guide Addendum.
Publish reminders in My Harlow	<b>197.</b> The Council considers that the most appropriate place for the guidance is on the Council website and in hard copies where appropriate.
<b>Section 5: Climate Change</b>	
Question	Council Response and Proposed Amendment
<b>Are there any design aspects relating to the effects of climate change, other than those identified in Chapter 5, which should be considered?</b> <i>Responses sorted by number of respondents making the point; no number given means one respondent made the point.</i>	
4. All new houses should have good insulation, i.e. energy efficient	<b>198.</b> See response #156.

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Not integrated into rest of guidance	<b>199.</b> Signposts have been added to this section from other parts of the Addendum.
Waterways must be checked and cleared of sediment and vegetation, which will help prevent climate change	<b>200.</b> This is not an issue which can be covered by the Design Guide Addendum.
Para 5.14 – split into two	<b>201.</b> Both paragraphs 5.13 and 5.14 have been amended to be split differently.
Buildings should be net zero now to avoid need for it to be changed later	<b>202.</b> This is not a requirement which can be made in the Design Guide Addendum. The Council will consider issues such as this in the forthcoming review of the HLDP.
Vehicle charging for whole developments is required	<b>203.</b> The HLDP contains a policy on vehicle charging.
Para 5.19 – zonal heating etc. – change “can” to “should”	<b>204.</b> Text has been amended accordingly.
Para 5.22 – strengthen to avoid overheating for occupants	<b>205.</b> Text has been amended to change “can help” to “should be incorporated”.
Para 5.22 – Make it clear that a lighter colour is functional	<b>206.</b> Text has been amended accordingly.
Flooding – needs requirement for development which results in reduced flooding risk for whole area as well as development itself	<b>207.</b> This is not an issue which can be covered by the Design Guide Addendum.
Para 5.36 – why would Council approve development with potential flood risk anyway. All homes SHOULD have these features	<b>208.</b> The text has been amended to change “can be incorporated” to “should be incorporated”. The HLDP provides policies relating to flooding and Sustainable Drainage Systems (SuDS).
Developments need storm storage lakes, floodplain and wetland areas – i.e. flash-flooding resilience	<b>209.</b> This is not an issue which can be covered by the Design Guide Addendum.

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Decontaminate greywater at source – toxic substances can otherwise infiltrate environment	<b>210.</b> This is not an issue which can be covered by the Design Guide Addendum.
Effects of pollution and rubbish	<b>211.</b> This is not an issue which can be covered by the Design Guide Addendum.
Protect green spaces; don't destroy existing habitats and biodiversity	<b>212.</b> The HLDP contains policies which give strong protection to the retention, enhancement and provision of existing habitats and biodiversity.
All new houses should have solar panels	<b>213.</b> This is not a requirement which can be made in the Design Guide Addendum. The Council will consider issues such as this in the forthcoming review of the HLDP.
Greenery on facades	<b>214.</b> The Addendum is to be amended to make reference to green walls on facades of tall buildings (see response #144). The Council will also consider issues such as this in the forthcoming review of the HLDP.
Encourage use of green spaces and gardens	<b>215.</b> This is not directly an issue for the Design Guide Addendum, as encouraging use is carried out in different ways by both the Council and other national and local organisations. However, the Addendum and other Forward Planning documents emphasise the importance of the provision of Green Infrastructure.
Have grass instead of paved areas	<b>216.</b> This will be covered in the Green Infrastructure section of the main Design



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	Guide update.
All new buildings should be heated by solar power or ground-source heat pumps	<b>217.</b> This is not a requirement which can be made in the Design Guide Addendum. The Council will consider issues such as this in the forthcoming review of the HLDP.
Reduce speed limits	<b>218.</b> This is not a requirement which can be made in the Design Guide Addendum.
Leave grass so it can be left for wild flowers	<b>219.</b> This is not a requirement which can be made in the Design Guide Addendum. Cutting of grass by the Council is carried out by HTS. Changes in best practice in the management of such spaces means that some areas of grass are cut much less often to allow grasses to flower and encourage biodiversity.
Wording should be stronger, e.g. for passive lighting and rainwater harvesting, say they should be encouraged and design should consider them	<b>220.</b> The text has been amended to change “can be” to “should be”, where it is considered appropriate to do so.
<b>Extra Comments</b>	
All guidance (Design Guide, Local Plan, Sustainability Checklist, etc.) should be in one place	<b>221.</b> Due to the differing national legislative requirements and timescales of producing these different types of documents and guidance, they cannot be combined into a single document. However, the Council website provides easy access to the various documents.

### Appendix 3: Consultees

The following statutory organisations, groups and charities were notified about the consultation on the draft Design Guide Addendum SPD. These are in addition to individuals and companies who were notified.

