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East Herts District Council
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BY EMAIL ONLY

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Gilston SLMP Submission

1. HEGNPG's Position Statement

The HEGNPG, speaking for the Parish Councils of Hunsdon, Eastwick & Gilston and residents it and they represent, welcomes the publication of the Gilston Area SLMP submission, and in particular the extensive account of the engagement which has been undertaken (Condition 6, Part A Appendix A), which reflects many of the comments raised by the Gilston, Eastwick and Hunsdon communities.

The Regulatory Plans and Design Code are complex documents with a lot of technical information which take considerable time to digest and understand. However, they display a very broad range of positive features which we welcome: the establishment of different Character Areas which reflect existing landscape and heritage features, significant increase of planting, woodland maintenance, efforts to make the most of some (although not all) of the village corridors and buffers and a very substantial provision of sport and other recreational facilities (SLMP Part A pg. 95).

Efforts are clearly being made to retain rural and semi-natural landscapes, even when associated with urban infrastructure such as the Sustainable Transport Corridor outside the Villages. Furthermore, the SLMP indicates a full network of leisure and commuter cycling and pedestrian routes (Pg. 112 of the Design Code), which will ensure safe active movement throughout the area while also connecting the existing villages.

However, while satisfied with the overall intent and many of the proposals in the SLMP, the HEGNPG is also seeking further clarification and reassurance from the Council and the developers. Key asks include:

- Giving greater prominence in the SLMP to opportunities to protect, enhance and increase climate and usage resilience of the landscape and to connect people with nature while promoting health and wellbeing. These are stated intents but not clearly carried through and referenced throughout the Design Code.
- Ensuring that the SLMP Regulatory Plans take precedence and inform the Village Master Plans particularly in respect of the transition between them and that all identified instances of integration between natural and built environment (the 'interfaces') are defined as mandatory (rather than as illustrative) and carried through into the village design.
- Suggesting that the Design Code should be more rigorous, without duplications and contradictions, so that it can be more strongly relied upon in implementation. We are concerned about the level of flexibility in the document and the extent to which indicative locations for facilities will become fixed without due consideration for the impact this will have on the quality of the landscape and heritage assets.
- A further review of the cumulative impact of the functions which are proposed in village corridors. The village corridors or buffers are required to ensure separation and distinctive villages- not just as multi-functional landscapes to provide amenity. The separation between Villages 7 and 6 relies on the coordination between the two developers and only Eastwick Hall Lane separates 6 from 5. Eastwick village itself is it seems to be separated marginally from Village 5 by allotments - which would not be available in time for Village 1.
- Clarification of current expectations regarding the land and relative access route for travellers.
- Considering carefully the burden placed on the future Stewardship Body of the vast spread of facilities and the multiple isolated football pitches in addition to many better served ones. These facilities should be reconsidered before their location is fixed.
- We are also concerned by the number of football pitches which Sports England have demanded. This seems out of proportion and seems to favour football at the expense of activities which may appeal to other people, especially women and girls and older residents.
- Ensuring that the future use and maintenance of heritage assets identified in the SLMP is considered at an early stage and restoration and reuse fitting-out is made by the developer prior to handover. The cost of use and maintenance of the various Listed Buildings within the SLMP area should not fall onto the community without adequate endowment. The feasibility study for the Airfield Buildings does not confirm commitment to the restoration of listed buildings and scheduled monuments but only identifies their current state after years of neglect.
- Reviewing the intensity of uses and activities proposed in the Countryside Parks in the context of Development Plan and other statutory guidance. The primary function of the countryside parks should be informal recreation, ecology, wildlife and enjoyment of nature, rather than formalised leisure activities.

