

Hunsdon Eastwick and Gilston Neighbourhood Plan Group (The Group)

Response to East Herts and Places of People consultation on the Concept Development Framework (Stage 2)

1 Introduction

This response follows on from the Neighbourhood Plan Group's Interim Response to the draft Gilston Area Concept Development Framework (CDF) (dated 20th September 2017) and the community workshop which took place in Eastwick and Gilston Village Hall on 23rd September. We would reiterate in the strongest possible terms the comments made in our Interim Response of 20 September 2017. This document sets out our additional comments which we would request are taken fully into account alongside our original representations.

The workshop was attended by over 100 local residents from Gilston, Terlings Park, Eastwick, Hunsdon and Widford. All age groups were represented and all contributed over the course of a three hour period to a review of the draft CDF and put forward comments and proposals for how they would like to see the document modified going forward. The level of engagement was extremely encouraging and demonstrated that local people are willing to engage with the developers and East Herts in a constructive dialogue to ensure that should development proceed, it will be of the highest quality; impacts on the local area and existing communities will be mitigated and managed and the provision of necessary infrastructure will be secured. A few pictures taken at the event are included in Appendix B.

However, the workshop served to highlight once again the widespread lack of information and understanding in the local area about the development proposals and it would have been helpful to have had time to repeat this recent workshop in another village as well to allow even more of the community to be involved. Whilst grateful for the recent assistance provided by the development promoters in securing professional support to help us engage more effectively, we must reiterate our great disappointment with the way in which the CDF has been prepared and the level and extent of community engagement which has been undertaken to date. The CDF document expressly states that it will be developed *collaboratively* with the communities prior to the EiP but until now, there has been no effective collaborative working (as required by Policy GA1) and the document remains as originally drafted by the development's promoters over a year ago. We hope that the event of last week and this response will constitute a step towards real dialogue and collaboration, leading to a revision of the document.

We are also aware that the combined local authorities have been granted funding from DCLG to prepare a Vision for the area and this work is now underway; this we believe should inform the CDF, not the other way round.

We are concerned that it may be the intention of the developers and East Herts to seek to finalise the CDF before the EiP session relating to the Gilston area takes place in November. We would be extremely concerned if this is the case, given the many written commitments to community consultation. The CDF is a substantial and far-reaching document which will set the framework and principles for development and change in the area over the next 30 years. Given the shortcomings of the formal consultation process, the community workshop has presented the local community with their first real opportunity to

understand and engage with the principles and form of the development. A number of fundamental concerns have been raised (as detailed below and in Appendix A) and we do not believe these issues can possibly be resolved and further consultation undertaken in the short time remaining before the EiP.

We believe the workshop can provide a constructive and helpful basis for a more active and on-going dialogue on an amended CDF with the Council and the promoters over the coming months and we look forward to working with you.

We suggest that a meeting to discuss and agree the scope of the amendments and a timeline should be sufficient to set out a clear way forward to the Inspector and answer her concerns about the status of the document.

In this regard, we have been very encouraged by the email received from Cllr Linda Haysey (dated 15th September) in which she reiterates the Council's commitment to a high quality development which complies with Garden Town/ Village concepts and principles and collaborative working with the local community. This email also serves to highlight the importance of the masterplan for Gilston (the whole site) and we welcome the East Herts' masterplanning approach which was the subject of a report to Executive Panel on 21st September which sets out clearly the required stages in masterplan preparation for *all* of the strategic sites allocated in the District Plan. This approach again highlights the importance of effective community engagement at each stage of the process and the need for a site-wide masterplan to ensure a coordinated approach to development and infrastructure provision. We remain concerned, however, that this process is not being followed in the case of Gilston, with the preparation of an outline planning application having commenced in advance of finalisation of the CDF (the document which will set the principles for development) and the preparation of a site-wide masterplan which demonstrates how these principles can be satisfied.

We set out below the key issues raised at the community workshop and our comments and proposed amendments to the draft CDF. In conclusion, we set out our thoughts on the way forward which we hope you will find constructive.

2 Key Issues

The community workshop gave us the opportunity to explore directly with the wider local community which aspects of the CDF, in our collective view, would support a high quality development, respectful of our communities and well integrated in our countryside and where modifications or further amplification may be appropriate. We have identified some areas for agreement as 'common ground', alongside things which we feel should be amended or removed from the CDF at this stage.

The workshop was led by the Group drawing on professional support and facilitation by our urban design advisors Urban Silence and comprised group discussion, table discussions on the topics of vision and development objectives, landscape structure, village centres and transport and movement and a review of key sections of the CDF. Copies of key sections of the draft CDF were displayed, (as kindly provided by the promoters) on the walls and comments were added by participants through the use of post it notes. A full transcript of the comments made at the workshop is attached as Appendix A and these comments have informed the response set out in this document.

Key issues raised at the workshop may be summarised as follows:

- The draft CDF raises significant questions and contains many contradictions about the character of the development which is being proposed. Whilst promoting the concept of 7 Distinct and Separate Villages, the illustrative masterplan and the images used throughout the document suggest urban or peri-urban character and perhaps a higher density than the 33dph stated in the diagrams. Many in the community observed that:
 - Terlings Park should be the maximum density before any sense of village is lost;
 - Harlow is often referred to as an inspiration, rather than garden villages which respect their context and setting and their relationship to existing communities;
 - The separation between villages is incidental rather than substantial, and the links and integration to the countryside not strongly presented.

We believe the Vision for 7 Villages needs to be further developed in text and illustration before the CDF is finalised and work on the preparation and submission of an outline planning application is further progressed. Based on the information contained in the draft CDF, the community has no confidence that the concept of 7 Distinct Villages in a rural setting will be delivered. We need a longer and more meaningful discussion about how the villages will be distinctive and individual in the context of the wider Visioning work. This is vital given the neighbouring authorities' publicised ambitions that this development will "form an extension" to Harlow with the residents becoming a "substantial new addition to the Harlow community". If we are to believe the vision set out in the document, the commitment to garden village principles must be strengthened and inappropriate and misleading images removed.