Affinity Water	Highways England
Anglian Water	Historic England
British Telecom/Openreach	Home Builders Federation
Canal and River Trust	Homes and Communities Agency
Chelmsford City Council	Hunsdon Parish Council
Department for Education	Later Life Matters
East Hertfordshire District Council	Lee Valley Water
East of England Ambulance Service	Little Hadham Parish Council
Eastwick and Gilston Parish Council	Matching Parish Council
Environment Agency	National Grid
Epping Forest District Council	Natural England
Epping Upland Parish Council	Nazeing Parish Council
Essex County Council	Network Rail
Essex County Fire and Rescue Service	NHS England
Essex Police	North Weald Parish Council
Fawbert & Barnard's Primary School	Pear Tree Mead Academy
Forestry England	Princess Alexandra Hospital NHS Trust
Greater Anglia	Robert Halfon MP
Harlow Alliance Party	Roydon Parish Council
Harlow and District Sports Trust	Sawbridgeworth Town Council
Harlow Area Access Group	Sheering Parish Council
Harlow College	Sport England
Harlow Council Officers and Councillors	Thames Water
Harlow Ethnic Minority Umbrella	Theatre Trust
Harlow Fields School and College	UK Power Networks
Hertfordshire County Council	West Essex CCG

## Appendix 4: Press Notice

### DRAFT DESIGN GUIDE ADDENDUM SUPPLEMENTARY PLANNING DOCUMENT

Harlow Council is consulting on the Draft Design Guide Addendum Supplementary Planning Document (SPD). SPDs contain guidance which expand on policies in the Harlow Local Development Plan.

The Council already has a Design Guide SPD (adopted 2011) which is used in examining design principles in new development, when assessing planning applications, in conjunction with the Harlow Local Development Plan. The Council has now prepared an Addendum which will accompany the existing Design Guide.

Most of the content of the existing Design Guide remains relevant, but it does not include guidance on a range of subject matters which are addressed by recently-updated national planning policy and guidance. The Addendum, therefore, provides guidance on these matters.

The Addendum comprises five sections: Tall Buildings; Privacy and Overlooking; Amenity Space and Gardens; Updated Householder Guidance; and Climate Change. The existing Design Guide has a householder section, but the section in the Addendum provides further guidance.

The Addendum, once adopted, will itself become an SPD and a material consideration in the determination of planning applications. It will also inform relevant pre-application discussions. It will be important that both the existing Design Guide and the Addendum are read together.

**We are now seeking views on the Draft Design Guide Addendum SPD.** The most efficient way to provide comments is by emailing [Myharlow@harlow.gov.uk](mailto:Myharlow@harlow.gov.uk) but letters can be sent to Forward Planning, Civic Centre, Water Gardens, Harlow CM20 1WG.

The consultation starts on Thursday 22 July and **closes at 5pm on Friday 3 September**. Comments received after this date may not be accepted. This six-week period is longer than the minimum statutory period of four weeks, to allow for the traditional summer holiday period.

The Addendum can be viewed online at [www.harlow.gov.uk/spd](http://www.harlow.gov.uk/spd), or in Harlow libraries and the Civic Centre during normal opening hours. If you are unable to access the document, please email us or phone (01279) 446 577 and we can send you a hard copy.

By responding, you give consent to the Council to hold & process your personal data in accordance with the Data Protection Act and the General Data Protection Regulation. Your name, organisation & comments may be available for others to view at the Council offices & on the Council website. The Design Guide Addendum has been prepared in accordance with The Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended).

**Harlow**  
Council  
*Working together for Harlow*

## **Appendix 5: Public Questionnaire on Council Website**

### **Section 1: Tall Buildings**

Do the definition and categories of tall buildings reflect what you consider tall buildings to be?

How many storeys do you feel a building should have to be called a tall building?

Thinking about the height and scale of tall buildings, are there any specific places in Harlow which you think would benefit from them?

In the town centre specifically, would you prefer individual tall buildings or clusters of ones which are at different heights?

What heights do you think are acceptable (in storeys)?

Aside from the points mentioned in Chapter 1, are there any other potential impacts of tall buildings which should be addressed?

### **Section 2: Privacy and Overlooking**

Do the minimum separation distances provide suitable privacy between houses?

Do the light angle distances provide suitable protection against impacting neighbouring properties?

Comment

### **Section 3: Amenity Space and Gardens**

Are the minimum acceptable standards for rear gardens for new dwellings appropriate?

Please explain why/Comment

### **Section 4: Householder Guidance**

Do you think the extension principles will ensure houses remain well-proportioned and local character is respected?

Do you think the householder guidance provides suitable protection against impacting neighbouring properties?

As householder guidance is normally used by individual homeowners when planning work on their property, do you find it easy to understand?

Comment

## **Chapter 5: Climate Change**

Are there any design aspects relating to the effects of climate change, other than those identified in Chapter 5, which should be considered?