- Reviewing the proposals for Character Area CA4 Gilston Fields to ensure future development and uses respect and enhance the setting of St Mary's Church, including limiting vehicular access on Gilston Lane. The design proposals (see also illustrations in Part A Pg. 140-141) are very urban in character and perhaps constitute over development which is out of place.
- Providing design detail as to how the STC crosses / interacts with existing country lanes (Gilston & Eastwick Hall Lanes). While Eastwick Hall Lane appears to be protected through the Code (which stipulate its character should be retained), nothing is said about Gilston Lane.
- Clarifying and considering the benefits of advance planting extending beyond the small areas already been undertaken and shown in the Regulatory Plan. Giving consideration to the establishment of a Nursery on site.
- Reviewing/strengthening the vague proposal that "provision of a Woodland Burial Ground should be explored at RMA stage, including consideration of scale, funding, access requirements, and appropriate facilities such as WC's and a shelter". Policy GA1.V.t of the Local Plan expressly require 'consideration of need for cemetery provision', which should be addressed at this stage. It is clear there will be a significant shortfall in land available for burials, and a woodland provision is the locally preferred option. It would be appropriate for the SLMP to include a clear response to the Policy requirement and address provision, potential location and at what point during the build out.

2. Key Questions for EHC

Most of these questions have already been asked to EHC, and broadly answered at the Community Forum. They are repeated here for completeness and to give EHC an opportunity to provide a fuller response where appropriate:

Procedural clarifications

1. **Are the Regulatory Plans to have equivalent status as the Parameter Plans** – so that all RMA will have to stay within the confine of the Regulatory Plans? Part B Section 1.1 of Part B states that the Regulatory Plans form the overriding design control tool and that the components of the Regulatory Plans are mandatory requirements and must feature in future RMA designs.
2. Will the **Regulatory Plans take precedence** over the Design Code? Section 1.2 states that the Regulatory Plans form the overriding design control tool and inform the Design Code.
3. Does **the SLMP take precedence over the VMP**? Will the interfaces, such as green corridor and paths continuity be fixed by the SLMP and integrated into the built environment as given?
That should be the case, as the Local Plan states that development should be sensitively integrated visually in the wider context of the surrounding landscape and this concept is further strengthened by GANP Policy AG3. It would also be consistent to the requirement of the SLMP approval ahead of the VMPs and as a unifying element.

However, Section 1.1 states that the SLMP covers land between the villages but does not set details for the developable area. The developable area boundary rather than the boundary of the SLMP is identified as the transition from the SLMP to the village masterplans. Furthermore, the document states that decisions within the SLMP should have regard to the interface with the village and beyond and vice versa. Further clarity is needed on how appropriate treatment of the village boundaries will be secured. It is stated later in Part B that treatment of the interfaces should be sensitive. We recommend to EHC that the SLMP is used to set details and be given weight to inform the sensitive treatment of the village interfaces.

4. How is the Council intending to **use the Design Code**? Is it for enforcement?
If yes, we think that it is not robust enough and provides too much flexibility, as in some cases it limits the 'must' requirements to lists of components (such as heritage or sport facilities) already agreed elsewhere and does not offer clear and enforceable design. Or in other cases it is inconsistent: for example there are Character Areas identified in the Regulatory Plans but also different Character Areas for planting, which are also called Character Zones.

Delivery, long-term viability and timescales

1. How is the Council going to ensure that landscape, biodiversity enhancement **and well established landscape is going to be delivered**?
GANP Policy AG4 requires provision for early planting and the Landscape Infrastructure Delivery Plan presumably indicates the S106 triggers for completion of the various landscape components and opening to use, which will be a few years after the planting has taken place. How is the Council monitoring and enforcing this?
2. When will the **planting of the village buffers** (new and existing) be delivered? With few exceptions, these have no identified trigger points on the Landscape Infrastructure Delivery Plans. GANP Policy AG4 requires provision for early planting. We are concerned that the opportunity to create an enhanced landscape setting for the development will be lost.
3. SLMP Regulatory Plans show a number of isolated pitches, playgrounds and 'destination' play areas. Has the Council **considered the practicality of servicing and maintaining these isolated facilities** and ensure that they will not place a disproportionate burden on the Stewardship Body for the use they will have? There is also a concern that these facilities are eating into the countryside parks and buffers. When will a decision be taken on the size, location and management of these facilities?
4. A large number of facilities and associated infrastructure (including parking) are shown on the Regulatory Plans but **their location remains indicative**. We are concerned that the Design Code provides insufficient detail to ensure the successful delivery of these facilities.

