

Appendix B (i)

Town Centre Masterplan Framework – Schedule of summary of representations received

	Consultee	Page/Para/Table	Summary of Representation	Comments
1	ECC GI Team	General comments	<ul style="list-style-type: none"> • There are extensive opportunities to incorporate GI as part of the development proposals to connect places and encourage sustainable transport and active lifestyles which will have a direct positive impact on the health and wellbeing of the population. • Opportunities need to be utilised to provide a minimum of 10% biodiversity net gain. • Tree planting, including street trees (in line with NPPF) can be utilised to in order to provide a number of key benefits such as urban cooling. • Green corridors can be created to avoid habitat fragmentation. • Ensure open spaces are multifunctional avoiding any potential conflicts. <p>Overall the provision of GI is very good and the proposals are based around GI. The proposals are creating sustainable transport links, promoting walking and cycling in particular. There is also good amounts of tree planting currently proposed and a decent amount of open space.</p>	<p>1. No changes necessary unless specific references to multifunctional GI, tree planting providing benefits to urban cooling etc want to be included. Council’s GI and Open Space SPD (to be adopted March) also addresses many of these points.</p>
2	John Mustafa	General comments	<p><i>“.....focus more on the cycle paths system combined with better spaces to live and work plus decent parking, drop off spaces, recreating "The Square" maybe create a leisure zone with plenty to go and do for a day or evening out pitch and putt could be reinstated. instead of packing in as many flats as possible stop that and think about the significant opportunity. Harlow is the birthplace of fiber optics, could you go after funding to create a museum all about the birth of that after all spurned a whole world of advances including the internet! why not brand the town as a tech town and encourage AI and tech companies to set up here.....”</i></p>	<p>2. No comment/change. None of this is pertinent to the Town Centre SPD which already addresses creating cultural quarters and leisure activities as well as supporting cycle paths etc.</p>
3	LPP on behalf of West Essex ICS	Policy basis, vision and objectives	<p>We support the Vision and strategic objectives for the town centre to be a healthy place contributing to the well-being of the community, accessible to all with particular emphasis on active and sustainable modes of movement, with a diverse mix of shops, services and first class facilities which supports the population.</p> <p>To further emphasise the need and desirability of maintaining a suitable range of diverse uses within the Town Centre, it is</p>	<p>3. Add reference to healthcare and healthy living and wellbeing in Vision and Strategic Objectives</p>

			requested that specific reference is made to the need for a suitable health care presence. This would allow for a valuable complementary community use and service, which could also help to reinforce and sustain the vitality and viability of the shopping centre and support Harlow's regeneration objectives as referred to further below.	
		Town Centre Guidance Note 4D: Civic, Community, Leisure	<p>Good access to local healthcare infrastructure will be a vital component of delivering the new model of care, and contribute to meeting Harlow's healthy town objectives. A suitable health presence in an accessible town centre location could deliver multiple benefits to the community. Including the potential to increase footfall to the town centre to support the retail offer, and encouraging the use of sustainable active travel modes towards the transport ambitions for the Garden Town.</p> <p>Guidance Note 4D could therefore, be expanded to both refer to support for local health infrastructure such as a local healthcare hub, and to partnership working with partners including the ICS.</p>	4. Add reference to healthcare provision / hub in guidance note 4D
		Land Uses	Figure 19 illustrates the future indicative predominant ground floor uses across the town centre, with the illustrative masterplan framework as the basis of the drawing. The current NHS Wych Elm Walk-In Centre along with the ambulance station, and Wych Elm decked car park located in this area (falling within Opportunity Area 2) are shown for proposed residential use at the ground floor. Given the potential relocation of PAH to the East of Harlow site, it may be prudent to retain a healthcare presence in this area, subject to further discussions with partners, along with associated parking for those patients for whom public transport would not be suitable means to access the services on the site. Consequently, the retention of the Wych Elm decked car park or suitable alternative facility may be desirable in this regard, whilst a health care presence remains here.	5. A separate brief is being prepared for the Wych Elm area that can include references to healthcare and retained parking provision.
		Opportunity Areas	Opportunity Area 2 (Wych Elm), and Retail Core 1 (Harvey Centre) both include an element of community floorspace in their indicative capacity estimates. Although it is acknowledged that community uses may include health care provision, it is requested that specific reference to health care facilities is made within the document for the avoidance of doubt.	6. Add reference to healthcare at Wych Elm.
4	Nazeing Parish Council	General comments	<ul style="list-style-type: none"> The increased numbers of homes and improvements to Harlow will probably result in additional traffic flow through Nazeing Village, particularly as there are plans to introduce new businesses such as Logistic Hubs. There is already a great deal of pressure on our small local roads. What provisions are there in the consultation to deal with increased vehicle movements through Nazeing? The document puts a great deal of emphasis on walking, 	7. No changes to the SPD – these comments are to be addressed in the development of the Town Plan and through separate discussions with education, highways of services at ECC and through Local Plans.

			<p>cycling, with bus connections focusing on important elements such as the train station, Gilston Garden Town, Main Shopping Area, business zones and schools. There is a proposal for car free zones and reduction of car parking with a preference for cycle parking. Because of the rural nature of Nazeing with limited existing public transport links, residents wishing to visit Harlow are most likely to use a private car at present. Are there plans to improve public transport links between Nazeing and Harlow?</p> <ul style="list-style-type: none"> • The plan proposes new hospital facilities for the increased numbers of residents of Harlow, as a result of additional housing. Will the consultation consider the wider area around Harlow such as Nazeing who are currently using the existing hospital facilities? • There are at present a number of children from Harlow using the Nazeing primary and junior school. What provisions are planned to limit the pressure on our school from the increased population in Harlow? 	
5	Affinity Water	General comment	Only want to ensure that any applications that come forward in the Town Centre are sent to Affinity Water as consultee	8. No comments/changes
6	Sport England	Town Centre Guidance Note 2A: Walking	Consideration should be given to adding a principle that supports seating in appropriate locations on walking routes to support walking by all community groups e.g. the elderly and those with health impairments.	9. Agree and include
		Town Centre Guidance Note 2B: Cycling	The principles proposed to encourage cycling are welcomed and are considered to accord with the abovementioned Active Design guidance. It is requested that the cycle parking related principles expect cycle parking to be in prominent locations with good natural surveillance to encourage use by all potential users.	10. Agree and include
		Town Centre Guidance Note 3A: Urban Design Principles	In view of the vision and objectives focus on the town centre being a healthy place for everyone and Policy L4 (Health and Wellbeing) of the adopted Local Plan requiring applicants to consider the impact on the health and wellbeing of new and existing residents having regard to principles including good quality design, having regard to the Essex Design Guide which incorporates active design principles, it is requested that an additional principle is added relating to encouraging physical activity would therefore be consistent with the Local Plan as well as Government policy in the NPPF and the NMDC. The abovementioned Active Design guidance which is referenced in the reasoned justification to policy L4 provides principles and specific advice which may be helpful.	11. Agree and include

		Town Centre Guidance Note 3B: Public Realm Principles	The public realm design principles are welcomed and are considered to accord with the abovementioned Active Design guidance. It is requested that the 'green infrastructure principle is amended to expect green space to be multi-functional to encourage use of it by all of the community e.g. spaces designed for play, rest, informal sport etc	12. Agree and include – this is also set out in more detail in the GI and Open Space SPD (to be adopted in March)
		Town Centre Guidance Note 4C: Housing	As the majority of new homes in the town centre would be expected to be high density proposals in tall buildings, the guidance should expect new residential to incorporate rooftop gardens, podiums and other communal amenity spaces where applicable and design them so that they encourage physical activity e.g. through including space that is multi-functional, 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.	13. The DG addendum sets out the requirements for amenity space including flats (through various options). Cross references to amenity space being multifunctional linked to Design Guide addendum.
		Tall Building Amenity Standards	The guidance on amenity standards in tall buildings is broadly welcomed. However, the guidance could be extended to incorporate the following advice which would encourage physical activity in tall building developments: <ul style="list-style-type: none"> • 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; • Designing buildings to promote the use of the stairs through the prominent position of stairs, appropriate signage and stairwells that are spacious and welcoming; • Cycle storage should be appropriately designed, secure and prominent and communal storage should be adequate to serve the number of dwellings in the building. 	14. Add these points in Guidance note 5H.
7	Theatres Trust	Town Centre Guidance Note 4D – Civic, Community, Leisure We would also support delivery of a new music venue in principle with provision having been a challenge since the loss of the Square, although we note there is an existing venue within the Harvey Centre since 2017 so consideration should be given as to whether Phoenix Live forms part of a longer term offer or whether a new venue offers something different to Harlow and its catchment	15. No comment/change
		Town Centre	This part references the potential for an enlarged theatre venue	16. Amend text to address this.