- The draft CDF only relates to the landholdings of Places for People and City and Provincial Properties and provides no guidance or commitment to the prevention of further development outside those boundaries.
- The draft CDF fails to recognise the impact (other than visual) on existing settlements. Limited consideration is given as to how the impacts of development on existing communities will be mitigated, how the new development will be integrated with existing villages and how existing communities will share any benefits. We believe a new section is required in the CDF to address issues of community integration and how the impact on all existing communities / pockets of houses will be mitigated / minimised; access and traffic through the villages; the availability of new services to the existing residents, access to the countryside and the existing network of paths, etc. The impact of construction is also not addressed.
- The transport strategy fails to identify firm commitments to good mobility. In addition, there is a lack of certainty regarding the impact, timescale and funding of new highways infrastructure and public transport provision. Further information is required in the context of the wider visioning work to ensure that there is adequate capacity to accommodate the cumulative impacts of development in the area. The residents of Terlings Park are particularly concerned that old maps are used (where their houses and play areas are not shown) and the apparent disregard of the potential impact of the second Stort Crossing in separating them from the community they are part of.
- The workshop again raised concerns about the massive infrastructure deficiencies in the area and the need for greater clarity and stronger commitments regarding

infrastructure delivery, funding and phasing. Policy GA1 (ii) states that the Concept Framework should identify *'infrastructure requirements and phasing'*. The draft CDF does not provide sufficient information on infrastructure requirements and contains no information about phasing. There is no assurance that the infrastructure referred to in the CDF will be delivered; the area's infrastructure is already overloaded and we believe cannot cope with added development pressures without new infrastructure which any developers must be required to provide before they start adding more pressure to already overloaded systems. We would therefore suggest that in its current form, the CDF fails to meet the requirements set out in Policy GA1 and that further amplification is required before the document can be finalised.

- The CDF lacks certainty- it is a developers' document written to *support* the development proposals rather than providing East Herts with a robust framework for the determination of planning applications. It needs to contain a much stronger commitment to the delivery of high quality development and infrastructure provision and what will be expected of any future planning applications.
- There is a lack of information about how the "Garden City Principles" will be applied and in particular, how the principles of land value capture and community ownership of community assets will work in practice Requests for such information have been outstanding for many months. We believe that it is unreasonable on the part of East Herts to invite a formal consultation on the CDF over the month of August but are not able to provide any clarification of how these elements will work – they are fundamental to the concept they are promoting.

3 Stage 2 Comments

Our detailed comments are set out below. These should be read in conjunction with our Interim Response dated 20th September. For ease of reference these are arranged under the headings set out in the document with relevant page references. We have sought to highlight those aspects of the draft CDF which we support and where we feel review and modification is necessary.

Ref	Page	Comment	Proposed Changes to CDF
SECTION 1: INTRODUCTION			
1	Page 6	The Concept Framework Status is confusing: here described as evidence to enable the site allocation, and in other instances (including Policy GA1) it is stated that the document is intended to be adopted as guidance for future planning applications	<ul style="list-style-type: none"> • Our recommendation is that the CDF is amended to become a Framework to guide future master planning and assess the planning applications. • If an evidence base document is needed, it should be titled in such a way to avoid confusion: 'Summary of Proposals' or similar

2	Page 7	<p>No reference is included to the need for the CDF to be prepared in consultation with local communities and how this has informed preparation of the draft CDF. Reference should also be included to Policy GA1 and the requirements of that policy as this sets the context for preparation of the CDF and specifies the considerations to be taken into account. The introduction should also explain the status of the document, how it is to be used and the intention of East Herts regarding its formal endorsement.</p>	<ul style="list-style-type: none"> • The current consultation should be seen as part of an ongoing process of engagement with the community before the CDF is finalised. • The purpose and expected outcomes of the consultation and timescales for further consultation to finalise the CDF should be clearly stated. • Text amendments to address points raised and provide necessary clarification.
3	Page 7	<p>Para 4 states that the document relates solely to the Gilston area. Development in the Gilston area, whilst very different from the 'urban extensions' being considered for Harlow, cannot be considered in isolation from the wider area. Consideration needs to be given to the cumulative impacts of development and the Visioning Work being undertaken for the wider Harlow & Gilston area and confirmation is required that this has been taken into account in preparation of the CDF. Clarification is also required of how the development and wider planning matters are being addressed in other cross boundary forums.</p>	<ul style="list-style-type: none"> • Include reference to the wider Visioning Work for the Harlow & Gilston area and relevant governance structures
4	Page 7	<p>The map should show the District Plan boundary of the Gilston Area, as informed by a East Herts led master planning approach - not limited to the land holdings of principal landowners. The map does not identify all villages within and adjacent to the development area; without this we believe that other landowners will seek to gain consents to add their land in a wholly unplanned manner. The lack of consultation on the District Council's master plan ambitions is a root cause of the issue.</p>	<ul style="list-style-type: none"> • Amend map to show boundary of Policy GA1 • Add Gilston, Eastwick, High Wych, Gilston Park and the full Stort Valley

SECTION 2: CONTEXT

5	Page 10 Strategic Context	<p>The Strategic Context makes no reference to the proposals for the Harlow & Gilston Garden Town and the wider visioning work being undertaken. What are the implications of this for the Gilston development? The Gilston Area needs to be considered in the wider context and the cumulative impacts of development in the Harlow area need to be fully assessed to ensure that there is adequate infrastructure capacity to accommodate the level of growth proposed. The Strategic Context is the only section in the CDF which considers risks and opportunities but no mention is made of the impacts of the development on local communities. For example the CDF makes no reference to the immensely important Stort Valley corridor and/ or commitments to this as remaining in the Green Belt.</p>	<ul style="list-style-type: none"> • Review and update text • Update plan to show development proposals in wider area • Identify all other development and growth areas, including those of Harlow and Gilston Garden Town
6	Page 12 Local Context	<p>The Local Context contains limited reference to existing villages and the need to manage and mitigate impacts of development on existing communities & the smaller house “groupings”. The section does not identify risks and opportunities presented by Local Context eg: traffic and capacity of infrastructure.</p>	<ul style="list-style-type: none"> • Include summary of risks and opportunities from a local perspective (as in case of Strategic Context) • Amend map to highlight existing villages & smaller house “groupings”, roads and network of paths.
7	Page 14-15 Planning Policy Context	<p>This section should make clear the status and purpose of the CDF and how East Herts intend to use it. No reference is made to Policy GA1 which provides the planning policy context for preparation of the CDF.</p> <p>We do not agree with the final paragraph on page 15 (see ref. 1): the purpose of the CDF should not be to support the allocation of the site in the District Plan but to set out the principles for development and provide a framework for future planning applications. It would also be appropriate to include reference to the status of proposals and DCLG funding for Harlow & Gilston Garden Town.</p>	<ul style="list-style-type: none"> • Amend and update text to include details of Policy GA1 • Include reference to status of proposals and DCLG support for Harlow & Gilston Garden Town.

SECTION 3: VISION & DEVELOPMENT OBJECTIVES

<p>8</p>	<p>Page 18-19 Gilston Area Vision</p>	<p>The vision statement is positive in presenting a focus on people and community life. It also (second half) talks about local character and seven distinctive villages.</p> <p>It is however, somewhat generic and could refer to other new locations and does not clarify the relationship of the Gilston Area's 7 villages to Harlow and the existing villages: functionally interdependent but with strong identity as individual villages. The Vision offers no guidance of what is intended as high quality development. We are concerned that the 5 principles are not easily translated in design and development proposals and lack practical relevance when discussing implementation.</p> <p>A vision for change of this magnitude should be ambitious for the well-being and prosperity of all in the area – in particular, it needs to make clear that this refers not only to new development but also to existing communities, who make a significant contribution to local character, and community lifestyle.</p> <p>Infrastructure is key and the principles need to include reference to the provision and appropriate phasing of necessary infrastructure (which needs to be provided before development proceeds) and reference should also be included in para 4 to the need to manage and mitigate the impacts of development on existing communities- not just visual impacts.</p>	<ul style="list-style-type: none"> • Review Vision Statement to include reference to the well-being of all, including existing communities • Clarify relationship to Harlow • Emphasise that vision is based on 'Garden Village' principles • Strengthen the commitment to delivery of 7 distinctive villages • Include new principle relating to infrastructure provision at required time. • Amend para 4 to include need to mitigate and manage impacts on local communities
<p>9</p>	<p>Page 18-19 Gilston Area Vision</p>	<p>The birds' eye view and diagrammatic plan presented in this section have no caption nor explanation and do not match the vision or objectives for the creation of 7 distinct 'villages'.</p> <p>Both present the development like a suburban town or an urban extension rather than as villages in a landscape setting. The birds' eye image shows a very dense development with insufficient green</p>	<ul style="list-style-type: none"> • Remove diagram showing layout of villages • Replace aerial view with more appropriate image which represents key principles underpinning the Gilston Area Vision and the spirit of village development

		<p>space separating the villages and no evidence of individual character. The photo is also out of date as it does not include other largescale housing development which has taken place in the area (eg: Harlow Leisure Centre).</p> <p>The diagram ignores the local context and shows details of village layout which are clearly not consistent with village character. The street and block layout go far beyond the scope of the CDF.</p> <p>Whilst it may be argued that the images are <i>illustrative</i> we believe they are misleading and potentially very dangerous to include alongside the vision statement as they are not consistent with the aims set out in this section and suggest a very different form and density of development. The images are at also at odds with the site promoters pre- application material for the outline planning application which suggests 7 storey development which is unacceptable in the context of 'villages'.</p>	
10	Page 20-21 Objectives	The use of the term 'aspirational' questions the commitment to delivering a high quality development and necessary infrastructure. It does not give the community confidence that the objectives will be achieved.	<ul style="list-style-type: none"> Remove 'aspirational' from heading and amend to 'Meeting the Objectives'
11	Page 20-21 Objectives	The objectives should all relate to the vision. 10,000 new homes should not be identified as a development objective, but a possible outcome. Objective 2 refers to a private estate and there are no specific proposals to satisfy this objective. Objectives 3 and 8 are supported. Objective 4 needs to be qualified as it would be expected that there would be a hierarchy of villages and that this would be reflected in the location of social infrastructure and facilities. Objective 5 needs to distinguish between drainage and water supply. There is inadequate explanation and justification for objective 10- regeneration of Harlow. It is noted that at the EiP for the East of England Plan the benefits to Harlow regeneration were challenged. This objective highlights the need to take into account the visioning	<ul style="list-style-type: none"> Reword Objective 1 to read: Delivery of 7 new Garden Villages to provide for the future growth of East Hertfordshire Qualify Objectives 4 and 5 Review Objective 10- this should be informed by the wider visioning study Additional objective: Mitigate and manage the impacts of development on existing communities and ensure that existing communities benefit from development Add new objective: Ensure the provision of

		work for the wider area.	adequate infrastructure to meet the needs of existing and new development
12	Page 20-21 Objectives	We feel the image is 'promotional' and misleading (no cars, etc) and perhaps not representative of village character. The provision of parkland within the villages overlooked by direct frontages is welcomed.	<ul style="list-style-type: none"> Consider replacing/ amending image
13	Page 22-23 Strategic Influences	We are generally supportive of the Strategic Influences but are concerned that the reference to Gibberd's legacy suggests that the development is perceived as an extension to Harlow and a town, rather than villages. It is a factor to take into account in promoting good planning but we understand that Gibberd advocated land to the north remaining green. The visioning work being undertaken by Allies and Morrison has highlighted that a different form of development will be appropriate in the Gilston Area. We agree that the landscape and village life are important influences but would question the integrity of these objectives given that the development will impact so significantly on existing villages, heritage and landscape quality. We believe that the text needs to be more specific to the local area with references to existing landscape assets and villages and the need to mitigate and manage impacts on existing character.	<ul style="list-style-type: none"> Amend or remove Strategic Influence 2 to make clear that this is not an extension to Harlow Amplify text to include more specific inspiration from local references
SECTION 4: BASELINE SUMMARY			
14	Page 28-29	We agree with the baseline summary of archaeology and heritage and the importance placed on this.	
15	Page 40-41	Many local groups are deeply interested in local wildlife, which is one of the key assets of the area. We would welcome reference to involvement of local groups	<ul style="list-style-type: none"> Add reference to the need to involve local groups in the identification and protection of natural habitats and wildlife
16	Page 42-43	We do not feel that sufficient analysis has been undertaken of the existing villages, the various small pockets of houses and built form. Over-emphasis is placed on Harlow and there is limited analysis of the constraints (and opportunities) presented by existing villages. The plans of existing	<ul style="list-style-type: none"> Further analysis required of exiting villages and constraints and opportunities these present for proposed development. Review plans of villages

		villages contain errors and need to be reviewed.	to ensure correct
17	Page 46 Surface Water Drainage & Flooding	<p>We are very concerned about the capacity of existing infrastructure and are being given conflicting information. The final para states that the existing Rye Meads Sewerage Treatment Works has capacity for development up until the year 2040, which includes development in the Gilston Area. The development will not be completed within this period and it is unclear what allowance has been made for other development in the area and development beyond 2040.</p> <p>The map is incorrect and out of date. It does not include the watercourse systems through the airfield which impact Hunsdon and Hunsdonbury - areas which have seen increased instances of flooding in the last few years.</p>	<ul style="list-style-type: none"> • Further and more detailed information is required. • Review watercourse maps to include the most recent and ensure the drainage/SUDs is using this data to inform the CDF,
	Page 50-51 Services & Utilities	<p>The paragraph states that there is capacity within their existing infrastructure to supply the proposed Gilston Area development however this does not address the supply of water in the area which is mainly derived from underground sources and aquifers. This year water restrictions due to low ground water levels were narrowly avoided. How this supply shortage would be met with an increased population needs to be stated within this section.</p>	<ul style="list-style-type: none"> • Further and more detailed information is required
18	Page 50-51 Access & Movement	<p>We do not feel that (given the importance of the issue and current problems) this section presents a sufficient baseline analysis of congestion and bus and rail transport facilities.</p>	<ul style="list-style-type: none"> • Need further information on existing highway capacity and public transport provision • Need a diagram or table that clearly identifies the current problem areas and deficiencies that need to be addressed or considered by the developers. • Need a map indicating all key routes and current traffic levels • Include information about safety and accidents
19	Page 52-53 Market	<p>We do not think the image reflects the vision and should be removed. The form of buildings proposed (a crescent 4-5 times</p>	<ul style="list-style-type: none"> • Remove image

	demand	larger than the one in Bath) is not in keeping with village character and is more representative of an urban setting.	
SECTION 5: SPATIAL FRAMEWORK			
20	Page 58-59 Place-making Principles	<p>We welcome the creation of village centres with houses, shops and community facilities.</p> <p>The image, however, shows a vast paved urban square and a wide road, not in keeping with village character. We believe this is detracting from the concept and is not appropriate for inclusion in the CDF. The Visioning work being undertaken (by Allies and Morrison) includes an analysis of the morphology of village settlements – this sort of understanding needs to be expressed in any revised CDF.</p> <p>Village 2 (in the caption of the picture) is perhaps intended to be the main centre with a supermarket and other services and it is therefore not representative of a placemaking framework that is inspired by villages.</p>	<ul style="list-style-type: none"> • Replace with image which reflects the vision of a typical village centre
21	Page 60 Landscape led approach (text)	<p>We are supportive of the landscape led approach but do not consider this has been fully developed in the Spatial Framework and further work is required.</p> <p>The wording of this section should be amended to present the ‘requirements’ of the approach. For example instead of ‘whenever opportunities arise...’ the wording should reinforce guidance: the proposals ‘should respect...’, ‘should integrate...’ etc.</p> <p>We cannot agree with the statement in para 4 that the outcome is the protection and enhancement of existing assets- the proposals shown in the CDF would have a significant impact and change the character of the area. It would be more appropriate to say it ‘seeks to minimise the impact on existing assets’.</p> <p>It does not appear that the landscape led approach is fully reflected in the concept masterplan and images. The landscape</p>	<ul style="list-style-type: none"> • Amend tone and purpose of text throughout to reflects requirements and commitments • Further detail is required to reinforce the landscape led approach • Stricter requirements are needed to define the minimum separation between villages and between new and existing dwellings.

		<p>buffers and separation between villages need to be of sufficient width to avoid coalescence.</p>	
22	Page 60-61 Illustrations	<p>We welcome the approach of only developing part of the site, leaving large parts as landscape.</p> <p>However, we do not consider that the main plan is illustrative of the vision and landscape led approach advocated in the document.</p> <ul style="list-style-type: none"> ➤ The most prominent aspect of the images is the footprint of the villages and their (urban) street pattern: the landscape is dimmed out and incidental ➤ The concept plan should <i>not</i> show layout of individual villages. The layouts suggest an urban form and density and further work is required to define village character. This level of detail is not appropriate for the CDF. The villages should be shown in outline only. ➤ Landscape/ green buffers between villages need to be wider to prevent coalescence and maintain distinctiveness. The Illustrative Concept Master Plan suggest the villages merge. ➤ The central crescent shaped housing is built over the green area identified as a Key Landscape Feature (diagram 1). It appears locally as an alien imposition on the local area and is deeply resented for its scale and for the way it splits the landscape: it should be removed. ➤ It is inappropriate for Gilston Park to be surrounded by development and there is a need for better integration with open countryside to the north ➤ The existing network of parks, views and paths is not acknowledged nor integrated ➤ It is misleading to talk about '7 villages of the Gilston Area' as this 	<ul style="list-style-type: none"> • Use Diagram 4 as the main illustration of this concept • Remove prescriptive and detailed urban form from all plans and diagrams, which anticipates a development layout yet to be discussed and developed • Simpler definition of the location of the villages and how they integrate and relate to the landscape and existing villages would be better

		fails to acknowledge the existing villages. The existing villages need to be clearly identified on the concept plan.	
23	Page 61 7 Villages of Gilston Area based on Illustrative Concept Plan	The concept shows area of land including the airfield and Gilston Park being retained as open space but we have no confidence that the necessary measures will be put in place to ensure these areas will not be built upon in the future. More information and a clear commitment/undertaking to the retention of open areas in perpetuity is required.	<ul style="list-style-type: none"> • Further information and undertakings required about the retention of open areas in perpetuity • Further commitment to the prevention of further development in the nearby areas (outside the promoters' landholdings) is needed
24	Page 62-63 Village Character	<p>We do not agree with the presentation of proposals for the villages and the rationale for different village layouts. All of the layouts appear to be of similar structure and density with an urban form inspired by Harlow and it is unclear how these have been derived and how they reflect village character.</p> <p>Moreover, it is unclear what is the urban design 'requirement' and guidance offered in this section.</p> <p>We need a longer and more meaningful discussion about how the villages will be distinctive and individual and suggest that the images in this section should be removed and the section revised to set principles for village development/character. It must also be recognised that this is not just about creating new 'distinct villages'- the existing villages want to retain their character and distinctiveness as well and we feel this has not been understood or addressed in the CDF.</p> <p>There needs to be clear thinking about the illumination of villages and alongside this light pollution in the context of 7 villages. There is no reference to this important matter of character and we cannot understand why this has been ignored.</p>	<ul style="list-style-type: none"> • Revise or remove Section on Village Character • Set guidance principles for village development/character • Include commitment to protecting character and distinctiveness of existing villages. • Existing villages, heritage and landscape features should be considered in detail to inform the character of new villages.
25	Page 64 Strategy 1: Landscape Buffers	<p>We do not think the Landscape Buffer Strategy has been adequately developed:</p> <ul style="list-style-type: none"> ➤ There is no mention of the Stort valley as an asset and the 	<ul style="list-style-type: none"> • Strategy 1 requires further development to address the comprehensive visual identity of the new and

		<p>landowners contribution to that as green infrastructure needs explanation and commitment;</p> <ul style="list-style-type: none"> ➤ The landscape buffers are too narrow; ➤ Need for wider and connected green buffers to protect and enhance natural habitat; ➤ The green infrastructure network and links between the parklands are poorly defined; ➤ The plans for the parklands, buffers and other community assets need better explanation; ➤ Gilston Park and its locally listed garden setting, including 'home wood' are not fully exploited for the wider setting. ➤ Consideration needs to be given to the impact of sports fields/ floodlighting on adjoining woodland/ wildlife and existing local communities; <p>The site promoters own land between Eastwick and the A414- this could provide an opportunity to mitigate the sound and pollution from this busy dual carriageway but seems to be a missed opportunity.</p>	<p>existing villages and the visual green background to Harlow</p>
26	<p>Page 66-67 Strategy 2 Minimising visual impact</p>	<p>Strategy 2 should be about more than minimising visual impact but also about minimising impact on existing communities, local heritage and wildlife. The plans do not show how existing heritage and landscape assets will be protected and enhanced. In particular, we would note the following:</p> <ul style="list-style-type: none"> ➤ Eastwick seems poorly thought about as a community. It has a distinguished Listed Church and war memorial as well as the opportunities to create sound and pollution buffers to the busy A414; ➤ The plans for the parklands, buffers and other community assets need better explanation; ➤ St Mary's is a Grade I Listed building with c1,000 years of history and we do not feel the future of this important community asset has been adequately addressed; 	<ul style="list-style-type: none"> • Develop and amplify Strategy 2 to show the requirements for minimised local impacts

		<ul style="list-style-type: none"> ➤ Gilston Park and its locally listed garden setting, including 'home wood' are not fully exploited for the wider setting; ➤ Consideration of Hunsdon and Hundonbury, home to Grade 1 listed Hunsdon House and St Dunstan's Church as well as numerous other Grade II listed properties appears to have received scant consideration in assessing the impacts from the traffic generated by the proposal and the plans for the collection of historic buildings and garden at Brick House Farm are particularly poor; ➤ The scheduled monuments are noted but little more is said about how they will be protected and enhanced; ➤ The Pye Corner war memorial seems to be ignored rather than used as an opportunity to mark the respect it deserves, especially in the context of the proposed adjacent park. 	
27	Page 68 Strategy 3: Learning from Harlow	We do not understand the emphasis placed on the design of Harlow when the Gilston Area is being conceived as 7 distinctive villages and not as an extension to Harlow. Whilst some lessons may be learnt, the development of Gilston should draw from wider best practice and precedents in the development of Garden Villages- this theme needs developing as a part of the core vision.	<ul style="list-style-type: none"> • Strategy 3 should be reviewed to include references to wider best practice in the development of Garden Villages.
28	Page 70 Scale and Massing	There is no clear rationale for the proposed height of buildings in villages. We are concerned that the proposed height of buildings is not appropriate to village character. Further work is required in relation to defining village character and the focus in the CDF should be on establishing broad principles. The images suggest an urban form of development with a uniform height of 4 storeys in Village 3 and 3 storeys in Village 4. Villages are characterised by a variety of building types and design. This is at odds with the developers' ambitions as set out in their	<ul style="list-style-type: none"> • Set out a clear rationale for height control in the villages and distribution of massing to enhance individuality and separation. • Remove and replace images with typical village 'mix'

		consultation on the outline application where they suggest 7 storeys, which we feel is simply out of context and so should be specifically excluded by the CDF.	
29	Page 71 Illustrative Concept Plan	The status of the Illustrative Concept Masterplan is unclear. We do not consider that it is consistent with the vision and objectives and should be amended as set out above (ref.20).	<ul style="list-style-type: none"> • Include conceptual diagram about rationale for heights and massing • Identify maximum heights
30	Page 72-73 Density approach	<p>We agree with the statement in para 1 that the focus should be on quality of place rather than quantity of development and support the approach of not building across the whole site.</p> <p>However, we find the explanation of density very confusing and further clarification is required. We would like to better understand what a development with an average net density of 33 dph would look like in terms of height and massing. The images contained in the CDF would suggest an urban form with a higher density than is characteristic of Garden Villages and we are concerned about the implications of this for the overall scale and form of development. We would like the CDF to establish clear guidelines which all developments will be required to comply with to ensure a high quality development based on Garden Village principles is delivered.</p> <p>We note that the separation of the villages is 'incidental' and the individuality of the villages is virtually undetectable</p>	<ul style="list-style-type: none"> • Clarification required of density calculation • Establish guidelines for determination of planning applications • Replace the precise footprints of the urban blocks with generic form
31	Page 74-75 Green Belt	We disagree with the statement made in para 1 regarding the Green Belt. This is a matter which will be determined through the District Plan. Reference should be made to proposals in the draft District Plan and Policy GA1. The revised Green Belt boundary has not been approved. Amend title of plan to ' <i>Proposed Green Belt Boundaries</i> '. The justification for Green Belt review is not a matter for the CDF and will be determined through the District Plan and debated at the EiP.	<ul style="list-style-type: none"> • Amend section to reflect policy position and status of District Plan • Amend title of plan
32	Page 76 to 81 Green Infra- structure	We disagree with the opening reference to Harlow's Green Wedges, which are in an urban setting and between	<ul style="list-style-type: none"> • The Stort Valley will be a key separation from Harlow and needs to be

		<p>neighbourhoods of the same town. But we also note that the Harlow Wedges are wider and more generous than the village separation described in the vision and objectives of the development.</p> <p>We support the creation of new managed parklands, but we would like to see more emphasis on the integration of historic features, views and paths and equally important, the process for these being transferred to the community for long term management with endowed funds/assets to provide for their maintenance to the quality expected.</p> <p>The existing park and play area at Terlings Park are ignored. It appears that this area is targeted for an A road dual carriageway; that cannot be right?</p>	<p>treated with a comprehensive plan, not limited to the land ownership of the proponents</p> <ul style="list-style-type: none"> • Gilston Park and surrounding Key Landscape Feature (page 60) should be integrated in the proposals on plans on all pages. • The separation of the villages and the green buffers should be clearly identified as structural elements in both plans (plans on all pages) and text • Existing landmarks and paths should be integrated (plans on all pages) • The built crescent clearly interrupts a key landscape area and should be removed
33	Pages 83-89 Character and open space provision	<p>We support the spirit and approach to the formal open space provision, but we would like to see more and better local inspiration from the 'countryside' rather than managed municipal parks to reflect the core vision of 7 villages within a rural setting.</p> <p>Governance by the community in perpetuity is a strong concern alongside an assurance that it will not be 'rolled back' for future development.</p>	<ul style="list-style-type: none"> • It is evident that the crescent fragments the continuity of the landscape – it should be removed. • Pitches and managed open space should not be located in sensitive areas • Clear guidance for future control of pitch floodlighting and club parking in sensitive areas is required.
34	Page 92 Village Centres Approach	<p>The illustrations are mis-leading. They are not of villages but of towns (similar to Harlow) and are inconsistent with the vision. The fact that they show specific villages is of concern as this suggests design work is further developed than has been stated. This level of specificity is anyway inappropriate to the CDF which is a guidance document.</p> <p>The first Placemaking principle that 'Gilston will exploit the rural setting with all the</p>	<ul style="list-style-type: none"> • Remove/ replace images with more appropriate illustrations of village environments • Delete first sentence of first placemaking principle • Clarify place-making guidance in relation to village vision.

		amenities of a <i>town</i> ' could be misinterpreted.	
35	Page 92 Village Centres Approach	We support the second placemaking principle- provision of a range of high quality low-carbon homes	
36	Page 92 Village Centres Approach	We do not agree with the last placemaking principle that development will promote more sustainable transport choices and high density development is appropriate near station. Existing services are at capacity and this principle is meaningless without a commitment to improving the frequency and capacity of bus and rail services	<ul style="list-style-type: none"> • Amend last placemaking principle to include reference to commitment to provision of improved public transport.
37	Page 92 Village Centres Approach	The CDF provides no guidance about how the development of the centres and community and service provision should be phased and subsequently managed. The inclusion of details regarding phasing in the CDF is a requirement of Policy GA1. We are concerned that provision will not be made until the later phases of development giving rise to increased pressures on existing facilities.	<ul style="list-style-type: none"> • Provide guidance relating to phasing and timescales for village centres and provision of community facilities
38	Page 92 Village Centres Approach	No guidance is provided regarding the proposed size of each village or how these relate to existing villages. There appears to be an assumption that each village will have a range of facilities but it would be expected that there would be a hierarchy of service centres. Policy GA1 requires the provision of serviced sites for Gypsy and Travellers and Travelling Showpeople. The CDF does not identify which village these will be located in. The policy also allow for the provision of a cemetery but does not show where this would be situated.	<ul style="list-style-type: none"> • Provide clear guidance on size of villages and hierarchy of service centres • Clarify criteria for location of sites for Gypsy and Travellers and Travelling Showpeople. • Clarify location of cemetery.
39	Page 93 Village Centres Approach	The plan shows a level of masterplanning detail which is not appropriate for the CDF. The CDF should establish principles and the masterplanning work should follow. The layouts of the villages should be omitted and the plan should be revised to show the boundaries of villages and proposed location of village centres. The plan raises questions about how the new road network will connect with the existing road network and suggests that traffic will be routed through Hunsdon. It also shows an additional Stort Crossing to the west but	<ul style="list-style-type: none"> • Amend Village Centres Plan • Address inconsistencies with other plans in the CDF (including access and movement)

		provides scant detail about this important new route which will carry considerable traffic through the proposed development; this should be better explained.	
40	Page 94-95 Village Centres – retail & commercial	No information is provided about the phasing of village centre development. This will have implications for infrastructure provision. There is a concern about the viability of retail facilities in every centre and a need to establish a hierarchy of centres which will also benefit existing residents. The individual village plans are unhelpful. The main plan should be amended to show location of centres and boundaries of villages only with details of village layouts omitted.	<ul style="list-style-type: none"> • Further information on phasing of village centre development and provision of facilities • Amend plan. Remove village insets And identify existing villages.
41	Page 96-97 Village Centres – Education & Leisure	The paragraph should be amended to include a commitment to how Early Years education will be provided. The last sentence of the second para should be amended to include firm requirements: 'Secondary school provision SHOULD include sixth forms'	<ul style="list-style-type: none"> • Amend text
42	Page 96-97 Village Centres – Education & Leisure	Greater clarity is required about the number of schools required and how these will be phased and how much land land will need to be safeguarded to allow future expansion. If schools will take children from the wider area outside the site, this needs to be reflected in the traffic modelling. Local schools are already under pressure and do not have capacity to accommodate new development. Additional school places are required before any development takes place. Plans to be amended to show village boundaries and location of facilities-omit village insets	<ul style="list-style-type: none"> • Include clear requirements on number and timescales/phasing of new schools • Identify need for safeguarded land, if any in future. • Ensure that the transport model takes account of pupils travelling from the wider area to the site • Amend plans
43	Page 98-99 Village Centres – Community Facilities & Health	Greater clarity is required about the type of facilities to be provided and the timescales and phasing of new health provision. Existing facilities are inadequate. A clearer commitment is required to a phased provision of facilities to meet the demands arising from the development. Plans to be amended to show village boundaries and location of facilities- omit village insets	<ul style="list-style-type: none"> • More information required on phasing • Amend plans
44	Page	Policy GA1 states that consideration	<ul style="list-style-type: none"> • Clarification required

	98-99 Village Centres – Community Facilities & Health	<p>should be given to the potential of the site to facilitate the delivery of a re-located Princess Alexandra Hospital (PAH). This is not addressed in the draft CDF.</p> <p>We do not consider that a major hospital of regional scale is consistent with the vision for villages. We would like to see a firm assurance that the traffic and infrastructure of a major hospital will not be located here. There has also been suggestions that it might be resited outside of the site but within the vicinity of the Gilston Area which would significantly impact traffic modelling.</p>	<p>regarding the status of proposals for PAH</p> <ul style="list-style-type: none"> • Firm guidance to prevent major regional infrastructure to be located within villages • Ensure that the transport model takes account of PAH relocation
45	Page 100 Residential	The top photo shows a density and form of development which is inappropriate in a village environment.	<ul style="list-style-type: none"> • Remove photo
46	Page 100 Residential	The guidance provided on residential mix and typologies is very limited. No reference is made to social and affordable housing to meet local needs.	<ul style="list-style-type: none"> • Add guidance on maximum densities and typology mix • Add reference to affordable housing
47	Page 101 Residential	The village insets should be removed for reasons previously stated. Plan should be amended to show boundary of villages only.	<ul style="list-style-type: none"> • Amend plan
48	Page 102-103 Approach to Governance	<p>Inadequate information/ guidance on requirements is provided and further clarification is required regarding future governance arrangements and how/ when these will be implemented. Detailed comments are set out in our Interim Response. We are particularly concerned about the management of community assets and the need to ensure that existing communities (including Hunsdon and High Wych will have a role in this). The protection of undeveloped land (eg: Hunsdon Airfield) needs to be much stronger. It is imperative that the shared green/ recreational spaces remain in the control of and accessible to all residents not just residents of new villages (we have requested details on this for several months but have yet to receive anything). Additional land in Hunsdonbury not connected to the site but under the same ownership has been included in the SLAA with the same reference as being promoted for the Gilston Area although it is outside the site boundary maps. There is</p>	<ul style="list-style-type: none"> • Precise guidance and requirements to be provided on Governance Approach (see also Interim Response). • Strong and clear policy commitment to prevent further development in the nearby area and in the existing villages

		concern that it may be brought forward for further development so clarity needs to be provided on its status and whether it would be afforded the same treatment and protection as the Airfield.	
49	Page 104-105	The transport vision is supported in principle, although we do not believe that people with cars will choose walking cycling or buses instead. The Illustration of page 105 shows a wide road, a large articulated bus (unsuitable to a village) and very narrow walking space	<ul style="list-style-type: none"> • Replace image with one that is more in the spirit of a people orientated village street
50	Page 106-107 Strategic connections	The title is inappropriate as it suggests that there are no strategic transport issues off-site. We are concerned that the focus on Harlow as the only destination and the rail link to London is misleading as it underplays other destinations in Hertfordshire that attract traffic through the villages, especially when the development is set within the London Cambridge corridor with Stansted being some 9 miles distant with its planes approaching landing overflying the development c.35% of the time.	<ul style="list-style-type: none"> • Replace Title with 'Strategic Connections' • Include firm requirements to manage additional traffic in off-site congested hot spots • Include specific reference to all main destinations • Identify routes that are at risk of attracting traffic through villages (Hunsdon & High Wych in particular) • Amend plans accordingly
51	Page 108-109 Road Hierarchy	The section is not presented as guidance or requirements. No reference is made to the requirements to minimise impacts on existing communities and local roads. There are grave concerns about: <ul style="list-style-type: none"> ➤ The scale of the Primary Road – presented as a 4 lane segregated road with side access roads: completely out of character with the aspiration for villages and slow community setting ➤ In village 7 the primary road appears to converge with a tertiary road at Brick House. This fails to consider the setting of this collection of historic buildings and garden at Brick House ➤ The eastern access proposed fails to respect the setting and children's play space of Terlings Park 	<ul style="list-style-type: none"> • Give clear indication of requirements and commitment to good access infrastructure at Gilston Roundabout. • Set out clear criteria to protect Terlings Park from the impact of the Eastern Access. • Set out clear requirements to prevent additional traffic through Hunsdon. • Set out clear requirements for low impact integration (no through traffic, but good access) for the existing villages, smaller pockets of houses and Terlings Park. • Add requirements for adoption and

		<ul style="list-style-type: none"> ➤ The expectation that the wide Primary Road will feed into Church Lane and Hunsdon is wrong ➤ The requirements for slow speed and liveability on the Primary Spine are needed. <p>The road sections are inappropriate, as are the images which show an urban boulevard in Rotterdam.</p>	<p>maintenance of the proposed new roads.</p> <ul style="list-style-type: none"> • Set out a clear commitment to slow speed, human scale roads, including a maximum road width consistent with village concept. • Replace/ amend images and sections accordingly.
52	Page 110-111 Sust. Transport Strategy	<p>The community does not believe that a strategy of walking and cycling is a credible foundation: people have cars and will use them. If the Council and Developers are planning to encourage cycling then they must put forward measures to do this and explain how that will work.</p> <p>However, this section should set out clear commitments to maximise sustainable travel, including but not limited to physical provision.</p>	<ul style="list-style-type: none"> • Plans – integrate the existing villages and paths into walking and cycle network. • Reinforce requirements and commitments to the promotion of walking and cycling – including marketing and promotion. • Add requirements for integration with Harlow’s sustainable transport initiatives.
53	Page 112-113 Bus Strategy	<p>The vague language of the text is inappropriate and is not supported. It should be changed to clear requirements for quality bus service in the area.</p> <p>There is no clarity of how the existing villages (especially but not only Hunsdon) will benefit from the additional provision.</p> <p>We disagree with the identification of the key destinations.</p>	<ul style="list-style-type: none"> • Indicate requirements for minimum quality bus services. • Identify likely passenger levels and requirement for services. • Integrate all existing villages. • Consider bus services to Hertford, Welwyn and Bishop Stortford.
54	Page 114-115 Rail	<p>The text paints a rosy picture of the rail service, with vague reference to forthcoming improvements. The community does not believe that capacity on the trains, in the station and in the car park will be available to serve the development.</p> <p>There are no ‘transport requirements’ but only ‘possibilities’ in this section.</p>	<ul style="list-style-type: none"> • Identify likely passenger levels generated by the development and requirement for additional services and relative timeframe. • Express firm requirements for access to the station, for development in line with additional capacity at station and railway. • Express firm travel planning and

			management expectations.
55	Page 116-117 Highway Improvement Strategy and summary	<p>The text of this section places no obligation on the developers to address transport requirements generated by the development and improve on current deficiencies.</p> <p>This section should set out clear parameters for strategic connections. There should be requirements to demonstrate good standards of service across the wider network and for minimal environmental impacts (noise and pollution).</p> <p>Our experience is that current roads are already congested and there is significant rat running already.</p>	<ul style="list-style-type: none"> • Firm requirements for transport infrastructure improvements off site. • Clear guidance for good standards of service. • Commitment to fund all necessary infrastructure in line with arising additional needs. • The summary should indicate quite clearly the transport service offered to the existing communities.
56	Page 116 Highway Improvement Strategy Page 121 Successful Outcomes	<p>The statement that the second Stort crossing is not enabling works and will be required with or without the Gilston Area development gives rise to doubt upon its funding viability. Without this link the A414 will become more congested making rat runs through Widford, Hunsdon and Much Hadham all the more attractive.</p> <p>We question the statement made in column 3 that the development will not result in increased traffic in Hunsdon and High Wych given that the new highway network feeds into local roads. The route through Hunsdon is used as a short-cut to Bishops Stortford which is the areas natural shopping destination as well as a preferred route to Stansted Airport.</p> <p>Successful Outcomes Transport “Capitalise on good regional road and rail connections” – this suggests that the road and rail infrastructure is adequate already. Amend text.</p>	<ul style="list-style-type: none"> • Further clarification required of traffic assessment and how impacts on existing communities will be mitigated. • Further information required regarding funding and phasing of highways infrastructure. • Amend text on page 121
57	Page 130-131 Delivery and Implementation	<p>The text does not set out any commitment or requirement (not even the delivery of the District Plan assumptions).</p>	<ul style="list-style-type: none"> • Clear commitments for housing delivery in line with District Plan. • Clear commitments to infrastructure first. • Clear commitment to managed construction to protect residents. • Clear requirements for

			community engagement in all future design and approval stages.
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4. Summary and Next Steps

We have sought to be constructive in our response to the draft CDF and hope you will find these comments and the earlier comments set out in our Interim Response helpful.

We believe it is vitally important that the status of the CDF is clarified. In our view, the current document is written and presented as a summary of evidence to *support* the allocation of the site in the District Plan. However, a strong and robust CDF is required in accordance with Policy GA1 which sets out clear guidance and requirements in terms of design principles, land uses, infrastructure and phasing and provides a framework for development and the preparation and determination of future planning applications. The CDF should determine *how* the development proceeds and therefore must be fit for purpose and formally endorsed by East Herts.

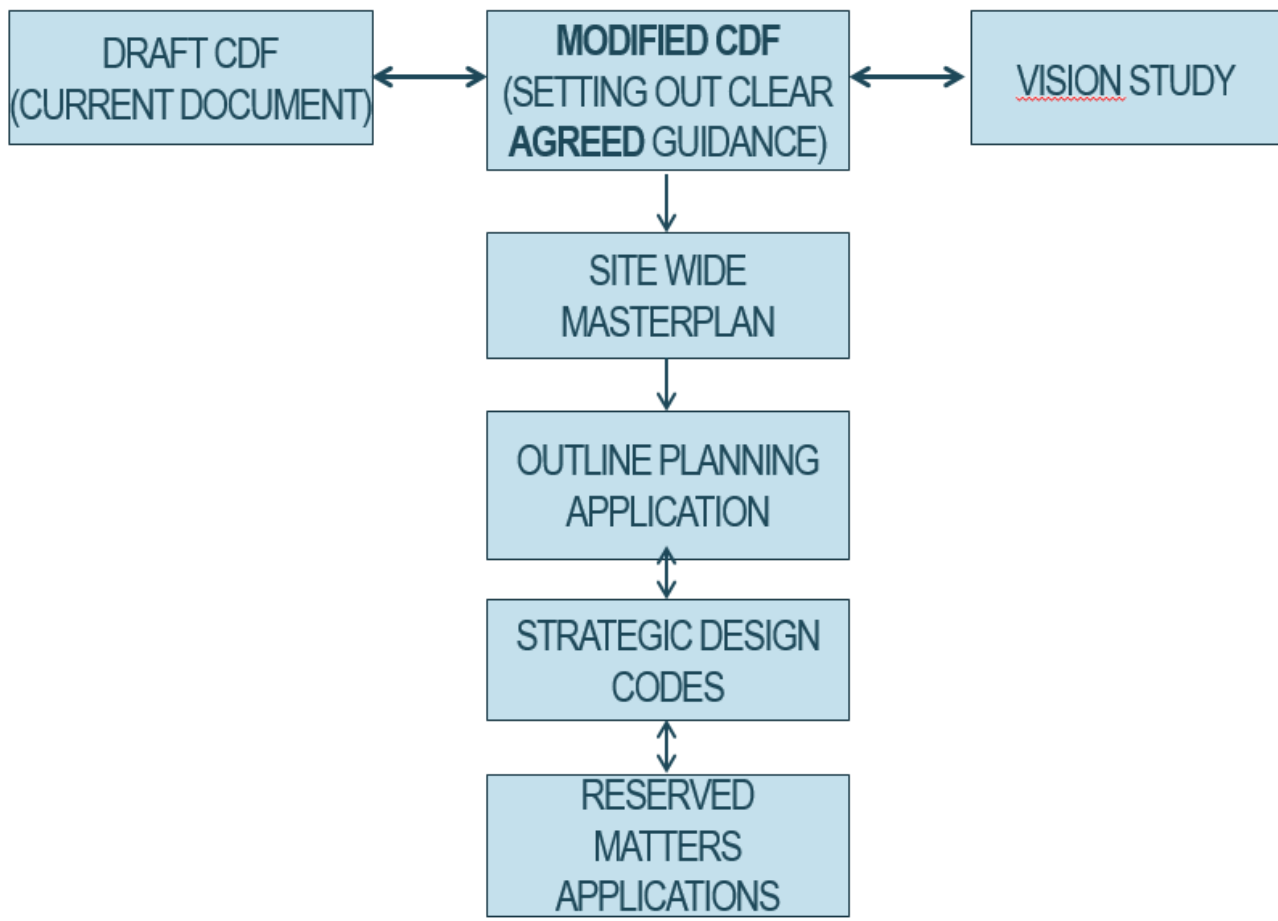
We believe there are a number of fundamental issues which need to be addressed and that further work needs to be undertaken in consultation with the community before the CDF can be finalised. This view has been reinforced by the comments made at the community workshop and in the spirit of Policy GA1 and East Herts' adopted masterplanning approach, we look forward to a constructive and on-going dialogue about the CDF with the Council and development promoters. As a first step, we would propose a meeting to discuss and agree the scope of the amendments and a timeline for its speedy revision.

Whilst this may mean that it will not be possible to finalise the CDF before the end of the EiP, we believe it will be possible to demonstrate to the Inspector that 'common ground' is being identified, good progress is being made and that the document is being prepared in consultation with the local community in accordance with Policy GA1. We believe this could have benefits in the longer term for taking forward development proposals and achieving the high quality of development which all parties are seeking.

We would also emphasise the importance of establishing a clear process for taking matters forward and ensuring that any planning applications are informed by the CDF and the visioning work currently being undertaken for the wider area. At present there appears to be a number of parallel activities and it is unclear how these are being coordinated. We would suggest that it would be more appropriate to view this as a staged process facilitated by East Herts (as illustrated in the following diagram) with community engagement at each stage. This reflects the masterplanning approach adopted by the Council which we understand is to be a requirement of all strategic sites.

The District Council should take the lead in coordinating the modifications to the CDF in response to the representations received from all parties and its re-issue as a robust, clear and collaboratively developed guidance document which will inform future master plan development and planning application discussions.

Proposed Approach



As stated previously, we very much welcome the support provided to the Group by the promoters which has enabled us to coordinate our responses and to engage effectively with the local community on these complex matters. We have also been very encouraged by Cllr Haysey's email of 15th September and the Council's commitment to a high quality development which complies with Garden Town/ Village concepts and principles and collaborative working with the local community on the sitewide masterplan.

We look forward to continuing discussions with the Council and development promoters regarding the key areas of concern and proposed modifications to the CDF.

Hunsdon, Eastwick and Gilston Neighbourhood Plan Group

September 2017