LATTON PRIORY DRAFT STRATEGIC DESIGN CODE STAKEHOLDER FEEDBACK AND RESPONSES

MARCH 2024

Epping Forest District Council
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HGGT
HARLOW & GILSTON GARDEN TOWN

Contents

EFDC Teams Consultation Responses..... 1
Design Code testing Report Outcomes..... 3
Public Consultation Responses Summary.....4
Essex County Council Consultation Responses inc Place Services..... 11
Essex Police Consultation Responses..... 19
National Bodies' Consultation Responses..... 22
North Weald Bassett Parish Council Consultation Responses..... 26
HGGT Members' Consultation Responses..... 29
HGGT Developer Forum Workshop Feedback.....31
CEG/ Hallam Consultation responses..... 33

Key (note text in bold denotes amendments in design code)

Theme - key	Status - key
Design code usability and scope inc legibility/ clarity	1. Note - no further action at this stage
Nature - green and blue infrastructure	3. Wider planning matter. To be passed on to relevant team/ person. Respond and/ or include in FAQs
Movement inc parking and servicing	4. Response as follows. Straighforward change/ update to design code.
Public Space - inc streets, junctions, open space and play	
Built form inc block structure, typologies and frontages	
Identity inc wayfinding and local character	
Resources - energy use and adaptability/ futureproofing	
Wider infrastructure - health/ social/ education/ transport/ servicing	
Delivery inc land use, on-site infrastructure, phasing, and funding	
Process/ Policy inc Local Plan/ HGGT/ principle/ location of development	
Engagement	
Miscellaneous	

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	EFDC Teams Consultation Responses			
Event	Comment	Theme	Status	Note/ response/ action
Air Quality - Ana Ventura	Highlight opportunities to tap into renewable energy and more sustainable resource provisions (underground source heat, air source heat, solar, wind, grey water, rain water capturing, green roofs, etc) - to support EFDC commintement to carbon neutral by 2030.	Resources	Update to design code.	See rule 7.7 *The energy strategy must not include fossil fuel use. On-site renewable energy sources must be prioritised and opportunities for utilising waste heat across different uses should be explored.* **In the explanatory text, under climate mitigation, final paragraph amended to include renewable energy.**
Comms/ general	Require solar panels on south facing roofs (solar orientation of buildings). Can we insist on integrated solar panels?	Resources	Note - no further action	See rule 7.10: *Roof forms must be designed to consider optimum solar orientation for photovoltaic panels (PVs). PVs on sloping roofs must be carefully designed, particularly due to longer views from Harlow, with PV panels mounted flush with the roof finish* .
	Can we insist that battery storage for solar installations - and other solar energy infrastructure is considered in house design?	Resources	Update to design code.	**Rewording of rule 7.6 to: *Plans must identify how renewable energy infrastructure e.g heat pumps or batteries will be sensitively integrated into the layout and buildings.***
	Should the design code require consideration of location of air source heat pumps to be considered in house design?	Resources	Note - no further action	See note above. Note that some of this is already covered elsewhere e.g. Green Infrastructure Guidance and checklist.
	Should ground source heat pumps be encouraged given installation would be easier on new-build compared to retro-fitting?	Resources	Note - no further action	Covered more broadly under requirements for renewable energy. It will be for the design team to ascertain whether ground source heat pumps are appropriate. Also potential overlap with the EFDC Sustainability Guidance and checklist
	Wheelie bins – we are likely to swap our remaining recycling sack collections for another wheelie bin in the new waste contract. Do we have provision of accommodation for several wheelie bins for each property as part of the design guide?	Movement	Note - no further action	See notes below folliwng consultation with EFDC Waste Team.
Waste	There is no objection to the idea of not every part of the site being accessed by service vehicles as long as there are clear collection points that residents can bring their waste containers to and then collect them after collection has been made. The drag thresholds being longer than the maximum for residents is not an issue as long as it will be clearly raised when a property that falls within this criteria is due for occupancy the proposed resident/s are informed preferably in writing.	Movement	Note - no further action	Noted. Do not want to encourage excessive drag distances for residents therefore will not include this in the design code but this can be reviewed as detailed proposals come forward.
	Individual Assisted Collections from properties that are more than 25m from the collection point for collectors could be an issue as the HSE/trade unions do not like this especially with communal bins and this needs to be addressed. It could be achieved by a collection method (eg tailifts) that will cost above the average property collection cost for the district which the council would need to pick up the difference - this should be avoided.	Movement	Note - no further action	Design code requires a strategy to be developed for any proposals where collection points are within the 25m collection distance. Can include further clarification.
	I cannot find any reference to paid special collections for household items such as fridges, freezers, cookers etc – are residents expected to place these at collection points on their appointment day of collection?.	Movement	Note - no further action	Detailed point - should be picked up at future stage(s).
	I was also confused by the terminology of “refuse” – does this relate just to refuse? Or does it relate to dry recycling and organics as well? If it is meant to cover all waste operations it maybe clearer to use Waste instead of refuse – but if it does not and the document is just referring to residual waste what are the arrangements for recycling and organics?.	Movement	Update to design code.	Draft DC uses term 'refuse' for all waste and recycling, this appears to be in line with Essex Design Guide, however, **for clarity, where recyling is not specifically mentioned, the term 'refuse' changed to 'waste and recycling' on pages 40 - 41.**
	3.84 – Communal bin points should only service up to 10 designated properties – this has been proved to enable control by the managing agent over the bin compound and the issue of dumped rubbish and waste outside the bins itself. The waste service does not clear bin compounds of dumped material and for us to do so would require additional payment which then can be recovered by the service charges from the designated residents.	Movement	Update to design code.	**Additional wording in rule 3.88 as follows: Any communal bin point should be well designed as part of the street scene and should not service more than ten designated dwellings.**
	3.88 – These rear courts that collections need to be made from will require adequate turning circles and bollards barriers etc to protect vehicles from damage that are parked there especially with communal bin which are much heavier and difficult to control.	Movement	Update to design code.	**Additional wording in rule 3.86 as follows: and the parking court must provide adequate turning circles and guarding to protect parked vehicles from damage.**
	3.90 - I am not sure about the terminology of reduce collections for waste? I would like to explore what this means and how it can be achieved especially with refuse collection likely to be mandated to be no more than a fortnightly collection and food a weekly collection? Green Garden waste is also falling under the mandated materials for collection with the ability to charge remaining.	Movement	Update to design code.	Can change wording slightly - on street bins will be reduced but frequency of collections may not. **Reference to reduced frequency of collections removed.**
	Underground systems can work but will require direct access to the bank for lifting/emptying purposes by specialist hiab vehicles so they can only be placed where service vehicles can access them. If a vacuum system is used then we need to make sure it has the power to bring the waste to a collection point that is accessible. I expect there could be a contamination issue as there is with all communal compounds because residents do not take individual responsibility for how they present their waste as it would be very difficult for the managing agents/enforcement to trace back to them – that’s why the comments in 3.84 are relevant here as well.	Movement	Response as follows.	Needs wider planning discussion as to potential benefits/ costs of providing alternative systems across the HGGT sites. Unlikely to be resolved through design code. Study into feasability is being initiated.
	3.91 - The descriptions of the waste containers are missing clear recycling sacks/240 litre blue lidded bin and the use of small plastic type carrier bags for textiles, batteries and WEEE. Communal bin compounds can have a purple bin for these last materials. Can insist on wheeled bins for recycling for this development under council policy and the EPA 1990 section 46 – there is also legislation that allows for additional charges to make against managing agents/householders for excessive costs above the normal for certain problems. The collection points for households individual bins where residents bring their bins for collection and then take them back afterwards could be a flash point for missing containers etc – this could lead to issues especially as the majority of waste containers need to be paid for by the residents.	Movement	Update to design code.	**Update to rule 3.90 to note current waste and recycling containers for houses (not flats/ communal): Two 180-litre wheelie bins (one black lid, one green lid)** **One blue-lidded 240-litre wheelie bin for recycling** **55-litre bin**
	3.92 - Community recycling/waste points can be a beacon for dumped rubbish and should be avoided with new developments. The setting of a suite of recycling materials that must be recycled under the Environment Act and the Waste Disposal authority push for reduction in residual waste does not agree with this statement if the term “refuse” just means refuse?. If community points are to be set up it should be for the refuse waste stream and not for the recycling or organics – these two waste streams need to be more accessible not less and the service provided should certainly not be less than refuse. The only exemption would have to be the medical bins in this situation because most medical bin recipients are Assisted collections as well and it would not be acceptable for such residents to have to arrange someone to take such waste to a communal point.	Movement	Update to design code.	**Noted. Have removed reference to community recycling or waste points.**
Officer	SANG 2.11 Provision of attractive walking routes with appropriately surfaced paths designed following Natural England’s SANG guidance (you can link it to this if needed) https://www.woking2027.info/supplementary/tbhspaspd/updated_sang_guidance_August_2021.pdf	Nature	Update to design code.	**Wording amended as suggested. Link not included.**

	EFDC Teams Consultation Responses			
Event	Comment	Theme	Status	Note/ response/ action
SuDS & C	SuDS Strategy (p. 26) SuDS will alleviate flood risk on site, mitigating the impact of development and address issues of runoff from the site currently impacting neighbouring residents, as well as respond to the climate emergency by aiming to future-proof the site.	Nature	Update to design code.	**Paragraph reworded to: SuDS will alleviate flood risk on the site, mitigating the impact of development and addressing issues of runoff from the site currently impacting neighbouring residents, as well as responding to the climate emergency through a future-proofing strategy.**

	Design Code Testing Report Outcomes			
Event	Comment	Theme	Status	Note/ response/ action
	Actions below are taken from the Latton priory Draft Strategic Design Code Testing Report dated February 2024			
Design Code Testing Actions	Reduce overall volume of text, focussing particularly on text-heavy pages.	Design code usability and scope	Update to design code.	**Document has been edited to reduce text throughout, particularly on text-heavy pages in**
	Review 'musts' and 'shoulds' – including the number of requirements to ensure that the design code priorities are understood. Consider visually differentiating 'musts' and 'shoulds' though noting that 'shoulds' should not be ignored and are not less important, but may just be more subjective than the 'musts'.	Design code usability and scope	Update to design code.	**Musts' and 'shoulds' have been reviewed and edited throughout.**
	Review strategic diagrams. Consider colour changes to aid clarity and/ or combining/ consolidating information to reduce the need to cross-reference between different parts of the design code.	Design code usability and scope	Update to design code.	**Diagrams reviewed for legibility throughout. Frontage diagram and matrix was particularly confusing so this was removed and illustrative typology diagram added in. Other plans amended as**
	Consider how to combine linked information/ requirements to reduce the need for cross-referencing, particularly around street requirements	Design code usability and scope	Update to design code.	This would require significant restructuring, which isnt feasible currently but **there has been some rationalisation of where information is located and reducing repetition between sections.**
	Expand on 'how to use' section to set out process for designing using the code. The process section should also include a process for deviating from the Code in certain circumstances, requiring designs to be reviewed by the QRP to demonstrate that they are an improvement.	Design code usability and scope	Update to design code.	**How to' section updated with 6-step flow chart on 'how to use the design code'.**
	Produce compliance tracker to aid document use and review of proposals.	Design code usability and scope	Response as follows.	To be produced following endorsement as a follow-on piece.
	Add more information about green infrastructure requirements e.g. green buffers at key edges or treatment beside existing hedgerows	Nature	Update to design code.	**Additional rules added in 'Nature' section**
	Reconsider the requirement around all mature trees from the outset to balance with longevity. A mix may be more appropriate.	Nature	Update to design code.	**Following discussions with tree officers, rule changed to approximately 25% of trees to be semi-mature at outset.**
	Review the requirements for building-line set-backs. These may be overly restrictive in places and may not allow for front garden bin/ bike storage where required.	Built form	Update to design code.	**Building line set backs moved to typology matrix as additional information. Numbers of streets for which building line rules are set has been reduced and ranges have been increased for greater flexibility.**
	Review 'frontage/ building line' requirements to allow more flexibility and make code easier to understand/ less complex. The principle of maximising frontage is positive but its extent should be reduced to allow more gaps in the built form. Gaps should be a minimum of 2-3m.	Built form	Update to design code.	**See note above. Plus additional rule added around size of gaps between buildings.**
	Sections showing how buildings relate to the street would be beneficial.	Built form	Note - no further action	Not achievable within timescales/ resources however the design code does give parameters and drawn sections may erode the flexibility required.
	Possible further coding around site perimeter roads and the character of these.	Public Space	Note - no further action	Not achievable within timescales/ resources and the character of perimeter roads does need to be developed in line with character areas and therefore may be more appropriate in the detained design code.

Public Consultation Responses Summary

Event	Comment	Theme	Status	Note/ response/ action
Comments and survey response summaries below are taken from the Latton priory Draft Strategic Design Code Community Engagament Report dated December 2023 (pages 15 - 25)				
Design Ambitions	In the survey, there was general agreement with the Design Ambitions, with the following considered most important: •A lively core of schools, amenities and shops supports a thriving and resilient community •An integral network of green routes and spaces connects surrounding landscape and enhances the Green Wedge into Harlow •A variety of uplifting and safe streets and spaces encourage year-round active and healthy lifestyles for all ages •Active and sustainable travel is the most appealing way to get around, including travel into Harlow and Epping •The climate emergency is addressed with buildings and spaces that can withstand the changing climate and minimise impact on the environment •There is flexibility to adapt to future needs, anticipating changes in travel, work and lifestyles	Design code usability and scope	Note	Noted.
	Less of a priority, but still agreed, were: •Compact, human-scale built form nestles comfortably into the hillside overlooking Harlow •The art and innovation of Harlow, the market town and pastoral character of Epping inform a distinctive identity	Design code usability and scope	Note	Noted.
	Additional comments called for: •Quality design, materials, and construction •Attractive architecture •Integration with the surrounding area •Questions were also asked about the benefits to Harlow itself.	Design code usability and scope	Update to design code.	Some of these will need to be addressed further through the detailed design code and review of future planning applications. **Further information has been added on the content of detailed design codes in the 'anticipated planning process' section of the design code.** See FAQs for further information on the integration and wider benefits
	'Please don't destroy this one time opportunity to build something good, don't try to cut costs on architecture or design'	Design code usability and scope	Note	Design code is intended to maximise the opportunity as far as possible.
	'Whilst this addresses a new development, there is no framework for integration with existing infrastructures'	Design code usability and scope	Response as follows.	See FAQs regarding integration.
	'It's all very well doing the design code but it's all about the site and not enough about the wider area, connections and interfaces'	Design code usability and scope	Response as follows.	See FAQs regarding integration.
	'Referring back to the November 2022 Latton Priory SMP draft report consultation, one of the key policies of particular relevance to Latton Priory was noted to be: Policy SP3 Place Shaping - ensure positive integration with adjacent rural and urban communities. This KEY policy is still not met within the Latton Priory Draft Design Code, in terms of the impact that the proposals will have upon the residents in the Rye Hill Road area, and those of many other Harlow roads that will be affected by Latton Priory.'	Design code usability and scope	Response as follows.	See FAQs regarding integration and wider transport infrastructure.
	'The amount of work that has gone into this design code is exemplary and should guide all other developments in the EF district. Well done to all those involved.'	Design code usability and scope	Note	Noted.
Land Use	There are concerns about the impact on the view both from the neighbouring part of Harlow, and from Epping. These are linked to the position of the site on a ridge and existing planning stipulations surrounding this. The raised location was also thought to have the potential to be a windswept location; using trees as buffers was suggested.	Framework masterplan/ stewardship	Update to design code.	**Following further analysis of any immediately neighbouring developments (primarily Sibneys Green and Corner Meadow) bounding the north of the site, there have been amendments in the height diagram to ensure heights are limited to two storeys close to the boundary in these locations, and changes to the density diagram to ensure density is limited to 'low density' in these locations. Combined with the existing tree and vegetation buffers, this should ensure views are not significantly impacted. Further wording has also been included about testing of built form through strategic views and also around micro-climate testing.**
	In-person events highlighted a need to consider the impacts on the neighbouring area of Harlow, and to give further consideration to the site boundary.	Framework masterplan/ stewardship	Update to design code.	**See note above.**
	There is concern about where the travellers' site is located within the development ie close to the neighbourhood centre. Many people expressed concerns that antisocial behaviour and crime associated with an existing site at Fernhill Road might be exacerbated. It was acknowledged that these issues were particular to this site and not to traveller communities in general. Consultation is taking place with Design Out Crime and other relevant services to help address this.	Framework masterplan/ stewardship	Response as follows.	See FAQs regarding Gypsy and Traveller site location.

	Public Consultation Responses Summary			
Event	Comment	Theme	Status	Note/ response/ action
	The need for social infrastructure – particularly schools and healthcare – was highlighted, as well as concerns about the impact on roads and additional population.	Framework masterplan/ stewardship	Response as follows.	See FAQs regarding infrastructure delivery.
	'The area proposed is too close to existing homes and Schools and the Roads and access routes just cannot take the extra chaos the build will bring. The proposed new homes will take away beautiful land that is used by 1000s of people for walks and to take their children.'	Framework masterplan/ stewardship	Response as follows.	The area and delivery requirements have been allocated as Policy in the adopted Local Plan. See FAQs for further information.
	'The site should be moved northwards so it lies beneath the ridge as would fit with Sir Frederick Gibberd's design standards - not to dominate the skyline. The rooflines should be hidden from views from the south.'	Framework masterplan/ stewardship	Response as follows.	The site area is allocated for development. The rooflines will need to be sensitively designed and this will be reviewed as part of the wider planning process.
	'A protected barrier of trees and shrubs should also be in place, setting the new buildings away from these borders, again minimising any disturbance.'	Framework masterplan/ stewardship	Response as follows.	That is the intention as shown in the SMF and the design code.
	'It is IMPOSSIBLE for up to an extra 3600 Harlow residents to positively integrate into Harlow's existing local healthcare provision, which is already stretched beyond capacity. A design code for Latton Priory with ZERO local healthcare facilities included in it is NOT APPROPRIATE'	Framework masterplan/ stewardship	Response as follows.	See FAQs regarding infrastructure delivery.
Stewardship	Maintenance was a concern in workshop conversations and the survey, and of particular importance to young people. This also aligns with the HGGT stewardship charter, which is undergoing separate consultation.	Framework masterplan/ stewardship	Update to design code.	Whilst maintenance has been adressed in the design code requirements, this will need to be reviewed in forthcoming proposals and in line with developing HGGT stewardship work. **The issue of adoption of roads has been considered in the highways technical report and subsequent amendments to the design code.** Again, this requires further discussion as the applications are submitted and details are received.
	Due to the location of the site – adjacent to Harlow but within the district of Epping Forest – several people said that maintenance should funded be through EFDC council tax. There should be minimal (financial and managerial) onus on homeowners.	Framework masterplan/ stewardship	Response as follows.	See FAQs
	'Please provide adequate funding for training opportunities for staff involved in this essential aspect of the development.'	Framework masterplan/ stewardship	Response as follows.	Related to maintenance and stewardship. See note two rows above.
	Green space, fields, woodland and hedgerows are an important part of the local identity and culture. People therefore felt strongly about both conservation of / reducing the impact on existing wildlife and woodland, as well as incorporating greenery into new streets.	Nature	Note	Noted.
	Climate resilience was acknowledged as a key consideration for a green space strategy – choosing climate resistant species, and using planting to provide shade and purify air. There was a unanimously positive response to green streets, partly as attractive places, but also to boost biodiversity.	Nature	Note	Noted.
	In conversations at events with Harlow residents, the idea of a green buffer between Harlow and the new development was also raised by residents who would be losing green space behind their homes and were concerned about having the new homes right behind their's.	Nature	Update to design code.	**See note above regarding amendments adjacent to the area adjacent Sibneys Green and Corner Meadow housing.** Elsewhere, there are generally retained buffers between existing and proposed development.
	More than half of survey respondents supported the following aspects of the Design Code: •A greenway for walking, cycling and other non-car-based travel •Green fingers of land penetrating the site •A new park •A wetland area •Connecting with and extending Harlow's Green Wedge •A new park •Sustainable Drainage (SuDS) •Allocation of a Suitable Alternative Natural Greenspace (SANG) •Supporting biodiversity and climate change	Nature	Note	Noted.
lature	There was less interest from survey respondents and in-person discussions around: •Allotments and food growing – although Youth Councillors identified these as facilities that would be well used by older people and Asian families. •Sports pitches were identified as something of particular importance to young people; further details of the activities they would like provision for can be found und 'Play'. •Concerns around existing natural habitat centred on •Destruction of existing hedgerows and trees •Impact on existing wildlife habitats and routes •Loss of existing countryside •Safety around ponds / blue infrastructure •Hayfever from certain plant species •Smells from stagnant water in attenuation ponds	Nature	Response as follows.	Most of these are policy requirements or best practice to achieve the aims of the Garden Town and district. The issue of smells from stagnant water in ponds will need to be prevented in the new ponds through good design and engineering. This will be addressed once proposals have been progressed.

Public Consultation Responses Summary			
Comment	Theme	Status	Note/ response/ action
Specific questions included • Whether the existing deer route from Latton Woods across the site had been taken into account • Will the oak trees along Riddings Lane be preserved?	Nature	Response as follows.	These will both need to be addressed as further detail emerges. As far as possible, existing trees and hedgerows will be retained.
'I love Harlow because of the trees!'	Nature	Note	Noted.
'I think having modern houses next to the colourful green space looks good'	Nature	Note	Noted.
'We have an attenuation pond near us and it stinks!'	Nature	Response as follows.	See note above regarding careful design of the proposed attenuations ponds.
'Will the developers landscape the Harlow side, as the public generally have a distrust of developers and if not written into a design code as a mandatory action will probably not be a consideration due to costs.'	Nature	Response as follows.	Developers will be responsible for the delivery of the whole of their application area, including the landscape proposals.
'Harlow's green wedge should not be imposed upon. There should be a clear and big enough wedge between the new site and Harlow.'	Nature	Response as follows.	There is an aspiration to make the green wedge more inviting and usable and public consultation, particularly in workshops with young people, made evident that many of the green spaces in Harlow are not inviting or usable. The proposals seek to continue the green wedge with a new park that will benefit new and existing surrounding residents. The proposed route of a sustainable corridor partly through the green wedge will be resolved through the wider planning process. Also see FAQs.
'There are currently huge problems with water run off from the green wedge at the north end of the LP site, across and down Rye hill Rd and into Longwood. Currently surface water runs into housing gas supplies causing major issues. All proposed land drainage for LP must have capacity to resolve these problems.'	Nature	Response as follows.	This will be addressed through a review of detailed proposals.
'A greenway connecting to Epping to encourage active travel to underground network [would be good].'	Nature	Note	Noted.
'I wouldn't really use community gardens, but older people might and it would be good to have things for all ages.'	Nature	Note	Noted.
The impact on existing roads and traffic congestions was a major concern for residents in Harlow and Epping / Thornwood, as well as online respondents. Much of this is the remit of the Transport Strategy rather than the Strategic Design Code, and there was a strong call for the Transport Strategy to be shared before the Design Code is endorsed. Detailed comments received on this subject will be shared with the transport consultant team.	Movement	Response as follows.	The transport strategy will accompany an outline application (See FAQs). This has not yet been received but the sooner the design code is endorsed, the earlier it can influence proposals.
More information was requested on entrance and exit points to the Latton Priory site, particularly with reference to potential impacts on Rye Hill Road. The example of Low Traffic Neighbourhood interventions in Bruce Grove, Haringey, North London were suggested by one respondent as a successful model for preventing rat-running.	Movement	Response as follows.	See note above.
Safety and security – The safety of roads, streets, walkways and cycleways is one of the chief concerns. It was regarded by survey respondents as one of the most important factors in encouraging people to walk and cycle, and it was one of the key topics in both Youth Council workshops. Safety means both road safety (eg separating cycle lanes from cars) but more importantly personal safety (eg mugging).	Movement	Update to design code.	**Design code has been updated with more robust requirements around various safety issues including 'Secure by Design' standards, CCTV potential in the local centre, sight lines and lighting. See also responses to Essex police comments.**
Good lighting was one of the most important things for making people feel safe; many also cited cctv, clear lines of sight and places with activity as deterrents to crime and antisocial behaviour.	Movement	Update to design code.	**See note above.**
Active travel – Bike security was seen as something that would promote cycling, with approval for communal street bike sheds and the request for secure bike parking near activities (eg play, sport) and neighbourhood centre.	Movement	Update to design code.	**Cycle parking requirements have been strengthened.**
Places to sit, good signposting and the attractiveness of routes also encourage people to walk/cycle. It was noted that equestrianism is also a popular activity in this area.	Movement	Note	Bridleways are included in the SMF, not directly addressed in the design code. The design code does address seating, signage and attractive streets.
Bus provision would need to be reliable, frequent and supported even if not viable for a private operator. There are concerns a service would not continue. Real time information was seen as essential, rolled out across the network.	Movement	Response as follows.	This has been addressed as requirements in the design code but will need to be reinforced and delivered through the wider planning process.
Parking – the issue of how to most effectively design parking drew mixed responses from the survey and in-person sessions, with some wanting to see on site /on street provision restricted to one space per house, and others insisting there should be no limit to care ownership with adequate parking off road.	Movement	Response as follows.	The parking strategy in the design code has been designed to achieve the aims and targets set out, with an appropriate level of flexibility. Parking numbers will be addressed at future stages.

Public Consultation Responses Summary

Event	Comment	Theme	Status	Note/ response/ action
Move	Thornwood residents were concerned that restricted parking provision at Latton Priory might push it on to them; Harlow residents that people would park further into Harlow.	Movement	Response as follows.	Given the distance from Thornwood this is very unlikely to be an issue. Where there is proximity, there will need to be consideration at future stages, which will involve consultation with nearby residents.
	There was much interest in car barns. It was asked that security, surveillance, management, maintenance and disabled access be considered in their design and operation.	Movement	Update to design code.	**Security requirements for car barns strengthened in design code in line with Essex police recommendations.**
	EV provision was met with approval, although one respondent thought it would be outmoded within 10-15 years and replaces with hydrogen technology.	Movement	Note	Noted.
	People liked the idea of car-free play streets, but commented on some of the detail and wanted assurances of emergency vehicle access.	Movement	Update to design code.	**Servicing and emergency vehicle access has been addressed in the design code testing work and amendments made accordingly.** This will be further reinforced in the review of planning applications.
	Not everyone can cycle, please look at opportunities for wheelchair users or electric buggies	Movement	Note	The streets have been designed to accommodate wheelchair users and electrical buggies.
	More than one parking space per household for parking minimum of 2 vehicles off road	Movement	Response as follows.	The parking strategy in the design code has been designed to achieve the aims and targets set out, with an appropriate level of flexibility. Parking numbers will be addressed at future stages.
	Buses need to be good for people to use them. Need to build people's trust and build in a culture of reliable and convenient public transport. This includes real-time information and buses that run at all times, including to serve those on night-shifts. Plus is there anything to prevent bus operator from closing the route if they don't think it makes them enough money?	Movement	Response as follows.	This has been addressed as requirements in the design code but will need to be reinforced and delivered through the wider planning process.
	Plan cycle paths where cyclists / pedestrians will not feel vulnerable in remote areas Please ensure that there is real security and round the clock monitoring of car barns - all too often tools etc are stolen from parked up vehicles.	Movement	Update to design code.	There is a significant focus in the design code of providing a choice of cycle and walking routes that are well overlooked and do not feel remote. **See also note above about further security requirements for the car barns.**
	Essential things for public space were: •Good lighting – considered hugely important in order to make streets and public spaces feel safe. •Accessibility of streets for all •Bins (including dog poo) and recycling •Maintenance – in general, people want their streets and public spaces to look attractive and cared for. Young people said bins next to seating would help reduce litter. •Plants and greenery •Trees and shade •Places to sit – to rest, socialise, keep an eye on children playing •Accessible public toilets (although opinion was divided in survey, it was thought v important by young people) •Spaces to play close to home (more than half of survey, and youth council •Digital connectivity (more than half of survey, and young people]	Public Space	Note	Appears to reinforce main points of the public space section of the design code.
	Much discussion of public space was had in workshops with Harlow and Epping Forest Youth Councils. Young people want places to look (and feel) attractive. They like colour, street art, greenery, flowers, things that appeal to all the senses. Maintenance is important (especially planted areas and. playgrounds), and the provision of bins to discourage littering. They also wanted to ensure that Latton Priory offered something to people of all ages.	Public Space	Response as follows.	Whilst the design code provides the basis for all these aspects being incoporated, it will be important that young people are involved throughout the planning process, especially as the detailed designs are developed.
	Local centre Workshops with Youth Councillors examined in detail what a neighbourhood centre could be like. Their collective vision was of an active, safe, accessible, welcoming place that reflected the diversity of Harlow. Somewhere people could come together, meet friends, sit and chat, but where you can have fun without having to spend money. They saw it as somewhere with independent shops/businesses and a market (creating character and local opportunity); car-free but with a drop off area; providing the infrastructure to host events and music; using public art to reflect different communities. Practical considerations included : drinking fountains, waste & recycling bins, seating (sheltered), lighting, PowerPoints for markets and performances.	Public Space	Response as follows.	See note above. This is also reinforced in the stewardship framework section of the design code.
	Pavements need to be wide enough for people to walk and for pushchairs / wheelchairs I like the idea of residents sitting outside their house and getting to know their neighbours	Public Space	Note	Noted.