		Guidance Note 11 – Retail Core 1	<p>on the library site. We raised in our comments on the Town Centre AAP in 2018 that the document was contradictory in that it both discounted a new theatre venue and sought replacement of the Playhouse. This part of the document indicates similarly unclear direction; theatre and live performance provision is very important for the town and the vitality and function of its centre.</p> <p>Therefore we would suggest the Council needs to take a strategic approach which either seeks to enhance the existing Playhouse or seeks a suitable replacement and allocates land for such use. If the Council is seeking both a larger venue and retention of the Playhouse it will need to be satisfied there is sufficient demand for both and that the needs and demands within the town are properly understood. We would strongly encourage the Council to engage with us on this matter.</p>	
8	Environment Agency	General comment	<p>Improving Access to Greenspace report from Public Health England, 2020, has good evidence on the benefits of greenspace, supporting that this should be a key part of the SPDs vision.</p> <p>The SPD area is located within a Secondary Aquifer, an area designated for drinking water abstraction from groundwater. Therefore, the bedrock and groundwater are vulnerable to mobilised contaminants. The SPD should acknowledge this constraint and that any development will need to demonstrate how it will not negatively affect water quality in surface water or groundwater bodies.</p>	<p>17. Add factual statement in “Existing landscape context” section (para. 5.13) re. aquifer.</p> <p>Add ref to Greenspace report in “Approach to the public realm, around para 6.7).</p>
9	Quod on behalf of Places for People	General comment	Supporting comments only	18. No changes necessary
10.	Historic England	General comment	The SPD would be improved if it included a list of the technical evidence that developers may need when preparing their plans for new development (depending on the location and local context), for example, heritage impacts assessments (HIAs) etc. See our comments on RC1 and RC2 for more information.	19. This is to be set out in a Validation Checklist currently being prepared by the Council
		Town Centre Guidance Note 3C: Heritage principles	<p>The text should be amended to make clear that a number of the sculptures in the town centre are also listed, and therefore National Planning Policy with regards designated heritage assets would apply to these too:</p> <ul style="list-style-type: none"> • Wild boar sculpture (Grade II Listed); • Portrait figure of Elisabeth Frink (Grade II Listed); and • Meat Porters sculpture (Grade II Listed). <p>We suggest that guidance note 3C is amended to list all designated heritage assets within the town centre, and to stipulate that Heritage Impact Assessments (HIA) will be required to inform and accompany any development proposals which could affect these. These needn’t be onerous.</p>	<p>20. Agree and add assets in Note 3C</p> <p>Add reference to HIA in Note 3C</p>

		Retail Core 1 - Harvey Centrewe strongly recommend that an additional criterion is added to TG guidance note 11: Retail core, to make explicit that Development proposals will expected to enhance and safeguard the setting of the Grade II Listed St Paul’s, and that development proposals should be informed and accompanied by a Heritage Impact Assessment (HIA).	21. Agree to include additional criteria.
		Retail Core 2 - The Water Gardens	While we support criterion ‘A’ of TC Guidance Note 12: Retail, which seeks to enhance and safeguard the setting and identity of the Water Gardens and the key view south to Rye Hill’, we request that the criterion is amended to reference it’s designated heritage asset status (i.e. Grade II Listed). The criterion should also refer to the Grade II listed Wild Boar sculpture which is located within the Water Gardens. Finally, as with Retail Core 1, we strongly advise that the criterion is amended to require that development proposals should be informed and accompanied by a Heritage Impact Assessment	22. Agree to reference in suitable text the Grade II status of the Water Gardens and Wild Boar Sculpture.
11.	HGGT Board partners	Housing	The TCMF identifies the aspiration that the town centre will “have a range of high quality homes that can support a mixed and balanced community” (TCMF para. 4.2). Whilst the principle is clearly supported by the HGGT Vision, it is questionable whether the density or building heights prevalent in the town centre, and generally supported by the draft TCMF, can aspire to achieving true mix and balance. It may therefore be more appropriate to recognise that the housing offer in the town centre will be different from that within existing and new neighbourhoods and plan for this accordingly.	23. Agreed – amend para 4.2 of vision Supporting text to Note 4C – add ref to monitoring
		Tall Buildings further rationale around the guidance on building heights is to be welcomed as would an understanding of how the ‘exceptional’ quality of tall ‘landmark’ buildings is to be measured. Alongside consideration of creating landmarks and points of reference the Panel have suggested technical analysis of the streetscape might also be considered that takes account of impacts to key views and overshadowing and microclimate impacts on existing buildings, the public realm and edges of open landscape.....	24. Add text relating to meaning of exceptional
		Infrastructure	the TCMF strategic objective of “first class community facilities” is welcomed. Understanding what those community facilities needs are, however, requires consideration of the future town centre that is desired. As the TCMF is not a local plan there is not the detailed evidence gathering associated with allocating growth. Infrastructure needs will likely be wide ranging in nature, inclusion of illustrative diagrams showing public realm, green space, SuDS and play facilities is useful, however, detailed assessment will still be required to properly understand both the needs of the future residents (taking account of the expected type of housing) and of visitors. The Council’s commitment to identify these infrastructure needs and to include these in the HGGT Infrastructure Delivery Plan (IDP) (TCMF para. 9.12) is	25. Note comments but no changes to the SPD itself. This will be considered both in the HGGT IDP and any Local Plan Review/AAP for the TC.

		welcomed by partners and considered a prudent and expedient aim given the development decisions faced in the town centre. Partners invite the Council to engage with the HGGT IDP to establish an evidence led approach to understanding and planning for the potential infrastructure needs of the town centre, further comments on this below.	
	Vibrant TC (library)	Whilst the current refurbishment and improvement works being undertaken by ECC to the Library will create a far better offer for current residents, Partners agree that its future offer could be enhanced (TCMF para. 2.34 and 5.33) to ensure it meets the needs of the garden town in years to come and takes advantage of the links in the town centre to cultural, leisure and further education as well as skills and employment.	26. Add additional text to para 5.33
	HeritageAs suggested by the Quality Review Panel, it would also be welcomed to see within the spatial principles recognition for the town's rich arts heritage alongside that of its modernist architectural character.	27. Amend spatial principle 10 to include this.
	'Harlow Urban Forest'The case within the TCMF is well presented and well thought out but, as suggested by the Quality Review Panel, this could be given greater prominence by introducing this earlier as a 'single big idea'. Placing it as it is, within public realm guidance near the middle of the document perhaps belies its power and potential to be a transformative action that would deliver a truly distinctive and celebrated town centre for the garden town with a unique identity.	28. Amend text
	Green LinksThe green wedge to the south of the town centre offers in particular the opportunity to put natural open green space on the doorstep of new residents. It is currently separated visually and physically from the water gardens by the parking deck and the dual carriageway. As an aspirational document the TCMF could, however, seek to encourage consideration of how these spaces can be reconnected taking inspiration from the original 1952 masterplan and the form of the town centre in 1966 (TCMF fig.s 29 & 30) and as suggested by the Quality Review Panel, for example by greening the car park	29. Add additional opportunity to Guidance Note 12
	Public realm consideration is given to how the outdoor spaces will be used all year round. For example the concept of creating a carefully curated series of public spaces, or 'rooms', within the town centre might itself be used to consider how each space is made up of parts that ensure it remains animated and useable throughout the day and evening, summer and winter and in the sun and rain.	30. This is too detailed for an SPD and could be considered through individual development briefs
	Pedestrians and cyclistsReference to the LCWIP in the TCMF (at Guidance Note 2A and 2B) would be welcomed to ensure this key connectivity is identified and supported.The Quality Review Panel have recommended that the TCMF might incorporate and build upon the '15-minute City' concept.	31. Agreed – add references to Note 2A and 2B

		HGGT Transport Strategy	this was approved by Harlow Council on 4 th November and contains important principles and guidance relating to sustainable mobility. Partners recommend that this document is acknowledged in the TCMF and the objectives and spatial principles checked to ensure these are consistent and support the implementation of the strategy.	32. Agree Add in chapter 3
		HGGT 'How To Guide for Planning Contributions'	Partners invite you to reference the document (at TCMF para. 9.11) to signpost this for developers and other stakeholders.	33. Add in chapter 3
		HGGT Sustainable Community Transport Hub and Healthy Town Framework:	There is no active work on either of these quoted documents. The healthy town principles were incorporated into the HGGT Sustainability Guidance and Checklist. The HGGT Transport Strategy (cited above) endorses the guidance developed by CoMo UK around sustainable mobility hubs. Partners recommend that the named documents are deleted and the TCMF is checked to ensure it picks up the relevant points within the Sustainability Guidance and the Transport Strategy.	34. Agree their deletion from the document
12.	Iceni on behalf of Courtenay Investments Ltd (CIL) Major Broad Walk landowner – see rep for map of freehold	Primary and Secondary Frontages	We note however, that Figure 20 on Page 55 identifies primary and secondary shopping frontages. Given the aspirations for a more diverse and flexible mix of uses within the town centre, defining specific retail frontages is a somewhat outdated approach and therefore we suggest defining a Primary Shopping Area, but not specific frontages within it. If defining frontages is considered essential for the Council, it is important that the planning policies relating to such frontages are not too prescriptive and restrictive on the types of uses which can be located in these locations.	35. The HLDP sets out the policies for Primary and Secondary Frontages so this SPD and the guidance note already produced by the Council has to set out those frontages for the Policy to hook onto. This cannot be removed from this SPD. The SPD already identifies key shopping/retail areas through the south OAs
		Pedestrian routes and public realm/greening (servicing arrangements)	In relation to key pedestrian routes and street typologies - Whilst CIL does not have any objection in principle to these routes being used by pedestrians, it is essential that that CIL's servicing rights along Cross Street are not jeopardised..... Cross Street should seek to balance pedestrian and vehicular space, creating a safe environment for all. Within the drafting of the SPD there needs to be consideration of commercial servicing requirements for the site, as well as pedestrians. It is noted that a green link is proposed along Cross Street. In the same vein as set out above, whilst CIL strongly supports additional green infrastructure within the town centre, it is important that this green link does not jeopardise our client's ability to adequately service the asset along Cross Street either as part of the existing scheme of any future development scheme.	36. Addressed in Note 2E
		Tall buildings	Firstly, as a minor point of clarification, Paragraph 7.8 of the draft SPD states that applications have been approved within the town centre of schemes up to 15 storeys. It should be noted that planning permission was granted for the redevelopment of the Harvey Centre, which comprised heights of up to 16 storeys (LPA	37. Agreed update para

