



HEGNPG

Supporting our Community

Consultation Statement

Gilston Area Neighbourhood Plan
2020-2033

(June 2020)

HUNSDON EASTWICK AND GILSTON
NEIGHBOURHOOD PLAN GROUP

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Document prepared by the Hunsdon Eastwick and Gilston Neighbourhood Plan Group with the technical support of URBAN Silence (Martina Juvara; Joanna Chambers)

A. Background to the Consultation Statement

A.1. Introduction

1. This Consultation Statement explains the community consultation process that was undertaken in producing the Gilston Area Neighbourhood Plan (referred to in this document as the Neighbourhood Plan, the Plan or GANP). It demonstrates how the requirements of Regulations 14 and 15 of the Neighbourhood Planning (2012) Regulations have been satisfied in producing this Neighbourhood Plan.
2. It describes the non-statutory and statutory community consultation, the consultation with statutory bodies and other stakeholders undertaken during the Neighbourhood Plan's development, including the landowners and developers.
3. Because of the specific situation of this Neighbourhood Plan, in a rural area including the development of 10,000 homes, consultation had to be balanced between four different groups, all already actively engaged with change in the area:
 - The local village and rural communities of Hunsdon, Eastwick and Gilston
 - The landowners / developers
 - The local planning authorities and the Harlow and Gilston Garden Town
 - A full range of statutory consultees
4. All groups, including the community, have been fully engaged with planning matters related to the future of the Gilston Area for a long time and through multiple processes (District Plan, Supplementary Planning Documents, planning documents prepared by the developers, guidance documents prepared by the Harlow and Gilston Garden Town, etc). For this reason, this Consultation Statement also includes reference to these occurrences where relevant to the formation of the vision, objectives and policies of the Neighbourhood Plan.
5. The work in practice started with the consultations and workshops related to the Concept Framework prepared by the developers and submitted by the Council for statutory consultation in summer 2017 (see Section B – Phase Four below). During that process, the community fundamentally informed the Vision and Principles which then was agreed by the developers and became part of the Concept Framework. These remain substantially the same as the Vision and Objectives of the Neighbourhood Plan. This has enabled the Parish Councils to ensure that the Vision was supported by the community, but also shared with developers and local authorities. Since that time, collaboration between community, developers and the Council has continued on the same foundation.
6. In particular, this statement documents the issues raised, how these have been considered in the plan-making process and any changes that have been made to the Neighbourhood Plan as a result of the consultation.
7. The Hunsdon Parish Council and Eastwick & Gilston Parish Council through the Hunsdon, Eastwick and Gilston Neighbourhood Plan Group have been, since it was first mooted in 2014, committed to the ambition that the Neighbourhood Plan should be developed with the full input of the community, and in transparent collaboration with the main landowners / developers, East Herts District Council and the Harlow and

Gilston Garden Town. Every effort has been made to consult in a meaningful way with as many people and organisations as possible at every stage of the Plan's development.

8. The legal basis of the Statement is provided by Section 15(2) of Part 5 of the 2012 Neighbourhood Planning Regulations, which requires that a consultation statement should:
 - