

## GILSTON AREA NEIGHBOURHOOD PLAN: COMMENTS ON DRAFT 2.1 ON BEHALF OF PLACES FOR PEOPLE

### GENERAL COMMENT

National planning policy and guidance is clear that the role and function of neighbourhood plans is to support strategic policies. As a result one of the core basic conditions that a neighbourhood plan is required to demonstrate at independent examination is that the plan is in conformity with the relevant strategic policy - in this context Policy GA1. A number of the policies are drafted in a manner that is inconsistent with Policy GA1.

The draft GANP explains that the intent behind the emerging document is to take the agreement reached by the Council, developer and community in producing the Concept Framework, and “*elevate it to formal policy status*”. Places for People has no objection to the terms of the Concept Framework being integrated into the neighbourhood plan, but has some concerns about how this has been done as there are a number of instances where the policy wording in the draft GANP does not replicate the wording in the Concept Framework.

In continuing to prepare the GANP we need to make sure that the GANP is consistent with the Concept Framework as well as GA1 to not undermine either.

GANP Draft Policy	PfP Comment and Implication for GPE	Rationale for Proposed Change	Proposed Change
Policy AG1, criterion 1(v)	Policy AG1 talks about a ‘predominance of the landscape setting and character over the built area’ – ie emphasis over landscape rather the policy requirement for 10,000 homes set within the landscape. The District Plan and Concept Framework (CF) talk about delivering 10,000 homes in a ‘landscape led’ approach – this should be reflected in draft Policy AG1.	As per EHDC comments, ‘landscape-led’ should be encouraged in the context of the District Plan allocation to ensure it does not undermine the delivery of the site allocation	Adopt a landscape led approach to ensure predominance of the landscape setting in the Neighbourhood Plan area and enhance existing rural landscape assets
Policy AG1, criterion 2(iv), Policy AG8, Policy AG9	Repeated reference to infrastructure addressing the existing needs of the community as well as new residents –	While PfP is committed to local communities benefitting from the infrastructure delivered to support the	Be supported by necessary physical and social infrastructure at each stage of development to ensure there is

	national guidance does not require that the scheme pick up existing community infrastructure deficiencies	development, planning applications are required by regulations to only make contributions which are directly, fairly and reasonably related in scale to the development proposed	sufficient capacity to meet the needs of <del>existing</del> and future residents and where possible to promote advanced infrastructure provision, <b>and explore opportunities to improve provision for existing communities.</b> (Plus similar changes to the other GANP draft policies)
<b>Policy AG2, criterion 1(i)</b>	Policy AG2 seeks new road design to ‘avoid severance of existing settlements and damage to rural/village character’, and deliver no significant increase in heavy vehicle movement – this is potentially at odds with Policy GA2 and the delivery of the Eastern Stort Crossing	This policy wording gives rise to a potential conflict with Policy GA2 and risks the Neighbourhood Plan being found unsound.	The design of new road infrastructure minimises impacts on existing communities, <del>avoiding</del> <b>and mitigates any</b> severance within existing settlements and damage to the rural and village character of the area
<b>Policy AG3, criterion 3 and figure 13 (referenced as 12 in policy)</b>	Policy AG3 seeks the designation of 12 Local Green Spaces, some of which potentially conflict with the development proposals	PfP has no intention to develop in the areas identified, but several overlap with land proposed for development consistent with the District Plan and CF. In addition, the designation poses a risk to activities and/or related built development that would be desirably located in some of these areas. The draft GANP therefore risks not meeting the basic conditions in this regard.	PfP would request further discussion on the revised policy wording, but based on current drafting edits are suggested below. <ul style="list-style-type: none"> <li>a. <del>Eastwick Wood</del></li> <li>b. <del>Hunsdon Airfield</del></li> <li>c. <del>Historic Gilston Park</del></li> <li>d. <del>The Avenue and Chase, including Ancient Monuments</del></li> <li>e. <del>St Mary’s Church</del></li> <li>f. <del>Gilston Cottages</del></li> <li>g. <del>Home Wood</del></li> <li>h. <del>Eastwick Valley and Eastwick Hall Corridor, including m</del> <b>Moated sites</b></li> </ul>

			<p>(Ancient Scheduled Monuments)</p> <ul style="list-style-type: none"> <li>i. St Botolph's Church</li> <li>j. <del>Golden Grove</del></li> <li>k. <del>Terlings Park</del></li> <li>l. <del>Fiddlers Brook Area and Lowland Fens</del></li> </ul>
Policy AG4, criterion 1 and 8	<p>Policy AG4 sets a test of visual impact on the landscape. It has been acknowledged through the District Plan process that the introduction of 10,000 homes will have a visual impact on the landscape, but this was outweighed by other factors and it was noted that mitigation should be introduced on the village boundaries. It also requires village buffers to comprise 'fields and woodland blocks' which is not consistent with the District Plan or CF.</p>	<p>The reference to 'contain development' in criterion 1 is unclear.</p> <p>On criterion 8, the proposed wording should be updated to more closely reflect the Concept Framework, which is the benchmark for development in policy terms</p>	<p>Delete criterion 1 or improve clarity.</p> <p>Criterion 8: Villages (new and existing) should be clearly set within the rural landscape and separated by fields and <del>woodland blocks</del> as meaningful buffers to protect individuality of villages and rural open space</p>
Policy AG5, criterion 2	<p>Policy AG5 seeks the termination of leases of 'existing non-conforming uses'</p>	<p>Planning policy cannot direct the existing uses/operations be terminated. Wording should be deleted.</p>	<p>Provision should be made for early planting and woodland restoration <del>and the termination of existing non-conforming uses will be encouraged</del></p>
Policy AG6, criterion 1 and figure 18	<p>Policy AG6 sets Community Boundaries where buildings and settlements are to be protected – however, the boundaries drawn cause conflict with the District Plan and CF specifically around the Eastern Stort Crossing and St Mary's Church.</p>	<p>If 'community boundaries' are to be defined, these must exclude land within the site allocation to avoid a direct conflict with the District Plan.</p> <p>Also, as per EHDC comments, a Landscape Masterplan is not a requirement of Policy GA1 and should</p>	<p>Measures are incorporated to protect the setting of Eastwick, Gilston and Hunsdon and other clusters of existing buildings through the establishment of Community Boundaries to the existing settlements (as defined in Figure 18) and landscaped green</p>

		not be referenced in the Neighbourhood Plan	buffers of sufficient width to separate them from new villages <b>as set out in the Concept Framework to</b> <del>and</del> ensure they remain distinctive. <del>The landscaped green buffers should be defined in the overall Landscape Masterplan</del> Figure 18 to be updated.
<a href="#">Policy AG7, paragraph 5.66, bullet 8</a>	Supporting text to AG7 refers to typical heights of 2 storeys	Text is not consistent with Concept Framework and therefore not consistent with strategic policy. Replacement text is from Concept Framework Placemaking Design Principles p.76	Heights are <b>appropriately scaled in relation to a village location and heritage and landscape elements</b> <del>typically two-storey</del> , with the ridge of the roof typically lower than the crown of the surrounding mature trees
<a href="#">Policy AG7</a>	AG7 expands the intent of the CF to suggest that the scale of buildings should draw inspiration from the existing surrounding villages, when the CF instead says the morphology and character of the new villages should take inspiration from the existing villages	Draft policy text overextends Placemaking Design Principle in Concept Framework p.76 The second change is proposed because as the site has been allocated for development, this policy should be positively worded	<del>The scale, location and form of</del> development should draw inspiration from the morphology and character of existing villages in the Gilston Area and elsewhere in Hertfordshire. Proposals for the new villages <b>should take into account the</b> <del>will be supported where it can be demonstrated that the following criteria are satisfied:</del>
<a href="#">Policy BU1, criterion 3(ii) and (iii), paragraphs 5.98 to 5.100</a>	Policy BU1 and the supporting text suggest/imply that the average gross and net densities of 15 and 33 dph (as set out in the CF) should be applied as maximum densities. This is	As draft the GANP is in direct conflict with the District Plan and CF.	<b>ii. Within the capacity of the site as established by Policy GA1,</b> <del>D</del> ensity should respect the character and the overall location of the development as well as other Policies in this Plan.

	inconsistent with the CF.		Higher densities <del>may</del> <b>will</b> be acceptable subject to a high-quality design which respects village character in the areas within an appropriate walking distance of <del>Harlow Town Station</del> <b>and access to sustainable transport provision.</b> iii. Lower densities <del>will be required</del> <b>should be provided</b> adjacent to sensitive landscape edges...
General	The document states it is based on evidence used as part of the District Plan and Concept Framework processes, however, in many cases different policy approaches are taken which are not evidentially based		