		Ref: HW/FUL/00097). Therefore, the end part of Paragraph 7.8 should be amended.	
	Tall building at Broad Walk	<p>Figure 160 (Page 123), sets out the 'Indicative Tall Building Framework Plan', showing specific areas identified for increased height (i.e. 'point blocks' of 10 – 12 storeys, sometimes 14 – 16 storeys). It is noted that there are no point blocks proposed for CIL's asset on Broad Walk. This is further shown in Figure 171 (Page 151) of the draft SPD, which sets out the indicative masterplan for Opportunity Area 4 which CIL's site is situated within. The majority of surrounding buildings are identified as showing some height, within nothing shown for our client's site. Whilst a detailed heritage and townscape assessment has not yet been undertaken by our client, it should be noted that the site comprises a key gateway for the town centre with no key views going through it or any listed buildings or heritage assets immediately adjacent. We would expect the SPD to be more ambitious in regard to height and it should also be acknowledged that a redevelopment scheme is likely to require a certain scale and quantum in order for it to be viable.</p> <p>If the Council is not able to identify height on CIL's site at this stage, we request that it is made clearer within the draft SPD that there remains potential for increased height to be located on other sites which aren't shown, subject to careful design consideration and appropriate justification with each proposal being considered on its individual merits.</p>	38. Include ref in SPD identifying that additional opportunities for development might come forward in the town centre. There is an expectation that proposals would correspond with the principles and guidance in the SPD.
	Dual aspect windows	TC Guidance Note 5F on Page 128 sets out that in order to create natural ventilation, ensure sufficient daylight, create a greater choice of views and ensure flexibility in the use of rooms, it is expected that 80% of flats in a tall building will be dual aspect..... 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..... To better reflect this, the wording should be amended to state that 'dual aspect flats should be encouraged and maximised' the requirement for 80% should be removed.	39. Do not agree. The Council needs to maintain the standard in order to achieve the aim, diluting the wording which result in fewer dual aspect windows being provided.
	TC Guidance Note 5G (Design Criteria – Street Level) 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	40. This is not agreed as it is an important objective to secure high quality greening of the environment and public realm improvements in the town centre, not just to accord with Council policy but Government objectives. This would not be achieved if green space is 'tucked away' and would perpetrate the harsh concrete spaces

			internal courtyards, podiums and roof terraces).	that currently dominate the town centre.
		TC Guidance Note 5G (Skyline) states that 'tall buildings have a major impact on a skyline'. 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'.	42. Not agreed as tall buildings do have an impact on the skyline (negatively or positively) but the impact on some views may not be major.
13.	Ripped Gym Basildon, Martorana Properties and Hybrid Holdings	Tall buildings	It is considered that greater consideration should be given to maximising the heights in this location, especially considering the highly sustainable nature of the site and the urgency to which the Council are seeking housing delivery..... Likewise, and in light of changing fire regulations and increased build costs, flexibility must be given in terms of proposed heights to ensure that homes can be viably delivered..... In addition to maximising height, NPPF paragraph 125 states that it is especially important that planning policies and decisions avoid homes being built at low densities, and ensure that developments make optimal use of the potential of each site. If the indicative heights at Wych Elm were increased, this would certainly optimise the use of each site, over and above the indicative massing that is being proposed in HTCMF's Figure 167.	43. There have already been discussions about Wych Elm and the differences between what is being approved or submitted but that the SPD should remain as is. It is a flexible document and a specific brief for this area will identify whether taller buildings are appropriate.
		Specific comment on 10 Wych Elm	It is noted that the height indicated for Wych Elm House is '10 storeys' when this was in fact given permission for a scheme of up to 11 storeys – this should be amended at Figure 167 on the HTCMF. Based on this permission, 12 storeys is a much more reasonable height for 10 Wych Elm (compared to 6 storeys which is shown at Figure 167 of the HTCMF), as the site is located directly adjacent to Wych Elm House and would be in keeping with the height precedent set in the area. The indicative massing for 10 Wych Elm shows the inclusion of the bus depot as part of the redevelopment. This is an unrealistic proposal, and 10 Wych Elm should be redeveloped in isolation to ensure that proposed homes are delivered in the short term. The relocation of the bus depot could take some time and would mean that contributions towards Harlow's housing targets would be delayed significantly.	44. Not agreed as a development brief is being prepared for this area.
		Specific comment for 5 Wych Elm	In terms of 5 Wych Elm, it is considered that the proposed heights in this location should be increased to be more in line with the scheme which was recommended for approval at 4 Wych Elm (15 storeys). Specifically, the indicative massing is being shown as 6 storeys, and 10 storeys would be more realistic in this location, in light of delivering a viable development. Even with an increase in height, proposals in this location would be designed to ensure Rectory Wood would not be impacted. Again, this would ensure the proposals in this location would match with the heights agreed in principle by the case officer for 4 Wych Elm	45. As above, retain SPD as is until brief prepared.

		Clusters of tall buildings	Tall buildings are naturally located in a group, and it is disputed that the positioning of multiple tall buildings in close proximity on a single site or adjacent site should be avoided. Notably, the HTCMF states that in certain circumstances, it might be appropriate to make the case for a small cluster (estimated as two to three taller elements). In order to do so, proposals should demonstrate exceptional design quality of the building and the street environment, as well as achieving the required amenity standards. Proposals should also demonstrate how they contribute to the overall regeneration of the area and place-making benefits..... There must be a number of tall buildings proposed in this area in order to meet the aims of Opportunity Area 2 (notably 370 residential units). The HTCMF does state that the area has the potential to accommodate taller development and Figure 165 shows a number of tall building elements – notably at 5 and 10 Wych Elm. This figure contradicts the principle of avoiding clusters of buildings in Harlow.	46. Not agreed
14.	Regen	Page 44	Should state that pedestrian focus would not hinder operation of current access.	47. Agreed Page 44 – update text
		General comment	Generally, where narrative talks about bring the balance back to the North of the town, we should consider this a General rebalancing rather than North being the priority as this somewhat ignores the Harvey Centre.	48. Agree spatial principle 5 – make this clear
		Library block and wording	Library block should be removed as the aspiration is to improve legibility between broad walk and the WGs. We should ensure narrative includes the continued provision of a Library and as such removal would be as part of re-provisioning to more appropriate location.	49. Agree remove library blocks from any images to allow movement through but must include wording explicitly somewhere that library services will remain in TC.
		Taxi ranks	Lastly, some narrative on further consideration of taxi rank locations as developments come forward to ensure appropriate drop-off/collection locations.	50. Agreed, amend text.
15.	EFDC	General comments	<p>.....Growth at the scale proposed represents an exciting opportunity for Harlow to embrace the delivery of sustainable town centre neighbourhoods with a rich mix of housing type and tenure, the concept of the 15-Minute City and for optimal integration with the Garden Communities. The Council considers there are opportunities for this to be more ambitiously embraced within the Framework. There are clearly significant infrastructure challenges that are not explored in any detail within the Framework.</p> <p>The Council considers that greater clarity is needed on Harlow's role beyond its immediate and Garden Town context as a sub-regional centre. This needs to be more consistently reflected throughout the Framework. Consistent with the Council's recent response to the consultation on the Harlow Town Plan 2047,</p>	51. No changes needed. The HLDP and SPD does enough to refer to its sub-regional centre and also through HGGT documents as well. The SPD does have to reflect the HLDP so it would be contradictory to change too much on this in the SPD – this would have to be looked at in a review of the HLDP.

		<p>Harlow needs to be an outward looking settlement that links and interacts positively with neighbouring districts, sharing living, employment and leisure opportunities. EFDC's retail strategy in its emerging Local Plan for example, does not seek to increase the District's retail market share but rather for it to remain constant recognising the more significant retail and service offers locally at higher order centres including at Harlow, albeit appreciating that the retail sector and our town centres are within a period of significant change.</p> <p>..... Drawing on this approach and our last paragraph, consideration could be given to opportunities to enliven the Framework in terms of potential land uses, particularly the future of town centres within a changing retail environment and potential future opportunities. Can the Framework draw upon any inspiration of new town centre mix typologies, new styles of workspace, innovative new leisure uses, meanwhile uses?</p>	
	General point	It is recognised that the Framework reflects the need for flexibility in terms of uses but we would question as to whether there is the opportunity for stronger reference to future-proofing beyond this? i.e. driverless cars, flexibility to repurpose buildings and spaces, including parking	52. Agreed add ref. to Note 3A , add supporting text to movement introduction
	Reference to work undertaken on HTCAAP	It is helpful that the Framework outlines how previous engagement on the AAP has been taken on board. It might be helpful however, to briefly outline what engagement was undertaken and with who for the benefit of those not engaged in the AAP process.	53. Add short reference at para 1.15
	2.7 Growth Context	Recognise that Article 4 is referred to later in document but it would be helpful to thread in here.	54. Agreed Add short ref in para 2.7i
	3.9 HGGT strategies, guidance and frameworks	This section requires updating to reflect that a number of these are now finalised/ adopted.	55. Agreed
	General	Generally, the chapter's approach to embed principles of environmental and socio-economic sustainability throughout the objectives and spatial principles is welcomed. There is an emphasis on bringing green infrastructure into the town centre and sustainable movement, which aligns with both the HGGT Vision and the HGGT Sustainability Guidance documents. However further importance could be placed on low-carbon design, whether through the use of particular materials or the provision of energy generation and conservation technologies. New buildings should be designed to be as adaptable as possible	56. Design Guide Addendum and HGGT Sustainability Checklist as well as HLDP already do this.

		whilst retrofit of existing buildings should be encouraged where possible.	
	4.4 Strategic Objectives	The National Model Design Code encourages community engagement in the processes of design and place-shaping. The Strategic Objectives as currently outlined in the chapter does not mention how engagement with local communities (both from the town centre as well as the garden town communities) will inform the implementation of the town centre vision – for example in terms of the design of a high quality public realm, or community facilities.	57. It is not necessary to put this level of detail in the SPD as engagement already takes place in the correct processes for masterplans and applications in accordance with existing Council documents such as the SCI.
	4.34 Spatial Principles	If our understanding of the significance of strengthening connections to station is correct, then its inclusion as the final principle 12 might warrant consideration. Also, whether it might be better situated alongside other access/ transport principles.	58. Agree and include this as a principle
	Guidance Note 2a	Where possible, new proposed walking routes should connect to either existing or proposed walking / pedestrian routes outside the boundary of the town centre, to encourage residents walking into town from residential neighbourhoods. It may be useful to include a larger scale map that shows the pedestrian, cycling and sustainable networks of Harlow District and how they relate to the town centre plans.	Agreed – add to Note 2A
	Guidance Note 2b	Figure 15 – colours of existing and proposed cycle networks shown on map could have higher contrast to improve legibility.	60. Agreed – update colours on Fig 15
	Guidance Note 3a	The National Model Design Code encourages community engagement in the processes of design and place-shaping. This section could include a clause on how engagement with local communities (both from the town centre as well as the garden town communities) and the Quality Review Panel will inform the implementation of the town centre vision.	61. Not agreed
	Guidance Note 3a	The HGGT Sustainability Checklist is a part of the Council’s Validation Checklist and a requirement for any planning application for new development to fill out. Rather than suggest referring to the document, this section could be more strongly worded to enforce the use.	62. Validation Checklist (and DG addendum) should address this and not SPD.
	Open Space	The National Model Design Code encourages community engagement in the processes of design and place-shaping.	63. Overly prescriptive in SPD