Public Consultation Responses Summary

Event	Comment	Theme	Status	Note/ response/ action
Public Space	Art pieces in the neighbourhood centre could reflect different types of communities, which gives the chance of them being involved in their creation – if they want to be	Public Space	Update to design code.	**Additional requirement added to the community plaza for items that must be provided: *Integrated public art that has been designed with the community as part of a wider art strategy.***
	Good lighting is insanely important!	Public Space	Note	Noted.
	The neighbourhood centre should not be boring; [it should have] lots of things to do, with lots of people, the hub of the community	Public Space	Response as follows.	Whilst the design code provides the basis, it will be important that young people are involved throughout the planning process, especially as the detailed designs are developed. Note that vibrancy of the local centre also relies on high quality and ttractive public realm throughout.
	PLAY Popular recreational activities mentioned (by Youth Councillors and survey respondents) were: •Bike pump track •Equestrian •Walking •Places to sit and chat •Cycling routes •Sports centre/ pitches •Local shops •Food/drink venues •Music venue •A natural running track •Swings •Tennis •Basketball •Netball •Badminton •Football	Public Space	Response as follows.	See note above.
	Key considerations: •Maintenance •Safety (Street boulders for climbing on were thought dangerous rather than adventurous by Youth Councillors)	Public Space	Note	Noted.
	The car-free play street is the best thing about it – it creates a space for people to hang out and spend time in.	Public Space	Note	Noted.
	Games for kids in the street would be good	Public Space	Note	Supported by the integrated play and 'play on the way' strategy in the design code.
	Variety of built form is seen as a positive aspect of local identity and of Harlow. ‘slabs’ of building blocks are particularly disliked.	Built form	Note	Noted.
	Low rise is seen as most appropriate, in keeping with neighbouring housing.	Built form	Update to design code.	The development is generally low rise to preserve strategic views but there are positive aspects of height and density for creating attractive public realm. The design code promotes density and height in appropriate locations and this will also support the wayfinding strategy. **See amendments as noted below to density and height limits close to neighbouring housing.**
	Homes should have generous proportions.	Built form	Response as follows.	Local Plan requires Nationally Described Space Standards to be met. Additionally design code requires that homes are designed to adapt to changes in accessibility requirements, family structures and lifestyle changes, such as increased home working. This will be further reinforced through the wider planning process.
Built Form	Survey responses all considered the following aspects of the code important: -Minimising energy use -Variety -Robust edges and enclosure to streets and spaces -Built form that maximises overlook and minimises blank frontage to the street	Built form	Note	Noted.

Public Consultation Responses Summary

Event	Comment	Theme	Status	Note/ response/ action
	‘ I don’t like the development at New Hall; it looks cheap and nasty and I can’t see it maturing into anything nice’	Built form	Note	Noted.
	‘I don’t mind density, but I don’t want it right by us’	Built form	Update to design code.	**Following further analysis of any immediately neighbouring developments (primarily Sibneys Green and Corner Meadow) bounding the north of the site, there have been amendments in the height diagram to ensure heights are limited to two storeys close to the boundary in these locations, and changes to the density diagram to ensure density is limited to 'low density' in these locations. Combined with the existing tree and vegetation buffers, this should ensure views are not significantly impacted. Further wording has also been included about testing of built form through strategic views and also around micro-climate testing.**
	You can imagine that, if your property has been overlooking green fields and hedgerows then the prospect of having the possibility of a three-story building is a depressing outcome. What will the developers do to ensure that the views from Harlow are as pleasant as those offered to the new development?	Built form	Update to design code.	See note above. This will also be addressed through the wider planning process through Landscape Visual Impact Assessments, for example.
Identity	Nature and green space is seen as a fundamental aspect of local character; woodland, hedgerows and a farming typology are particularly pertinent on the Latton Priory site.	Identity	Note	Noted.
	Attractiveness and quality of architecture, materials and construction are all important factors in whether people like a place.	Identity	Update to design code.	Noted and this will be developed further through the wider planning process, including requirement for a detailed design code. **Further information on this has been added to the planning process section of the code.**
	The youth councillors see diversity and multiculturalism as an important part of Harlow’s identity and said they wanted to see that represented in the public spaces.	Identity	Response as follows.	Whilst the design code provides the basis for all these aspects being incoporated, it will be important that young people are involved throughout the planning process, especially as the detailed designs are developed.
	‘I don’t like the pale brick [of the new Cambridge vernacular]; it’s not very Essex. I do like black boarding though, that does feel very Essex.’	Identity	Update to design code.	Noted and this will be developed further through the wider planning process, including requirement for a detailed design code. **Further information on this has been added to the planning process section of the code.**
	‘Art pieces in the neighbourhood centre could reflect different types of communities, with the chance of them being involved in their creation if they want to be’	Identity	Update to design code.	**Additional requirement added to the community plaza for items that must be provided: *Integrated public art that has been designed with the community as part of a wider art strategy.***
rces	The need to design with climate change, reduced energy / carbon use, and responsible management of resources is recognised as important.	Resources	Note	Noted.
	In the survey responses, there was agreement with all of the measures, with those directly relating to biodiversity and green / blue infrastructure given the highest importance, suggesting that nature and the natural landscape is of particular importance in the Harlow / Epping Forest area. At the public events, there was support for green roofs, solar panels, EV charging,	Resources	Note	Noted.
	Futureproofing of new development was also seen as important to survey respondents, with the inclusion of digital technologies considered very important.	Resources	Note	Noted.
	Many people expressed concerns about the impact of extensive new development on water management, flooding and sewage treatment, and more detail was requested on what would happen to water from Latton Bush after it had passed through permeable paving / SuDS.	Resources	Response as follows.	Furtehr details regarding the Sustainble drainage proposals will need to be submitted by the applicant with any planning application. This can then be reviewed in detail.

Public Consultation Responses Summary

Event	Comment	Theme	Status	Note/ response/ action
Resour	Homes need to be well insulated from the start, with heat pumps etc. It is much easier than trying to retrofit a decade later	Resources	Response as follows.	The resources section of the code describes high standards that must be met for sustainable standards in housing and built form. This will need to be supported and reinforced through the wider planning process as the applications are reviewed. Note also that the HGGT/ EFDC Sustainability Guidance and checklist will need to be applied to any development proposals.
	There's an opportunity to build eco homes that address climate-change measures. We need to force builders to incorporate them. Things like solar panels, grey water usage, etc	Resources	Response as follows.	See note above.
Using the doc	Comments from survey respondents and event attendees were that: •It's too wordy •It has too many abbreviations •The maps should be clearer •Keys are needed	Design code usability and scope	Update to design code.	**Design code has been edited throught, particularly reducing the quantity of text on the word-heavy pages. Graphics have been reviewed and updated for better usability/ clarity. Keys are provided and a glossary is included.**
Wider Issues	Most of the issues raised at in-person sessions, and several submitted by email and via the survey, were concerned with matters beyond the remit of the Strategic Design Code.	Wider infrastructure	Response as follows.	See FAQs for detailed rseponses to the recurring questions/ issues raised.
	Infrastructure delivery, including healthcare and traffic Many people – in person and online – raised concerns about the pressures of new development at Latton Priory on local infrastructure, and the timings of its delivery. These included: -Pressure on social infrastructure – specifically schools and healthcare – which is perceived as already overstretched. There was a positive response to the inclusion of a reference to healthcare in the latest draft of the design code. -Joined-up thinking eg that the healthcare strategy for locations of new provision ties in with the sustainable transport strategy -Need to provide new infrastructure at the same time as (not after) homes – especially schools and healthcare, but also other community facilities – to serve people when they move in -Worsening of traffic congestion and road safety. Rye Hill Road, B1393, and routes to Epping and the M11. More details can be read in email responses and event feedback. -Additional commuters using Epping Tube station, and busses/roads to reach it -Who would operate the bus routes, whether they would remain viable and in operations, reliability and frequency, and the need for area-wide real-time information -Pressure on sewage and reservoirs It was explained in public sessions that some of these concerns would be dealt with through the separate transport strategy and Infrastructure Development Plan; it is recommended that these are shared with those who signed up for email updates when available.	Wider infrastructure	Response as follows.	See FAQs for detailed rseponses to the recurring questions/ issues raised.
	Development delivery At the in-person events, more information was requested about the timescales of delivery and which parts of the site would be developed first. Harlow residents in particular would like to be informed of any planning applications coming forward and the channels through which they can comment. Both Epping / Thornwood and Harlow residents expressed concern about local disruption during the construction period.	Wider infrastructure	Response as follows.	See FAQs for detailed rseponses to the recurring questions/ issues raised.
	Anti-development sentiment The situation of the development – on the edge of Harlow – has provoked much opposition to any development happening on the site. This is not something that is within the purview of the Strategic Design code, but is noted here as it was a core sentiment raised by Harlow residents who attended the in person sessions at the Latton Bush centre, and by a small number of Harlow residents lodging official responses by email or online. (It should be noted, that this was not the case at the in-person sessions in Thornwood.)	Wider infrastructure	Response as follows.	See FAQs for detailed rseponses to the recurring questions/ issues raised.
	Politics Many Harlow residents see this development as EFDC pushing their housing needs onto Harlow. As the site sits within the district of Epping Forest, but adjoined to Harlow, questions were raised over -Local council and parliamentary representation (which ward or constituency would cover it) -Where council tax would go and which council would be responsible for providing services -If EFDC are the planning authority, how much representation Harlow and its residents have when planning applications come forward	Wider infrastructure	Response as follows.	See FAQs for detailed rseponses to the recurring questions/ issues raised.

	Essex County Council Consultation Responses inc Place Services			
Event	Comment	Theme	Status	Note/ response/ action
	p6 (10 of 100) The Planning Context makes reference to the EFDC GI Strategy which is positive and demonstrate the link to HGGT. It would be to mention the HGGT GI Framework in the list of key HGGT documents.	Nature	Update to design code.	**HGGT GI framework added in list of key HGGT docs on p20 and p10.**
	p6 (10 of 100) ECC recommends reference to the Essex Green Infrastructure Standards (2022), which should be used as part of the Design Code evidence base and have been endorsed by Natural England and awarded Building with Nature Policy accreditation, 2023. The Essex GI Standards outlines nine principles and standards for the protection, enhancement, creation, and management of GI in Essex. The application of these principles and standards through development management and planning policy will ensure the delivery of multifunctional, accessible high-quality GI. Essex Green Infrastructure Standards | Essex Design Guide> The GI Standards can help to design codes to set the context for development to delivery good design and should be referred to for local development requirements.	Nature	Update to design code.	**Reference added to 'Nature' section rather than planning context section. This should also be picked up at future planning stages.**
	p6 (10 of 100) The National Green Infrastructure Framework includes national Headline Green Infrastructure Standards, which set out the ambition for green infrastructure in terms of quantity, quality, and type to enable everyone to benefit from good green infrastructure. Both these standards are voluntary and the national GI standards are referred to in the National Model Design Guide. It is noted that the National GI Design Guide has been referenced in Chapter 2 Nature/Green Infrastructure Framework section.	Nature	Note	In order to keep the design code usable, we are trying not to repeat information or repeat information that is found elsewhere in policy. This first section concentrates on the most high level, key documents. References added to Nature section as appropriate.
	Page 10 (14 of 100) See comment above regarding the list of documents listed under heading	Nature	Note	See note above.
	Page 12 – 13 (16-17 of 100) We welcome the ambition for an integrated network of green routes and spaces and for active travel routes. Although would encourage for attractive active travel routes. All these ambitions are people focused and there is no reference to achieve a better balance between people with nature. To support biodiversity net gain targets and links to local nature recovery. There is an opportunity to show case best practice, in that developments can also contribute positive impacts on the natural environment with the right design in the right location. Linking this to the requirements in Chapter 2. Nature and Green Infrastructure Framework section. There is a need to include a design ambition that is landscape – led ensuring that it is designed and managed for balancing people with nature, allowing for nature recovery based on considerations of local needs, opportunities, and constraints. The Design Code to support and encourage opportunities to enhance and establish green infrastructure along sustainable transport and PRoW networks to both encourage active travel and create a green corridor for wildlife. This could include, but not be limited to, the integration of nature focused SuDS; native hedgerows, tree, and shrub planting; incidental 'play on the way' features / trails; informal sport (outdoor gym/fitness trails); and areas for seating to stop and rest.	Nature	Note	We did previously have a much more extensive 'vision' but were encouraged to distill it right down by the Design Council and Department for Levelling Up however there is still a landscape-led design ambition - the network of green routes and spaces. This is not exclusively for people. This is then directly elaborated in the 'Nature' section of the design code with key strategies that include wildlife and ecology. Those other items mentioned in the comment are included in the Nature section.
	20 (page 24 of 100) See also section. There is no mention of the HGGT GI Framework in the list of key HGGT documents. Ideally would also like to see a reference to the Essex GI Standards.	Nature	Update to design code.	Given that the EFDC GI strategy and the HGGT Strategy consolidates other policy and guidance, further County and National guidance documents have not been included unless they provide information on specific issues that arent included in the local documents. **Have added HGGT GI framework to list of references on p20 .**
	20 (page 24 of 100) Site-wide green infrastructure requirements 2.4 to include a reference to the requirements for delivering Biodiversity Net Gain and even wider Environmental Net gain. Also demonstrate the opportunity to contribute to the Greater Essex Local Nature Recovery Strategy. ECC as the 'Responsible Authority' for delivering the GELNRS but will work closely with the LNP to provide direction and ensure key stakeholders are engaged. The GELNRS is being prepared for completion by early 2024. The GELNRS will form the baseline for habitat information, which in turn will generate action to promote biodiversity management and improvement. BNG still relies on the application of the mitigation hierarchy to avoid, mitigate, or compensate for biodiversity losses. Should the Design Code support the BNG target? The Essex LNP Biodiversity and Planning Working Group are currently reviewing and exploring the feasibility for 20% Biodiversity Net Gain. In line with the aspiration of other Garden Communities, the Design Guide may wish to adopting the higher 20% figure than the minimum 10% requirement within the Environment Act (2021).	Nature	Note	BNG has not been included as it is now required by planning law. As it has not been sufficiently tested and there is not enough support in existing policy and guidance, we have not included an additional requirement for higher provision in the design code, however that does not preclude it being pushed for through other mechanisms in the planning process for Latton Priory and the other HGGT communities.

	Essex County Council Consultation Responses inc Place Services			
Event	Comment	Theme	Status	Note/ response/ action
ECC - Green Infrastructure	21 (page 25 of 100) The map shows the GI features and has a note that street trees are not included here. Although not listed within the GI key as GI we welcome the inclusion of the Suitable Alternative Natural Green Spaces (SANGs), sport pitches and allotments. As all these are also defined as GI asset type. As well as the potential from car free play streets, school grounds and local centres through incorporating GI in the design can contribute to the wider GI network. There was a note on page 20 that GI includes green and blue infrastructure, but there is no mention on the map. For clarity it might be worth referencing that blue infrastructure is covered under water management as extension to the footnote on page 20. As outlined in the Essex GI Strategy (2020), the following can be considered as Green Infrastructure: - - Parks and Gardens - Natural and semi-natural green spaces - Designated sites (SPAs, SACs, Ramsars, SSSIs, AONBs) - Reservoirs, lakes, and ponds - Waterways (watercourses)- Greenways (Public Rights of Way, footpaths, cycleways and tracks, bridleways, towpath) - Outdoor Sports Facilities (Sports pitches) - Amenity green space (provision for play facilities etc.) - Green spaces around premises (Educational premises open space and playgrounds) - Cemeteries and churchyards - Allotments, community gardens and city farms - Public Realm/Civic spaces (urban greening – urban and street trees, road verges, green walls, green roofs, Sustainable Drainage Systems and Natural Flood Management) - Productive Spaces (agricultural land and meadows) - Green Corridors (verges, green wedges, and green fingers)	Nature	Note	Noted. No further note added at risk of making the page more busy and difficult to read/ consume.
	22 (26 of page 100) Regarding the SANGS, New Park and Sport pitches it uses the terminology should for the design of these features rather than a must. Is this because the requirements listed are not essential and that there is flexibility in the design of these? It is noted that the guide distinguished between the terminology for Must and Should, and if should is used that the proposal has got to provide justification why these features have not been included. However, it is recommended that any elements of the design of these features listed are in fact essential to list as a separate must. For instance, SANGS must be large enough to provide a range of attractive circular walks. SANGS must seek to provide a rural and wild feel with a variety of habitats for visitors to experience (e.g., some of woodland, scrub, grassland, heathland, wetland, open water). Sport Pitches - sports grounds and other play areas must be designed flexibly to support the needs of a range of ages and in line with Sport England recommendations. And active design principles including active environments by Sports England and Active Essex - https://www.sportengland.org/guidance-and-support/facilities-andplanning/design-and-cost-guidance/active-design It is also recommended that sport pitches are designed to be multipurpose which links in to 2.13 to ensure accessible and attractive to range of users and not just sport and dog walkers. Multifunctional spaces bring a wider spectrum of environmental, social, and economic benefits to urban areas, especially for small areas of open spaces and more cost-effective way of addressing many social, wellbeing, drainage and other hard infrastructure needs.	Nature	Update to design code.	These requirements are shoulds because they are principles rather than objective requirements. **However, there has been a review of the 'musts' and 'shoulds' in the document. Where requirements are specifically covered in other guidance and policy they arent always repeated here.**
	22 (26 of page 100) Allotments and food growing requirements. There are other food growing opportunities that could be considered such as community orchards and Food Forests. Food Forest are currently being piloted in 5 schools and parishes (as part of Liveable Neighbourhoods) across Essex. The East Anglia Permaculture Association C.I.C is working with partners seeking opportunities to help combat the climate emergency through the creation and management of food forests on pieces of land in communities. A food forest is an area of any size of purposely designed edible woodland. Taking inspiration from nature, it sustainably mimics the ecosystem of a forest (by having multiple layers, e.g., canopy, bush, ground cover) but replaces elements with food-producing trees and plants that communities and schools can get involved.	Nature	Note	Whilst the design code does not go into such extensive detail, it does seek to ensure a number of food growing opportunities at different scales and in locations to support connections such as close to schools or other communities. This should be picked up further at future stages of the planning process.
	Green finger/ node requirements 2.27. regarding seating and street furniture to take into consideration sustainable design such as Green Roofs for cycling facilities: The provision of these features allows ecosystems to function and deliver their services by connecting urban, peri-urban and rural areas, alongside biodiversity habitat creation. Dual street furniture/seating (i.e., a bench including a planter): The design of the street furniture and bin stores can contribute to the landscape character, reduce clutter of an area or street and act as a green corridor/link to the wider landscape scale GI network.	Nature	Update to design code.	**Additional requirements added to p23: *Dual-function street furniture e.g. benches with planters, green roofs to bin or bike enclosures) should be used to contribute to street greenery, reduce clutter and provide green corridors and link* s.**
	23 (27of page 100) Street trees and greenery requirements Greening of the local centres should be considered too to make this an attractive ad visually pleasing places for people want to spend time and hopefully benefit the local retail areas with increase footfalls and spend. Create pocket parks, attractive seating areas and play, rain gardens/SuDs, planting to provide shading and wind breaks.	Nature	Update to design code.	Feature trees or tree clusters shown in community plaza on GI framework diagram. Also noted as a requirement on p60 under 'Community Plaza' requirements. **Added requirements for SuDS/ rain gardens to this.**

	Essex County Council Consultation Responses inc Place Services			
Event	Comment	Theme	Status	Note/ response/ action
	General Comment - All the GI features state that it should be native planting, which is supportive and understand the flexibility of planting needs to be able to suit the conditions i.e., soil type etc. Another consideration is climate resilient planting where appropriate that can adapt and mitigate though dry periods or saturate in extreme rainfall.	Nature	Note	Note requirement 2.33 under street trees that requires species selection to be diverse and to support climate resilience.
	26 (page 30 of 100) Fourth Paragraph to make reference how SuDs and water management can contribute to the Green and Blue Infrastructure network. Recommend addition al wording: The northern part of the north-south green fingers is located on the steepest parts of the site and provide an opportunity to create an attractive and distinctive landscape that addresses topography and accessibility, biodiversity, and SuDS through the creation of hillside wetland parks. While connecting to the wider green and blue infrastructure network.	Nature	Update to design code.	**Additional wording of 'whilst connecting to the wider green and blue infrastructure network' added to fourth paragraph on p26**
	26 (page 30 of 100) SuDS infrastructure requirements In relation to 2.70 and 2.72 for the design of SuDs to follow the hierarchy for nature-based solutions as set out in the Essex SuDs Design Guide. Naturalised SUDs provide a high-quality environment for people, by providing amenity value, opportunities for environmental education, delivering safe surface water management systems and improving ecological connectivity. There is therefore a need for proposal to design to deliver the benefits of naturalised (GI) SUDs, and for SUDs to be integrated as aesthetic and accessible features within the GI of all developments.	Nature	Update to design code.	**Essex SuDS design guide added to key reference documents on p20 at the beginning of the section. Additional wording added to requirement 2.70 to state: *A site-wide, coordinated SuDS strategy must be approved as part of a coordinated landscape and public realm strategy or design code before the approval of any detailed applications. This should follow the hierarchy for nature-based solutions set out in the Essex SuDS design guid* e.**
	28 (pages 32 of 100) With reference to Nature/ Green Infrastructure. To include reference to Nature/ Green Infrastructure especially links to greenways, green routes and street trees and greenery to ensure GBI is incorporated to the design of sustainable movement across the site. See below separate table for suggested GI for various street types – as potential examples of what could be considered This can also relate to 04 Public Spaces/ Street Design.	Movement	Update to design code.	**Nature' added to signposting box**
	42 (page 46 of 100) Key strategies for uplifting and safe streets and spaces. Fourth bullet pint to include a reference to green infrastructure. GI and open space should be approached from a multifunctional perspective, combining uses such as sustainable drainage, public open space, green corridors/ walking and cycling routes shading through street trees and biodiversity conservation to combine functional uses with amenity benefits. Recommend wording changes: Make art, and innovative design and green infrastructure part of everyday life.	Public Space	Update to design code.	**Wording changed to include green infrastructure in fourth bullet point.**
	42 (page 46 of 100) Public space requirements In relation to 4.5 please see comments for Green finger/ node requirements under 02 Nature/ GI Framework - 23 (27of page 100). In relation to seating and street furniture dual purpose design.	Public Space	Update to design code.	**Requirement 4.5 additional wording: *Dual-function seating such as planters in benches should be considered to contribute to green infrastructure.***
	42 (page 46 of 100), 54 (page 58 of 100), 62 (page 66 of 100) Public space requirements - 4.7, S6 Car-free play streets - Movement and access requirements: 4.94 – 4.95 and the Play and Recreation- play strategy - all to encourage natural play. For this, we would expect play strategies to be formed by the character and function of the green spaces. It should be imaginatively designed using landforms, level changes and water, as well as natural materials such as logs or boulders, which create an attractive setting for play.	Public Space	Note	Considered sufficiently covered, particualry with text and requirements on p62. This can also be interrogated further as this moves through the planning process.
	61 (page 65 of 100) The diagram could include reference to pocket park in open spaces/ local centres with the ring of seating or planters/planting. Where there are flat roofs to include the potential for roof gardens or green/ bio solar roofs.	Public Space	Update to design code.	**Notes indicating 'potential rain gardens or green roofs on flat roofs' and 'pocket parks' added to diagram.**
	62 (page 66 of 100) General Comment, that this should include school grounds to ensure schools include the provision of outdoor green spaces. we would expect school playing field to be designed to ensure multipurpose and functional use and not just concrete grounds or sport field. To provide green spaces for natural play, sensory, areas that enhanced biodiversity and contribute to climate change mitigation and adaptation (flood and water mitigation, shading, air quality etc.) that all together can contribute to the curriculum, for example PE, science, English, maths, outdoor learning, and forest schools. It will improve staff and pupil health, wellbeing, learning and chances in life. In 2021, Department for Education announced a new initiative designed to put climate change at the heart of education, young people will be empowered to take action on the environment. By 2023, teachers will have access to a model science curriculum designed to teach children about nature and their impact on the world. In addition, children will be encouraged to get involved in the natural world by schools enhancing their school grounds for biodiversity.	Public Space	Update to design code.	This is a really important point however, given the school design will be developed through intensive consultation with Essex teams, not critical t oinclude here, particularly given the need to reduce the text of the document and make it more usable. Therefore, this should be picked up further along the planning process. **Additional wording added under destination play text: *School grounds will also provide multi-functional and multi-purpose play opportunities* .**
	64 (page 68 of 100) See also: To include reference to Nature/ Green Infrastructure, Especially reference to green fingers and greenway.	Built form	Update to design code.	**Nature' added to signposting box**
	64 (page 68 of 100) General Comment - There is a need for identifying the types of green infrastructure that will best provide the required functions or benefits, as well as ensuring that the building blocks interact to form a multifunctional interconnected network. All green infrastructure elements can be included in the national Nature Recovery Network.	Built form	Note	Not included to avoid repetition of content from Nature section.

	Essex County Council Consultation Responses inc Place Services			
Event	Comment	Theme	Status	Note/ response/ action
	78 (page 82 of 100) Environmental design requirements 7.10 to consider for commercial buildings with strong roof design to incorporate bio solar is explored. This can have dual benefits for energy and biodiversity. This includes biodiversity habitat creation, water storage capacity, flood alleviation and energy saving potential. Further information can be found here: https://livingroofs.org/introductiontypes-green-roof/biosolar-green-roofs-solar-green-roofs/	Resources	Update to design code.	**Note that the design code is light on green roof content because of the nature of the site, there is ample space for biodiversity and green and blue infrastructure on the ground as part of the public realm (as opposed to a more dense urban site). There is also a requirement for a predominance of sloping roofs to suit the context and position of the site. Nevertheless, wording of 7.10 amended to '*Roof forms of all buildings must be designed to consider optimum solar orientation for photovoltaic panels (PVs) or bio solar green roofs* .**
	79 (Page 83 of 100) Another adaptability consideration is water-efficient landscaping and climate-resilient planting. Changes in weather patterns and more extreme events are impacting on our landscapes that are unprepared for these conditions, so resilient gardens that can adapt, survive, and recover are critical.	Resources	Update to design code.	Have included this in the Nature section (see note on species selection). **Have amended wording of second paragraph under 'climate resilence' to: Minimising hard surfaces/ highways and maximising climate resilient green and blue infrastructure will help to reduce the urban heat island effect and reduce susceptibility to flooding and extreme weather.**
	Pages 16 and 23 Reference to 'two new schools' should be clarified to say a new primary and secondary school (together with provision for Early Years and Childcare) or an all-through school.	Framework masterplan/ stewardship	Update to design code.	**For brevity, on p16 have changed 'two new schools' to 'a new primary and secondary school or an all-through school'. Note that the wording of the design code will not change the allocation requirements.**
	Page 32 para 3.27 Vehicular access to the school will not be taken from the north and therefore there is unlikely to be a need for pedestrian crossing of the Greenway.	Movement	Update to design code.	**Wording about possible crossing over greenway for school access removed.**
	Diagrams on pages 33, 35 & 37 et al: The school frontage (denoted in yellow) is shown as 'car free or limited car access school street'. Any vehicular access to this area, with the exception of emergency vehicles, is unacceptable and this designation should be amended to read 'vehicle free pedestrian only public realm'. • The school site is split in two by a 'Greenway'. The option of an allthrough school must be delivered. In any case, such a route would be a security risk and the divide between space for primary and secondary pupils is incorrect. The masterplan will need to be amended to remove any split between primary and secondary school sites. (see Strategic Masterplan Framework) • A main vehicular access from public highway needs to be shown on the western boundary of the education site and an emergency access point on the east. Note a fire engine also needs to be able to access the pedestrianised area to the north in the case of emergencies. • The north south 'secondary vehicular route' which meets the middle of the northern boundary of the education site will not be acceptable as an access to the school and should be removed to ensure the environment around the school entrance is entirely traffic free.	Movement	Update to design code.	**Key changed to car-free school frontage. - green lightened to prevent any confusion that it is a greenway. Just indicating some green infrastructure on the school site. Vehicle access not shown as the detail is yet to be resolved but following wording added to p40: *The site-wide servicing strategy will need to address emergency and refuse and recycling collection from the local centre facilities and the new schools, through consultation with the relevant authorities and the end users, including Essex County Council as education authority* . North-south secondary vehicle route shown has been pulled back slightly from east-west greenway, but will likely still be required for servicing the local centre buildings either side.**
	Page 38 para 3.54 Careful design will be needed as there must not be any car drop off bays close to the school entrance.	Movement	Note	This will need to be carefully considered in any future proposals.
	Page 60 para 4.143 The school cannot be expected to maintain any area of public realm. A covered external area which is not within the school's secure boundary is not in itself an issue, but the school cannot be expected to maintain the provision	Public Space	Note	Noted, this will need to be resolved as part of the stewardship and public realm maintenance arrangements. To be resolved through the wider planning process.
	Page 70: School Frontage - Although the school entrance can address the public realm, any other fenestrated parts of the building need to be set back and within a secure boundary (for security and safeguarding). • Staff parking is likely to be required on the western boundary but there will be no provision for vehicular 'drop-off' (except for disabled parking).	Built form	Note	Noted, this can be adressed as the design of the school develops. No 'vehicular drop-off currently shown in the design code.
	General - While ECC Education welcome the design code as a good practice guidance, we will still have to assess / determine design details of new school(s) at planning application stage for respective school(s) on their own merit which could diverge from the design Code requirement	Process/ Policy	Note	Noted. There is intentionally significant flexbility around the design of the schools, only coding for the essential requirements. All other matters to be resolved through the wider planning process.
ECC - Education	Exec Summary (p 3) This states that 'By focussing on the strategic elements of the development, and prescribing only their key aspects, the code leaves scope for innovation, creativity and variety in future proposals while embedding the foundations of a place where people and nature can thrive.' This intention is supported in principle. Yet at 100 pages in length and with the level of detail / prescription involved on many specific matters, it is suggested to review how far the document as drafted achieves this objective and provides the appropriate balance. that allows sufficient scope for innovative and creative design approaches and solutions.	Design code usability and scope	Update to design code.	Noted. There will be a review of the content of the design code, however it should be noted that for a masterplan of this scale, 100 pages is on the shorter side of design codes. If there are any particular aspects that appear overly restrictive this feedback would be appreciated.

	Essex County Council Consultation Responses inc Place Services			
Event	Comment	Theme	Status	Note/ response/ action
	Planning context (p 6) This refers to EFDC GI Strategy and this provides an EFDC specific GI guide. To assist UDC in developing GI throughout the Design Code attention is also drawn to the Essex GI Standards, 2022 (developed through EPOA) which recommend under the "Mainstreaming and Integration Principle," that schemes must show how GI is essential to the distinctiveness of place. Specifically, ECC would recommend that consideration is given to the advice and guidance provided on pages 15 and 20 of the GI Standards, which demonstrates that design can assist in achieving the vision and objectives resulting in the protection of local landscape, character, and heritage. It is important to note that the Essex GI Standards have been endorsed by Natural England and awarded Building with Nature Policy accreditation in 2023.	Nature	Note	See comments above in response to ECC - Green Infrastructure.
	Planning context (p 6) Although it is positive that this section references the Draft HGGT Healthy Town Framework (2019) providing positive and useful guidance on this matter the framework was not finalised, endorsed and rolled out for use As a key point, the Design Code would benefit from a specific reference to highlight the need for Health Impact Assessment (HIA). Accordingly, the comprehensive health and wellbeing guidance hosted on the Essex Design Guide webpages, developed and endorsed through EPOA, should be considered as a reference and guidance in this matter. The EFDC Public health Practitioner would be a key consultee in emerging development proposals for this site allocation, including planning applications	Process/ Policy	Update to design code.	The planning proposals will, as part of the normal planning process, be rqeuired to submit a HIA. This should be picked up as part of the wider planning process. **Reference to HGGT Healthy Garden Town framework has been moved down to the list of draft documents on p6.**
	Design Ambitions (p 16) The stated design vision 'The design code for Latton priory will help to deliver a healthy, vibrant place' – as a concise headline statement – is supported	Design code usability and scope	Note	Noted.
	Stewardship framework (p18), GI framework (p20), Site-wide sustainable movement (p28), Energy Use (p82) - As mentioned above, referencing the comprehensive health and wellbeing guidance would be helpful for reference sections across key themes in the design code: 4) Stewardship framework (p18) 'Support Communities' section 2) GI framework (p20) Essex Design Guide: Healthy Places Guidance, Access to Open Green and Blue Spaces 3) Site-wide sustainable movement (p28): Essex Design Guide: Healthy Places Guidance, Active Environments and Sport England Active Design Principles 4) Energy Use (p82): Essex Design Guide: Healthy Places Guidance, Environmental Sustainability	Framework masterplan/ stewardship	Note	There is a need to reduce the amount of text and the references in the design code and avoid reptition, therefore Essex Design Guide references have generally not been specifically included but should be considered as part of any future proposals. Where there are specific requirements from the design guides that need to be reiterated in the design code these are included.
ECC as lead flood authority	P30 para 2.71 Should include "Surface water discharge rates will be equivalent to the 1 in 1 Greenfield rate for all events up to the 1 in 100yrs plus climate change."	Nature	Update to design code.	**Requirement amended as suggested.**
	General - The north of the site appears to be within a critical drainage area; however, this is not mentioned in the design code and when developments are within CDA's we require all areas of hardstanding to be permeable and all houses should have water butts installed. This is to reduce the risk of downstream flooding. Consideration should also be given to water re-use where appropriate, schools, community centres and commercial units may be candidates.	Nature	Update to design code.	**Note that additional note has been added regarding SuDS hierarchy and reference to Essex SuDS Design Guide**
	P8 Site Location Plan Key – STC connection should be shown as indicative.	Framework masterplan/ stewardship	Update to design code.	**Note added below key re STCs: *Indicative routes shown. Final routes subject to further technical work.**
	P17 We need to secure potential future access point to the Harlow Dev site	Framework masterplan/ stewardship	Wider planning matter.	
	P17 why couldn't the 'car-free play street' run along the wet boundary of the neighbourhood green in the north-eastern part of the development?	Framework masterplan/ stewardship	Note	Objective is to have car-free play streets well integrated with homes and overlooking on both sides.
	P22 – 2.15 What about bus?	Nature	Note	Buses are not discounted.
	P29 will there be sufficient cycle parking provision? Have we done any calculation? How many spaces are we allowing per dwelling? Not all new homes will have designed in cycle parking (e.g. flats) so some secured on-street cycle parking is likely to be necessary? This may link to stewardship arrangement as someone will have maintain these on street parking provision.	Movement	Note	No, calculations have not been undertaken but at this level it is diagrammatic and strategic. Cycle parking provision is required through the code and other policy and guidance and it be for designers of future proposals to designthis in. Agreed that stewardship will be a consideration. Note that flats must also have designed-in parking.
	P30 this design is based on the alternative route for the STC connector and is unlikely to work with the HGGT preferred route option	Movement	Note	This route reflects one option. Given the final route has not been determined, it is presented here with the appropriate caveats.
	P30 do we need to allow a bigger turning cycle so that, if need be, some buses could temporarily park there? What about service facilities for bus drivers (maybe there can be an agreement for them to use the facilities in the community hub?)?	Movement	Note	The turning circle has been calculated and advised by PJA. Further work will be down to future proposals.
	P33 where do we stand on having two vehicular access onto Rye Hill Road?	Movement	Note	This is the current strategy.

	Essex County Council Consultation Responses inc Place Services			
Event	Comment	Theme	Status	Note/ response/ action
ECC - Transport and highway	P36 with the EPOA parking guidance under review, it would be helpful if the site wide car parking strategy were in line with the revisions proposed to the outdated EPOA parking standards.	Movement	Note	The design code is very much in line with the draft EPO parking standards (Part 2), particularly in relation to strategic planning e.g. limiting the access of vehicles, managing volume and speed in 'human scale' spaces and use of filtered permeability. The two documents also align in their preference for unallocated off-plot parking as a preference to on-plot and the need to future proof and build in adaptability. The design code has slightly more (site-specific) detail regarding what parking solutions are acceptable in different locations or relating to different building typologies. Parking numbers are not dealt with in the design code and therefore alignment will require further interrogation as the outline and detailed applications are reviewed. Also note that the EPOA parking standards for garden communities are currently in draft form and therefore this should be reviewed again once they have been updated.
	P36 have we taking into account need for on-plot PV charging? E.g., residents on the car-free frontage street?	Movement	Note	Homes without on-plot parking will not have on-plot EV charging but this will be designed into street parking.
	P39 I thought car barns are not a priority in the Essex Parking Standard?	Movement	Note	They may not be a priority generally but are a critical component here in trying to achieve the mode shift targets.
	P44 trees and materials – ECC may not be able to commit to adopting nonstandard. We also may have view on the type and umber of highway trees there are lots of trees in the photo	Public Space	Note	This wil lneed to be resolved but street trees are an important aspect of the design strategy and green infrastructure of the site to help meet the Aims and Vision
	P45 street lighting – do we have anything to say about street lighting?	Public Space	Note	Street lighting is included in street design
	P48 street design, do we have a view on things like informal space, 4.44, corner radii 4.52, resident parking zone 4.57, drainage 4.60 etc. General – to achieve the quality of public realm and better than the standard accepted for adoption, this will require a stewardship body to maintain non adopted public realm spaces	Public Space	Update to design code.	**This has been reviewed separately with further PJA work and liaison with ECC Highways. A technical sudy was undertaken (available on request) and recommendations from this report have resulted in amendments to the design code. There are certain detailed points that will need to be discussed with Essex Highways at a future stage when detailed proposals are submitted.**
	General – where are we with the row of houses to the east of the school site?	Framework masterplan/ stewardship	Note	Don't understand the comment.
ECC - Stewardship	Pg 18. We support the inclusion of a Stewardship section and recognise the mention of the HGGT Stewardship Charter; however, the requirements could be perceived as the developer only needing to seek community engagement, not that developer needing to establish a Stewardship Body to take ownership of community assets and there on-going maintenance. Would be beneficial to strengthen this.	Framework masterplan/ stewardship	Note	Given the ongoing work on Stewardship across HGGT, further detail at this stage may not be in alignment with the outcome of that, therefore the wording has been kept flexinle - see rules 1.20 and 1.21 in particular. It is intended that the design code signposts to key information elsewhere but limits any repetition of it.
	Pg. 19 ECC welcome the requirements to include and asset management plan however there should be a requirement for the developer to include a checklist of community assets that will be transferred over to the SB including detail on endowments, S106 and income generation streams. As this will impact viability and will be key to the SB providing on-going maintenance of such assets in future that deliver better than normal standards.	Framework masterplan/ stewardship	Update to design code.	**There is wording to this effect in rule 1.16. This has been expanded to: *Asset management plans must be provided for all public realm and community assets. These should include plans showing each element, the ownership, their use (i.e. significant social, ecological or economic value), maintenance status and detail on endowments, Section 106 and income generation streams that will allow for on-going maintenance of those assets. This will allow their impact and care to be monitored, prioritised and managed holistically to better than normal standards* .**
	We welcome the general approach to the structure of the design code. Its reflection of the National Model Design Code in this way is considered to likely assist the end user. The reference to key policy and related design code sections is likely a helpful tool for all future users and interested parties. We also support the use of mandatory (musts) or recommended (should) requirements, which makes the requirements of the code clear and prescriptive to all users. The framework masterplan at the end of each section will also likely assist users in the implementation of many of the key considerations.	Design code usability and scope	Note	Note.
	It is considered that to help all users of the design code, including lay-persons, definitions of technical terms would assist. For example, terms like build-to-line, car-free streets, landscape led, could be unknown and confusing to certain users of the design code. Including definitions would assist in reducing term subjectivity and would ensure the code is as accessible to all parties as possible.	Design code usability and scope	Update to design code.	**Following terms added to glossary: car-free streets, demand responsive transport (DRT), landscape-led, build-to line.**
	Furthermore, in response to the aspirations of the National Model Design Code, which states 'a design code is a set of simple, concise and illustrated design requirements that are visual and numerical wherever possible', it would also help users of the design code if additional graphics and illustrative images could be included. Like the National Model Design Code, the images could demonstrate the expectations of the LPA and would assist in outlining how certain parameters would be expected to be delivered.	Design code usability and scope	Note	Unable to produce significant new visuals within available time/ resources, however the current level of description is considered to provide a degree of flexibility. It should also be noted that the National Model Design Code can be referenced in the assessment of future planning applications.

	Essex County Council Consultation Responses inc Place Services			
Event	Comment	Theme	Status	Note/ response/ action
Place Services	Site Context On page 11, it would be of assistance if the positive aspects of the Morley Grove example could be defined. The other precedent images in this section outline the positive features whereas this is not defined for Morley Grove. The context assessment could also be enhanced by graphically highlighting the architectural features present within the local area.	Design code usability and scope	Update to design code.	**Morley Grove image caption updated to: *Strong composition and terraced rhythm at Morley Grove, Little Parndon, Harlow by Gibberd and partners.*** Further references have not been included but Harlow Design Guide SPD is referenced as well as local Conservation character area appraisals.
	Vision We are pleased to see the inclusion of a vision in the 'Design Ambitions' section, this relates well to the structure of the National Model Design Code and outlines the key design features of the masterplan. The illustrations will help to engage users of the code and aid in defining the ambitions.	Design code usability and scope	Note	Note.
	01 Strategic Design Code Framework The Framework Masterplan is aimed at illustrating the site-wide strategies and principles of the design code. This section sets out the features of the masterplan and the requirements which are facilitated by an illustration of the masterplan. Page 16 could be more engaging through the use of additional images as it is relatively text heavy.	Framework masterplan/ stewardship	Update to design code.	**Text has been edited down**, however it should be noted that it is designed to be read as a double page spread and the opposing page on the spread is a full-page diagram.
	The stewardship framework should provide reference to ensuring spaces are designed for women, older people and those with reduced mobility. Points like widening pavements, having regular low kerbs for crossing and shelters and seating opportunities within public spaces may want to be included and/or considered. The Essex Design Guide and Make Space for Girls provide further information and guidance on this.	Framework masterplan/ stewardship	Update to design code.	**Additional wording added to rule 1.8: *At each phase, community assets must be planned and designed through inclusive engagement with neighbouring residents and intended user groups and stakeholders; this should include under-represented groups, particularly young people, older people, women and those with reduced mobility* . Make Space for Girls signposted in the 'see also' box.**
	Page 26 paragraph 2.11 states that the "SANG should have appropriate surfacing materials". It is recommended that this is amended to require the surfacing materials be appropriate for all accessibility requirements including pushchairs and wheelchairs.	Framework masterplan/ stewardship	Update to design code.	**Wording changed to: • *Provision of attractive walking routes with appropriately surfaced paths for accessibility.***
	Page 26 paragraph 2.12 states that new parks should "engage and be accessible to people of all ages". It is suggested that reference "and to all genders" is added. This paragraph may also want to include the requirement for sensitive lighting strategies which are effective for safety without harming the landscape character and ecology.	Framework masterplan/ stewardship	Update to design code.	**Suggesting wording added to this paragraph.**
	03 Movement The site-wide sustainable movement strategy appears positive, including great levels of permeability. The use of car-free streets is supported and would be an attractive feature that would benefit the health and well-being of future occupants by prioritising pedestrian and cycle movements. It is questioned whether the primary active travel route would be slightly convoluted from the development to the east. In addition, it primarily runs parallel to the primary vehicle route. Ideally, this route should be located separately but in any case, a substantial buffer between the vehicle and active travel routes should be provided.	Movement	Note	Noted. The proposal is for a choice of types of travel routes for active travel however it is noted that site constraints inevitably mean that there are some compromises.
	The proposed use of car barns is positive for sustainability benefits and would remove cars from the public realm. The use of parking courts is largely supported, however, they must be provided with good levels of overlooking, active frontages and should be well landscaped with planting/trees breaking up every fourth space.	Movement	Update to design code.	**Clarity added to rule 3.67; *Parking courts should contain no more than twelve spaces and should include green infrastructure, with planting/ trees breaking up every four spaces* .**
	Page 28 paragraph 3.5 requires that homes have front doors to the street. It may be necessary to also require front doors with direct street access to be provided with defensible space to ensure safety of users and separation from the public space.	Movement	Update to design code.	**Added wording to rule 5.18 (in built form section) *Doors with direct street access should have some defensible space for separation from public space* .**
	Paragraph 3.90 discusses the support to site-wide underground vacuum and/or waste storage system. We would also be supportive of this as it reduced street scene clutter and can reduce in the reduction of street sizes which are positive towards addressing urban design principles. It should be noted that the authority must have refuse vehicles which are compatible with this collection method and therefore early discussions should take place with the Council to ensure the success of this refuse storage/collection method.	Movement	Wider planning matter.	Feasability of this is being investigated with EFDC Waste team in case introduction of alternative system across all EFDC Garden Town sites makes the infastructure investment worthwhile.
	04 Public Space Strategy The public space strategy sets out the expectations and requirements of the open spaces and network of streets within the development. It is positive that the public space strategy seeks to address both of these elements as per the National Model design Code. As above, the street network provides excellent levels of permeability for pedestrians/cyclists both internally and externally to the site. There is also a clear street hierarchy with established characters that will aid in placemaking and wayfinding.	Public Space	Note	Noted.
	To ensure women and girls are considered within the design of public spaces, the public space requirements should provide reference to Essex Design Guide Women and Girls Safety in the Public Realm and the Make Space for Girls guidance.	Public Space	Update to design code.	Both references added to 'see also' box' at the beginning of the public spaces section.
	Within the street design section, it is recommended that the code discusses visibility splays along adopted streets. It should require that visibility splays are considered at an early stage to ensure they are acceptable and do not require unnecessary or additional hardstanding, particularly at the expense of landscaping and good design practices. Further work could be done to outline how the development could employ active design principles at each street level and within the open spaces. It is recommended that on page 56 junction design, where car movements are required over pedestrian footpaths, dutch style kerbs are encouraged to support a levelled footpath.	Public Space	Response as follows.	Corner radii and visibility splays are being further reviwed currently in collaboration wiTH Essex Highways and PJA. There may be the need for some flexibility within the design code for detail to be resolved at future stages.
	Page 60 public open space design, it may re-enforce the character of Harlow if the infrastructure/items for inclusion within larger nodes and the plaza include reference to the requirement for public art.	Public Space	Update to design code.	Integrated public art is already a requirement in the plaza but 'Art' added to neighbourhood node requirements too.

	Essex County Council Consultation Responses inc Place Services			
Event	Comment	Theme	Status	Note/ response/ action
	05 Built Form This section outlines the block structure and density, building typologies, frontages and building lines and building heights of future development. The use of diagrams, illustrations and graphics aids the understanding of the requirements of this section. Further work could be done to encourage the use of high quality built form features in specific areas such as bay windows, porches, expressed gables, dormers etc.	Built form	Update to design code.	This is a strategic design code and intended to inpire creativity and innovation. It would be expected thatthis level of information would come forward in a detailed design code where specific design features can be proposed in response to character areas and other factors. **Additional information on detailed design code requirements added to p7 under 'anticipated planning process'.**
	Page 67 paragraph 5.10 states that buildings should not have flat roofs but one of the precedent images has a flat roof. Perhaps this could be re-phrased to discuss where flat roofs might be appropriate i.e. to address a key corner.	Built form	Update to design code.	**The note is regarding flat roofs on larger buildings. For clarity, wording updated to: *Larger buildings must be carefully modulated to reduce the perceived bulk and extensive flat roofs on larger buildings should be avoided in order to prevent a dominant and bulky silhouette* .**
	On pages 70 and 71 (building line requirements) it would be helpful if graphics or illustrations demonstrating how each typology could be implemented would aid use of the code. If precedent images were to be used, it would be helpful to annotate these and show how they comply with the envisioned typologies/building lines.	Built form	Update to design code.	**This section has been reviewed in rseponse to CEG Hallam comments and design code testing and now focuses more on typologies than building lines.**
	On page 73 where the site wide building heights strategy is provided, it may benefit the code to depict where height increases may be considered appropriate to distinguish corner buildings.	Built form	Note	This was previously included but was considered too detailed and too confusing. Given the need for flexibility and a number of ways the design could come forward, this specific information has not need included.
	06 Identity The identity section identifies how future development could employ wayfinding, sense of place and local character. The inclusion of this chapter is highly supported and the relevant sections set out clear requirements and expectations that will hold future development accountable to delivering high quality design that is anticipated by the NPPF.		Note	Note.
	On page 76 it would be good to understand why each precedent image has been selected. What is it about the images which creates the identity of Harlow Town Centre		Note	This section is intended very high-level guidance to indicate the range of references that can be drawn from the context both in style and in terms of how these could influence proposals, from detailing through to the arrangement of built form around a space. It is anticipated that, with the appropriate expertise at future stages, there will be imaginative and creative responses that are not constricted by the design code. It should also be noted that there a number of existing references including the Essex Design Guide and the Harlow Design SPD.
	On page 77 it is not clear how the high street image highlights focal points. There are also likely more images that could be shown to demonstrate the character of Epping.	Identity	Note	See note above.

	Essex Police Consultation Responses			
Event	Comment	Theme	Status	Note/ response/ action
	The DOCO would welcome further consultation on the new Master Plan. Essex Police considers that it is important that this specific development is designed incorporating the maximum achievable benefits of CrimePrevention Through Environmental Design (CPTED) for which Secured by Design (SBD) is the preferred enabler.	Framework masterplan/ stewardship	Wider planning matter	Design code developed to build in safety and security and specific points picked up below. Planning team to ensure that 'Secured by Design' (SBD) is achieved through the masterplanning process and later design stages. Strengthen DC points around SBD requirements as appropriate.
	At the appropriate stage of the process the DOCO would welcome the opportunity of working with the Developer/ Design Team to enhance the landscape and public realm spaces. It is important that such spaces should be designed with residents' and the community's safety in mind, whilst making all areas inclusive for all.	Nature	Wider planning matter	Refer to FAQs
	The DOCO would like to bring to your attention, the Home Office strategy of reducing 'Violence Against Women and Girls' (VAWG). The strategy aims to improve wellbeing and perception of crime for women and girls, thus ensuring their safety within their community. Therefore, it is recommended when designing new public realm and green spaces (inclusive of cycling, walking and play areas,) that consideration should be given to environmental design so that the community feel included, safe and comfortable using those spaces.	Nature	Note	Having reviewed the Home Office Strategy document, the design code is in line with therelevant spatial principles outlined in there (street lighting, safe transport etc)
	The DOCO welcomes the addition that play provision must be designed with the community in mind, (paragraph 4.154). This concept is supplemented in the Green Flag Safer Parks document: "Women and girls often do not feel safe in parks and so use them less. This is not just because they fear crime, whether that's rape, assault or harassment. They also feel uncomfortable, unwelcome and judged. Women are three times more likely than men to feel unsafe in parks during the day, and that gets worse after dark". Safer Parks Improving access for woman and girls (Safer Parks Executive Summary (greenflagaward.org)	Nature	Note	Note that 'safer parks' document is referenced on p62 under play and recreation.
	Allotments and food growing requirements are good for community (paragraph 2.19), involving residents will bring a sense of ownership and community cohesion. However, it is advised that these spaces are well maintained and looked after to prevent against crime and antisocial behavior.	Nature	Note	Noted.
	Walking and cycling access should be a prioritised with good cycle provision however It is advised the new routes are designed to be well lit, straight, and as wide as possible maximising on the opportunities for natural surveillance. Well-designed spaces will allow users to feel safe and secure while using the space throughout different times of day. Applying the methods of CPTED will support this	Nature	Note	Noted.
	Road Design and Layout: Consideration is requested to use the "Safe system approach" when designing local roads in and around the community. This will take into consideration the various road user groups who wish to access these roads. Essex Police would request that thought is given for the provision of Emergency Service Access throughout the Garden village (Paragraph 3.21) It is essential that emergency vehicles can gain rapid access to any incident occurring within the village and surrounding neighbourhoods.	Movement	Note	There is a balance to be struck between ease of access for emergency vehicles and limiting priority of vehicles over other users of the public realm. The movement strategy has been developed to ensure that an emergency vehicle can get within 20m of any building entrance. This is in line with building regs requirements that a fire tender must be able to get within 45m of the furthest point in any dwelling.
	20mph speed limits: Many local authorities are introducing 20mph limits to reduce road risk (Paragraph 3.32), and encourage active travel, and improve air quality. Essex Police would recommend liaison with our Roads Policing colleagues regarding this matter. It is vital that any enforcement strategies (such as parking enforcement and low speed limits) are self-policing and enforceable. Emergency Services should not be overburdened to overcome inadequacies in safety management, access control or enforcement.	Movement	Response as follows.	Detailed point - should be picked up at future stage(s). Noted that collaboration between Roads Policing and Highways is critical.
	Community mobility hubs (Paragraph 2.16) A sustainable transport infrastructure will be critical to the success and longevity of the new community at Latton Priory. We note the Mobility hub has indicated different requirements such at cycle maintenance, public toilets, and a café. The facilities will require a detailed management and maintenance plan in place prior to development. Mobility hubs need to be designed with the use of monitored CCTV, natural surveillance, and lighting to promote a safe and secure environment. Essex Police advocates the use for Secure By Design (SBD) Commercial as the preferred enabler to mitigate against crime. SBD Commercial provides a practical level of risk commensurate and sustainable security measures. Consideration is given to for the parking provision to achieve the British Parking association- Park Mark accreditation. A Park Mark is awarded to parking facilities that have met the requirements of a risk assessment conducted by the Police, meaning the operator has put in place measures that deter criminal activity and anti-social behaviour.	Movement	Update to design code.	**Have added wording to rule 3.19:** ***Operation and long-term management of the community mobility hub must be considered at the early stages in order to ensure that the facilities are designed to meet operational requirements. This should include Secure By Design (SBD) Commercial accreditation*** **. Rule 3.80** ***updated to: Security should be well considered including good lighting, motion-detection lighting and CCTV as appropriate. The facility should achieve British Association Parking 'Park Mark' accreditation.***
	Electric vehicle and cycle charging points (Paragraph 3.17) New technology surrounding this agenda brings new types of criminal activity, for example, theft of core cabling and anti-social behavior. Specially in relation to providing EV charging capability, it is advised that crime prevention measures for such provision are implemented at the earliest stages to mitigate opportunities for crime. The DOCO would recommend adopting the BPA Park Access Scheme. Park Access is a brand new accreditation that aims to provides safe and inclusive parking (via the Park Mark process) alongside electric vehicle charging facilities.	Movement	Response as follows.	Detailed point - should be picked up at future stage(s).
	Car Barns (Paragraphs 3.57 and 3.80) We welcome the inclusion that Car Barns should be overlooked with uniformed lighting and considerations for monitored CCTV and Security. As part of the process, we would welcome discussion regarding the Security specification of doors and what would be suitable for this site. It is imperative that all physical security components adopt industry approved standards are used to prevent against theft and damage to vehicles.	Movement	Response as follows.	Detailed point - should be picked up at future stage(s).
	Refuse and recycling requirements (Paragraph 3.84) We welcome the inclusion that bin stores for flats and non-residential premises should have integrated facilities, however the security will need to be to the same standard as the main entrance stores to prevent against anti-social behavior and arson.	Movement	Response as follows.	Detailed point - should be picked up at future stage(s).

	Essex Police Consultation Responses			
Event	Comment	Theme	Status	Note/ response/ action
Essex Police	Neighbourhood Nodes, Pocket Parks and Community Plaza The design of these spaces will be crucial for safety vibrance and inclusivity for the new community. It is advised to take into consideration the reference to developing a safe and inclusive place for women and girls (VAWG as detailed in section 2). Neighbourhood nodes should aid wayfinding, this should supported by uniformed lighting and surveillance to allow users to feel safe using the facilities. Pocket parks should be well maintained and designed for their intended user to mitigate against opportunities for anti-social behavior. Careful consideration regarding the materials used for external furniture and aesthetics such as seating, planters, and play equipment, to ensure they are risk commensurate and fit for purpose i.e., vandal, graffiti, and arson resistant. Essex Police would propose that materials used for street furniture reflects the crime risk assessment and consider where appropriate additional security, risk commensurate measures. This will ensure that any street furniture can withstand multiple crime types and anti-social behaviour inclusive of anti-skateboarding measures.	Movement	Response as follows.	Detailed point - should be picked up at future stage(s).
	Community Plaza (Paragraph 4.146 and 4.147) The Community Plaza and multi purposes market space needs to be 'innovative and distinctive', however the building needs to be safe and secure using the CPTED principles and the Secure By Design Commercial guide. In the event of a critical incident, CCTV will be imperative and therefore welcome early discussions concerning the use, operational requirements, and accessibility. This will need to be embedded within contingency plans and overall policies and procedures.	Movement	Response as follows.	Detailed point - should be picked up at future stage(s).
	Public toilets (Paragraph 4.6) It is recommended that when designing public toilets that there are separate facilities for women and men rather than the unisex option, this is supported by Government research which has illustrated the following regarding the impact of unisex toilets in public buildings. "It is extremely important women can feel comfortable when using public facilities, so we are taking action to restore dignity and privacy at the centre of all future provision. These proposals will mean separate toilets for men and women, as well as self-contained toilets for those that need them, become a requirement for every new building across England. New building requirements for separate male and female toilets - GOV.UK (www.gov.uk)We would welcome consultation with the developer regarding the design and layout of public toilets.	Public Space	Response as follows.	Detailed point - should be picked up at future stage(s) - as part of inclusive and accessible design.
	Lighting (Paragraph 4.97) Lighting plays a pivotal role in deterring criminal activity, but also promotes a feeling of safety within that space. When designing both public and private space, (and when applied and designed correctly), lighting can reduce the potential for crime. It is imperative that the lighting provision must provide uniform illumination with due consideration given to the spill of light and ecological considerations. To evidence such requirements, we would recommend inclusion of detailed lighting design, evidencing current relevant standards and or relevant industry standards. Please note the DOCO does not advocate the use of bollard lighting as it does not provide a uniformed lighting source and should only be used for wayfinding. It is important that the landscape architect and lighting designers coordinate their plans to avoid conflict between lighting, planting strategies, CCTV, tree canopies and conservation. A sensitive approach is required to ensure that the lighting is incorporated in such a way that it does not impact on security, such as ensuring lighting does not provide any glare to the CCTV cameras. Light fittings should be protected where vulnerable to vandalism. Essex Police are cognisant of the proposed phased construction of the site, however, a project of this size and magnitude will require the lighting to be effective from the start, and not considered in isolation of various stages.	Public Space	Response as follows.	Detailed point - should be picked up at future stage(s), including through detailed design codes. Refer to draft EFDC Design code briefing note.
	Car free play (paragraph S6) Car free play spaces are advised to have a detailed management and maintenance plan (inclusive of landscape) in place prior to the development, this is to prevent against crime antisocial behavior. The space should also be designed for the intended use.	Public Space	Response as follows.	Detailed point - should be picked up at future stage(s), including through detailed design codes. Refer to draft EFDC Design code briefing note.
	Constructing well designed places, buildings and communities that promote both sustainable communities and health and wellbeing is an objective that the Essex Police DOCO widely supports; however, it is imperative that they must also be safe, secure, and accessible. Having a safe place to live with good community cohesion will have a positive effect on health whilst also building sustainable communities. Incorporating the principles of CPTED within the built form will allow for safer homes and community facilities which residents will feel secure living in.	Built form	Note	Noted.
	To support the opportunity for 'good quality homes' within Latton Priory, the Essex Police DOCO would advocate that all new development seeks to achieve SBD Homes accreditations. Security hardware (such as doors, windows, locks and cycle storage) should be risk commensurate and in line with industry approved security standards. Essex Police advocates the use of SBD Police Preferred specification status. Member companies / products have not only been tested to the relevant security standards but are also fully certified by an independent third-party certification, therefore proven to deter criminal activity and reduce crime.	Built form	Update to design code.	**Wording added to rule 1.23: S*ecure by Design accreditation should be achieved where relevant.***
	It is important to avoid the creation of windowless elevations and blank walls immediately adjacent to public spaces; this type of elevation, commonly at the end of a terrace, tends to attract graffiti, inappropriate loitering and potential anti-social behaviour. The provision of at least one window above ground floor level, where possible, will offer additional surveillance over the public area.	Built form	Note	Active frontages already included as a requirement.
	Where there is insufficient room to create defensible space between public and private space, an appropriate (non-destructive) climbing plant should be planted adjacent to the wall, or a finish applied to the wall that will allow easy removal of graffiti.	Built form	Update to design code.	**Rule added to p68: Where there is an absence of, or minimal defensible space between public and private space, anti-graffiti measures should be included, which may be through window placement, material selection or non- destructive climbing plants.**
	Flats and apartment are advised to have compartmentalisation fitted throughout the building; this will prevent non-residents entering the building unless invited whilst preventing crime and anti-social behavior. Connectivity across the development will require careful consideration to ensure the appropriate permeability and connectivity without infringing or compromising resident's security. Access and audio control is required for the flats, this will enable residents to see who they are letting into the building as well as monitoring if there was an incident. Essex Police do not advocate the use of Tradesperson or timed-release mechanisms on communal developments as they can facilitate unlawful access to developments. For further information regarding access control please see the Secure By Design Guide	Built form	Response as follows.	Detailed point - should be picked up at future stage(s).

	Essex Police Consultation Responses			
Event	Comment	Theme	Status	Note/ response/ action
	We acknowledge the vison for creating variety, vibrancy and wayfinding into streets and open spaces. Creating a sense of place will enhance the community and promote a feeling of safety and security.	Identity	Note	Noted.
	The development is recommended to have good signage to allow residents and non-residents easy access to locations. Developments that promote intuitive wayfinding and enhance the passive surveillance of the street by residents within their homes and high levels of street activity are desirable as they have both been proven to deter criminal behaviour. Routes for pedestrians, cyclists and vehicles should be integrated and assist easy, intuitive wayfinding through the application of inclusive design by increasing activity and therefore natural surveillance, proven deterrents for crime and anti-social behaviour.	Identity	Note	Noted. This section and the movement and built form section all promote intuitive wayfinding and natural sruvellance and activity. Signage is noted in public space requirements.
	Planting should not impede the opportunity for natural surveillance and wayfinding and must avoid the creation of potential hiding places.	Identity	Note	Noted. Detailed point - should be picked up at future stage(s).
	Bollard lighting is purely for wayfinding and can be easily obscured or damaged. It does not project sufficient light at the right height making it difficult to recognise facial features and as a result causes an increase in the fear of crime.	Identity	Note	Noted. Detailed point - should be picked up at future stage(s).
	Pathways should be as straight as possible, well lit and have natural surveillance.	Identity	Note	Noted.
	Academic research suggests that they Police Preferred Products support sustainability agendas as they are proven to last longer (due to the robustness of the product), and therefore reduce the developments carbon footprint. Products will have a longer life span and minimal maintenance whilst supporting the sustainable homes vision and objectives of the Latton Priory Garden village.	Resources	Response as follows.	Detailed point - should be picked up at future stage(s).
	The DOCO acknowledges the concept for future proofing housing and being able to adapt to future needs and lifestyles. Good design can help support future proofing and is crucial for housing longevity, however creating safe and secure homes will enhance the lifespan allowing homes to be designed for the future and not just for present day.	Resources	Response as follows.	Detailed point - should be picked up at future stage(s).
	Health and Wellbeing (Paragraph 7.13) Embedding 'Designing out Crime' principles can evidence Sustainability Objectives and Health Impact Assessment requirements, as developments that have mitigated against potential crime can see increased community engagement.	Resources	Update to design code.	Added as an amendment to Stewardship section as this ties in with the community engagament aspect. **P18, new rule 1.23 'Designing out Crime' principles should be embedded into the layout to mitigate against potential crime and increase community cohesion and engagement.**
	Adaptable spaces (Paragraph 7.15 and 7.16) Buildings and public realm spaces should be adaptable, however its critical to consider if the different functionalities will suit all of the buildings. There are mitigation methods available using the principles of CPTED to allow this function to work and to adapt to prevent crime and anti-social behavior.	Resources	Response as follows.	Detailed point - should be picked up at future stage(s).

	National Bodies' Consultation Responses			
Event	Comment	Theme	Status	Note/ response/ action
Canal River Trust	The trust have no waterways, assets or land interests within the area covered by the document and as such we have no comment to make.	Nature	Note	Noted.
Environment Agency	Given that there are no Main Rivers on site, and the development is within Flood Zone 1 in its entirety, we don't have any major flood risk or proximity to main river concerns. We would however like to emphasise and echo what is stated in the Strategic Design Code and ensure that SuDs are incorporated as much as possible. Retaining water onsite is important to ensure that flood risk to Main Rivers downstream of the site and those living near them is not increased and where possible, reduced.	Nature	Note	Noted.
	Sustainable Drainage It is good to see that run off rates will be reduced by 60% of present-day conditions. We would want to see this replicated across the whole site if possible. We are pleased to see that options to harvest rainwater such as rain gardens and SuDS tree pits are being looked at. We are also happy to see the incorporation permeable paving across the site, including for highways.	Nature	Note	Noted.
	Future Schemes Harlow, Kingsmoor Pluvial Flood Alleviation Scheme is to the west of the site. If hydraulically and hydrologically linked, drainage and surface run off from the site must work in tandem with this and other schemes and not compromise their function.	Nature	Wider planning matter.	This should be picked up at outline application stage.
	Biodiversity We are pleased to see that "the development proposes to deliver a minimum 10% Biodiversity Net Gain with the promotion of biodiversity to be explored at every opportunity".	Nature	Note	Noted.
	Water Efficiency The Epping Forest local plan also requires that new homes meet the 110 litres per person per day efficiency standard (Policy DM19, page 111). Policy SP2 in the Epping Forest Local Plan further states that any development proposals must positively respond to sustainable water management (paragraph xiv, page 33). The need and requirement for Latton Priory buildings to use water efficiently is clear. We would therefore expect to see explicit strategies for achieving this water use standard, or a more efficient value, in the HGGT masterplan. Strategies could include commitments for all new dwellings to have efficient water fittings and the installation of water butts, or installation of building- and/or neighbourhood-level SuDS schemes which increase the retention and/or recycling of rainwater. We would add that a project on the scale of HGGT represents a great opportunity for each new home to be built with greywater recycling systems, as such systems can be difficult to retrofit at an individual dwelling level. We would expect this to be integrated into Section 7 and potentially other sections too, as appropriate.	Resources	Note	There is a need to limit the scope of the design code in order to promote usability and focus. The nature section referes to the drainage hierarchy within the Essex SuDS design guide, which notes re-use as the highest priority. This information is also in the EFDC and HGGT Sustainability Guidance and checklist and therefore not repeated here.
	Groundwater quality This site is situated in a vulnerable groundwater area on a secondary bedrock and superficial aquifer and so any proposal will need to be dealt with in a way which protects the underlying groundwater. Please therefore take note of the following advice. Any potential developers should refer to the following (non-exhaustive) list of sources of information and advice in dealing with land affected by contamination, especially with respect to protection of the groundwater beneath the site (further details of comment not included here)	Nature	Wider planning matter.	This is detail that should be picked up separatel at outline application stage.
Historic England	We welcome the production of this draft design code to inform the development and design as set out in the Latton Priory Masterplan. We do not wish to comment in detail on the design aspects of the code as it addresses the themes of the National Model Design Code. We have noted and are pleased to see the design code consider the positive aspects of Harlow New Town and surrounding areas to reinforce positive locally distinctive characteristics.	Identity	Note	Noted.
	However, we do wish to comment upon the emphasis placed on heritage and the historic environment within the document. We refer back to previous responses from Historic England (dated 26/01/23 and 17/03/23) which remains relevant and comprehensively set out the significance, setting and archaeological importance of both Latton Priory and Rye Hill Moat, as well as presenting heritage risks and opportunities for enhancement. As the document currently reads, we believe the significance and the contribution setting makes to the significance of the designated heritage assets has been downplayed. This presents a missed opportunity to incorporate the historic environment into the design of the new neighbourhood in a way that maximises the opportunities to enhance its character and the significance of the scheduled monuments, and avoids, mitigates or minimises any harm to their significance. For example, we note brief reference to these sites within the 'Site Context' chapter but believe this could be strengthened by providing an assessment of their significance and what they represent to the landscape and character. This could if necessary be included as an appendix.	Identity	Note	We have had to limit the scope of the design code to promote usability and focus, and it should also be noted that some of this information is contained elsewhere - e.g. in the EFDC Green Infastructure Guidance. There is scope to include some specific information as noted below.
	We do recommend that the draft design code is therefore revised to reflect the significance of the scheduled monuments, for example preserving or enhancing key views and/or associated open spaces or watercourses. For example, in section 4 'Public Space', reference could be made to these sites to promote the importance of setting, management potential, and the rich heritage it has to offer the new neighbourhood character and landscape. We note in particular the designation of a play area in close proximity to the Rye Hill moated site and suggest that this offers an opportunity to intertwine play and heritage, and encourage the design of any play equipment to consider its setting.	Public Space	Update to design code.	**There are references to integration of heritage and this will be also explored as the proposals progress through the planning process. Additional wording has been added to rule 4.156: *The design of play equipment and the area around it must be positive, purposeful, bespoke and characterful. Design should draw on the site or more unexpected creative elements. Play areas close to heritage assets should explore the interwining of play and heritage and equipment should be designed with consideration of the asset* .**
	We also note that both the designated assets are shown as sited outside of the design code's red line boundary. We would recommend that the red line boundaries are consistent between the design code, masterplan, and any outline planning permission to ensure consistency and clarity for policy makers and developers.	Framework masterplan/ stewardship	Update to design code.	**Red line in diagrams is now consistent with site allocation.**

	National Bodies' Consultation Responses			
Event	Comment	Theme	Status	Note/ response/ action
	In a broader point, we suggest researching examples of how scheduled monuments can be incorporated into development for betterment of the scheme, for example the moated site in Whomerley Wood, Stevenage or Priestly Wood, Alconbury.	Identity	Note	These are helpul references and will be useful in the review of proposals at future stages. Due to a need to limit the length and scope of the design code for usability, further references have not been included here.
National Highways	In relation to this proposed SDC, our principal interest will include safeguarding the operation of the Strategic Road Newtork (SRN) SRN routes within Essex, specifically within the Epping Forest DC area, these include M11 and M25, both of which run through the district council and provide access to the largest settlements in the area. The key themes of interest for National Highways will include the importance of Movement related to this document. The EFDC Local plan policy SP4 related to garden communities makes reference to the site – Latton Priory (SP4.1) which includes a number of set out criteria's including; (not listed here). National Highways is interested in the potential impact of the planned communities on the SRN network within the vicinity of the neighbourhoods and to what extent this has been considered.	Wider infrastructure	Wider planning matter.	This is a key issue and should be addressed in the wider planning process.
	The document provides a significant focus on sustainability in promoting new development and housing design as well as maximising the effectiveness of sustainable strategies by applying them early in the development process. Similarly, focuses on the importance of reducing the amount of car parking spaces and integrating sustainable and active modes of travel. National Highways supports the promotion of sustainable modes of travel within new developments as it reduces the impact of new developments within the vicinity of the SRN to have a significant impact on the local SRN network. Similarly, we support the promotion of the user hierarchy and the importance of prioritising sustainable modes of travel at the very top and reducing the reliance on motor traffic with the key to permeability being achieved through new developments in a way to minimise the need to travel and encouraging sustainable modes of travel that are easily accessible.	Movement	Note	Noted.
	Furthermore, National Highways supports the promotion of mixed-use developments and developments close to existing facilities as it reduces the impact of new developments within the vicinity of the SRN to have a significant impact on the local SRN network by reducing the potential trip generation.	Framework masterplan/ stewardship	Note	Noted.
	We would have liked to have seen more consideration into the interaction with the SRN when considering the movement and links into the local network and considerations of potential mitigations to be included at the design stage. We would like to be included in further discussions related to the Latton Priory development to understand the potential impacts of such a large development in close proximity to the SRN.	Wider infrastructure	Wider planning matter.	This is a key issue and should be addressed in the wider planning process.
	General The design code is welcomed by Sport England as it has embedded the principles in Sport England's (supported by Active Travel England and OHID) Active Design guidance https://www.sportengland.org/guidance-and-support/facilities-and-planning/design-and-cost-guidance/active-design which seek to create environments that encourage physical activity. It is also consistent with the current Essex Design Guide which has also embedded the Active Design principles. The majority of the content of the code is therefore supported and is considered to be an example of good practice. The following requests for amendments focus on how the design code could be enhanced further.	Design code usability and scope	Note	Noted.
	How to Use the Design Code The clarity provided through the guide on what must or should be required provides clarity to developers and will help avoid potential misunderstandings about what is expected. The expectation that a compliance tracker should be completed by applicants is specifically welcomed as this is considered to be needed to transparently demonstrate that the design code has been fully considered by the applicant. Without this, there will be more onus on the local planning authority to interpret whether the design code has been fully considered which is difficult in practice given the resource requirements.	Design code usability and scope	Response as follows.	Compliance tracker will be produced to accompany the design code, as a follow-up piece of work.
	Planning Context Given that the detailed content of the code is considered to be consistent with Sport England's Active Design, it is requested that the Planning Context section of the code (or another suitable section) refers to the design code being aligned with the Active Design guidance. It is also suggested that the Active Design guidance be signposted to provide users of the code with detailed advice about how to ensure the development is designed to encourage physical activity.	Design code usability and scope	Update to design code.	**Reference to Sport England Active Design Guidance added on p18, p28, p62 (stewardship, movement and play and recreation)**
	Design Ambitions The design ambitions are welcomed as they would all contribute towards creating an environment which should encourage physical activity and thereby accord with the Active Design principles.	Design code usability and scope	Note	Noted.
	Framework Masterplan •Support is offered for ensuring Latton Priory is a walkable neighbourhood. •The framework masterplan requirements are supported as they would support mixed use development and co-location of community facilities which encourages physical activity as well as supporting active travel routes to and from existing and new destinations. •The framework masterplan layout is supported in principle due to the co-location of community facilities in a central location supported by a mobility hub, the neighbourhood nodes, the active travel route connections and the range of open space that is integrated into the layout and connected to the residential areas and community facilities. For consistency it is requested that "Sustainable transport corridor" is defined as "Sustainable Transport Corridor (Bus Rapid Transit/walking/cycling) as it has been in other diagrams in the document as this broader definition is more helpful. •As well as showing the active travel routes that would link the development to the existing urban area of Harlow it is requested that the framework plan also show the opportunities for providing access by active travel modes to the countryside outside of the development for leisure purposes.	Framework masterplan/ stewardship	Update to design code.	**Suggested clarification added to STC description in key**

	National Bodies' Consultation Responses			
Event	Comment	Theme	Status	Note/ response/ action
Sport England	Stewardship Framework • The focus on community engagement is welcomed as this is consistent with the Active Design guidance (See page 13 of the guidance about community engagement in relation to inclusive and equitable spaces and facilities). • Community development initiatives are supported as these are needed to activate spaces for physical activity but this is often overlooked in practice after new developments are occupied. This is consistent with Principle 10 of the Active Design guidance which provides advice on this in relation to assets that support physical activity.. • The emphasis on designing to support future maintenance is welcomed as this will support the sustainability of the assets. This is consistent with Principle 9 of the Active Design guidance which provides advice on this in relation to assets that support physical activity.	Framework masterplan/ stewardship	Note	Noted.
	Green Infrastructure Framework • Support for the emphasis in the site wide requirements for the focus on green infrastructure being multi-functional, safe and connected with active travel networks. These would all accord with the Active Design principles. • Particular support for green infrastructure being designed to support access for all (section 2.8). However, it is requested that the examples include spaces that encourage use by women/girls and the elderly as well as dementia/neuro-diversity friendly spaces as the needs of these groups are often overlooked in the planning of green infrastructure. • The expectations for the SANG in section 2.11 are welcomed as they would all support pedestrian access for recreational purposes.	Nature	Note	Make space for girls and the need to design for all ages is addressed elsewhere.
	• The expectations for the new park in section 2.12 are welcomed as they would encourage informal physical activity. However, it is requested that section 2.12 makes it explicit that a pavilion will be required to be provided in the park. As well as being consistent with the proposal for this on the Framework Masterplan layout, a pavilion is needed to support the objectives set out in section 2.12. In particular, a pavilion can provide the necessary refreshment, toilet and meeting space that can provide a focal point for the community in the park and will influence whether some user groups visit the park and how long they will stay there.	Nature	Update to design code.	**Wording for new park requirements updated to:** ***The new park will extend the green wedge and will serve to attract visitors and provide social infrastructure that benefits new and existing communities, including a new pavilion .***
	• The sports pitch requirements in section 2.13 are generally supported including the requirement for shared facilities at the school to be explored as this is considered essential to help avoid potential duplication of facilities and to support their sustainable operation. However, it is requested that reference be made to facilities being designed in accordance with sports governing body (e.g. The FA, the ECB etc) recommendations as well as Sport England recommendations.	Nature	Update to design code.	**Rule 2.13 updated to:** ***Community sports grounds should be designed flexibly to support the needs of a range of ages and in line with Sport England and sports governing body recommendations.***
	• It is also requested that it is made explicit that a pavilion must be provided to support the pitches rather than reference being made to 'facilities may benefit from the provision of a sports pavilion'. A sports pavilion will be an essential ancillary facility to support the use of the pitches which must be provided by the developer. A pavilion would provide the changing rooms, toilets, equipment storage and refreshment facilities that would allow the pitches to be fit for purpose for community use and should not be considered as an option.	Nature	Update to design code.	**2.16 reworded to:** ***A sports pavilion must be provided, including publicly accessible toilets, changing, refreshment and storage facilities. This must be designed to minimise impact on views from the south.***
	• While maximising the opportunity for users of the sports pitches to access the site by active travel is welcomed it needs to be acknowledged that unlike the other open space typologies proposed in the development, the pitches will be formal in nature and will be used by people from outside of the local area especially 'away' teams and officials during times when public transport will be limited. Therefore there will be a need for car parking to be provided as part of the sports pitches to avoid parking overspill issue arising within the adjoining residential areas. It is therefore requested that there is an acknowledgement that an appropriate level of parking will be required to support the sports pitches to avoid a misinterpretation that parking will not be required if they are designed to be accessible by active travel modes.	Nature	Update to design code.	**2.15 reworded to:** ***Walking and cycling access must be prioritised, with ample cycle parking provision. An appropriate level of car parking should also be sensitively incorporated .***
	• It is queried why walking and cycling access to the sports pitches should be prioritised rather than must be prioritised in section 2.15 given the importance attached to prioritising active travel throughout the design code. It is therefore requested that this be reviewed.	Nature	Update to design code.	**2.15 reworded to:** ***Walking and cycling access must be prioritised, with ample cycle parking provision. An appropriate level of car parking should also be sensitively incorporated .***
	• In relation to boundary treatments around the sports pitches, it is requested that opportunities are explored for encouraging informal recreation around the periphery of the sports pitches and that the landscape is designed to support the use of the pitches e.g. gradients/bunds designed as natural viewing platforms.	Nature	Note	In order to limit the scope and detail of this strategic design code, this can vbe picked up at furture stages of the planning process.
	• The greenway and green finger requirements are supported especially the requirements to incorporate organic/natural play equipment and include focal amenity areas such as pocket parks as these will all support physical activity. The requirement in section 2.27 for green fingers to be supported by seating, cycle parking and lighting is welcomed. However, it is requested that these supporting facilities also be an explicit requirement of the greenways to avoid misinterpretation that they are not necessary for the greenways.	Nature	Note	Greenway requirements covered in 'public space' section, p58.
	• The expectations in sections 2.39 and 2.42 that the wetland park should incorporate multi-functional uses such as play or recreation when dry and be designed to support access by active travel modes is welcomed as this would maximise the recreation potential of the park when appropriate.	Nature	Note	Noted.
	• The expectation that SuDS will be integrated with other activities such as play and recreation is welcomed as SuDS can play an important role in providing a destination for people to walk/cycle to view or for informal play.	Nature	Note	Noted.