Presentation of the Regulatory Plans

1. The key plan is the 1:10000 Regulatory Plan showing the whole of the Gilston Area and Villages 1-7. However, because of the volume of information and size of the key, it is

very difficult to read. The inset plans are helpful but do not show the connectivity which is key to the successful delivery of the shared vision. Could we please request that in addition to the composite 1:10000 plan, **additional 1:10000 plans are prepared to show the separate thematic layers** to ensure this detail is not lost. This is particularly important in respect of access and movement and existing landscape features to be protected and enhanced. It would also be helpful to show POS and community facilities; interfaces and boundaries and ecology and habitats on the 1:10000 plan as this information is not currently provided.

Appendix / Comments

The documents overall indicate a mix of good design intentions, but also a desire not to commit beyond the already committed. This weakens the submission.

These notes relate to issues spotted in the various documents for your awareness and to consider as you need.

Part A

1. Pg. 10 Exec Summary: “The SLMP highlights the huge potential of the landscape to become the defining element of the new garden town of the Gilston Area” – a positive commitment, also backed up by the statement on the following page: “The Strategic Landscape Masterplan establishes a landscape-led vision for the creation of a sustainable new community, through strategies....”. On pg. 34 the vision is “landscape as the foundation for a truly sustainable new community to be established in the Gilston Area which is embedded in its sense of place” – These are important statements that must come true in delivery
2. Pg 23. GANP openly acknowledged but limited reference to Neighbourhood Plan policies in substance in the actual Design Code.
3. Pg. 31: in the Regulatory Character Areas village separation is not by buffers but by ‘Village Corridors’ which are then in cases designed as local parks, and gathering points, rather than for the purpose of establishing distinct villages as required by GANP AG4
4. Pg. 82 two very clear Opportunities are identified, but they are never mentioned again in Part A or Part B – meaning that it is not clear how these opportunities are driving the design and proposals.
 1. Opportunities to protect, enhance and increase resilience of the landscape
 2. Opportunities to connect people with nature and promote health and wellbeing.
5. Pg. 91 shows the entirety of the leisure provision, including inside the future villages. Note 4 single isolated football pitches, two Destination Play areas in the SLMP, and allotments scattered throughout, including in the buffers around Eastwick, Channock Farm, Pye Corner, edge of V7 (see also point 3 referring to page 31).
6. Pg. 105 – the Countryside Parks are defined not as dark zones, but areas with ‘restricted lighting’. Given the vast expanse of the area the cost of lighting for the Stewardship Body should be considered and maybe confine lighting to a few path and visitor facilities.
7. Pg. 116-117 show an illustration of the Gilston Park sport facilities: no fencing, no lighting, etc. This is a preferable vision, but not aligned with the Design Code Part 4 Pg. 142, which shows very intrusive play pitches.
8. Pg. 125 – The primary school in Gilston Park is indicated as an area and no design rules are given, while the secondary school has an indicative layout (pg 96) that shows how it will sit on the land.
9. Pg. 140-141 – give a very urban illustration of Gilston Fields. Plan on pg. 147 confirms the range of activities. One indicative section provides an idea of the regrading that might be necessary. The cross section in the other direction (where the ground slopes more) is not given. The car park is not sufficient if the 4 football pitches are used for Sunday matches with kids (8 teams and families): is this the right place for this extensive provision?
10. Pg 154 and pg 163 show the landscape proposals for the Countryside Park, before ‘development’ and ‘facilities’ are added: both present a very attractive improvement of the areas.