			Engagement with local communities should inform the design of public realm elements particularly those that will have an impact on local residents – such as the new open spaces and play areas.	
		Guidance note 5c	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. There is a numbering error with the figures – should read 148 to 150.	64. Consulted as per SCI when applications submitted. Check figures.
		Guidance note 5c	Massing studies, CGI images and physical models are critical to understanding the impact that proposed development, especially of tall buildings, will have on its surroundings. We recommend this becomes a definite requirement for any new tall building application.	65. Already covered in Validation Checklist and DG Addendum
		Guidance note 5f	The National Model Design Code encourages community engagement in the processes of design and place-shaping. Local communities should be included in the determination of what is considered ‘aesthetically-pleasing’ with regards to the tall building design.	66. Will be consulted as per SCI
		Guidance note 5f	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%. The London Plan (2021) states, “Residential development should maximise the provision of dual aspect dwellings and normally avoid the provision of single aspect dwellings. A single aspect dwelling should only be provided where it is considered a more appropriate design solution to meet the requirements of Policy D1 ‘London’s form and characteristic’s’ than a dual aspect dwelling and it can be demonstrated that it will have adequate passive ventilation, daylight and privacy, and avoid overheating.”	67. Agree 80% but note 90% in DG Addendum.
		Guidance note 5f	The inclusion of both aspects of carbon emissions is welcomed. Applicants should also be directed to embodied and operational carbon targets as set out by the HGGT Sustainability Guidance and Checklist, and applications should demonstrate how principles of carbon reduction have informed all aspects of the design of tall buildings.	68. As per comment 62
16.	Harlow Civic	General support but	Various Public Health England occurs in several places – we assume that	69. Change/amend typos

	Society	typos	<p>this should be replaced with UK Health Security Agency (UKHSA) Para 2.7 Office-to-residential – missing text</p> <p>Figures 11 and 148 Moor Tower and Nicholls Tower are missing from the map</p> <p>Para 4.19 Believe that First Ave should be Fourth Ave</p> <p>Paras after 6.10 Numbering shows 5.11 to 5.13, rather than 6.x</p> <p>Para 7.14 Figure 145 should be 147</p> <p>Page 114 Figures 146 to 148 should be 148 to 150</p> <p>Page 158 Point E does not appear on the maps on pages 159</p> <p>Numbering shows 6.8 to 6.26, rather than 8.x</p>	
17.	Montagu Evans on behalf of Peer Group (Peer Group is the landowner of the block bounded by Terminus Street, East Gate, Broad Walk and East Walk)	Section 6 – Public Realm	Peer Group appreciates the intention to improve the quality and experience of the public realm for pedestrians, although we have concerns with regards to the intentions of the Street Typologies Map (Page 83) which seeks to turn part of East Gate into a wholly pedestrian street, removing the vehicular access to the Site. As noted above, servicing of the Site is undertaken from East Gate so Peer Group would need to be satisfied that the proposed improvements to East Gate would not undermine the existing servicing strategy. Therefore, until such time as clarity on the protection of existing servicing can be provided, our client would raise objection to this element of the Masterplan.	70. see comment 36
		OA 4 – redevelopment opportunity on this site (CONCEPT IMAGE PROVIDED)	By virtue of the Site’s position in the heart of the Town Centre, Peer Group was surprised to see little mention of the Site in the Masterplan. Indeed, the Site is identified within Opportunity Area 4 (“OA4”) yet the Masterplan is silent on how it could potentially contribute positively towards the aims and aspirations of OA4. After all, OA4 is recognized as a key gateway into the Town Centre and that there are opportunities through redevelopment and public realm project to strengthen its strategic role..... Due to the strategic location of the site within the Masterplan area, Peer Group would like to promote it as a potential redevelopment opportunity to come forward within the Plan period.	71. Include note in SPD identifying that additional opportunities for development might come forward in the town centre.
18.	Addington	Background info	Our Client is the landowner of the Harvey Centre and has a significant land interest in the Town Centre.	
		General	In general, our Client welcomes the principle of a Masterplan which, until such time as adopted development plan planning policy comes forward, will act as a material consideration in the determination of planning applications within the Town Centre.	72. General support is welcomed and noted. Further consideration and discussion required in respect of the comments about pedestrianisation and tall buildings. It is the

			<p>The Masterplan will help support future investment by providing a framework of how the Council intends the Town Centre to evolve up to 2033 and beyond. Our representations are therefore written in good faith and intended to be received as constructive towards ensuring that the Masterplan serves the best interests of the Town Centre and the people of Harlow.</p> <p>In conclusion, our Client is supportive of the principle of the Masterplan and hopes to be in a position where it can offer its full support towards its final version. However, there are key elements which we believe require further refinement at this stage. In particular, the aspirations for the pedestrianisation of the Town Centre, whilst supported, need to be balanced against ensuring that existing servicing arrangements are maintained and we also believe that there is a missed opportunity to better connect the northern and southern elements of Broad Walk.</p> <p>Finally, whilst we appreciate that the Masterplan needs to provide guidance on the suitability of tall buildings, we are of the view that the Masterplan, in its current form, is in danger of being too prescriptive and an overly constraining tool on the expression of good design and architecture. In our view, it is more appropriate for the design and architecture, massing potential and massing locations of tall buildings to be determined through the planning process, where the technical evidence base has undertaken to determine whether such schemes are acceptable.</p>	<p>intention of the SPD to guide development not to set out detailed standards.</p>
		<p>Town Centre Guidance Note (TCGN) 4/4a/4c</p>	<p>We welcome that a strong retail and leisure offer is a strategic objective of the Masterplan and we are pleased that the Harvey Centre is identified in Town Centre Guidance Note (“TCGN”) 4a as within the core of the Town Centre and within the Primary Shopping Frontage as suitable for retail and commercial leisure uses. Equally, we are supportive that TCGN 4a acknowledges that the Town Centre should be responsive and demonstrate adaptability to shifting market trends and dynamics with units being capable of amalgamation, sub-division, and the provision of mezzanines supported. In this regard, we welcome that the Figure 178 recognises the potential for flexible uses in the Harvey Centre provided that such uses provide active frontage. Indeed, this flexibility is vitally important as within the designated frontages, there are clearly more successful and less successful locations for retail uses. For example, the first floor of the Harvey Centre is located within the Primary Shopping Frontage yet clearly does not get the footfall that the ground floor or Broad Walk does. We therefore suggest that the principles of TCGN 4C are applied in these instances, namely that Council will take a flexible view of uses and activities including embracing a rich range of retail and leisure, workspace, civic, cultural and</p>	<p>73. General support is welcomed and noted.</p>

			community land uses and that the Council will support meanwhile uses to animate key spaces.	
		TCGN 4c / BHS site	<p>We welcome that the delivery of residential in the Town Centre is recognised in TCGN 4C and that denser forms of development will be encouraged to increase the resident population, which in turn will enhance the vitality and viability of the Town Centre. In this regard, we ask that the future development potential of the air rights above the Harvey Centre is recognised in the Masterplan as potential for residential development in the future.</p> <p>We welcome that the former BHS site and land to the immediate east which includes the library are identified as suitable for mixed use development with commercial ground floors and residential uses above. We also broadly support the place-making objective around the buildings, namely to open-up views along Cross Street to the Grade II listed St Paul’s Church. We do, however, question the strategy on the Street Typologies Map (Page 83) to introduce a new street between the former BHS site and the library. It is not clear why this route is proposed but we are of the view that there is a missed opportunity to respond to the urban structure of the Town Centre (Spatial Principle 3) by enhancing the “bone structure” that runs up along Broad Walk and to strengthen north/south desire lines. Indeed, by moving the proposed block on the site of the existing library westward to adjoin with the former BHS site, it would create a larger expanse of public realm on Broad Walk and help to realign the north-south pedestrian route. We therefore strongly recommend that the proposed arrangement is reconsidered in order to improve pedestrian connections and the legibility of the Town Centre which will also contribute positively to the wider place-making aspirations of the Masterplan.</p>	74. General support is welcomed and noted. Further consideration is required in respect of the comment made about Street Typologies.
		TCGN 5d	<p>In relation to tall buildings, we acknowledge that TCGN 5D seeks to ensure that buildings demonstrate a building form, massing and typology that is appropriate to the Harlow context. This leads to three distinct typologies being presented under TCGN 5D: Perimeter blocks; Slab blocks; and Point blocks. For each of these typologies, a massing range is suggested and there is further guidance on the positioning of these building under TCGN 5D. Whilst we support the Council’s intention to scrutinise tall buildings to ensure that they are of the highest quality, we would question the necessity and potentially constraining function of TCGN 5D and TCGN 5D on design and architecture, particularly when TCGN 5B already makes it clear that proposals for tall buildings need to consider the relationship with the existing context, including prevailing building height and demonstrate that the location is appropriate in relation to an evaluation and</p>	75. No change – these are general guidance principles. The guidance also allows for alternative geometries where a high quality design / contextual approach is present.

			assessment of suitability and sensitivity. As such, there is already a check and balance in place to ensure that tall buildings are situated in appropriate locations without overly constraining design and architecture which we consider TCGN 5D and TCGN 5D could potentially do.	
		TCGN 5e	<p>With regards to TCGN 5E which identifies potential tall building zones, we would challenge the claim that clustering should be avoided and that in general it is anticipated that each zone should contain one tall building. The Council has recently permitted the clustering of new buildings to the north of the Harvey Centre and, again, TCGN 5B will ensure that proposals for tall building consider the relationship with the existing context and to demonstrate that the location is appropriate in relation to an evaluation and assessment of suitability and sensitivity. As such, we are concerned that the guidance and principles as currently written are overly constraining and has the potential to not make the best use of land. For the same reasons, we would argue that the 3d massing pages in the Opportunity Areas section which identify building heights should be removed. Whilst we appreciate that the heights are indicative, the individual development potential of the sites identified have not been fully explored through an evidence-based approach, particularly from a heritage and townscape and residential amenity perspective. In our view, it seems premature to speculate on the massing potential of the buildings at this stage and appropriate building heights should be determined at planning application stage when the full impacts of the building height can be assessed.</p> <p>Notwithstanding this, should the Council still consider it necessary to provide indications of massing potential in locations to guide development, we would recommend that this is done by reference to a scale, for example, “low, medium, tall”, rather than identifying specific building heights. In relation to the BHS site specifically, we would urge that thorough consideration is given to the Council’s detailed pre-application advice letter issued in June 2020.</p>	76. The rationale for the guidance is clear. add a note to each caption in cpt 6 to highlight that heights are indicative.
		TCGN 5f	<p>Finally, we welcome TCGN 5F that requires tall buildings to make a positive contribution to their surroundings and use a palette of materials that are in keeping with the locality. However, we are of the view that the requirement for 80% of flats to be dual aspect could be onerous in some instances, particularly in constrained development footprints. Therefore, whilst we entirely support the desire to ensure that new units have adequate natural ventilation, sufficient daylight, and amenity views, this can still be achieved with single aspect units and may not always be possible in some cases to achieve the 80% dual aspect threshold. We would therefore recommended removing the percentage threshold and instead requiring developments to maximise dual</p>	77. 80% requirement to be retained

			aspect units where possible to allow for site-specific development constraints.	
		Spatial Principle 5	Whilst we appreciate (and welcome) the intention of Spatial Principle 5 (Page 29) which seeks to improve the Stone Cross area, we do have concern with regards to the narrative as seeking “to rebalance the focus of gravity northwards”. Indeed, the Harvey Centre, Water Gardens and Broad Walk which links the former together comprise the Primary Shopping Frontage of the Town Centre and therefore it is vital that the Masterplan does not in any way undermine this. We therefore do not consider that a rebalancing is required, rather just a general improvement to the Stone Cross area in its context as within the Secondary Shopping Frontage. We therefore suggest that the narrative behind Spatial Principle 5 is refined to reflect this.	78. Do not agree, rebalancing is about creating an equilibrium so that one part of the town centre is not more disadvantaged than another part.
		Masterplan Section 6	Section 6 of the Masterplan provides guidance on public realm. Whilst we appreciate the place-making intentions to improve the quality and experience of the public realm for pedestrians, we are concerned with regards to the intentions of the Street Typologies Map (Page 83) which seeks to turn part of West Gate into a pedestrian street. Servicing for the Harvey Centre is undertaken from West Gate and it is critical for the ongoing operation of the occupants of the Harvey Centre that the servicing of these units is not compromised. Therefore, whilst we support proposals to improve the pedestrian environment of West Gate, this needs to be balanced against not undermining the operation of existing uses. Based on the proposed arrangement in the Masterplan, we would strongly object to the conversion of part of West Gate from a vehicular street to a pedestrian street and we ask that this is reconsidered in order to protect the retail and commercial leisure operators of the Harvey Centre.	79. Separate reference to servicing noted.
19.	ECC		See separate schedule	
20.	SSRE Investments Ltd	Background	SSRE Investment 4 Limited is the landowner for a key town centre regeneration site on land north of the Harvey Centre (hereby referred to as the ‘Harlow Quarter’). SSRE Investment 4 Limited achieved planning permission for one plot in the ‘Harlow Quarter’ in 2020 (ref. HW/FUL/19/00291) and is currently the applicant for a live outline application for the remaining plots of the Site (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.	80. Noted
		Quarter Site background	The Harlow Quarter site is currently the subject of an extant planning permission obtained by the previous landowner and applicant (application ref. HW/FUL/17/00097, granted August 2018) (i.e. the 2018 Consent). The detailed planning permission	81. Noted, it is not intended SPD to be treated as prescriptive.

		<p>comprises 447 dwellings and circa 4,000sqm of flexible retail space delivered across 4 key buildings referred to as A, B, C and D with consented building heights ranging from 3 to 16 storeys.</p> <p>Upon procuring the Site in 2019, the current Applicant subsequently obtained detailed planning permission in February 2020 (ref. HW/FUL/19/00291) for a revised Building D that comprised 163 dwellings and circa 390sqm of flexible retail space. This means that currently the entire regeneration site as a whole has planning permission for 523 dwellings and circa 3,870sqm of flexible retail space across the two permissions.</p> <p>Figure 1: Permitted ground floor and identity of Blocks A, B, C and D. Blocks A-C extracted from 2018 permission (ref. HW/FUL/17/00097) and Block D extracted from 2020 permission (ref. HW/FUL/19/00291)</p>	
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In April 2021, SSRE Investment 4 Ltd submitted an outline planning application for the remaining three plots (i.e. Blocks A, B and C). In December 2021, a revised submission pack was submitted to the Council to reflect ongoing discussions with Harlow officers, key consultees and the emergence of the draft HTCMF and now adopted Design Guide Addendum.

For consistency, the Outline scheme continues with the same naming of the development blocks as A, B, C and D (as identified in Figure 2). In the proposals, Block B can be subdivided into B1

			and B2 and Block C can be subdivided into Block C1, C2 and C3. The indicative layout of the outline proposal for Blocks A-C, as well as the location of the consented Block D, is shown below at Figure 3.	
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Figure 2: Extract from Submitted Design Code supporting Outline Application
Layout

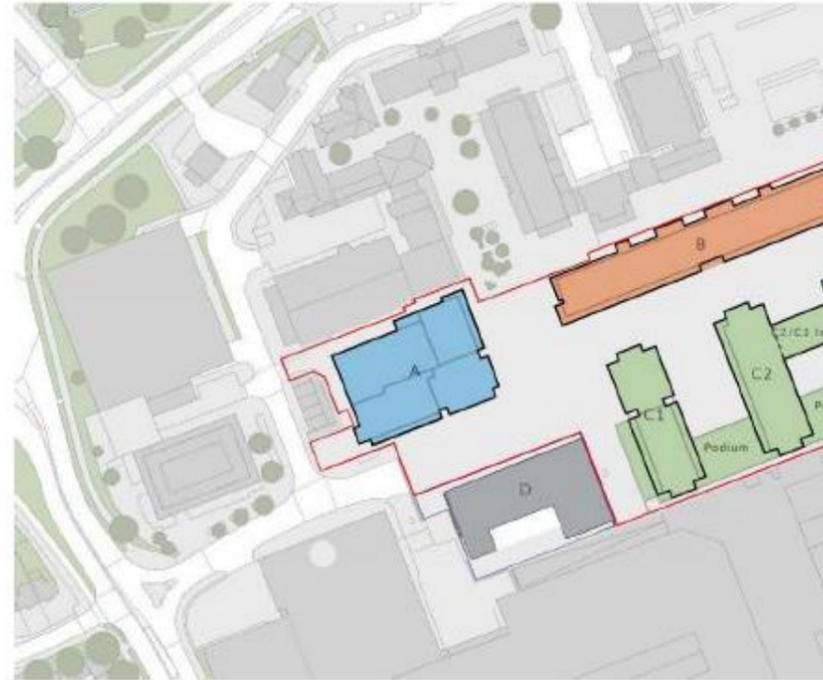


Figure 3: Extract from Submitted Design Code Outline Application demons
floor public and private realm areas of the proposals



The SSRE Investment 4 Limited 'Harlow Quarter' scheme offers the fantastic opportunity to significantly invest and transform one of the most poorly performing parts of the Town Centre. It will

include injecting significant urban greening and public realm improvements and promises to deliver high quality architecture alongside two slender point tower buildings that will landmark and signify the regeneration of Harlow's Town Centre (see Figure 4). Approving this application and positively engaging with its delivery would be a strong step towards putting Harlow 'on the map', and a real catalyst for the wider regeneration plans which would benefit the vitality of Harlow as a whole.

Figure 4: Extract from Submitted Design and Access Statement Outline Application
Aerial View



There are many elements to the draft HTCMTF guidance that we are supportive of. However, that SSRE Investment 4 Ltd's emerging Harlow Quarter proposals have not been reviewed in any way. Nor was SSRE Investment 4 Ltd approached or allowed to proactively engage in Council and its urban designer to help inform the direction of the HTCMTF. As a key element of the Town Centre, SSRE Investments 4 Ltd shares the Council's aspiration to enhance the town centre and vitality, making it a great place to work, visit and live. However, the lack of engagement questions the robustness and deliverability of the draft HTCMTF. We would therefore recommend that the HTCMTF is more reflective of SSRE Investment 4 Ltd's proposals and look forward to engage further with the HTCMTF Council and design team directly in this regard.

			<p>include injecting significant urban greening and public realm improvements and promises to deliver high quality architecture alongside two slender point tower buildings that will landmark and signify the regeneration of Harlow's Town Centre (see Figure 4). Approving this application and positively engaging with its delivery would be a strong step towards putting Harlow 'on the map', and a real catalyst for the wider regeneration plans which would benefit the vitality of Harlow as a whole.</p> <p>Figure 4: Extract from Submitted Design and Access Statement Outline Application Aerial View</p>  <p>There are many elements to the draft HTCMTF guidance that we are supportive of. However, that SSRE Investment 4 Ltd's emerging Harlow Quarter proposals have not been reviewed in any way. Nor was SSRE Investment 4 Ltd approached or allowed to proactively engage in Council and its urban designer to help inform the direction of the HTCMTF. As a key element of the Town Centre, SSRE Investments 4 Ltd shares the Council's aspiration to enhance the town centre and vitality, making it a great place to work, visit and live. However, the lack of engagement questions the robustness and deliverability of the draft HTCMTF. We would therefore recommend that the HTCMTF is more reflective of SSRE Investment 4 Ltd's proposals and look forward to engage further with the HTCMTF Council and design team directly in this regard.</p>	
		<p>Vision</p>	<p>We are supportive of the direction of the Vision, particularly: "...the town centre will have a diverse mix of shops and services; offer high quality office and employment spaces; civic and wide ranging leisure uses including cafés and restaurants; and a thriving evening economic and cultural offer. The town centre will also have a range of high quality homes that can support a mixed and balanced community."</p>	<p>82. Noted and welcomed.</p>
		<p>Strategic Objectives</p>	<p>the 10 Strategic Objectives are considered appropriate, and we</p>	<p>83. Noted and welcomed.</p>

			are particularly supportive of the aims to unify and rebalance town centre between north and south; for the town centre to support wider economic growth through providing homes; and in improving the town centre's public realm and environment	
		Spatial Principles	we are also broadly supportive of the 12 'Spatial Principles', although item 11 (establish appropriate approach to building heights) raises concern when read alongside the overly prescriptive and inadequately justified Chapter 7 (Building Height Strategy), for which more detailed comments are provided later in this letter	84. The SPD allows for significant intensification in a way which is responsive to the historic context.
		Movement	We are supportive of the change that has been made since the previous draft of the Area Action Plan (dated December 2019) that removes the Sustainable Transport Corridor bus route along East Gate / West Gate and instead sets it along Post Office Road. Furthermore, the intention for the East Gate / West Gate route to instead be utilised as part of the cycle network is considered to be appropriate	85. Noted.
		Guidance Note 2e	<p>It currently states: <i>"Overall, a low level of parking provision will be supported in new residential developments with appropriate justification on a scheme-by-scheme basis"</i>.</p> <p>Whilst we are supportive of the Council's aspiration to reduce reliance on private car ownership and usage, it is important to consider whether Harlow's public infrastructure is yet in place to fully support car free development in the District. Large scale car free development is an untested market, particularly in Harlow where circa 75% of households owns at least one vehicle (as per 2011 census data). To fully commit to car free development at this time where car reliance is still high and further sustainable transport improvements have not yet been implemented has the potential to significantly limit the pool of potential buys / renters for such development, which can impact on deliverability. This concern particularly relates to dwellings for young families, where there is often a greater need or expectation for a car. In this context, it is considered Guidance Note 2E should allow for parking to be provided for residential developments in the town centre, but for it to be below current Essex Standards (2008) and to be designed to be readily adaptable for conversion to other uses in the future when the sustainable transport infrastructure has become more established.</p> <ul style="list-style-type: none"> <i>"Servicing for retail areas should be via the rear of the units and must not have a detrimental impact on pedestrianized areas in the town centre. Servicing arrangements should protect gateway locations, legibility for pedestrians, entering the town centre and enhance the public realm and appearance of these areas..."</i> <p>We agree that it is important for servicing arrangements to avoid negative impact to pedestrians and public realm, but we do not</p>	86. Encourage potential for car free in Note 2E in accordance with Council position

		agree that the only way this can be achieved is through service areas at the rear of units. To deliver on the vision to intensify, diversify and regenerate the town centre will mean that there will be fewer opportunities to create back of house service yards, for some sites more than others. It is therefore recommended that the guidance also allows for access controlled and well managed servicing arrangements to be acceptable, when adequately demonstrated and committed by the submission of a robust Delivery and Servicing Plan.	
	Fig 17 street typologies	<p>Broad Walk should be shown as a 'Commercial Pedestrian' street typology given its status as the high street of the town centre.</p> <ul style="list-style-type: none"> • There is no clarity provided in the Key for what the dotted blue outlined area is meant to denote. <p>It is not considered appropriate for East Gate or any streets north of East Gate to be purely categorised as 'Commercial Pedestrian' as the intention elsewhere within the draft HTCMF is for this area to become more residential in land use and nature (as shown in Figure 19 of the HTCMF). This will follow through to ground floor level with the need for residential entrances, foyers and cycle stores, which will have an influence on the street typology. To address this, we recommend these streets (particularly East Gate) are either re-categorised as 'Mixed Use Pedestrian' or include both 'Residential Pedestrian' and 'Commercial Pedestrian' categorisation.</p>	<p>87. Noted, Replace Fig 17 with Fig 69.</p> <p>Add cross ref to Public Realm chapter where the approach to Broadwalk is more explicit.</p>
	Guidance Note 3a	<p>Guidance Note 3A (Urban Design Principles) currently states "<i>key streets and spaces could accommodate a general / shoulder height of four to six storeys. This will create a greater sense of enclosure, overlooking and natural surveillance of key streets and spaces. Key market locations might also be appropriate for taller elements...</i>". Whilst we agree with and support the principle of increased scale to create a greater sense of enclosure and natural surveillance, it is considered the four to six storey height quoted is too prescriptive and not supported by a robust evidence base (e.g. a visual impact assessment or skyline study). Adopting a blanket limit on general / shoulder heights to 4-6 storeys for the next 15 years does not align with the National Planning Policy Framework that seeks for town centre, brown field, sustainable and accessible sites to be optimised for development. It is recommended that reference to storey heights is completely removed from Guidance Note 3A as it is a matter that is instead covered by the 'Building Height Strategy' chapter.</p>	<p>88. These general height guidance principles are considered appropriate and represent a significant intensification of the town centre. Chapter 7 provides clear criteria and a context for exceptions.</p> <p>No change</p>

		Land uses	It is supported that the HTCMTF recognises there is a need for “ <i>a degree of flexibility around precise mix of town centre land uses</i> ” (paragraph 5.18), and as such the guidance provided “ <i>should not be treated as prescriptive, and the Council will require proposals to provide a clear narrative and justification for the proposed mix of uses in relation to property market demand and opportunities on a site-by-site, and phase-by-phase basis</i> ” (paragraph 5.19).	89. Noted, no change.
		Fig 19 predominant future ground floor uses	Figure 19 (plan showing proposed predominant future ground floor land uses), however, is considered to be too simplistic in its approach. It is considered that some parts of the town centre will not be as clear cut as ‘residential’ or ‘retail / commercial’, and there will be some areas and sites where it is more appropriate to be classed as ‘mixed use’ where residential and commercial feature side by side at ground floor level. This is particularly the case for SSRE Investment 4 Ltd’s ‘Harlow Quarter’ scheme that will deliver circa 3,400sqm of commercial/retail alongside up to 841 dwellings, which will result in the ground floor comprising both economic active frontages and domestic foyers and amenity areas. It is recommended that the figure is amended to allow for ‘mixed use’ ground floor areas, particularly for the ‘Harlow Quarter’ site.	90. It is considered that ground floor residential use would not be appropriate in the town centre where HDC aims to increase active frontages and enhance vitality to help support retail and complementary uses.
		Land uses - retail	<p>We are supportive of what is set out in paragraphs 2.16 – 2.22 of the draft HTCMTF, which highlights the findings of a Cushman and Wakefield 2020 retail study that concluded emerging indicative targets suggest a lower level of capacity growth might be appropriate in response of evolving trends. Paragraph 2.19 of the draft HTCMTF therefore states “<i>In the context of increasing online retail sales (30-40% of total retail sales by 2030) and the growing number of collapsed or ‘as risk’ retailers, Harlow Town Centre, like many centres in the UK, potentially has too much retail space overall</i>”. It is recognised that there are clear opportunities for improve the offer of Harlow Town Centre, but the scope of improvement will “<i>largely depend on town centre regeneration and other interventions to deliver a higher quality, more secure environment and better accessibility</i>” (paragraph 2.20). This is said to therefore mean enabling poorer quality retail space to be replaced by alternative, non-retail uses in less prime areas while focusing new retail space in the more prime areas. Finally, the draft HTCMTF seeks to not be overly restrictive in relation to uses classes, as such it encourages the use of greater flexibility for a range of permissible use classes / retail types on a site by site basis to allow the market to determine what is and is not deliverable.</p> <p>However, none of the above evidence base or conclusions seems to have informed the wording of Guidance Note 4A (retail growth</p>	91. The HDC policy requirement reflects not only the needs of the new residential development being brought forward in Harlow in the recently adopted Local Plan, but that taking place on the edges of town through the HGGT that amounts in total to 23,000 dwellings. Notwithstanding recent challenges associated with Covid there will remain a retail need and associated complementary uses that will need to be accommodated.

			and flexibility). It instead only primarily reiterates the position set by Policy RS2 of the Local Development Plan, which is based on more dated evidence that, most significantly, pre-dates the COVID-19 pandemic. We recommend that the wording of Guidance Note 4A is adjusted to reflect the findings of the evidence base (particularly the Cushman & Wakefield 2020 retail study) more; highlighting that removal of retail may be considered appropriate in less prime or successful areas of the town centre and the focus should be on the provision of well curated, flexible and successful commercial spaces in appropriate locations in the town centre rather than.	
		Fig 20 frontages	<p>In regard to Figure 20 (Town Centre Existing Primary and Secondary Frontages), we recommend the following alterations are made:</p> <ul style="list-style-type: none"> • The primary frontage line be removed for where Little Walk shopping parade used to exist between Broad Walk and West Gate as this has been vacant and demolished for circa 5 years (works undertaken by its previous landowner). • The secondary frontage line along the former building line of the north wing of Gate House, north of West Gate and South of the former Odeon building be removed as it has been vacant and demolished for circa 5 years (works undertaken by its previous landowner). 	92. This is not accepted although it will require further consideration as part of wider LP review.
		Guidance note 4c	<p>We support that Guidance Note 4C (Housing) clearly states that <i>“the Council will support the introduction of new residential accommodation in the town centre”</i>.</p> <p>We are supportive of the position that <i>“dual aspect units should be maximised”</i>, although it must also acknowledge that how well a site can perform in its dual aspect provision will vary on a site by site basis, particularly in consideration to its plot form, orientation and neighbouring context. We fully object, however, to the position that <i>“where dual aspect cannot be achieved national space standards should be significantly exceeded”</i>. This position is made with no justification or consideration to the viability implications it creates; nor is there any clarity on how ‘significantly exceed’ would be applied. The benefit of dual aspect dwellings is in relation to outlook, ventilation and daylight/sunlight; none of which are improved by increasing the size of a dwelling. In fact, in some cases the arbitrary increasing of a dwelling can have a negative impact on how well it performs against these criteria – it is important to remember that more space does not automatically correlate with better quality. It is strongly recommended that this wording is removed from draft HTCMF.</p>	93. Not agreed see 77 above.
			It is noted that <i>“in residential developments of more than 10</i>	94. Noted, but viability is regularly being used as