	National Bodies' Consultation Responses			
Event	Comment	Theme	Status	Note/ response/ action
	Site-wide Sustainable Movement • The soft measures are welcomed as activation of walking, cycling etc is often overlooked after the infrastructure is in place especially for groups that may not have the confidence to use these travel modes without support. • The active travel network requirements are supported especially the measures to support safety and minimise gradients as these will support access to the network for all potential users. • The site wide strategy plan for active travel is supported as this integrates active travel routes with all of the residential areas, community facilities and green infrastructure which will encourage physical activity in practice. For clarity, it is requested that the 'neighbourhood nodes' be shown on the key and that the mobility hub in the local centre is more clearly shown. • The mobility hub requirements are supported especially the services and facilities proposed at the community hub as this would support use by all groups in the community.	Movement	Update to design code.	**Neighbourhood nodes, gateway spaces and community plaza added to key and mobility hub made clearer**
	Site Wide Vehicular Movement • The proposal to limit vehicular crossings over the greenway and to limit vehicular access to the sides is welcomed on the basis that this would encourage walking/cycling.	Movement	Note	Noted.
	Site Wide Car Parking • As set out above, it is requested that there is acknowledgement that car parking will be required to support the sports pitches and therefore advice on car parking requirements for the sports pitches should be considered to provide clarity of expectations for developers.	Movement	Update to design code.	**Further requirement added to site-wide parking as follows: *Destinations*** ***Key destinations such as the SANG and sports pitches must provide appropriate levels of car parking that is sensitively integrated, with consideration for shared facilities to minimise provision* .**
	Parking Design • The on-plot and off-street cycle parking requirements in sections 3.46 and 3.54 are supported especially the requirement to make them more convenient and accessible than car parking.	Movement	Note	Noted.
	Public Space Strategy • The public space requirements are welcomed especially sections 4.4-4.6 which require lighting, seating and public toilets to be provided to support public spaces as well as the requirement for active lifestyles and play-on-the-way to be embedded into the public space network.	Public Space	Note	Noted.
	Street Design • The requirement in section 4.4 for seating to be incorporated at regular intervals and for cycleways to be 2 way and continuous on Latton Avenue is supported as this will encourage active travel along this strategically important travel route. • Support is offered for play, recreation and SuDS being required to be integrated into the design of the Greenway as this will make the greenway more attractive for informal recreation. • Car free play streets are welcomed especially as they provide space for seating, landscaping and social interaction as well as play and therefore would encourage use by all groups not just children.	Public Space	Note	Noted.
	Public Open Space Design • The neighbourhood node and community plaza requirements are supported especially the infrastructure listed for the larger nodes in section 4.148. However, it is requested that the larger nodes and community plaza include a space that is suitable for informal play (and community events) that is unobstructed by landscaping, street furniture etc which may inhibit such physical activity.	Public Space	Update to design code.	**Additional point added under 4.14: *Area for informal play and community events unobstructed by fixed street furniture or landscape elements.* Additional element added under 4.148: *Space for informal play***
	Play and Recreation • The play strategy requirements are welcomed especially the expectation to integrate the play strategy with blue/green infrastructure and active travel, promoting connectivity with the wider community through new/improved links and requiring provision to be diverse. However, it is requested that a strategy for sport is incorporated into the play strategy given the need to consider the role of the community playing pitches and school facilities in meeting the development's sports needs and their contribution to the site wide public realm and green infrastructure.	Public Space	Update to design code.	**Requirement 4.152 reworded to: A site-wide play, recreation and sport strategy must form part of the site-wide public realm strategy or design code. This must include play/ sport infrastructure shown on the play strategy diagram.**

	North Weald Bassett Parish Council Consultation Responses			
Event	Comment	Theme	Status	Note/ response/ action
	However, there is one prevalent matter which will undoubtedly have an impact on our entire parish, and that is the matter of traffic. Whilst this response addresses a number of points within the Design Codes document, the Parish Council wish to emphasise that our main focus is that of traffic, and that without two fundamental key elements of the development being absolutely secured (those being the Sustainable Transport Corridor and a frequent, reliable, bus service to Epping), the knock on effect to neighbouring residents in Thornwood, North Weald, and Epping, will be both insufferable and inexcusable on the part of those involved.	Wider infrastructure	Wider planning matter	Refer to FAQs
	1. The 'Proposed Site Area' as referenced on page 8 of the draft codes (and subsequently throughout the document) differs to the Allocated Masterplan Area SP4.1 included within the Local Plan, and the Strategic Masterplan area detailed in the Strategic Masterplan Framework which has been adopted by EFDC (See Appendix 1). There is no explanation as to why this is the case, and this will cause confusion without either a full explanation being included within the Design Codes document, or consistent mapping.	Design code usability and scope	Response as follows.	Site boundary has been updated throughout the document to reflect the boundary shown in the adopted Local Plan site allocation, with clarification below key on opps and constraints page noting: * Reflects boundary of masterplan area allocation in adopted Local Plan 2023. This does not preclude improvements outside of the boundary shown.
	2. The Location Map key on page 8 uses some ambiguous wording as follows: • It is unclear what the word 'Headquarters' is supposed to signify. The headquarters of what? • The word 'Community' sits just after 'Town Hall' which suggests the icon is supposed to reference the location of Town and Community halls, however the map on page 8 locates neither the Queens Hall Community Centre at the top of School Green Lane, nor the Hastingwood Village Hall located in Glovers Lane. • The key includes 'District parks/ nature reserves', however there are at least three nature reserves that are not identified on the map – Roughtalleys Wood, Church Lane Flood Meadow, and Weald Common Local Nature Reserve. • They key includes a thicker blue dashed line for 'New/improved infrastructure for enhanced cycling', however the extent of this line goes right down to The Plain junction in Epping, and it is our understanding that there will not be any improved cycling infrastructure along this route. Furthermore, it includes a route cited on the map as being a 'potential future link to the North Weald Airfield Masterplan'. The thinner blue dashed line suggests 'Potential cycle connections on shared roads', which then adds to the confusion. These points all need clarifying, as at present they are confusing.	Design code usability and scope	Response as follows.	**Headquarters' is accompanied by 'significant employment areas'. Queens hall community centre and Hastingwood village hall added to map. Roughtalleys Wood, Church Lane Flood meadow and weald common nature reserve all now have labels and nature reserve icon.** Design code is advocating for improved cycling. If some improvements here, such as closure to through-traffic are made, then the whole route is improved. The wider cycle networ is being explored separately to the design code work.
	3. The Opportunities and Constraints map on page 9 seems to have lost some of the topography lines on the northern edge of the masterplan area, specifically two parcels of land. These should be added. This also occurs on various other maps throughout the document. Furthermore, there is a yellow dot and dashed line on this map, however the key does not reference what this is.	Design code usability and scope	Response as follows.	Sun path added to key
	4. Page 8 includes an aerial view of Latton Priory strategic masterplan area, however the area marked in red is not the same as the strategic Masterplan Area set out within the Strategic Masterplan Framework. This needs to be rectified.	Design code usability and scope	Response as follows.	Site boundary has been updated throughout the document to reflect the boundary shown in the adopted Local Plan site allocation.
	5. The following paragraphs on page 16 are unclear. Notes included within this extract in red are added by the Parish Council to identify what parts are unclear and why. Purpose of the framework masterplan The framework masterplan (Does this mean the Design Codes Framework Masterplan?) illustrates the site-wide strategies and principles of the design code. It has been developed alongside the strategic design code (but it is included within, and as part of, the strategic design code so what does this mean?) and incorporates the mandatory spatial principles of the Strategic Masterplan Framework (see Appendix A) and site allocation. While this framework masterplan (presume this means the Design Code Framework Masterplan, or is does this mean the Strategic Masterplan Framework?) should be a consideration for future proposals, there is flexibility for detailed proposals to respond to technical analysis and employ innovative design to meet or exceed the design ambitions and other policy requirements. This is further confused by paragraph 1.6 on the same page which suggests that that 'Framework Masterplans' would accompany any future planning applications, without actually saying so. But then on the next page it shows the Framework Masterplan. It is, therefore, entirely unclear what the Framework Masterplan is / isn't. Further clarity is needed so this can be clearly interpreted.	Design code usability and scope	Response as follows.	**Wording amended in relevant paragraphs and rules on p16 to address these comments and provide further clarity.**
	6. Page 16 includes a paragraph which states that 'The masterplan could provide approx 1,500 dwellings across the site'. Where has this information come from, and why has it been included on the Design Codes document? The Local Plan does not reference this number of homes, nor does the Strategic Masterplan Framework. The only time we have seen this figure, is when it has been suggested by the developer. Therefore, without any evidence to back this up, this paragraph should not be included, and should be removed.	Framework masterplan/ stewardship	Response as follows.	**Wording to be changed to minimum of 1,050 homes with a note saying that densities should support sustainable transport infrastructure and other services. Additional site capacity would need to be assessed for environmental and infrastructure impact.**
	7. The maps on page 17 and 73 show a single proposed location for the gypsy and traveller site, however the Strategic Masterplan Framework provides for three possible site locations. Does this mean the Strategic Design Codes document now sets this as the final location, as there is also a note on the same page that says the location of the site is yet to be agreed. The map on page 85 and supporting text on page 84 states that all three locations are still a possibility. This needs to be clarified.	Framework masterplan/ stewardship	Wider planning matter	There are still three possible locations but one has been chosen to for the purposes of showing how the site-wide strategies could work. Final location is subject to detailed review and advice from relevant authorities.

	North Weald Bassett Parish Council Consultation Responses			
Event	Comment	Theme	Status	Note/ response/ action
NWBPC	8. The map on page 17 also shows the Sustainable Transport Corridor (STC) simply leaving site and joining Fern Hill Road, which is an extremely narrow road. The HGGT Infrastructure Delivery Plan states under paragraph 3.5.2 that: 'The STC network will provide dedicated routes for public transport as well as cycling and walking…..These modes of travel are key interventions necessary to achieve the 60% modal split for the Garden Town communities . In the HIF bid to Homes England, sections of the STC network have been identified as forming part of the network to support the comprehensive and sustainable growth of the Garden Town. The Design Codes documents is proposing to place this route on road which simply cannot provide a dedicated route for public transport as well as cycling and walking. There is also no clear plan identified as to where the STC goes from that point forward. Does it simply adjoin existing routes? If so, this does not support the fundamental principle of the Garden Town in terms of providing a sustainable transport corridor.	Framework masterplan/ stewardship	Wider planning matter	Refer to FAQs
	9. The Framework Masterplan Key Map on pages 17, 27, 29, 41, 43, 63 and 75 does not include a reference to the yellow star, which it is presumed is a 'site feature', as detailed on the map on the same pages. In fact some of the stars have been removed from the map on page 27, 41 and 43, and the stars on the map on page 75 have no details next to them at all. This needs to be altered to ensure consistency.	Framework masterplan/ stewardship	Note	This is to reduce the amount of information on these pages for legibility. Given that these are noted in the key on earlier diagrams, the labels have not been added.
	10. Page 20, paragraph 2.1 sets out that Detailed design codes for site-wide coordinated green infrastructure and public realm must be provided and endorsed for the whole masterplan area in advance of, or at the same time as any full planning or Reserved Matters Application. However, it is understood there are a number of landowners for the site, and as such it is unclear how the requirements of the paragraph can be met. It is also unclear what is meant by 'full planning' application – does this refer to an Outline planning application too?	Process/ Policy inc Local Plan/ HGGT/ principle/ location of development	Response as follows.	Regardless of who is producing it, the EFDC planning process for Strategic Masterplan Areas requires design codes to be produced. Due to the government Pathfinders funding and support, part of that task on Latton Priory has been undertaken by EFDC, however the outstanding design code matters still need to be undertaken in the same manner they would have been had there not been an authority-led design code. This could happen in a number of ways, most likely by the site promoter's consultant team prior to any reserved matters applications. **A design code briefing note has been produced to provide further information and there may be further detail added in to the strategic design code regarding requirements for more detailed code elements.**
	11. It is suggested that there should be a change of wording in Paragraph 2.7 on page 25, detailing that 'Development must not 'extend south' of the ridgeline'.	Nature	Response as follows.	**Wording changed as suggested.**
	12. The document makes numerous references to 'key destinations', however there is no map included that identifies where these are located, both within and outside the development site. This results in some ambiguity on certain requirements within the document, specifically the active travel network requirements, as it will be essential for public transport to reach these 'key destinations'.	Design code usability and scope	Note	Key destinations outside the site shown on the map on p8. Within the site, noted on the plans as the local centre, schools and major faciluties such as sports pitches and allotments.
	13. Paragraph 3.15 on page 30 states that bus stopping and waiting environments must be provided at neighbourhood mobility hubs, however the map on page 29 does not show a bus stop being located at the eastern mobility hub location. Is it intended that there should be a bus stop at this mobility hub?	Movement	Response as follows.	**Wording changed to: *Waiting environment and real time information, where the mobility hub is co-located with a bus stop.***
	14. The information on mobility hubs also on page 30 is quite confusing. Reference to is made to 'mobility hubs', 'neighbourhood mobility hubs', 'community mobility hubs', and later in the document 'mini mobility hubs'. Whilst this is clarified to some degree on page 84, this is 54 pages after mobility hubs are first introduced to the reader. Furthermore, the map keys simply refer to them as 'mobility hubs', and it is not until the map on page 91 that you understand where the different types of hubs are proposed. This is confusing.	Movement	Response as follows.	**Further clarity provided on p30, with nieghbourhood mobility hubs renamed 'mini mobility hubs' for consistency and the following wording added: *A main community mobility hub will be located in the local centre. This will be supplemented by smaller 'mini mobility hubs' at key nodes as shown indicatively on the active travel strategy diagram on the previous page'.***
	15. The 'Neighbourhood node and other local social spaces' key reference / icon seems to be missing on pages 29, 33, 35 and 37, although it is marked on the maps.	Design code usability and scope	Response as follows.	**Icons added to key.**
	16. The Parish Council does not support the use of Car Barns. Car barns are said to be designed to locate parking remote from the home and to discourage car use over more sustainable modes of travel. Firstly, it should be noted that an electric car is a sustainable mode of travel. Secondly, they are a hub for both anti-social behaviour and crime, a matter that is accepted under page 39 paragraph 3.80. The Design Codes document suggests that car barns can more easily accommodate larger vehicles such as vans, however most van owners need their vehicles for work, and wish for the vans to be parked outside their homes for reasons of added security. Whilst it is acknowledged that the Latton Priory development is being designed in such a way to discourage car use, Car Barns would inevitably create their own problems, and we believe would not be used.	Movement	Note	Car barns are a critical component here in trying to achieve the mode shift targets. It is acknowledged that the design of them need to be very carefully considered to encourage use and ensure safety of people and the vehicles.
	17. The Parish Council has concerns regarding the prevalence of proposed rear parking courts. The Secured By Design Homes 2023 documents identifies under paragraph 16.3 that 'Rear parking courtyards are discouraged for the following reasons: • They introduce access to the vulnerable rear elevations of dwellings where the majority of burglary is perpetrated • In private developments such areas are often left unlit and therefore increase the fear of crime • Ungated courtyards provide areas of concealment which can encourage anti-social behaviour There is no reference within the draft design codes for the need to ensure Security By Design is considered and evidenced as part of any planning application, and this should be included as a 'Must'.	Movement	Note	The intention is to provide a balanced strategy to ensure that there is a variety of parking solutions and that the public realm is not overly dominated by vehicles. The risk posed by rear parking courts are minimised in the following ways: blocks are kept small and therefore parking courts will be small. Parking courts need to be overlooked and designed to minimise the fear of crime or anti-social behaviour. There are many examples of successful rear parking courts. E.g. Nansledan, Cornwall

	North Weald Bassett Parish Council Consultation Responses			
Event	Comment	Theme	Status	Note/ response/ action
	18. Page 60 focuses on the Public open space design, however it is noted that there is no requirement to provide infrastructure for CCTV to be installed at these locations. This should be a mandatory requirement, and should be listed under paragraphs 4.148 and 4.145 to ensure adequate security measures are in place to support the community from the outset.	Public Space	Note	Further wording added around security of community plaza in line with Essex Police recommendations. It will not necessarily be practical or beneficial to have CCTV at all neighbourhood nodes as these would need monitoring. CCTV can also have a negative effect on spaces because it makes people more aware of the prospect of criminality and can make spaces feel more hostile. This can be reviewed at the detailed stages when the design of these spaces is reviewed.
	19. It is noted that the Local Character sections on page 76 and 77 make no mention of Thornwood Common, a small village located between the Latton Priory site and Epping. In fact , Thornwood Common is only identified once throughout the entire document on the map on page 8. It seems strange that no design inferences have been taken from Thornwood, given it is closer to the site than Epping. Is this correct?	Identity	Note	The local references are not necessarily related to proximity. Given that there is some distance between the Latton Priory site and Thornwood, it would make sense that Latton Priory has its own identity that draws on the best of Epping (as a District) and Harlow (as a District). References from Epping Town Centre are because they are characterful and distinctive examples in the District, just as Harlow references are not neccessarily those areas closest to the site. These references are for inspiration and it will be down to designers to look at references and context in more detail.
	20. Paragraph 7.1 on page 78 regarding Energy Use states that 'Sustainability must be embedded at the earliest stage and that a sustainability consultant must be part of the project team from the masterplan stage.' Once again this use of the word 'masterplan' is confusing, as it is not clear what masterplan is being referred to. Can this be clarified?	Resources	Response as follows.	**Wording changes to: *a sustainability consultant must be part of the project team at all stage* s.**
	21. Whilst the draft design codes document frequently references 'play', there is very little, if any, wording focussed on ensuring activities and safe spaces / areas are provided for youths. The word 'play' seems illogical when referring to the activities of older teenagers, and we suggest some specific wording should be included to ensure this demographic are considered.	Public Space	Response as follows.	Play and recreation is intended to be aimed at all ages, not just very young children. This is indicated in the title 'play and recreation', plus wording around catering for all ages. **Further wording/ clarification added to rule 4.157: *Provision must be diverse, ranging in scale, formality and user groups including differing abilities and neuro-diversity. The needs of women and girls and older children/ teenagers must be specifically considered.'***
	There are some very positive elements in the Design Codes document, and we hope that you find the comments above of some use. However there are also elements of the document that are quite confusing and hard to read / understand. The mapping is quite complex, with many elements overlayed on each particular map, making it quite hard to decipher. The Design Codes are very specific, which may be a good thing, however it is not clear what further design codes are required to be produced if these are so specific. However much of what is included does not address the current concerns of the Parish Council, those being: • The quantum of extra traffic that will be generated by this development alongside all the other developments in both the Harlow and Epping Forest Local Plans, and the affect on our residents due to traffic congestion • How all this traffic will affect The Plain junction in Epping, given its surrounding constraints, and the resultant effect on both the B1393 and B181. • The current lack of a firm plan for when and where additional public transport (buses) will be coming through Thornwood. • What the plan is for Rye Hill Road, and if this includes 'stopping up', what does that mean for traffic going through both the new Latton Priory Development and/or Epping Upland / Upland Road. • Uncertainties around the route of the Sustainable Transport Corridor, and when this will be implemented.	Wider infrastructure	Wider planning matter	Refer to FAQs

	HGGT Members' Consultation Responses			
Event	Comment	Theme	Status	Note/ response/ action
HGGT dev Forum workshop transcript and post-it-notes	We have seen problems in Old Harlow and Newhall with developers failing to provide the public assets that they promised to install. What strategy are you planning to implement to ensure that the public services infrastructure (School, Surgeries, pharmacy etc) will be provided early on in the project. Sticking bits in as almost an afterthought is not acceptable under any circumstances.	Delivery	Wider planning matter	Agree that we want to avoid that, that is why we have an up to date adopted Local Plan, an endorsed Latton Priory Strategic Masterplan, and are discussing the Design Code as well. We also have an Infrastructure Delivery Plan, working with Essex County Council and other HGGT partners and stakeholders to ensure we bring infrastructure along and ensure it is delivered at the right time; the Garden Town partner authorities are ambitious about modal shift, and bringing around developments that we can be proud of. The Design Code is also focused on ensuring that there is policy and devices that can be used to hold applicants and developers to account on design and placeshaping quality, and deliver in a timely and relevant fashion.
	Control of vehicular movement sounds good; car barns is a novel idea. What evidence exists to show that drivers are likely to be enthusiastic?	Movement	Response as follows.	In the wider context, what we are aiming for on all the Garden Town sites, does require ambitious design at every scale in order to embed a culture that is different to the status quo. So if people are used to having cars outside their home window, then car barns will require a slight shift in mindset in that regard. Car barns will provide protection from the elements, and we do think that they can help to be a design solution for a number of issues where car parking design may be detrimental to placeshaping, and where we are not seeking for cars to be the most convenient. option and yet recognise that people do still need them. There are examples in Europe and it is becoming more prevalent in this country, and we think there is scope for them to be an important contributor to the scheme and overall modal shift strategy
	Interested in personal accessibility issues, e.g., those in wheelchairs or using sticks, or those who are deaf etc. I notice there is nothing specific on this in document apart from p.15 of presentation which notes movement network that is accessible to all and in relation to site topography. So my comments include: Shared surfaces are an issue, for guide dogs for example. Clear spaces on pavements and squares and shopping areas, in the document there are illustrations showing trees, benches, tables and chairs, which are good providing they are in managed areas and there is clear space for those with visual impairments or other to access. You have mentioned topography and gradients are extremely important, avoiding stairs.	Public Space	Response as follows.	The public space section looks at various aspects of accessible and inclusive places and was partly informed by consultation with a group of older people. This includes measures such as continuous pavements without vehicle crossovers to at least one side of the street on key routes. These comments are helpful in further informing this aspect eg reviewing the requirement for shared surface when it may be more appropriate to introduce a low kerb. **Where shared surfaces are utilised. these are on low traffic streets. For neighbourhood streets, wording has been amended to: 4.42 Neighbourhood streets should be level surface with a change of material for pedestrian footways and shared-surface crossing zones to indicate pedestrian priority. Kerbs should be detectable by people with impaired vision. This will be considered further once detailed proposals are received.**
	Sustainable transport and modal shift is a key feature for the Garden Town, however most public buildings will require vehicle access for people who are disabled. Need short distances and accessible parking/ drop off for those who are disabled, and need to consider this for school buildings	Movement	Response as follows	This will be considered in conjunction with the updated EPOA parking standards at the planning application stage when parking quantum is proposed based on assessed need including blue badge holder spaces.
	Open space and streets require landmarks for legibility for those with access issues. The consultation document also needs to be available in different and accessible formats. 17% of the population of Harlow do not have access to IT, so also need to consider non-digital forms of consultation.	Identity	Response as follows	landmarks for wayfinding, legibility and character/ placemaking are addressed in the Identity and Public Space sections. The comments on consultation are also welcome – we will be undertaken a hybrid consultation (both digital and in person access) and will be learning from successes and challenges of previous consultations too. However, if there are further specific accessibility points which can be built into our consultation plan then we welcome these too.
	What has been noted on health facilities such as surgeries, pharmacies is important, but won't be in the gift of developers. An early assessment of how they will be provided will be necessary, the developers can build the building for you, but they won't be able to provide the staff, the doctors etc. So early discussion with the health authority is needed.	Delivery	Wider planning matter	In terms of health facilities and provision, that conversation is ongoing with the West Essex and Herts ICB, and we will continue to provide updates on this once we have further confirmation on requirements and need from the ICB.
	Like the idea of the car barns, but we mustn't forget elderly people in their late 80s who still drive a car. They may not be able to walk to a car barn or be fit enough to go on public transport but the use of a car parked next to their house enables them to travel and carry on with their lives. If we are building housing for all ages, then we need to consider the elderly too.	Movement	Response as follows	Car barns are not intended to be the sole parking provision, however they may help to deal with households that require more than one parking space (they may have on street, and one in car barn) or for oversized vehicles rather than creating bigger spaces on the street. But we acknowledge the need for cars, and the intention is not to get rid of them but accommodate them in a way that is balanced. The other side of the coin is that there are a number of elderly people who can't drive any more for various reasons and actually the dominance of cars may preclude them from making trips safely and comfortable so we believe we need to find the balance and be sensitive to these different needs.
	You noted that individual parts will have access to the main avenue; cul-de-sacs which tend to be separated don't have good local feeling within them as they don't' have access to other roads and neighbouring properties to give them a sense of community. So I think it's important to look at how a sense of community is established on smaller roads, and how these may link to the main avenue.	Movement	Note	We are not looking to build in cul-de-sacs into the development – that diagram is showing car movement, but on the active travel diagram there is permeability right through and we are hoping that helps to foster community as there will be streets where neighbours can come out and engage with each other without cars speeding through every street. This was a key point that the QRP picked up on, bringing the cul-de-sac feeling of not having vehicles running through but having a permeable network for walking and cycling (active travel).
	Thank you for the good presentation, and I want to draw us back to the document that is before us tonight. Page 15 the drawing is a bit confusing, with the coloured dots and the keys for different elements. I think we should show the Sustainable Transport Corridor clearly on these diagrams. On p16 the primary bus route is shown as going to Rye Hill Road, but I thought this road was likely to be closed off, around the access to Dorrington Farm? Without having the Sustainable Transport Corridors on there, it's not clear if the bus is ending there, looping around, where this route is going etc	Movement	Response as follows.	Two separate types of bus service, the rapid service which uses the STC and there will be other buses serving the development which may use Rye Hill Road to link in with existing neighbourhoods much like an ordinary service bus. ECC are looking at closing Rye Hill Road to the south of the development so that it is not a through road anymore, otherwise it would attract a large number of vehicles going out onto an unsuitable road (B1393). **Graphics of drawings have been updated to promote clarity/ easue of use.**
	EFDC has around 97% connectivity to broadband across the district. Part of the design strategy is to ensure that new developments are linked in to the most up to date fibre broadband infrastructure that can be provided.	Delivery	Note	
	Will car barns facilitate EV charging? Will they be shared space, will you need to book a space to access them?	Movement	Response as follows	Yes EV charging is included, with access to EV charging for all parking spaces and the car barns offer an opportunity to provide EV charging in a consolidated way. EV charging is also incorporated into the street design in a way that doesn't block other functions or create accessibility issues.

	HGGT Members' Consultation Responses			
Event	Comment	Theme	Status	Note/ response/ action
	It isn't clear to me how the road network here is going to work, it appears that most of the traffic from the development is going to be going north into Harlow via Rye Hill Road, when we know this road network is already at capacity. Can more work be done to design road layout to push traffic towards London Road (B1393) to relieve Harlow's road network?	Wider infrastructure	Wider planning matter	We have a parallel piece of work underway in regard to transport and travel related infrastructure, within the context of this proposed new garden neighbourhood. This evening is an opportunity to look at the design code, so I suggest that rather than discuss in detail the transport and wider road network conversation this evening, we can capture those comments and when we reconvene on sustainable transport corridor, those challenges and questions and observations are responded to. The access points onto Rye Hill Road, and the connection onto London Road are spatial design fixes as per the Latton Priory Strategic Masterplan Framework. The Design Code doesn't look to amend those, and so it may be more applicable to address in the wider transport forum. The main route in and out of the site for cars is considered will be via London Road, and sustainability is key in getting people out of their cars and helping people to make sustainable transport choices into and around Harlow. The closure of Rye Hill Road will mean this is no longer a feasible shortcut out of Harlow, and those people doing that will now need to travel via the main road network. The developer for the site will also be undertaking a transport assessment which will identify much more clearly the traffic and capacity points.
	Plans suggest the STC link simply goes onto Fern Hill Lane - will this be correct, and should the plans detail a little more about what the STC will look like and what, if any, improvements will there be to the road network? If this could just be clarified please.	Wider infrastructure	Wider planning matter	This will be picked up during the further detailed design discussions/ Member briefing on the Centre – South STC due to take place in the coming months. Refer to FAQs.
	On p.12, there are 6 variations of the colour green, and it is difficult to read with the key. Also on that page, the wetland park edge, it doesn't seem to link up to anything and what exactly is the wetland park edge?	Nature	Response as follows	Point taken on the clarity of diagrams, we will look to review. The wetland park edge is where the attenuation basins for the SuDs are located, and what we are trying to ensure through the design code is that those are multi-functional in that they are also used as amenity and to inform character, and better biodiversity and work with the play strategy. To note, the presentation that we are referring to today shows extracts of the design code, it is not the full design code document, which does go into detail about what is contained within these areas. **Graphics of diagrams have been reviewed to promote legibility and usability.**
	We have concerns around the separation of cyclists and walkers, if you get lots of people travelling actively you end up with hundred of bikes, including fast electric bikes and e-scooters, and there is risk of conflict between pedestrians and cyclists. So there needs to be consideration of this in the design of these streets. This is also the case for play streets being made, but we need to think carefully about how cyclists move through these spaces for safety reasons. Have you also considered parking for cycles? Will there be special areas, for example in the car barns?	Movement	Response as follows	Within the Design Code itself we have street design for all the main street types, and Latton Avenue itself, the main route through, will have separate cycle lanes (from pedestrians and cars) which follows government guidance LTN 1-20 which requires separation. This is also the case on the Greenway. On the smaller streets there are instances where cyclists and walkers are sharing a space, but that is calculated on the basis of how busy that street is likely to be. There is also a balance that needs to be struck between overall street widths and placeshaping at a human scale: if you put separated two way cycle lanes on each side of a road you end up with very wide streets, and as building height is limited on this site (due to visibility of the site because of its topography) you achieve a less proportionate space. On cycle parking, this is discussed as a requirement for homes and in shared facilities and also visitor cycle parking in the public spaces as well.
	Is Rye Hill Road closure a done deal? your comment was rather concerning, who has agreed to closing it?	Wider infrastructure	Wider planning matter	With the level of growth the development will generate keeping it open as a short cut to Epping and the tube will be unacceptable from transport terms due to width/alignment and the poor junction onto London Road alongside as I mentioned existing use. It will need a TRO, so it's not a done deal in that sense, but from at least a highways perspective it's considered necessary - note walkers and cyclists would be able to use it as a safe route. Obviously happy to discuss further.