Part A – Appendix A (Engagement)

1. The Appendix details the consultations and engagement and provides a table with responses to the Community Working Groups comments.
2. In some cases the response is not actually answering the observation. Example:
 - Pg. 26: Observation: The SLMP should create planted buffers as separation; Answer: the Village Corridors should be designed as multi-functional landscapes that provide amenity (nothing about separation)
 - Pg. 27 concern about the sensitive treatment of sport pitches is met with this ‘side stepping’ response: The sports provision for the Gilston Area is defined within the OPP Development Specification. The SLMP defines the size and zones for suitable locations of the facilities – albeit their precise location and provision are subject to the relevant Village Masterplans and/or reserved matters applications as they are part of a site wide provision (which can include provision of sports facilities within villages).
 - Pg.30 at the enquiry for the future of Black Barn solicited this answer: A feasibility study for the integration and long-term future use of the designated heritage assets in Hunsdon Airfield Park, including the black barns, has been included in the SLMP – the SLMP and Design Code however do not commit to anything specific and it is not clear what is the plan for the restoration and fit out of listed buildings.
 - Pg. 32 questions about early planting. Answer: Early planting has already been undertaken around Channoeks Farm and Pye Corner – i.e. relatively small areas and no further commitment.

Part B

1. The Details Section of the Design Code (as stated on pg. 15) provide specific ‘mandatory requirements’ and design guidance. These are often worded in a fuzzy way, which undermines the intent or simply reinstate commitments already made (not adding anything new) – a few examples:
 - Pg. 46 New areas of woodland, woodland pasture, woodland coppice and woodland scrub must be created – but neither the regulatory nor the illustrative plans use the terminology or indicate where, how, how much of each is to be provided.
 - pg.64 Buffer Zones must be provided to Homes Wood, The Chase and Hedgerows - already an existing commitment
 - pg. 71 and 72: Character of Eastwick Lane should be retained on pg. 71 and must be retained on pg. 72
 - pg. 111 gives mandatory requirements for the Gateway Nodes, but these are not identified in the plans.
 - Pg. 115 Parking must be sensitively integrated into the landscape – but the Design Code does not explain what this means; or the need for Coach Parking is identified, but no requirements made.
 - Pg. 136 designs must be appropriate to the setting of Listed Building – not adding anything to what high level planning policy already requires. No specific proposals as to how the designs should be made is offered
2. The Regulatory Plans are difficult to read without large scale prints allowing reading the legend and the map at the same time.
3. A heritage trail is included but “Indicative Only” – further details are included on pg. 137, but still remains undefined.

4. Character Areas descriptions do not include a definition of what the CA actually is – under Defining Characteristics there is a list of existing features and one of proposals, without any statement about what the CA should be about. There is no reference to the two main Opportunities (Point 4 in Part A - 1. protect landscape; 2. Connect people with nature)
5. The detailed section of the Design Code is very uneven in the level of detail: Active Travel Routes (pg. 104 onwards) are very detailed, with widths and materials, while other things like car parking (which is a more sensitive design item) has no detailed guidance or requirement at all. Trees have lots of detail (pg. 126) but other planting none. No minimum height/ size for the trees is required. They could be simple sticks taking decades to mature.
6. No real design guide for the integration of sport pitches (pg. 142), only vague slope integration.
7. Pg 74 Golden Brook Riparian Corridor CA10, Purpose Section should include a requirement to retain the ancient country lane character of Gilston Lane
8. Pg 74 Access and Movement section to include a requirement to retain the width, landscape and general character of Gilston Lane must be retained including encouraging its use for active modes of travel
9. Pg 76 Fiddlers Brook Riparian Corridor CA11 Purpose section to a requirement to retain the ancient country lane character of Gilston Lane
10. Pg 76 Access and Movement section to include a requirement to retain the width, landscape and general character of Gilston Lane must be retained including encouraging its use for active modes of travel.

Infrastructure Delivery Plans

1. Very informative of the trigger points – but unclear about when the planting will actually start
2. The village separation buffers (or corridors) are often not identified / given a time for delivery (left white on the plans)

Transport Infrastructure Plans, does not include the cycle routes that are presumably part of the landscape delivery packages – but not helpful