		<p><i> dwellings it will be expected that at least 30% affordable housing is provided in accordance with HLDP Policy H8” . Whilst the importance of affordable housing cannot be understated, it is an unfortunate reality that there are forms of development and locations within Harlow that are subject to extreme viability constraints. This is particularly the case in the Town Centre and for flatted developments, which is acknowledged in Harlow Council’s own evidence base for its Local Plan and is clear from the level of affordable housing provision being achieved in recent planning permissions. In these instances, a balanced approach needs to be adopted and due weight given to viability analysis. In order to fully align with HLDP Policy H8, we recommend that viability is acknowledged as a consideration in the wording of the Guidance Note.</i></p>	<p>justification to avoid making appropriate contribution towards a range of infrastructure, social and otherwise. This will require further consideration in due course.</p>
		<p>The Guidance Note further states that <i>“The Council will take a flexible view of uses and activities on the ground floor in areas outside the designated retail frontages. A rich mix of uses will be embraced including retail and leisure, workspace, civic, cultural and community uses”</i>. It is recommended the wording of this is changed to make it clear this relates to designated primary retail frontages in order to be consistent with Harlow Local Plan Policy PR6, which allows for greater flexibility for secondary retail frontages. It is further recommended that ‘residential entrances / foyers’ is also listed as an appropriate ground floor use.</p>	<p>95. Noted</p>
	Guidance note 4e	<p>Guidance Note 4E currently states: <i>“the Council will require development proposals to contribute to enhanced education provision in the District in line with the Council’s adopted planning policy in the HLDP (see HLDP Policy IN6 and supporting implementation text)”</i>. We highlight that this must be subject to viability constraints</p>	<p>96. Noted</p>
	Figs 21 - 23	<p>We object to how Figure 21 (indicative Town Centre Masterplan), Figure 22 (Existing and Consented Schemes in 3D) and 23 (Indicative Future Context – illustrating masterplan framework proposals alongside existing buildings and consented schemes) only shows the 2018 planning permission (ref. HW/FUL/17/00097) for the Harlow Quarter site, which was granted to the previous landowner. They does not take account of the more recent permission in place for what is referred to as ‘Block D’ (ref. HW/FUL/19/00291), which was granted to SSRE Investment 4 Ltd in 2020. Similarly, it is also noted that Figure 22 does not include ‘the Angle’ scheme on the former YWCA Hostel site planning permission (ref. HW/FUL/15/00193, subsequently allowed at appeal APP/N1540/W/16/3146636), granted in 2016 and confirmed as implemented in 2020.</p>	<p>97. Footnote required to recognise that evolution in schemes over time is possible.</p>
		<p>Furthermore, Figure 23 gives no consideration to the live planning application for the remainder of the Harlow Quarter site (ref. HW/OUTAM/21/000251), which includes the following key</p>	<p>98. The drawing cannot include live schemes – add note highlighting that the context will continue to evolve in caption</p>

			<p>changes to the 2018 permission:</p> <ul style="list-style-type: none"> • Moving the location of the east-west boulevard link between West Gate and Broad Walk slightly north, resulting in narrower Block B and a deeper Block C. • A revised massing strategy that achieves more regular articulation and massing form, increased densities and two focal towers on Blocks A and the western end of Block C. 	
			<p>Failing to consider the live planning application for this vital central regeneration site in the town centre does not result in a robust masterplan that is reflective of reality. This is an example of how the draft HTCMTF should have been prepared with input from key town centre landowners and stakeholders prior to draft publication, which we consider to be a key weakness in the drafting of this document. It is formally requested that SSRE Investment 4 Ltd and its design team is proactively engaged with by the HTCMTF design team for the preparation of the next version of the HTCMTF to ensure that the masterplan is more reflective of what will be coming forward on the Harlow Quarter site north of the Harvey Centre.</p>	<p>99. No change at this stage in the process. It is acknowledged that live schemes will come forward over time, some of which may deviate from the indicative approach in the SPD.</p>
		Public realm Harlow Quarter Site	<p>As per previous comments, we do not support the building form and layout of the Harlow Quarter Site that is shown in the base masterplan used for figures throughout this chapter of the draft HTCMTF, as it is reflective of the scheme permitted in 2018 by a previous landowner and not the live proposals currently submitted by SSRE Investment 4 Ltd</p>	<p>100. See 99 above</p>
		Fig 61 SuDS	<p>Figure 61 shows a 'Potential SuDS Area' along the new east-west boulevard link on the Harlow Quarter Site, which is not reflective of either the permitted drainage strategy from the 2018 planning permission or the currently proposed drainage strategy in the live outline application. It is considered to have a swale along the full length of this public realm that will feature a lot of retail/commercial activity would impede pedestrian movement and not be in keeping with the purpose and character of the space. This is demonstrated in Figures 67 and 68 of the draft HTCMTF, where the former shows an example 'Residential Pedestrian' street featuring a central SuDS garden and the latter shows an example 'Commercial Pedestrian' street featuring high quality paving and areas of seating and planting. As such, it is proposed that the 'Potential SuDS Area' is removed from the Harlow Quarter site.</p>	<p>101. Not accepted, SuDs can be located in central locations.</p>
		Fig 69 street typologies	<p>Broad Walk should be shown as a 'Commercial Pedestrian' street typology given its status as the high street of the town centre. In Figure 69 it shows a dotted red line, which is not included in the</p>	<p>102. This is not accepted as in this location residential use is considered subsidiary to the main town centre.</p>

		<p>Key as denoting anything.</p> <ul style="list-style-type: none"> It is not considered appropriate for East Gate or any streets north of East Gate to be purely categorised as 'Commercial Pedestrian' as the intention elsewhere within the draft HTCMF is for this area to be residential in land use and nature (as shown in Figure 19). This will follow through to ground floor level with the need for residential entrances, foyers and cycle stores, which will have an influence on the street typology. To address this, we recommend these streets (particularly East Gate) are either re-categorised as 'Mixed Use Pedestrian' or include both 'Residential Pedestrian' and 'Commercial Pedestrian' together. 	
	Fig 105 open space typologies	<p>Figure 105 currently shows a 'recreation space' (public open space with significant provision for children's sport and recreation) the full north-south length of West Gate from Aylmer House to the Harvey Centre. Whilst we agree that the northern half of this space is appropriate for this sort of space, it would not necessarily be appropriate in the southern half where it will also interact with the pedestrian and cycle route along West Gate and East Gate and the servicing routes for the proposed Harlow Quarter. It is recommended that this area is reduced so as not to conflict with other parts of the draft HTCMF guidance and the submitted proposals for the Harlow Quarter.</p>	103. Not accepted as it is important to enhance green elements in the town centre.
	Fig 122 open space typologies	<p>As mentioned in other parts of this letter, the visual provided for Figure 122 (West Square Functional Plan with Principles) is not reflective of the current scheme that is submitted for planning permission by SSRE Investments 4 Ltd, and therefore needs to be further updated and rationalised. For instance, the new east-west link has been moved further north and private car movements crossing over East Gate / West Gate into 'Block B' have now positively been removed. The intention to "create new retail space and entrance to the Harvey Centre" and have a potential 'events' space there is not reflective of either the 2018 planning permission or the live Harlow Quarter proposals currently submitted, as there is an approved and proposed service entrance to Block C in this location. This section of the draft HTCMF should be updated accordingly to better reflect the emerging proposals for the land north of the Harvey Centre, and it is strongly recommended that this is informed by direct engagement between SSRE Investment 4 Ltd's design team and the HTCMF design team.</p>	104. see 99 above
	Building heights	<p>In paragraphs 7.1-7.5, and from the visuals on page 107, this is where further consideration should be given to Frederick Gibberd's own written work in 'The Storey of a New Town' (1980), from which it can be said to the three fundamental principles on which the Town Centre was based: an essentially human</p>	105. Noted but the HDLP seeks to ensure green spaces permeate more urban areas.

		<p>environment, an urban atmosphere, and the principle of evolution. The third predicated a flexible approach and the first two were basic to the concept of new towns</p> <p>Gibberd sought to plan the town around the existing landscape retaining features such as streams and hedgerows and based the foundation of the design on the existing land form comprising the Stort Valley forming a natural containment of the town. The Green Belt would be visible beyond. Four main residential areas or 'clusters' were placed on high ground between open land wedges within the valleys. Each cluster had its major neighbourhood centre (Town Centre, The Stow, Bush Fair, Stale Tye). Linear parks were to provide accessible outdoor amenity space for the neighbourhoods; the area with the most interesting topography at Netteswell Cross was designated as the Town Park (currently a Grade II registered park) and the provision of a wide range of recreational activities.</p> <p>Gibberd sought to create a contrast between the broad areas of landscape with compact areas of high density development.</p>	
		<p>There were three fundamental principles on which the design of the Town Centre was based: an essentially human environment, an urban atmosphere, and the principle of evolution. The third predicated a flexible approach and the first two were basic to the concept of new towns.</p> <ul style="list-style-type: none"> – An essentially human environment was based on the concept of a pedestrianised centre, “so that buildings can relate to each other as a series of varied and intricate civic spaces, the essence of civic design”. – The second principle was that the Town Centre was to be as small as possible so as to provide the qualities of urbanity lacking in much of the town. This would lead to vertical growth, as described by Gibberd: <i>“The corollary of a tightly-built urban centre is vertical growth. I assumed that postwar reconstruction would mean that existing town centres would grow vertically and that if demands for space were greater than we anticipated, growth would be by tall buildings. The Town Centre was to be the visual focus of the town. The taller the buildings placed on it, the more emphatic this focus would be.”</i> – The third principle was that the framework for the Town Centre should be sufficiently flexible to allow different kinds of 	<p>106. Noted, but there is now the consequences of climate change to be addressed through enhanced green spaces etc which means that Gibberd’s original principles need to be tempered in this respect.</p>