	HGGT Developer Forum Workshop Feedback			
Event	Comment	Theme	Status	Note/ response/ action
HGGT dev Forum workshop transcript and post-it-notes	It could be that the good practice in the design code also has better viability returns, in which case it could be a win-win scenario.	Miscellaneous	Note	Note
	Support for active travel and wider benefits (e.g. reduced costs to NHS)	Movement	Note	Note
	Lots of great measures shown such as modal filters and car barns, One key principle is how can you fit everything in that you might need to fit in? Do you think anything should be left out? When land is money, what should you prioritise when you need to prioritize? Another instance of flexibility changing ideologies over time is Cuthley, where monies were secured for overloaded junctions. The funds were then reviewed after three years and determined to be best used for active travel. Conducting an annual review of the code as it progresses through the development cycle and different phases will be beneficial to determining whether it remains fit for purpose.	Process/ Policy	Response as follows.	The design code is designed to be sufficiently flexible, but also in promoting a compact, sustainable form of development, increases space available for more extensive green infrastructure etc. There will be timelines/ mechanisms put into place for review of the design code as the masterplan continues through the planning process and through delivery. This will be part of a 'design code briefing note' separate to the Latton Priory Strategic Design Code'.
	Developer concerns – will they sell if less parking provision? Smaller blocks need play street and a parking court. Does it work?	Public Space	Response as follows.	Typical or historic parking provision does need to be addressed in order to build sustainably and achieve the modal shift targets. The design code aims to provide balance as well as adaptability for changing mobility trends in the future. It also seeks to ensure that the benefits of reduced space for cars is identified in a much higher quality of public realm that is focused on people and nature.
	Good to see school right by mobility hub so kids can get the bus. Will reduce car use. Mixed-use and schools reduces trips and encourages internal trips by active travel.	Movement	Note	Note
	Will the code consider any changes to reflect the recent EPOA parking consultation? Everyone needs to be on the same page regarding parking, and that the code doesn't conflict with new regulations.	Movement	Response as follows.	The design code is very much in line with the draft EPO parking standards (Part 2), particularly in relation to strategic planning e.g. limiting the access of vehicles, managing volume and speed in 'human scale' spaces and use of filtered permeability. The two documents also align in their preference for unallocated off-plot parking as a preference to on-plot and the need to future proof and build in adaptability. The design code has slightly more (site-specific) detail regarding what parking solutions are acceptable in different locations or relating to different building typologies. Parking numbers are not dealt with in the design code and therefore alignment will require further interrogation as the outline and detailed applications are reviewed. Also note that the EPOA parking standards for garden communities are currently in draft form and therefore this should be reviewed again once they have been updated.
	Having primary and secondary education on site might lead you to think you're internalizing trips. There might be a wider catchment for the secondary school than just the people living on that site. It's therefore important to consider options to promote healthy living, including strategies that are more wide-ranging, like a built environment planning approach.	Movement	Response as follows.	The SMF and design code seek to ensure high quality modal choice throughtout
	Some local employment – more walking, may encourage others to walk.	Delivery	Note	Note
	Need to restrict parking by school and shopping centre.	Movement	Response as follows.	Parking quantum will need to be evidence based and reviewed through the planning process.
	With regard to the guidance, we discussed, in particular, aspects like the fact that it provides certainty, but it also needs to strike the right balance between the number of musts or shoulds because if there are too many shoulds, it won't have enough bite, it might not have enough bite. A developer is almost in a straight jacket if there are too many musts. As a result, we acknowledged the importance of striking the right balance.	Design code usability and scope	Response as follows.	**Musts and shoulds have been reviewed to ensure that the design code focus and priorities are clear and that appropriate flexibility is built in.**
	Could be helpful to have a contact list for who to get in touch with for more information.	Design code usability and scope	Response as follows.	As this may change and the design code may be in use for many years, this can be dealt with through the planning process.
	Would the likelihood of a planning application being approved be higher if this code is followed to the letter? Is there member buy-in? Again, this has to do with certainty, and will following this code result in a promotion that is approved by members at a later stage?	Process/ Policy	Response as follows.	The intention is that the design code makes the palnning process smoother at latter stages by clearly setting out aspirations and expections that reflect local policy and guidance. Member consultation has been a part of the process of developing the code.
	How does the work around this code flow through to the later stages of applications so all members of the planning departments are on board?	Process/ Policy	Response as follows.	The use of the design code will be supported by the production of a compliance tracker. As the design code use commences in the assessment of schemes further training or tools will be considered.
	The unforeseen implications that can arise when rules are applied is interesting. Someone mentioned that there was a rule in another code somewhere else in Bishop's Stortford where there were unintended consequences of a particular requirement. My understanding is that there was a coding that prevented cars from reversing on public highways. A result was an increase in parking courtyards, which wasn't necessarily a good thing.	Process/ Policy	Response as follows.	There will be timelines/ mechanisms put into place for review of the design code as the masterplan continues through the planning process and through delivery. This will be part of a 'design code briefing note' separate to the Latton Priory Strategic Design Code'.
	Design code testing by architects is a really positive thing.	Miscellaneous	Note	Note
	We've discussed whether we could use one of these forums to do a trip around Harlow to see how some of the new developments and how some of the older developments have been built and how they relate to the code.	Engagement	Response as follows.	This should be arranged by HGGT in future.
	Looking at the design code documents, we were pleased to see that it includes a guide on how to use this document, which we think is very important since not everyone is a professional. The document outlines how you should proceed through it in a very helpful manner.	Design code usability and scope	Note	Note
	The size of the design code document isn't off-putting. Design code documents matter in terms of size. There are a lot of used to store stops collecting dust, and this is one I think is usable. You can pick it up, flick through, use it, and put it back on the shelf at 90 pages.	Design code usability and scope	Note	Note

	HGGT Developer Forum Workshop Feedback			
Event	Comment	Theme	Status	Note/ response/ action
Persimmon Homes (partner developer at Water Lane Masterplan Area)	Overall, Persimmon Homes supports the use of Design Codes in delivering Strategic Sites; and have recently assisted East Herts District Council in preparing a Design Code to guide development in Bishops Stortford (though we would perhaps caveat that, in our recent experience, it is preferable for Design Codes to allow a degree of flexibility overall in terms of design). The approach taken in the draft Design Code will ensure a high-quality, sustainable and coordinated design is delivered. However, we would welcome the opportunity to identify some areas of concern, which if applied to the Water Lane Design Code, we would challenge and where implementation could become difficult.	Design code usability and scope	Note	Note
	Urban Greening Factor It is noted that one of the requirements of the Green Infrastructure Framework is that "Public realm proposals must demonstrate how the Urban Greening Factor (UGF) has been maximised and how development areas will meet or exceed a UGF score of 0.5." Persimmon Homes supportsthisin principle; however, we would suggest changing the "must" to "should" to allow for discrepancies in assessment, with the comfort that mandatory BNG requirements will ensure that a 10% net gain is achieved in any event. We note that London Plan Policy G5 sets the standards at 0.4 for predominantly residential development, so whilst aiming for 0.5 is admirable, it should be a target rather than a requirement, to ensure development is viable and to prevent barriers to development.	Nature	Response as follows.	UGF is becoming increasingly common as a way of measuring quality and quantity of green infrastructure. Natural England have developed an urban greening factor for England and local authorities are encouraged to positively set standards and promote delivery. Their recommendation is a UGF of 0.5 for residential greenfield development. Given that on top of this being a greenfireld development, it is also part of a Garden Town with Green Infrastructure and sustainability at the heart of its principles, this requirement is entirely appropriate at the strategic and detailed scale. More information can be found here: https://designatedsites.naturalengland.org.uk/GreenInfrastructure/downloads/Green%20Infrastructure%20Standards%20for%20England%20Summary%20v1.1.pdf
	Vehicular access should be limited to three sides of any development block or two sides plus a rear parking court: Persimmon Homes welcomes the Council's aspirations for a modal transition to sustainable transport and understands the responsibility as a housebuilder to encourage the shift in attitudes towards integrating sustainable transport into everyday journeys. However, it is important to ensure that the requirements accord with Chapter 11 of the NPPF "Making efficient use of land" by ensuring that the layout requirements do not result in less than optimum densities being delivered. It is therefore suggested that the "should" is amended to "could".	Movement	Response as follows.	It is unclear how the design code will result in less than optimum densities. The design code encourages compact walkable blocks that maximise density whilst providing for a high-quality public realm in line with the Garden Town and District Vision for the new community. To clarify, it is expected that all side of the development block will have housing (where it is a residential block), however some homes will not have car parking or car movement directly outside their front doors.
	Car Barns: It is noted that Car Barns are referred to in the National Model Design Code that was recently endorsed by the Levelling-up and Regeneration Act 2023 Chapter 5 26th October 2023. However, this is just one of many solutions, and should not be relied on too heavily. In practice, implementing car barns are difficult, and our concern is that with less natural surveillance, they have the potential to increase criminal activity and therefore be less attractive to prospective purchasers. We therefore look forward to working with the Local Authority during the production of the Water Lane Design Code and identifying successful measures that we have incorporated on our developments elsewhere which, in our opinion, represent a better solution than Car Barns.	Movement	Response as follows.	Parking barns are proposed for extra vehicles where households have more than one space or larger vehicles to accommodate. This is part of a balance and future-proofed adaptable parking strategy. The design code sets out key requirements for ensuring that the parking barns are designed in such a way to mitigate concerns.

	CEG/ Hallam Consultation Responses			
Event	Comment	Theme	Status	Note/ response/ action
David Lock Associates letter Dec 2023 (Additional appended detailed comments with page references)	The draft Design Code varies from the SMF in a number of places and we consider there needs to be greater consistency between the endorsed SMF and the draft Design Code. The two documents should work in tandem and not conflict/contradict each other and it should be clear that the Code is building on the Mandatory Spatial Principles set out within the SMF. This is particularly important to ensure it can deliver on its intent to be a clear and accessible design tool for all those involved in the development of planning applications for the site.	Process/ Policy	Note	See responses below to detailed comments
	Clarity on the role and purpose of the Code and other steps in the planning process is key for future developers. Currently, the anticipated planning process is depicted in a diagram on p7. This is showing the Strategic Design Code feeding sequentially into the Outline Planning Application and Detailed Design Code(s), as parallel processes and for those two outputs to feed into Reserved Matters Applications. Whilst the outputs of those exercise(s) will feed into Reserved Matters Applications, the timing of the preparation of any future Code(s) will take place subsequent to any outline application approval. Moreover, the existence of a Strategic Design Code, with the detailed content as included in the draft version will also inform the RMAs (not currently clear in the flow chart), and more importantly, should help minimise the need for further and additional steps in the design process/future Design Code(s). This will then allow RMAs to come forward in a timely manner to enable the delivery of much needed houses in the district in accordance with the anticipated trajectory for completion of the development within the Plan period (by 2033).	Process/ Policy	Response as follows.	The diagram is intended to show process not just for Latton Priory but also for other Strategic Masterplan Sites. As noted, it is an anticipated planning process and there are a number of ways that codes/ planning applications could come forward. The diagram does not preclude a detailed code being produced subsequent to an outline approval or after it. A point of clarification has been added to the diagram noting that* approval of outline application is not dependent or reliant on the prior endorsement of the strategic or any detailed design codes. Whilst the the strategic design code does contain some detailed points, these are strategic points. There is still a requirement for coordination of detailed elements such as lighting, public realm material palettes, play and planting prior to the approval of any reserved matters applications. An explanatory note will be produced to clarify this point. **Clarification added to p7**
	The SMF includes an illustrative masterplan framework and the draft Design Code also includes a number of illustrative plans. There is a note on p5 of the Design Code which advises that: “All diagrams and images, unless stated otherwise, are illustrative and depict how the requirements of the code could [our emphasis] be brought forward on the site”. We, therefore, understand from this that the plans and diagrams in the document are not “set in stone” and have a degree of flexibility in how they are interpreted, followed and ultimately implemented. We also note (on page 3) that the Design Code will “allow for creativity, variety and innovation in future proposals”. Furthermore, the glossary states that “The framework masterplan is diagrammatic and illustrates the site-wide strategies and principles of the design code. It illustrates how the design code requirements can be delivered whilst allowing flexibility for innovation and creativity in detailed design proposals”. This statement needs to be clear and upfront in the Design Code document.	Design code usability and scope	Response as follows.	**Exact wording from glossary as noted here added again on p4 under 'content of the code' and framework masterplan/ land use.**
	The document contains a number of “musts”. In many cases, this is acceptable and to be encouraged to ensure a high quality design. However, there are a number of areas where it is considered that the “musts” should be changed to “should” to allow a greater degree of flexibility, particularly when the design goes to greater detail and to make the users understand the true priorities.	Design code usability and scope	Response as follows.	DLUHC and the National Model Design Code is very clear on the purpose of design codes and the terminology that should be used. The terminology has been carefully considered to ensure that the design code has the required robustness and avoids vagueness. It should also be noted that 'should' requirements are still requirements. There is scope for diverging from these for technical reasons or because an alternative proposal would better meet the aims but this would need to be robustly justified. **Wording has been added to the first section to clarify that. That said, the number of requirements overall has been reduced.**
	The draft Design Code shows requirements for street typologies (eg. Play streets, quiet active travel routes, car free streets alongside green corridors) as well as detail on parking solutions (eg. rear parking courts and car barns). Whilst some of these approaches are supported in principle, this is an area where a degree of flexibility is needed to ensure deliverability by housebuilders and once all the constraints are understood and further detailed design has taken place.	Design code usability and scope	Note	See responses below to detailed comments
	We understand that Jas Bhalla Architects have been appointed to undertake testing to help refine the usability/deliverability of the code and requirements within it and which is of key importance, particularly where the Code is currently providing significant detail. We welcome the invite to the workshop on Friday 15th December 2023, and Jeff Nottage at Turley who is leading on the design work for the applicants consultant team will be attending. CEG and HLM would also recommend that the Code is tested with housebuilders to ensure the delivery of the site and useability of the Code.	Design code usability and scope	Note	There isn't scope for further testing prior to endorsement however housebuilder input has been sought through the HGGT developer forum and through inviting to participate in the online survey and consultation. There will be a process put in place to review the code as appropriate or at key milestones during the planning and delivery timeline.
	The prescriptive requirements provided on some topics such as ‘at least 75% of dual aspect homes should have predominantly north-south facing aspects’ is starting to make policy assertions beyond those required in the Local Plan and in contradiction with other existing advice. The HGGT Design Guide advises that aspects/rooflines facing north to Harlow should avoid creating a ‘wall of development’ in an east-west direction which could be visually prominent (p36) (particularly on the ridgeline). Essex Solar Design Guide (p5) also explains that elevations facing +/-30degrees south is an appropriate range so that designers can make an informed judgement whilst still achieving useful solar gains. Balancing and considering these requirements will be part of future design considerations and which will also still be drivers of the detailed layout of this site. Therefore, having a specific target is not particularly helpful or beneficial in reconciling competing requirements. In a similar way, prescribing house types in certain parts of the site is also concerning and does not allow for creative or innovative solutions which could be used and which could still sensitively address the eastern ancient woodland edge for example.	Design code usability and scope	Note	See responses below to detailed comments
	The SMF included a play strategy which had a clear play hierarchy and even distribution of provision and which was designed to Fitwell standards. The draft Design Code is showing a different approach and which requires further information and justification.	Public Space	Note	See responses below to detailed comments

	CEG/ Hallam Consultation Responses			
Event	Comment	Theme	Status	Note/ response/ action
	CEG and HLM are keen that high-quality, sustainable and equitable design principles are followed in the delivery of the development of Latton Priory but that there remains appropriate flexibility in how these are applied to ensure its successful delivery. The detail provided and to be followed in the planning process also needs to be commensurate with the relevant stage of the planning process. CEG and HLM would request the above summary of comments along with the detailed tracker of comments are given proper consideration to inform the finalisation of the Design Code and we would welcome the opportunity to discuss these comments in detail. We look forward to working collaboratively with the Council to discuss the best way of resolving issues and to ensure that the guidance produced is adaptive and clear for developers and avoids duplication or contradiction with the SMF and other guidance.	Process/ Policy	Note	See responses below to detailed comments
Exec S.	Exec summary 2nd para: Text says it "draws on the SMF". Wording should say "It accords with the principles established by the Strategic Masterplan Framework…"	Process/ Policy	Note	Design code goes further than the principles in the SMF and in some cases does not accord e.g. block configuration in response to solar orientation and topography, therefore the proposed statement would be wrong. The code does draw on the SMF and alings with the mandatory spatial fixes within it.
2	p2 plan: To help with the context, suggest either more detail is added and greater colour variation (e.g. Harlow urban area should be a stronger colour) or do a greyscale Google Earth image with the key features on the plan highlighted.	Design code usability and scope	Response as follows.	This plan is only intended to indicate strategic location within Epping district and bordering Harlow - level of detail is in line with equivalent in Local Plan. More detailed context plan is provided later in the section. **Nevertheless more detail added: all major roads in the District, stations labelled and Thornwood, North Weald Bassett and Hastingwood Roundabout noted to help with orientation.**
4	p4 2nd column, last para; Text states that future planning applications will need to be accompanied by detailed design codes. Wording should be changed to say "future detailed and reserve matters planning applications should be accompanied by detailed design codes".	Process/ Policy	Response as follows.	**Wording changed to 'It is expected that future reserved matters, detailed or hybrid planning applications will be accompanied or preceded by detailed design codes that address the other themes of the NMDC.'**
7	p7 The flow diagram suggests that a detailed design code should be done in parallel with an outline planning application. The diagram should show how the strategic design code informs the outline planning application, whilst any detailed design codes inform future reserved matters planning applications. An amended version of this diagram, showing this alteration, was sent by DLA in September. We would be happy to provide this again	Process/ Policy	Response as follows.	The diagram is intended to show process not just for Latton Priory but also for other Strategic Masterplan Sites. As noted, it is an anticipated planning process and there are a number of ways that codes/ planning applications could come forward. The diagram does not preclude a detailed code being produced subsequent to an outline approval or after it. A point of clarification has been added to the diagram noting that* approval of outline application is not dependent or reliant on the prior endorsement of the strategic or any detailed design codes. Whilst the the strategic design code does contain some detailed points, these are strategic points. There is still a requirement for coordination of detailed elements such as lighting, public realm material palettes, play and planting prior to the approval of any reserved matters applications. An explanatory note will be produced to clarify this point. **Clarification added to p7**
9	p9 opps and cons plan: The views shown differ to those set out within the SMF Mandatory Spatial Principles page 10. Some of these views might not be deliverable due to existing intervening obstructions but given the Design Code notes that the diagrams show one way development 'could be brought forward' this should provide sufficient flexibility at detailed design stage. The colours of the arrows are difficult to decipher and there is also no yellow arrow in the key so suggest further clarification is provided. Suggest wording of accompanying bullet text be altered to say - "Expansive views of Harlow to the north and countryside to the south should be capitalised where practicable through the site layout and positioning of key open spaces and vistas".	Design code usability and scope	Note	As noted in previous feedback to CEG/Hallam comments: *There are additional views because we have considered design that makes the most of the opportunities the site offers in order to promote character, placemaking, wayfinding and integration with the surroundings. These 'additional views do not terminate at buildings but open spaces or nodes. The view lines have been clearly labelled (on spread 6 of the coding plans document), with strategic views differentiated from additional views that will aid wayfinding/ character/ integration. Strategic HGGT views are a minimum and do not preclude other views to be integrated. The views that are noted in the second image below as additional are just relocated views as the HGGT design guide diagram shows an outdated Latton Priory local centre location (see RHS of p6 of coding plan doc).* No change to text regarding 'capitalised' as clearly this would not happen where it is not possible. Most people will understand that a solid yellow circle and associated line indicates the sun path, nevertheless **a label has been added to the diagram, next to the sun**.
p12-13	Suggest that the document includes the jointly agreed vision statement that is in the SMF - so these design ambitions can relate back to that vision..	Design code usability and scope	Note	As noted previously the design code vision has been refined as a result of Design Council and DLUHC review and now closely relates to the structure of the document. It is a more refined/ concise version of the vision in the SMF and does not contradict it.

	CEG/ Hallam Consultation Responses			
Event	Comment	Theme	Status	Note/ response/ action
16	Strategic framework requirements– para 1.1: The text states that “development proposals must include the components shown on the diagram opposite”. This should be changed to “should include the components shown” to reflect the intent of the intro paragraphs and whilst it is one thing to set ambitions and principles, these have not all been tested and therefore the wording should allow for the flexibility. This relates to certain aspects such as the location of the car barns	Framework masterplan/ stewardship	Note	The requirement is that the components must be provided, i.e play streets must be provided, car barns must be provided. It specifically notes that '*The precise quantity, geometry and alignments of components can be modified to suit technical requirements or best-practice to achieve the Vision and ambitions of the Garden Town community.* ' That clearly leaves flexibility e.g. in quanity, location of car barns, to refine the proposals through design development and testing. However, the framework plan does address the various design code requirements.
16	Strategic framework requirements – para 1.3: Text states that “the local centre must be supplemented with smaller nodes that support the more immediate surrounding residents”. It also adds that “where viable, these should include retail that helps people meet their day to day needs conveniently”. This does not accord with the SMF which seeks to ensure that all retail is in the local centre. Further retail outside of the local centre will weaken it. This paragraph should be deleted.	Framework masterplan/ stewardship	Response as follows.	There is a concern around meeting daily needs within an easily walkable distance, particularly on the eastern portion. However, if design for active travel is maximised in every way between homes and services/ amenities that meet daily needs, inside and outside of the site, then this can be mitigated. **Paragraph removed.**
16	Strategic framework requirements – para 1.4 Text states that “sustainable and active travel routes to and from new and existing key destinations must be shown alongside strategies for delivery where these are outside of the site boundary. Suggest that the word “must” is changed to “should”	Framework masterplan/ stewardship	Note	This is a must.
17	The strategic framework plan differs from the SMF masterplan in certain places and the illustrative block structure / parameters for development also differ. It is noted on page 5 of the Draft Design Code that “All diagrams and images, unless stated otherwise, are illustrative and depict how the requirements of the code could be brought forward on the site”. So we assume there is flexibility here (as per the paragraph on p 16).	Framework masterplan/ stewardship	Note	It has always been understood that the illustrative masterplan in the SMF is an illustration of how a scheme might come forward (hence 'illustrative') but the detail of it has not been tested, including block structure. In its current form it would not meet some of the requirements of the design code. There is flexibility both in the illustrative masterplan and the strategic framework plan.
17	The plan shows a number of streets designated as “Quiet active travel route – low car movement”. Whilst we support this in principle, we cannot at this stage agree with the locations shown on the plan as they have not been tested and some of the streets shown do not accord with the SMF masterplan document. Could this not be explained as a principle, rather than marked on a plan?	Framework masterplan/ stewardship	Note	Removing the quiet active travel routes from the plan may weaken the requirement and/or understanding of them. Showing them on the plan shows how they can be brought forward in line with the various requirements.
17	Car barns are shown on the plan in two locations. There is no information about the exact size or parking capacity of these two car parking barns. Nor indeed if these are the right locations and work with any phasing. Could this be explained as a principle rather than marked on a plan? Also, we assume that the car barns are for second cars only.	Framework masterplan/ stewardship	Note	This is all subject to design development. The design code does not deal with parking quantum so the size and location of them can be refined. The sizes shown on the diagram are comparable to other car barns.
17	Car free play streets are shown on the plan. Whilst we support this in principle, we cannot at this stage agree with the locations shown on the plan as they have not been tested and some of the streets shown do not accord with the SMF masterplan document. Could this not be explained as a principle, rather than marked on a plan?	Framework masterplan/ stewardship	Note	Removing the car free play streets from the plan may weaken the requirement and/or understanding of them. Showing them on the plan shows how they can be brought forward in line with the various requirements, including car free frontage requirements as part of of a site-wide strategy.
p18/19	Stewardship arrangements will evolve over time and depending on the scale and delivery arrangements as there is no ‘one size fits all’ approach. Latton Priory will be delivered by housebuilders/developers not yet known so there needs to be some flexibility in the approach rather than just the statement that applications must provide information on proposed models. Suggest this is reworded to say applications should indicate a commitment to the Charter and high level principles set out only rather than detailed requirements and para 1.23 should be reworded to advise that detail provided should be proportionate and commensurate with the stage of the planning process. There is also a lot of detail of assets marked on the Plan which is misleading – it needs to be clear throughout that the plans are illustrative.	Framework masterplan/ stewardship	Response as follows.	Good community management/ development from the very start will be critical to the stewardship and success of the development. The wording is for 'Development applications' to include information and it is unclear why this is problematic'. **'Illustrative' added to the title of all site-wide plans and diagrams.**
20	Green infrastructure framework – para 2.1: Text states that “detailed design codes for site-wide coordinated green infrastructure and public realm must be provided and endorsed for the whole masterplan area in advance of or at the same time as any full planning or Reserved Matters Application. How would this work? Who would prepare this? Is there a need for another design code to cover this? Does the first developer to submit a reserve matters application need to do a detailed site wide design code? This wouldn’t work as a) it will not affect their parcel and b) they may have alternative ideas to other developers later in the phasing.	Nature	Response as follows.	Regardless of who is producing it, the EFDC planning process for Strategic Masterplan Areas requires design codes to be produced. Due to the government Pathfinders funding and support, part of that task on Latton Priory has been undertaken by EFDC, however the outstanding design code matters still need to be undertaken in the same manner they would have been had there not been an authority-led design code. This could happen in a number of ways, most likely by the site promoter's consultant team prior to any reserved matters applications. **A design code briefing note has been produced to provide further information and there may be further detail added in to the strategic design code regarding requirements for more detailed code elements.**
20	Green infrastructure framework – para 2.2: The text states that “proposals must be aligned to the EFDC Green Infrastructure Strategy and Natural England’s Green Infrastructure Design Guide”. The EFDC GI strategy section 3 refers to various off-site initiatives under the heading ‘Latton Priory and Water Lane Garden Town Communities’ (references to the STC and enhancement of offsite habitats and green spaces to which the developer has no control over). Suggest wording change to address as follows - “Proposals for the site should be aligned to the EFDC Green Infrastructure Strategy and Natural England’s Green Infrastructure Design Guide”	Nature	Note	Most of the proposals and recommendations within the EFDC GI Strategy (Part 3) for Latton Priory are site-specific recommendations for within or immediately around the site. Given that the EFDC Green Infrastructure Strategy is a key document within the policy framework, it is neccessarily a key driver for Green Infrastrcuture proposals. It is considered that there is sufficient flexibility in the word 'aligned'.
20	Green infrastructure framework – para 2.3: Text states that “proposals must be developed iteratively with the Council and other stakeholders. Engagement with the Council’s review panel must be sought at key stages of design development”. What is this review panel? Is it the QRP?	Nature	Response as follows.	Yes, the Quality Review Panel. **Wording changed to: Engagement with the Council’s quality review panel (QRP) must be sought at key stages of design development.**

	CEG/ Hallam Consultation Responses			
Event	Comment	Theme	Status	Note/ response/ action
20	Green Infrastructure framework - para 2.4: Text states that “proposals must demonstrate how neighbouring communities and wildlife will be included and connected with. This should include details of enhancements outside the site boundary as well as mapping of the ecological network”. The developer has no control over enhancements outside the site boundary other than by enhancing connections across the site to peripheral communities and habitats.	Nature	Note	Connectivity is a key component of green infrastructure at should be at the fore of any proposals. Improvements outside of the site can be negotiated through planning discussions either through direct improvements or contributions.
20	Green Infrastructure framework – para 2.5; Text stages that “green infrastructure should comprise the components and general alignments shown on the diagram opposite”. Some green finger alignments differ from the SMF, but it is noted that the plan is illustrative. Note that the diagram shows existing tree belt / hedgerow / field boundary incorrectly. Hedgerows shown within the SANG and surrounding the ‘allotments’ are not existing, and existing tree belts are shown as solid green hatch.	Nature	Response as follows.	It should be noted again that the illustrative masterplan in the SMF is purely illustrative and will not meet some design code requirements in its current form. Precise green finger alignments have not been agreed and they will need to be tested alongside various other design factors including block size and/or geometry. **Key changed to remove the word 'existing' from tree belt/ hedgerow/ field boundary and additional item added 'existing woods' in solid green.**
20	Green infrastructure framework – para 2.7; Text states that “public realm proposals must demonstrate how the Urban Greening Factor (UGF) has been maximised and how development areas will meet or exceed a UGF score of 0.5”. This forms one of Natural England’s Green Infrastructure Standards and is referred to in their new GI Design Guide, which states that this a voluntary standard. It isn’t widely used except across the London Plan urban areas. Please confirm what is defined as public realm and if this is a detailed design stage matter?	Nature	Note	UGF is becoming increasingly common as a way of measuring quality and quantity of green infrastructure. Natural England have developed an urban greening factor for England and local authorities are encouraged to positively set standards and promote delivery. Their recommendation is a UGF of 0.5 for residential greenfield development. Given that on top of this being a greenfireld development, it is also part of a Garden Town with Green Infrastructure and sustainability at the heart of its principles, this requirement is entirely appropriate at the strategic and detailed scale. More information can be found here: https://designatedsites.naturalengland.org.uk/GreenInfrastructure/downloads/Green%20Infrastructure%20Standards%20for%20England%20Summary%20v1.1.pdf
21	Green infrastructure framework – plan; Plan shows a section of Latton Avenue alongside the green finger. The SMF sought to keep pedestrian and cycle links away from the main vehicular corridors to create better walking and cycling environments and also to prevent the corridors from becoming too wide and lacking in enclosure. This comment does, however, recognise that the text earlier in the document refers to such plans being illustrative, depicting how the site “could “ be brought forward	Nature	Note	Latton Avenue itself will have provision for cycling and walking regardless of whether there is a green finger alongside so we do not understand this comment. It should be noted again that the illustrative masterplan in the SMF is purely illustrative and will not meet some design code requirements in its current form.
22	Green infrastructure framework – para 2.16; Text states that “publicly accessible toilets must be provided. Suggest change of wording to say, “Should a pavilion building be provided it must include publicly accessible toilets.	Nature	Response as follows.	Publicy accessible toilets are a key component of genuinely accessible and inclusive place, regardless of whether a pavilion is provided. The ongoing maintenance of this needs to be a stewardship consideration. **'Must' changed to 'should'.**
23	Green infrastructure framework – para 2.23; The text states that the greenway should vary in width as well as character along its length but there should be a minimum of 20m between frontages and a minimum width of 8m of soft landscape or SuDS throughout. The East-West Green Corridor ranges from 25m to 14.5m in the endorsed SMF document, so suggest that the Design Code aligns with the parameters set out in this document.	Nature	Note	The width of the green corridor has never been interrogated, tested or fixed with EFDC through the SMF process and therefore is not defined in this way in the spatial fixes plans in the SMF. There is scope for block dimensions to change in order to ensure that the Greenway has meaningful and continuous green infrastructure along its whole length.
23	Green infrastructure framework – para 2.26; The text states that the green fingers should vary in width but must incorporate a minimum width of 8m of soft landscape or SuDS throughout and should widen to accommodate green nodes for functions such as play, seating, socialising and community growing. The Green Fingers largely align with this, though there should be flexibility to allow pinch points to allow for greater variation.	Nature	Response as follows.	There is sufficient flexibility within these parameters to provide variety, **however, the minimum has been changed to 5m.**
23	Green infrastructure framework – 2.28; Text states that “the use of boundary barriers such as railings or fences must be avoided”. Change wording from ‘must’ to ‘should’ be avoided – there may be occasions where they are necessary	Nature	Note	Fenced off green fingers would defeat the object. Good design should mitigate any requirement for fences and railings e.g. the use of bollards or street furniture to prevent vehicles entering these areas.
23	Green infrastructure framework – para 2.31; The text requires that “to provide equitable benefits of tree planting, every home should have a view of at least three decent-sized trees in the public realm”. This appears to be overly prescriptive and not always possible with any development. Would also require agreement from Essex County Council in terms of the adoption of street trees. Suggest that this is removed	Nature	Note	Street trees are a requirement of the NPPF. This is not an overly presecriptive requirement given that properly integrated green infrastrcuture will be properly embedded into the development in line with Garden Town principles. These will provide many benefits and will have a significant impact on the wellbeing of residents and the community.

	CEG/ Hallam Consultation Responses			
Event	Comment	Theme	Status	Note/ response/ action
23	Green infrastructure framework – para 2.32; The text requires that “street trees should be mature from the outset to ensure the quality and benefits they provide can be enjoyed from initial occupation”. Please clarify what ‘mature’ means. It is not practical or advisable to plant mature trees especially given the uncertain climatic conditions. In periods of dry weather, they will be more prone to die before roots are established than smaller specimens. Mature trees are also very costly and more difficult to source than standard sized trees. Suggest this is removed.	Nature	Response as follows.	Agreed that this needs to be more nuanced and the immediate impact needs to be balanced with lasting impact, however this cannot be removed entirely as some semi-mature trees will be required to ensure his is a high-quality place from the outset. Also note that the guidance 'trees in hard landscapes' by the Trees and Design Action Group (tdag) is noted in the key references box at the beginning of the section and this provides guidance on this matter. Definition of semi-mature trees is provided in BS3936-1 and would be understood by the appropriate consultant. **Paragraph amended to: *Approximately 25% of trees should be semi-mature from the outset to ensure the benefits and character they provide can be enjoyed from initial occupation.* Additionally, 'semi-mature tree' has been added to glossary defined as *'An established tree but one which has not reached its potential ultimate height and has significant growth potential. British Standards Institution definition: “Trees with an overall height in excess of 4 metres and or a stem girth measurement (circumference) of 20 centimetres or larger.”***
25	Green infrastructure framework – para 2.47; Text states that “development must not go beyond the ridgeline, shown as the build-to-line in the mandatory spatial principles in the SMF”. We agree with this principle, though it should be caveated to enable ancillary works in relation to the sports fields (e.g. school fences, any future sports pavilion building).	Nature	Response as follows.	**Wording added to the requirement: *The exception to this may be ancillary works in relation to the sports fields, which would need to be sensitively designed* .**
26	Water management – para 2.64: Text states that “Swales should be used to aid water movement along green fingers and the greenway. Rain gardens should be used on Latton Avenue and secondary streets to collect Highways drainage and contribute to the overall attenuation. Opportunities for rain gardens or SuDS tree pits on other streets should also be maximised. Whilst these are reserved matters details, we would be happy to include these in the FRA as ‘toolbox options’ for SuDS solutions. They have no volume storage properties at all, they are purely for conveyance or to water plants. Essex to support rain gardens in streets and they are adopted on other developments in the county.	Nature	Note	No action or response required.
28	Site wide sustainable movement – para 3.3: Text states that “the street network must incorporate designated quiet active travel routes to key destinations that are car-free or have low car movement through filtered permeability. These routes must be well lit and natural surveillance should be maximised through reduced street widths and enclosure and overlooking on both sides” Whilst we support the principle of quiet active travel routes, we cannot at this stage agree with the locations shown on the plan as they have not been tested and some of the streets shown do not accord with the SMF masterplan document. Suggest the text is changed from “must” to “should”. One of these routes looks like it crosses the drive way to Dorrington Farm which is not deliverable.	Movement	Note	It has always been understood that the illustrative masterplan in the SMF is an illustration of how a scheme might come forward (hence 'illustrative') but the detail of it has not been tested, including block structure. The mandatory spatial principles are the mandatory elements of the SMF. In its current form the illustrative masterplan in the SMF would not meet some of the requirements of the design code. There is flexibility both in the illustrative masterplan and the strategic framework plan. The site-wide sustainable movement shows how the street network can work in line with the design code requirements. The link across Dorrington Farm access shows that the framework has been planned to allow connectivity should the circumstances permit in the future.
28	Site wide sustainable movement – para 3.8: The text states that “the active travel network must incorporate car-free play streets”. Whilst we support this in principle, we cannot at this stage agree with the locations shown on the plan as they have not been tested and some of the streets shown do not accord with the SMF masterplan document.	Movement	Note	See note above.
29	Site wide sustainable movement plan: Overall, the plan is very busy and quite difficult to read. Plan needs to be stripped back or differentiate routes by using different colours.	Movement	Response as follows.	**Graphics of diagram has been reviewed. It is a balance between separating information out into several different plans or showing how it all coordinates on a single plan.**
29	Site wide sustainable movement plan: Key incorrect for sustainable transport corridor. Correct the key.	Movement	Note	The sustainable transport corridor line is overlaid on a key active travel route line so the key is correct. As noted above the graphics of this will be reviewed.
29	Site wide sustainable movement plan: Plan shows car free play streets. Whilst we support this in principle, we cannot at this stage agree with the locations shown on the plan as they have not been tested and some of the streets shown do not accord with the SMF masterplan document.	Movement	Note	It has always been understood that the illustrative masterplan in the SMF is an illustration of how a scheme might come forward (hence 'illustrative') but the detail of it has not been tested, including block structure and tertiary streets. The mandatory spatial principles are the mandatory elements of the SMF. In its current form the illustrative masterplan in the SMF would not meet some of the requirements of the design code. There is flexibility both in the illustrative masterplan and the strategic framework plan. The site-wide sustainable movement shows how play streets can work in line with the design code requirements.

	CEG/ Hallam Consultation Responses			
Event	Comment	Theme	Status	Note/ response/ action
29	Site wide sustainable movement plan: Additional NEAPs, LEAPs and LAPs shown which is different from the SMF. See our comments below on the Play and Recreation Plan.	Movement	Note	The play strategy has been developed in line with the Vision and Graden Town aims of a healthy and uplifting neighbourhood by better integrating play into the development, close to homes and along travel routes so that it is part of everyday life, accessible, safe and well overlooked. The quantum is not vastly different to the quantum in the SMF but both the quantum and the locations reflect aspirations for quality and Garden Town status that goes beyond the bare minimum for status quo development. Not all areas shown as play need to be intensive 'playgrounds' they can comprise a small set of incidental or naturalistic play elements as long as well-designed and intentional.
p30/31	Site wide sustainable movement – Mobility hub plan and section: This is quite a detailed design and hard to see without enlarging the page. It would be better if this was more diagrammatic showing the main principles, rather than a detailed design, to provide further flexibility for the operators of the facility when working up their plans.	Movement	Note	It is considered that this diagram helpfully shows the key elements and aids everyone's understanding of a mobility hub without being overly presecriptive.
32	Site wide vehicular movement – para 3.21: Text states that “public transport must be integrated to provide a direct connection to Harlow via the Sustainable Transport corridor and to Epping via the new B1393 connector” Suggest the text is reworded to say “Public transport should be integrated to provide a direct connection to Harlow and to Epping via the new B1393 connector.	Movement	Note	Current wording reflects Policy.
32	Site wide vehicular movement – para 3.23: Text states that “vehicular loops must provide vehicle and service access to small low-traffic neighbourhoods with filtered permeability to prevent through-routes for vehicles”. Suggest that text is reworded to say “vehicular loops could provide vehicle and service access to small low-traffic neighbourhoods with filtered permeability to prevent through-routes for vehicles, where practical”.	Movement	Note	This suggested re-wording would weaken the strength of the design code in achieving a holistic site-wide strategy that designs for 60% modal shift by encouraging alternative modes of travel at every scale of design.
32	Site wide vehicular movement – para 3.25; Text states that vehicular access should be limited to three sides of any development block or two sides plus a rear parking court. This approach could be considered for the larger blocks where rear courtyard parking is practical Have these blocks been tested? If so, the Design Code should show how this can be achieved. We certainly would not want to see too many blocks with rear courtyard parking as this approach takes activity off the street and encourages people to enter the properties via their back doors	Movement	Note	The code is intentional in providing a balanced approach with some car parking on-street, some on-plot and some to rear courts. It is clear that rear courts are only to be used in limited circumstances. Generally, where there is car access to three sides of the block, testing has shown that the car parking for the 'fourth (car-free) frontage can be accommodated on perpendicular streets and will not require a rear parking court (based on on-to-one plus visitor parking quantum and assuming any homes with more than one car have space in a parking barn or on-plot. Rear parking courts can and have been designed successfully and the requirements set out in the design code aorund parking court design reflects this.
32	Site wide vehicular movement – para 3.26: Text states that “key green routes including the greenway and the north-south green fingers must not have vehicle access on both sides at any point”. We consider that this is too restrictive and unnecessary. If there was vehicular access on both sides, but it was accompanied by walking, cycling routes and an attractive green corridor, then it would not be a problem – particularly on low speed streets. Having vehicular access on both sides of a greenway encourages people to use their front doors to access their homes, rather than rear accesses, thus activating these green corridors and creating safer environments.	Movement	Note	There is a balance of car access to homes along the greenway and north-south green fingers in line with quality aspirations for the Greenway and the wider scheme and in line with modal shift targets. Vehicle access on both sides would significantly diminish the quality of the route and would make the Greenway overly hard and wide in relation to building heights.
32	Site wide vehicular movement – para 3.30: The text states that “green nodes and play spaces must have car free aspects on a minimum of two sides. Where possible, access from family housing to play spaces should not require crossing vehicular streets”. This is impossible to enforce as people may travel from other parts of the development to use such play spaces. Delete the last sentence.	Movement	Response as follows.	The requirement already states 'where possible'. **For clarity, sentence reworded to: The need for crossing vehicular streets between housing and play spaces should be minimised.**
33	Site wide vehicular movement – plan: Plan shows STC corridor alignment. STC should be shown as being an indicative route.	Movement	Response as follows.	**Note added under key to say 'STC route shown indicatively'**.
33	Site wide vehicular movement plan: Plan shows a bus stop by the eastern mobility hub /.green space. This will not be a bus stop. Remove bus stop from the plan.	Movement	Response as follows.	**Bus stop moved to location shown on other plans.**
33	Site wide vehicular movement – plan: Plan shows a network of tertiary routes going round the edge of the development parcels along the edges of the scheme. We question if this is practical. Running tertiary streets around the edges of the development, rather than having quieter streets on the edge that create a better transition between the development and the adjacent green space, does not seem the right approach. We accept that the idea here is to allow, say, a play street in the centre of the block, but it assumes that plays streets are in the locations as shown. We question, for example if a number of the blocks are deep / flexible enough to accommodate play streets in the locations shown. As noted on page 5 of the Draft Design Code “All diagrams and images, unless stated otherwise, are illustrative and depict how the requirements of the code could be brought forward on the site”, so we assume there is flexibility here.	Movement	Note	Do not agree that the tertiary streets will be less quiet than the 'quiet streets' shown on the SMF illustrative masterplan, which shows car access to every frontage regardless of whether it is on the green edge or not. As described in the design code the 60% modal shift target and other key aims of the Garden Town require a move away from the business as usual approach and that is what is defined in practical terms within the design code. Testing shows how these play streets can be accommodated even within the tightest blocks.

	CEG/ Hallam Consultation Responses			
Event	Comment	Theme	Status	Note/ response/ action
33	Site wide vehicular movement – plan: The plan shows a number of blocks with parking courts. Whilst we agree with the principle of this being applied in certain locations, the precise location of these blocks cannot be determined at this stage. Furthermore, a number of blocks, shown to have parking courts, are likely to be too small to accommodate them. We suggest that the principles are set out in the document, but the locations should not be shown at this stage. As noted on page 5 of the Draft Design Code "All diagrams and images, unless stated otherwise, are illustrative and depict how the requirements of the code could be brought forward on the site", so we assume there is flexibility here.	Movement	Note	The code is intentional in providing a balanced approach with some car parking on-street, some on-plot and some to rear courts. It is clear that rear courts are only to be used in limited circumstances. Generally, where there is car access to three sides of the block, testing has shown that the car parking for the 'fourth (car-free) frontage can be accommodated on perpendicular streets and will not require a rear parking court (based on on-to-one plus visitor parking quantum and assuming any homes with more than one car have space in a parking barn or on-plot. Rear parking courts can and have been designed successfully and the requirements set out in the design code aorund parking court design reflects this. The framework plan for pakring shows how this could be applied across the site in line with the requirements of the design code. Not showing the locations/ possible solution would increase vagueness.
33	Site wide vehicular movement – plan: The plan shows car free areas (4x typologies). We suggest that the principles are set out in the document, but the locations should not be shown at this stage.	Movement	Note	The locations are intentionally shown because they respond to certain situations e.g. play spaces.
33	Site wide vehicular movement – plan: Additional NEAPs, LEAPs and LAPs shown which is different from the SMF. See our comments below on the Play and Recreation Plan.	Movement	Note	The play strategy has been developed in line with the Vision and Graden Town aims of a healthy and uplifting neighbourhood by better integrating play into the development, close to homes and along travel routes so that it is part of everyday life, accessible, safe and well overlooked. The quantum is not vastly different to the quantum in the SMF but both the quantum and the locations reflect aspirations for quality and Garden Town status that goes beyond the bare minimum for status quo development. Not all areas shown as play need to be intensive 'playgrounds' they can comprise a small set of incidental or naturalistic play elements as long as well-designed and intentional.
35	Site wide street network - plan: The alignment of Latton Avenue is different to the SMF. Latton Avenue also appears to extend to the north-east. Both the above do not reflect the SMF. As noted on page 5 of the Draft Design Code "All diagrams and images, unless stated otherwise, are illustrative and depict how the requirements of the code could be brought forward on the site", so we assume there is flexibility here.	Movement	Note	It has always been understood that the illustrative masterplan in the SMF is an illustration of how a scheme might come forward (hence 'illustrative') but the detail of it has not been tested, including block structure and street alignment. We have always been assured that that level of detail had not been fixed. The mandatory spatial principles are the mandatory elements of the SMF. In its current form the illustrative masterplan in the SMF would not meet some of the requirements of the design code. There is flexibility both in the illustrative masterplan and the strategic framework plan. The site-wide street network shows how Latton Avenue can work in line with the design code requirements.
35	Site wide street network - plan: Whilst we support the principles of the streets set out in this plan, we cannot at this stage agree with the locations shown as they have not been tested and some of the streets shown do not accord with the SMF masterplan document.	Movement	Note	See note above - applicable to all streets shown.
36	Site wide car parking – para 3.33: The text states that "all parking must be on-street to provide continuous level footways on both sides of the street clear of turning vehicles" This is on Latton Avenue and local streets. This limits the flexibility to provide varied housing with on plot parking on both street types. Suggest that the word must is replaced with "should" or "could" Throughout the document there is too much detail on parking. Should the document not just reference the ECC standards that are currently out for consultation?	Movement	Response as follows.	Within the overall scheme this represents a very limited length of street and reflects the intended character of those key streets, as well as the need to maximise natural surveillance and enclosure (i.e. limit the width of those streets relative to building heights). It is possible within the requirements to provide a balance across the site and provide a clear character and street hierarchy. The parking requirements are site specific (unlike the County wide draft standards) and the strategy works with the other strategies in the design code. **However, some rules relating to parking removed or relaxed for further flexibility.**
36	Site wide car parking – para 3.40: Text states that on plot parking (on residential streets) must not be used on both sides of the street. We question what is wrong with having on plot parking on both sides of a street. We do not consider that this is the right approach and could impact the character / balance of certain streets within the development. It also restricts flexibility. Suggest that this sentence is removed.	Movement	Note	Where on-plot parking is provided, it neccessitates a drop in kerb levels for vehicle crossovers. This requirement (3.40) ensures a mixed and balanced approach to the provision of parking without obstructing active travel for all, including those that may find it more difficult to negotiate level changes. Further more, on-street parking can reduce overall parking numbers because it does not have to be allocated to a specific house. It also follows the principles of making active travel options including cycling as convenient, if not more conveneinet than private vehicle use - in line with the modal shift targets. Also, see S3 street types. The street design relies on some on-street parking to provide street narrowings and on-plot on both sides would prevent this.

	CEG/ Hallam Consultation Responses			
Event	Comment	Theme	Status	Note/ response/ action
36	Site wide car parking – para 3.43: Text states that in car free frontages dwellings must be served by rear parking courts or street parking on adjacent streets. We are not convinced that rear court parking is the best design solution. Furthermore, we need to see that this has been tested.	Movement	Note	The code is intentional in providing a balanced approach with some car parking on-street, some on-plot and some to rear courts. It is clear that rear courts are only to be used in limited circumstances. Generally, where there is car access to three sides of the block, testing has shown that the car parking for the 'fourth (car-free) frontage can be accommodated on perpendicular streets and will not require a rear parking court (based on on-to-one plus visitor parking quantum and assuming any homes with more than one car have space in a parking barn or on-plot. Rear parking courts can and have been designed successfully and the requirements set out in the design code aorund parking court design reflects this. The framework plan for pakring shows how this could be applied across the site in line with the requirements of the design code. Not showing the locations/ possible solution would increase vagueness.
37	Site wide car parking – plan: Plan shows car free frontages. Has the car parking been tested in order to enable this approach to happen? The amount of car free streets appears to be excessive. This approach relies on rear court parking, an approach that we have (above) questioned.	Movement	Note	The car-free streets are not excessive, they follow the stated principle of car access to three out of four frontages of every block to have car access (or two frontages plus a rear parking court). Excessive relative to what? It needs to be acknowledged that a Garden Town scheme that is designed to achieve 60% modal shift will need to actually be designed differently to the status quo.
38	Parking design – para 3.50: Text states that “car parking spaces could be open or in car ports or garages only within a garage mews arrangement”. This prevents garages attached to other housing and prevents choice for residents. This should be deleted.	Movement	Response as follows.	Garages are often not used for cars and are often parked in front of instead of within. There are many examples of this on recent developments within Epping and Harlow, **however this requirement has been removed and the acceptability of garages will need to be assessed when proposals are submitted.**
39	Parking court requirements – para 3.65: Text states that “rear parking courts must only be used where necessary to accommodate parking for blocks with multiple car free frontages”. Noted, but high density blocks will also need to have parking courts (or at least the flexibility to do this).	Movement	Note	See comments above parking courts.
39	Parking court requirements – para 3.67: Text states that “parking courts should not contain more than twelve spaces…” The number of spaces should depend on the size of the block, so the wording is inflexible as it stands. This should be deleted.	Movement	Note	Given concerns above about the potential for poor parking court design, this requirement should be welcomed. It is possible to provide, for example, two smaller parking courts rather than one larger one.
39	Car barns requirements – para 3.70: Text states that “car barns should be used for extra spaces where homes require more than one space”. Have the car barns been tested to ensure they are large enough to accommodate the additional vehicles?	Movement	Note	The design code does not deal with parking quantum therefore we cannot say how many spaces the car barns will need to accommodate however there is flexibility to provide mor parking barns if needed.
39	Car barns requirements – para 3.71: Text states that “car barns should be within 400m of homes served”. The location of the car barns on the plan in the document do not serve all the homes within a 400m catchment.	Movement	Note	There is no requirement for car barns to serve all homes. The scheme can be designed for car barns to serve all homes with the use of additional car barns or locating the car barns elsewhere. The code does not fix the number or the locations of the car barns.
39	Car barns requirements – para 3.73: Text states that “car barn size should typically start at around 50 spaces over two levels of parking (approx. 36 x 40m)”. Do the blocks on the plan accommodate this? Have they been tested? Do they provide for the quantum of cars that would need them as set out in para 3.70	Movement	Note	The design code does not deal with the quantum of car parking only the design of it. The areas shown have been checked at high-level to be comparable to good-sized car barns, however the framework plans are digrammatic and will need fully designing out include amendments to block sizes where required.
40	Refuse and recycling requirements – para 3.90: Text requires that “the feasibility of a site-wide underground vacuum and / or waste storage system should be explored at an early stage to reduce on-street bins and frequency of collections. If this is not found to be feasible at the outset, the layout should allow for this to be incorporated in the future”. Vacuum waste management is still relatively new in the UK and not yet a requirement through any policy or British Standards. This should be deleted	Movement	Response as follows.	Whilst it is not a policy requirement, all options should be explored at a strategic scale if they could benefit the new community and help to meet the innovation and placemaking aims and vision of the District and the Garden Town. The requirements is to explore the feasibility of it and this is in line with creating a modern neighbourhood utilising the best of moder systems and technology. Note, discussions are also being had with EFDC Waste team to explore the benefits and challanges of alternative waste collection systems. Note also Essex Design Guide: Refuse Collection states: *Progressive refuse disposal systems should be considered wherever possible. Where it is not feasible to incorporate such a system into a development, street design should allow for their introduction at a future date.* *Other refuse systems that reduce the visual and practical impact of large numbers of bins include large-capacity standalone in-ground waste stores shared by streets or neighbourhoods. These stores can be mounted, lifted and emptied by refuse-collection vehicles. Again, such infrastructure should be considered at an early stage to avoid the need to retrofit with its ensuing disruption and detrimental impact on the streetscape.*