		<p>development to take place over time.</p> <p>From the above, it is vital to acknowledge that Gibberd himself saw the town centre advancing in height and allowing the growth of tall buildings.</p>	
		<p>In paragraph 7.12 of the draft HTCMTF, the first bullet point states that taller buildings “<i>are positioned close to the perimeter route of the town centre. They tend not to be situated directly on roundabouts or junctions</i>”. We are concerned that this is written in a way that assumes the perimeter placing of tall buildings is a virtue, but we consider they should not be treated as justifiable precedent. Many of these existing tall buildings are poor in form and expression, do not relate well together and fail in their purpose to adequately landmark the town centre.</p> <p>In the same paragraph, the fifth bullet point states that taller buildings “<i>visibly meet the ground – they are not buried within larger blocks</i>”. We do not believe this reflects the existing built form of the town centre and is out of keeping with this list of existing characteristics. Furthermore, ‘buried’ is a derogatory term and infers negativity to design precedents elsewhere or potential innovation within Harlow.</p>	<p>107. Not agreed, The guidance, in the round, provides an appropriate context for tall building design.</p>
	Guidance note 5b	<p>Guidance Note 5B states that “the Council will require any proposal for tall buildings to consider the relationship with the existing context, including prevailing building heights”. Whilst we understand this position, it fails to acknowledge that there are parts of the town centre that are too low density for its urban context and fail to optimise what is sustainable brownfield land, which goes against the thrust of the National Planning Policy Framework. Furthermore, elsewhere in the draft HTCMTF is an acknowledgement that perimeter blocks would benefit from increasing in height to enhance sense of enclosure. Finally, this does not take account for the buildings that have been permitted in recent years but have not yet been constructed. In this context, it would be appropriate for tall building proposals to consider the relationship with both the existing and emerging context, as well as what is adopted in the Council’s own Town Plan vision and HTCMTF indicative masterplan</p>	<p>108. Noted but the SPD provides a clear context for a general uplift in density. Responding to context does not preclude development which of a higher scale.</p>
		<p>For Figure 150, we are supportive that a blue triangle denoting ‘landmark building’ is included on the Harlow Quarter Site where Block B is permitted (where Block C is now proposed). We would, however, recommend that a further blue triangle is included on Block A, where a 16 storey block is already permitted under the 2018 planning permission and a 19 storey building is currently proposed in the live application submitted by SSRE Investment 4 Ltd.</p>	<p>109. Noted, Fig 160 does not undermine any planning decisions / consents. Add note to caption highlighting that the precise block locations might vary depending on the final consents</p>
		<p>Whilst we understand the Council’s position is seeking to get a framework in place in regards to town centre height, we consider</p>	<p>110. Not agreed</p>

			<p>the guidance set out under Note 5D to be too prescriptive and limiting in nature. It goes too far in stymying innovation and allowing the town centre to be sufficiently flexible to allow different kinds of development to take place over time as Gibberd had intended.</p> <p>Nor is the guidance necessarily reflective of development that currently exists or has been permitted in the town centre. For instance, the guidance takes the position that multiple tall buildings in close proximity on a single site or adjacent site should be generally avoided, which is not compatible with recent planning approvals in the town centre (particularly the 2018 permission north of the Harvey Centre). Furthermore, there is no clear basis with this position, as in townscape terms tall buildings are generally preferable to singular objects – the current tall buildings on the periphery of the town centre should not be viewed as a virtue or positive precedent in this regard. The guidance does go on to acknowledge that small clusters of 2 or 3 may be appropriate, but does not advise where or under what townscape circumstances this might be the case.</p> <p>Most concerning is the lack of townscape or visual impact analysis that has been undertaken to inform the recommended maximum ceiling heights of 4-6 storeys for a ‘slab’ block and 10-12 storeys for a ‘point’ block (14-16 storeys in exceptional circumstances). It is not clear what has helped inform these heights and therefore they come across as arbitrary, which brings into question the robustness of the guidance.</p>	
			<p>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 HTCMTF 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. Furthermore, care should be taken when defining appropriate storey heights, as this will vary depending on whether the use is commercial or residential. 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:</p> <ul style="list-style-type: none"> • 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’ 	<p>111. The guidance provides clear criteria and context for the general guidance points, and aspects where exceptions might apply.</p>

		<ul style="list-style-type: none"> • 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. • 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. <p>The above is reflective of the nature of the heights proposed for the Harlow Quarter outline application, which is supported by a robust Heritage and Townscape Statement, Design and Access Statement and Design Code, which together demonstrate how these heights in the right locations for the right sites are appropriate.</p>	
	Fig 160 indicative tall building framework plan	We are supportive that the Harlow Quarter development site is identified in Figure 160 (indicative tall building framework plan) as falling within a zone that might accommodate height, as this is supported in our own Heritage and Townscape Assessment that has been submitted to support planning application HW/OUTAM/21/000251. However, the specific wording in the key of “zones which might accommodate a single point block or point block alongside shoulder block” is not supported, as it already contravenes what has been permitted under the 2018 planning permission on the Harlow Quarter site, but also it goes back to our earlier comments, to provide the differential in Gibberd’s terms, greater clusters of tall buildings should be supported rather than single disassociated blocks.	112. See note above about wording in caption (and note that blue blocks indicate consented elements which are special case in this specific location by virtue of the existing consent and amendments.
	Guidance note 5f	Guidance Note 5F states that “it is expected that 80% of flats in a tall building will be dual aspect”. We agree that this is achievable for tall ‘point’ blocks, and so the wording should be revised to say “it is expected that 80% of flats in a tall point building will be dual aspect”. Often by their nature, slab and perimeter blocks are unable to achieve as high a levels of dual aspect, but importantly they can still achieve high quality homes with adequate ventilation, daylight and outlook when designed correctly.	113. Noted

		Guidance note 5g	<p>We are generally supportive of the majority of points raised under Guidance Note 5G, with the exception of the following:</p> <ul style="list-style-type: none"> • The guidance states that “<i>any wind mitigation measures should be wholly within the applicant’s site boundary, should be permanent structures maintained by the applicant, and should not include trees or soft landscape</i>”. It is not appropriate to completely discount the mitigation measures that can be achieved by trees and soft landscaping, and this was specifically removed from the final version of the adopted Design Guide Addendum. This text should be removed from Guidance Note 5G in order to align with paragraph 1.42 of the Design Guide Addendum 	114. Not accepted.
		Opportunity areas	<p>The focus of our comments is on Opportunity Area 3 (OA3) for Town Centre North. Before this, however, we wish to highlight, as mentioned previously, that it is inappropriate for the indicative Town Centre Framework Plan (Figure 161) to show the Harlow Quarter site only as approved under the 2018 planning permission granted to a previous landowner. The Town Centre Framework should be informed by SSRE Investment 4 Ltd’s own emerging proposals that are currently submitted for approval and we would strongly recommend the next version of the HTCMF is also informed by direct engagement between SSRE Investment 4 Ltd’s design team (and any other key landowners) with the HTCMF design team.</p> <p>For the indicative capacity estimates under paragraph 6.17, this should be changed to circa 1,295, with 667 currently approved, an additional 318 currently submitted for approval on the Harlow Quarter outline application, and 350 proposed for the remainder of the opportunity area. This injection of residential directly in the Town Centre will be transformative to its vitality and viability for the future; particularly in better supporting economic activities.</p>	115. The emerging proposals do not have the benefit of planning permission so it would be premature to assume they will be implemented.
		Guidance note 8	<p>In terms of the Guidance Note 8 (Opportunity Area 3) wording specifically, we are broadly supportive of the guidance as proposed. However, we recommend the following amendments:</p> <ul style="list-style-type: none"> • Figures 168 (indicative town centre framework plan for Opportunity Area 3) and 169 (indicative town centre land use plan for opportunity area 3) are updated to be more reflective of the revised block layout of the Harlow Quarter site as currently submitted. <p>Figures 168 (indicative town centre framework plan for Opportunity Area 3) and 170 (indicative 3D view for opportunity area 3) are updated to be more reflective of the revised massing strategy of the Harlow Quarter site as currently submitted.</p> <ul style="list-style-type: none"> • Figure 169 (indicative town centre land use plan for 	116. See 115 above

			<p>Opportunity Area 3) is updated at ground floor level to include 'flexible active ground floor uses' with 'residential parking' included on Block A for the Harlow Quarter site (currently all shown in grey). At upper floor level, the Harlow Quarter Site should be shown as 'residential' (currently all shown in grey).</p> <ul style="list-style-type: none"> • We are supportive that it the guidance identifies this area for a mix of uses, including residential, office, retail and other active ground floor uses. 	
21.	Canal and Rivers Trust	Transport in relation to the Stort	<p>The Trust is the owner and navigation authority of the River Stort and its associated towpath, which is located further north of the Town Centre SPD area. The towpath is an important traffic free route for walking /cycling for both leisure and utility walkers and represents a multifunctional asset, providing linkages to local facilities, recreational opportunities, and a safe, convenient and attractive walking and cycling network to promote health and well-being, consistent with the aims of the NPPF. The Trust has previously responded to planning applications relating to the Harlow and Gilston Garden Town developments and are particularly interested in the impacts of the proposed bridge crossings, the impact of development on use of the towpath, and the opportunities for improvements to the waterway corridor to mitigate adverse impacts (on biodiversity, for example) across the wider development area. It is therefore positive that this SPD seeks to promote safe and sustainable modes of transport with new and enhanced networks, in particular better linkages to the Garden Town. The towpath would form an integral part of this connected network and for completeness reference to it could be included within the SPD.</p>	117. Noted.