	CEG/ Hallam Consultation Responses			
Event	Comment	Theme	Status	Note/ response/ action
41	Site wide refuse collection strategy - plan: Refuse routes and rear parking court collection points are shown on the plan. This assumes that the street network / block typologies will follow this. However, as per our points on the site wide vehicular movement plan, we do not agree that taking tertiary streets around the edges of the blocks (that would accommodate refuse vehicles) is the correct approach. As noted on page 5 of the Draft Design Code "All diagrams and images, unless stated otherwise, are illustrative and depict how the requirements of the code could be brought forward on the site", so we assume there is flexibility here.	Movement	Note	See note above regarding tertiary streets and green edges. See also the block testing that has been undertaken to ensure that all homes can be serviced by refuse and emergency vehicles.
42	Public space strategy – para 4.1: Text states that detailed design codes for site-wide coordinated landscape and public realm proposals must be provided and endorsed for the whole masterplan area in advance of, or at the same time as any full planning application or Reserved Matters Application. How would this work? Who would prepare this? ? Is there a need for another design code to cover this? Does the first developer to submit a reserve matters application need to do a detailed site wide design code? This wouldn't work as a) it will not affect their parcel and b) they may have alternative ideas to other developers later in the phasing	Public Space	Response as follows.	Regardless of who is producing it, the EFDC planning process for Strategic Masterplan Areas requires design codes to be produced. Due to the government Pathfinders funding and support, part of that task on Latton Priory has been undertaken by EFDC, however the outstanding design code matters still need to be undertaken in the same manner they would have been had there not been an authority-led design code. This could happen in a number of ways, most likely by the site promoter's consultant team prior to any reserved matters applications. **A design code briefing note has been produced to provide further information and further detail added in to the strategic design code regarding requirements for more detailed code elements.**
42	Public space strategy – Para 4.4: Text states that "lighting must be provided on all streets and key open spaces. The type of lighting must be appropriate to the character and function of the space and coordinated with tree planting to avoid shadowing". Suggest wording change "lighting should be provided on all streets and key open spaces, ensuring that lighting is not placed where it conflicts with nature conservation mitigation measures."	Public Space	Note	Not clear on why amendments are required to this. Lighting can still be provided where there are natur conservation measures in place, but the type and placing of the lighting needs to be carefully considered, which is encompassed by 'appropriate to the character and function' of the space. Lighting is key to safety and perceived safety, particularly for active travel.
42	Public space strategy – para 4.6: Text states that "public toilets and bins (litter, recycling and dog waste) must be provided at the local centre, the SANG, Community Park and where the mini mobility hubs are located as a minimum" Text should say "could " and not "must". SANGs do not normally have on site toilet facilities. Mini mobility hubs are small facilities involving racks and bus stops and it was not envisaged that they would have such facilities.	Public Space	Response as follows.	Publicy accessible toilets are a key component of genuinely accessible and inclusive place, regardless of whether facilities are 'normally provided'. The ongoing maintenance of this needs to be a stewardship consideration. **'Must' changed to 'should' so that this needs to be provided unless there is a technical reason not to or if there is an alternative proposal that better meets the aims of accessibility and inclusivity.**
43	Public space strategy plan: Plan is difficult to read with pink dashes and dotted lines very hard to differentiate.. Different colours for the different routes would help the legibility of the plan.	Public Space	Response as follows.	**Graphics of diagram has been reviewed. It is a balance between separating information out into several different plans or showing how it all coordinates on a single plan.**
	Street design – para 4.4: Text states that "seating must be incorporated at regular intervals and at least at every 50m on both sides of the street". This is excessive and should be changed to "should"	Public Space	Note	Excessive compared to what? In Designing for Accessibility (Centre for Accessible Environments, 2004), it is recommended that "seats should be provided at intervals along long routes or where waiting is likely". In Inclusive Mobility (DfT, 2005), the UK Department for Transport suggests that "in commonly used pedestrian areas … seats should be provided at intervals of no more than 50 metres". The design code needs to be clear and measurable, in line with best practice wherever possible.
44	Street design – para 4.7: Text states that "cycle lanes should be continuous and two-way on the south side of the street only, separated from vehicular movement. Cycle lanes should be highquality in line with LTN 1/20. We question why it should be on the south side of the street only?	Public Space	Note	South side stipulated due to the linear green space on part of Latton Avenue and the Local Centre being mostly south of Latton Avenue.
44	Street design – para 4.16: Text states that "allocated car parking should be limited to blue badge spaces and car clubs". An earlier point (see response to para 3.33) says that you can only have on street parking on Latton Avenue, whilst this point says that any allocated parking will be blue badge spaces and car clubs. Where would residents of Latton Avenue park, other than in rear courtyards (and many of the blocks are not big enough to accommodate rear parking courts)?	Public Space	Note	As discussed at meeting, this just means on-street spaces are not allocated to specific homes but are dealt with through parking permits. The exception is blue badge spaces and car clubs. Therefore homes on Latton Avenue can park on-street subject to neccessary permits.
46	Street design – para 4.26: Text states that "space for seating and social activity must be incorporated at regular intervals and at least at every 50m along the length of the street". This is excessive and should be changed to "should"	Public Space	Note	Excessive compared to what? In Designing for Accessibility (Centre for Accessible Environments, 2004), it is recommended that "seats should be provided at intervals along long routes or where waiting is likely". In Inclusive Mobility (DfT, 2005), the UK Department for Transport suggests that "in commonly used pedestrian areas … seats should be provided at intervals of no more than 50 metres". The design code needs to be clear and measurable, in line with best practice wherever possible.
46	Street design – para 4.27: Text states that verges must incorporate SUDs on both sides. This may not always be required. So the word "must" should be removed and replaced with "should" or "could"..	Public Space	Note	SuDS on both sides, as shown on the accompanying street diagrams is part of the intended character of the street. No minimum length of SuDS is stipulated.
46	Street design – para 4.28: Reference is made to Latton Avenue . Text is wrong as this is about local streets, not Latton Avenue.	Public Space	Response as follows.	**Latton Avenue' changed to 'local streets'**

	CEG/ Hallam Consultation Responses			
Event	Comment	Theme	Status	Note/ response/ action
47	Street design plan and section: The plan and section shows verge / parking on both sides of the street. We consider that tree planting only necessary on one side on such streets – to help differentiate it from Latton Avenue.	Public Space	Note	Local streets are small stretches of street that are very similar to Latton Avenue but a slightly smaller scale. In terms of street and public realm greenery the design of Local streets within the design code is intentional and sufficiently different in character from Latton Avenue and Neighbourhood streets.
48	Street design – para 4.45: Text states that verges must incorporate SUDs on both sides. This may not always be required. So the word “must” should be removed and replaced with “should” or “could”..	Public Space	Note	SuDS on both sides, as shown on the accompanying street diagrams is part of the intended character of the street. No minimum length of SuDS is stipulated.
48	Street design – para 4.49: Text states that there must be continuous footway on at least one side – free of crossovers. This is overkill and adding an unnecessary constraint to the masterplan. How many vehicles will really be crossing the footway throughout the day? Suggest it is deleted..	Public Space	Response as follows.	It is not about the number of vehicles crossing, it is about the provision of a continuous and level footway, without drops for car driveway access. This is part of practical and measurable actions to design for a healthy, accessible, sustainable neighbourhood. **However, given the flush levels street design, this requirement has been removed.**
54	Street design – para 4.58: Text states that where local streets run alongside a park or green finger, parking should only be on the residential side of the street. This should be tested to ensure that this is achievable.	Public Space	Response as follows.	**Requirement removed for increased flexibility.**
50	Street design – para S4: Text states that “spur streets have an ultra-low traffic residential character with a human scale and a strong sense of place. Spur streets have modal filters at one end to prevent through-movement of vehicles. Service vehicle access may or may not be required, however shared surface principles should be used to provide an informal and social environment”. This approach can be introduced where practicable. However, we cannot at this stage agree with the locations shown on the plan for these streets as they have not been tested and some of the streets shown do not accord with the SMF masterplan document.	Public Space	Note	It has always been understood that the illustrative masterplan in the SMF is an illustration of how a scheme might come forward (hence 'illustrative') but the detail of it has not been tested, including block structure and street alignment. We have always been assured that that level of detail had not been fixed. The mandatory spatial principles are the mandatory elements of the SMF. In its current form the illustrative masterplan in the SMF would not meet some of the requirements of the design code. There is flexibility both in the illustrative masterplan and the strategic framework plan. The site-wide street network shows how spur streets can work in line with the design code requirements.
50	Street design – 4.71: Text states that “spur streets must provide through access for pedestrians and cyclists but must not allow through access for vehicles. If not adopted, the street must remain publicly accessible and maintained by an appropriate company”. This approach can be introduced where practicable. However, we cannot at this stage agree with the locations shown on the plan for these streets as they have not been tested and some of the streets shown do not accord with the SMF masterplan document.	Public Space	Note	Same point as the one above? See response above.
52	Street design – para 4.84: Text states that the greenway must be a minimum of 20m wide between private thresholds. The East-West Green Corridor ranges from 25m to 14.5m in the endorsed SMF document, so suggest that the Design Code aligns with this.	Public Space	Note	The width of the green corridor has never been interrogated, tested or fixed with EFDC through the SMF process and therefore is not defined in this way in the spatial fixes plans in the SMF. There is scope for block dimensions to change in order to ensure that the Greenway has meaningful and continuous green infrastructure along its whole length. 14.5m would be narrower than Latton Avenue.
52	Street design – para 4.88; Text states that vehicle access must not be permitted along the greenway, but that residential and servicing access is allowed along one side. This requirement is inflexible and concerning given the width of the corridors proposed. Vehicular access on both sides (on slow and shared surface streets) provides movement, activity and surveillance of this space. This requirement also places a reliance on rear courtyard parking, thus removing the amount of people accessing their homes through the front door.	Public Space	Note	There is a balance of car access to homes along the greenway and north-south green fingers in line with quality aspirations for the Greenway and the wider scheme and in line with modal shift targets. Vehicle access on both sides would significantly diminish the quality of the route and would make the Greenway overly hard and wide in relation to building heights. Given the modal shift target, a rear parking court would not mean people entering their home from the rear as they would not be using their car for the majority of journeys if the design has successfully achieved this.
54	Street design – car free play streets: This approach can be introduced where practicable. However, we cannot at this stage agree with the locations shown on the plan for these streets as they have not been tested and some of the streets shown do not accord with the SMF masterplan document.	Public Space	Note	It has always been understood that the illustrative masterplan in the SMF is an illustration of how a scheme might come forward (hence 'illustrative') but the detail of it has not been tested, including block structure and tertiary streets. The mandatory spatial principles are the mandatory elements of the SMF. In its current form the illustrative masterplan in the SMF would not meet some of the requirements of the design code. There is flexibility both in the illustrative masterplan and the strategic framework plan. The site-wide sustainable movement shows how car free play streets can work in line with the design code requirements.
	Public open space design – para 4.146: The text states that “indicative locations for the largest nodes and gateway spaces must be provided as indicated on the public space network diagram at the beginning of this section”. The text is contradictory as it refers to “indicative locations for the largest nodes” which suggests they are not fixed but then states that they “must be provided as indicated on the public space network diagram”. The locations also do not accord with the SMF. Suggest that the text is amended to say “could” or “should”, not must.	Public Space	Response as follows.	See note above regarding fixes in the SMF. Notwithstanding this, **further flexibility has been added by rewording to: *Larger neighbourhood nodes must be provided as focal points for every area of residential development of approx. 200 homes. Indicative locations are shown on the public space network diagram at the beginning of this section* .**

	CEG/ Hallam Consultation Responses			
Event	Comment	Theme	Status	Note/ response/ action
60	Public open space design – para 4.147: The text here refers to Neighbourhood Nodes including a play element. The supporting plan at page 43 shows neighbourhood nodes adjacent to proposed play spaces, thus doubling up on play provision in localised areas, with an absence of provision elsewhere. This contradicts advice on distribution of play in the FIT guidance. Please clarify the distribution of play provision on the play strategy plan at page 63– see notes on this plan below. Suggest the play element is removed and play is addressed holistically by the play strategy - not here.	Public Space	Note	The key on p43 notes that smaller neighbourhood nodes are not shown. The full text of requirement 4.147 states that '*Neighbourhood nodes should aid wayfinding and the space and infrastructure provision should be appropriate to the scale of the node. At the smallest scale this could be shaded seating and a play element* .' Clearly then the smallest neighbourhood nodes are not those shown on the plan on p43 and not neccessarily adjacent to play spaces. This leaves ample flexibility for designers of future proposals to decide how best to identify and articulate smaller node spaces.
60	Public open space design – para 4.148: Same point as above. Suggest the play element is removed.	Public Space	Response as follows.	Whilst the larger node spaces are located close to play spaces the intention here, with the words 'play elements' is that the node spaces can still be activated by play, possibly as an extension of the main play space. This could be as simple as different or playful surface treatment to encourage a playful interaction with the space. **Therefore, wording of 4.148 changed to: 'Incidental or integrated playful elements'**
60	Public open space design – para 4.150: Text stages that "node spaces should combine different uses to maximise activity, vibrancy and interaction between different groups". Many of the node spaces are located in purely residential areas, so references to "different uses" should be deleted.	Public Space	Response as follows.	Different uses meaning different ways of using the public space i.e. growing, playing, learning, sitting, recreation etc etc **however, this sentence has been removed to edit and simplify.**
60	Community plaza paragraph: Numbering in this section is back to front in the 2nd and 3rd paragraphs. Amend the numbering	Public Space	Response as follows.	**Noted. Numbering amended**
60	Public open space design – para 4.144: Text states that buildings fronting the square must not have railings or threshold fencing facing the square. Whilst we support this principle, it is likely that the school buildings will need such threshold fencing. Request that this point be made in the document.	Public Space	Response as follows.	Threshold fencing on to the community plaza will not be acceptable as this will diminish the quality of this important public space. For these areas, boundaries will need to be high-quality e.g. brick walls that are coherent with the architecture. **However, must changed to should.**
61	Public open space design - image: Some buildings are shown as having 3 storeys plus a pitched roof. These buildings will need to have flat roofs due to the height parameters set in the SMF – relating to views from the north and south of the site. Suggest that the image is amended.	Public Space	Note	As noted elesewhere there may be opportunities for moments of height for wayfinding and placemaking over the blanket height established. See built form section. This would also help n long term views to promote a more granular appearance to the built form. In any case, this massing is not labelled or highlighted on the image.
62	Play and recreation – para 4.152: Text states that "a site-wide play and recreation strategy must form part of the site-wide public realm strategy or design code. This must include play infrastructure as listed and shown on the play strategy diagram. As explained on our comments on the play and recreation plan below, this is significantly more than the SMF is showing, without justification. The SMF justifies it.	Public Space	Note	See other notes on play strategy. It is not 'signifcantly more' but is designed in line with the stated Vision and aims for the new community.
62	Play and recreation – para 4.156: Text states that "Connectivity with the wider community must be promoted through new or improved links to existing play spaces in surrounding areas and provision of new play infrastructure along key routes". Note that the developer will have no control over links and facilities outside of the site boundaries. Suggest this is reworded.	Public Space	Note	See other notes on play strategy. This point is about having the locations of play spaces align with connections with neighbouring communities, particularly given the proposal for two new schools on the site. This includes new play spaces on the site as well as potentially outside of the site. Improvements outside of the site can be negotiated through planning discussions either through direct improvements or contributions.
62	Play and recreation – para 4.160: Text states that "destination play and recreation must include convenient access to public toilets". We consider the only 'destination' play facility is the one at Latton Park. See comments below.	Public Space	Note	See other notes on play strategy and other notes on the importance of publicly accessible WCs for accessibility and inclusivity.
63	Play and recreation - plan: The plan shows a distribution of NEAPs, LEAPs and LAPs which isn't consistent with FIT guidance and the logic for the number/type of space proposed is also not understood. This is a significant divergence from the approved SMF. In contrast the SMF play strategy sets out (on page 99) a clear play hierarchy and an even distribution of provision; it proposes 1 NEAP (destination play) in Latton Park, 3 LEAPs to serve each neighbourhood, and 25 'LAP' locations distributed with walking distances that accord with FIT guidance to provide accessibility for all residents. It allows for flexibility at detailed design for the 'LAP' to be formal or informal doorstep / play-on-the way / play incidents positioned as deemed appropriate within a clear spatial framework. Has the Design Code play strategy considered the distribution of play elements and play provision holistically? Suggest adjusting this plan to avoid conflicts with the SMF.	Public Space	Note	Yes, the Design Code play strategy is one of the core strategies and has been considered holistically alongside other strategies including active travel, street hierarchy, public space network and wayfinding. The play strategy has been developed in line with the Vision and Graden Town aims of a healthy and uplifting neighbourhood by better integrating play into the development, close to homes and along travel routes so that it is part of everyday life, accessible, safe and well overlooked. The quantum is not vastly different to the quantum in the SMF but both the quantum and the locations reflect aspirations for quality and Garden Town status that goes beyond the bare minimum for status quo development. Not all areas shown as play need to be intensive 'playgrounds' they can comprise a small set of incidental or naturalistic play elements as long as well-designed and intentional. It has always been understood that the illustrative masterplan in the SMF is an illustration of how a scheme might come forward (hence 'illustrative') but the detail of it has not been tested, including play strategy. the SMF conecentrates play on the periphery, often not well overlooked and does not make any discernible attempt to make access to these spaces safe and accessible. In its current form the illustrative masterplan in the SMF would not meet some of the requirements of the design code.

	CEG/ Hallam Consultation Responses			
Event	Comment	Theme	Status	Note/ response/ action
64	Block structure and density – 5.1: Text states that the overall layout must be based on a grid of small perimeter blocks. Certain blocks shown on the plans in the document (in particular, the south west of the site) are very tight and do not allow sufficient flexibility of housing choice.	Built form	Note	The block size requirements are intentional and in line with the aims of the Garden Town and the District in promoting walkable neighbourhoods, a human scale, a variety of streets, permeability, better balance between private amenity and public amenity etc. The tightest part of the site (at the south-west) has been tested to ensure it is deliverable. Moreover, the block structure shown on the plan shows a range of block sizes across the site.
64	Block structure and density – para 5.2: Text states that the "block structure should be in line with the block structure shown on the plan in the document, with flexibility in precise dimension and geometry of blocks. Blocks must not be combined to create larger blocks. Smaller blocks could be tested". We strongly object to the requirement for blocks not to be combined to create larger blocks. The design code must allow flexibility, particularly in the early phases of the development.	Built form	Note	See note above.
64	Block structure and density – para 5.5: Text states that "the site layout must be planned to address steep gradients without the need for excessive retaining walls. Where it is shown that retaining walls cannot be addressed through alternative layouts, these should be no higher than 0.8m". What is this 0.8m based on?	Built form	Note	0.8m is based on the height above which blank walls would become increasingly unfriendly and unappealing to children or people in wheelchairs, as well as impacting other users' experience of the pubic realm. Also above that height, the relationship between living spaces and public realm activity is weakened.
64	Block structure and density – para 5.6: Text states that "block size must be designed to encourage walking and cycling. Block dimensions should be as shown in the diagram opposite. Where density is higher, or site dimensions are particularly constrained, block sizes should be at the smaller end; where density is lower, blocks could be at the larger end of the scale to reflect the more dispersed character. We agree that blocks should encourage walking and cycling. However, we strongly disagree that they should be shown as in the diagram. This shows one way of laying out blocks, but this cannot be fixed. Blocks must provide flexibility, particularly in the early phases of the development.	Built form	Note	See note above regarding block sizes.
64	Block structure and density – para 5.7: The text states that at least 75% of the blocks should have predominantly northsouth facing aspects. No justification is given for this. We can only assume that this relates to solar / PV panels. However, this approach can cause other issues of a) overheating and b) poor quality urban design and streets with no frontage onto them. Indeed, a number of the neighbourhood streets that run north-south will have few / no houses fronting onto them resulting in dead streets and a very poor environment /place. They will certainly not achieve the design aspirations set out in the street design section. Solar power can still be generated on blocks with housing facing east-west as long as the roof pitches are north-south. This also contradicts the statement on page 72 'Local Landmarks' which seeks "to avoid monotonous streetscapes and skylines" and "avoid the development appearing as a solid mass of built form".	Built form	Response as follows.	Concerning that the comment here is querying why north south frontages are preferable for passive design. See LETI climate change guide to understand. **However, wording amended to: 'Proposals should aim for at least 75% of dual aspect homes to have predominantly northsouth facing aspects'. So that it is a strong driver without overly constraining.**
68	Block structure and density - plan: The page contains a density strategy. The density strategy does not line up with the SMF. Whilst it shows the lowest density on the eastern side (along the woodland), low density housing should also be sought along Rye Hill Road to respond to the housing density / character opposite. High density is also shown around the area north of Ridings House. However, caution needs to be applied here in terms of building heights	Built form	Note	The density largely aligns with the SMF with additional rationale included, though it should be noted that the SMF does not fix the precise density. The reasons for higher density along the key routes is provided in the SMF and thos locations with better public transport connections should also have higher density. This will not impact on the character of Rye Hill Road given the green buffer at the site edge.
67	Building typologies – para 5.10: Text states that "larger buildings must be carefully modulated to reduce the perceived bulk and flat roofs should be avoided in order to prevent a dominant and bulky silhouette". The site has height limits, as set out in the endorsed SMF, and in many circumstances larger buildings will have to have flat roofs to achieve these limitations. Text should be altered to address this point.	Built form	Note	Extensive flat roofs should be avoided. Where they cannot be, they still need to be treated carefully to avoid a dominant and bulky silhouette, especially on larger buildings.
68	Frontages and building line – para 5.19: Text states that "roof forms must vary to support character and wayfinding. More varied roof heights and forms should be used around key nodes and primary junctions whereas smaller streets should have more consistent roof lines". We support this, but it must also be acknowledged that building heights must respect the parameters set out in the SMF.	Built form	Note	Noted that the SMF has some mandatory spatial principles. This requirement does not contradict those.
68	Frontages and building line – para 5.22: Text states that "roof form and orientation should consider optimum orientation for photovoltaic panels". We acknowledge this. However, this does not mean that buildings need to be orientated the same way. The key design principle here should be the orientation of the roof pitch.	Built form	Note	Yes, that's right. See different note about building orientation for passive solar thermal design.
69	Frontages and building line plan: Hard to distinguish between the colours on the plan. This, therefore, makes the associated table harder to read. Address the colours on the plan.	Built form	Response as follows.	**Frontages and building plan removed and replaced with 'illustrative site-wide typology strategy', which more closely relates to other strategy diagrams in the document and is therefore easier to understand.**
70	Frontages and building line – para 5.33: Text states that streets should: - have terraced typologies on at least one side of any residential street. - restrict large plot detached houses to the lowest density areas next to the woodland. On the first point, we consider that this is not only too restrictive, but also has the potential to create imbalanced streets if the other side of the street is another housing typology. This point should be deleted. On the second point, we consider that restricting large plot detached houses to the area next to thewoodland is wholly unacceptable and limits choice and variety in the remainder of the development. This point should be deleted.	Built form	Response as follows.	Typologies are not arbitrary and are defined in order to support the aims for the new development of vibrancy, form factor and thermal efficiency and compact walkable development that promotes active modes of travel and a high-quality public realm. The section on typologies defines the typologies in certain area but does not preclude different typologies in other locations that are not described here, as explained in the meeting. **This has been clarified in the document.**
70	Frontages and building line – table. 2 Greenway: Table references roof terraces for overlooking. This also, again, seeks to limit detached or semi-detached housing to the area next to the ancient woodland. It cannot be expected that all properties provide roof terraces on the Greenway. Suggest that this reference is deleted. Limiting detached or semi-detached housing to the area next to the ancient woodland is not acceptable.	Built form	Response as follows.	See note above. Good overlooking of the greenway is vital to its function for active travel.

	CEG/ Hallam Consultation Responses			
Event	Comment	Theme	Status	Note/ response/ action
70	Frontages and building line – table. 5 Latton Avenue Frontage: Table states that Latton Avenue should comprise terraces, broken terraces of apartments. This is considered too restrictive. It could also result in a “wall effect” and does not achieve some of the principles set out on page 129 of the SMF	Built form	Response as follows.	See note above. Good overlooking of Latton Avenue is vital to its function for a vibrant connection.
70	Frontages and building line – table. 7 Wetland park frontage: Seeks 80-90% building line. The text also limits semi-detached and detached housing to the eastern end, close to the woodland. 80-90% building line is considered to be too dense and could result in a feel of a wall of development around these wetland spaces. Suggest that it is reduced to 65%. Limiting detached or semi-detached housing to the area next to the ancient woodland is not acceptable	Built form	Response as follows.	See note above regarding typologies. **Building line requirements as percentages around wetland has been changed to medium - high, 70 - 90%. This refelcts the need for good overlooking of this space and the open space beyond, the need to respond to the scale of the space in front and provide a robust and appropriate backdrop..**
71	Frontages and building line – table. 10 Woodland frontage: Again, the text limits semi detached and detached housing to the eastern end, close to the woodland. Again, this is considered unacceptable.	Built form	Note	See note above regarding typologies, as discussed and explained in the meeting.
71	Frontages and building line – table. 12 Green finger frontage: Only permits terraced and broken terrace. Again, this is considered unacceptable	Built form	Response as follows.	See note above. Good overlooking of green fingers is vital to their function for safe activity and active travel.
74	Frontages and building line – table. 13 Rye Hill Road frontage: Seeks 60-80% building line. The housing here should really be low density detached and semi-detached. This better reflects the form of the housing opposite. Suggest this is 45-65% building line.	Built form	Response as follows.	The Rye Hill road frontage does not need to reflect the form of the housing opposite given it is well set back behind trees and a belt of SuDS basins. As noted in the design code, it does need to reflect its location close to the main gateways into the site. **However, building line as a percentage requirement for Rye Hill road frontage has been removed and this requirement is now represented by the density diagram.**
72	Building heights – second para: Reference made to a ridgeline. This is not a ridgeline, but a high point within the site.	Built form	Note	The site sits on a ridge so 'ridgeline' is a straightforward term that most can understand.
72	Building heights – para 5.38: Text states that building heights must consider the micro-climate of the street and public spaces, including wind modelling and sunlight analysis. Agree with this paragraph, but wind modelling should be a “should” or “could”, not a “must” as this is not a common requirement of a planning application – particularly outline.	Built form	Response as follows.	**This can be assessed in the wider planning process so removed from the design code.**
72	Building heights – para 5.40: Text states that floor-to-ceiling heights at ground level must be at least 2.6m throughout and 3m in the local centre, or higher where required for nonresidential uses. We have worked on the following assumptions, based on schemes delivered elsewhere: Flats = 3m (floor to floor) Commercial = 4m (floor to floor) Parapets for roof top equipment = 1.5m So: 2 storey flats with flat roofs and parapets = 7.5m 3 storey flats with flat roofs and parapets = 10.5m 3 storey (2 storey flats with commercial ground floor) = 11.5m 3 storey (2 storey flats with commercial ground floor with minimal heights of 2.6m floor to floor) = 10.7m	Built form	Response as follows.	The minimum heights are to promote quality street-scene, activity, light and ventilation to ground floor dwellings. **The requirement has been changed to 5.27 'Floor-to-ceiling heights at ground level should be at least 2.5m throughout and higher where required for non-residential uses.'**
73	Building heights plan: Views indicated on the plan correspond to those shown on the plan at page 9. See earlier comments on views. Note that some may not be deliverable.	Built form	Note	See response to earlier comments on views.
75	Wayfinding and sense of place plan: The plan is difficult to read. Difficult to distinguish the colours. Also, some streets are identified as “landmark frontage to key open space” A couple of these relate to north south running streets that run past blocks that are very shallow and are unlikely to have much in the way of building frontage. Not sure how these can, therefore, be land mark frontages	Identity	Response as follows.	**Graphics of diagram has been reviewed. It is a balance between separating information out into several different plans or showing how it all coordinates on a single plan.**
78	Energy use – whole section: Paras 7.4-7.11. Downgrade ‘must’ to ‘should’.	Resources	Note	The design code needs to be robust. Changing these to 'should' could weaken the design code and clearly, particularly when it comes to resources and the climate, this is not in anyone's best interest.
79	Adaptability and futureproofing – para 7.12: Text states that “most car parking must be shared on street or in car barns, rather than within private curtilages”. The word “must” should be removed here as homes will still require cars in the early phases at the very least. On-plot car parking can be accommodated if it is pulled back off the street and behind the building line – without having a detrimental impact on the street scape. As mentioned earlier, the Design Code plans only show 2x car barns, which is unlikely to be sufficient or in the right locations to serve the needs of the whole development.	Resources	Note	Car barns are very good ways of dealing with the interim solution where earlier phases may not have full access to eventual Sustainable Transport solutions. It is also critical that the sustainable modal shift culture and infrastrutcure is baked in from the start as far as possible. Car barns do not have to be limited to the two shown on the framework diagrams.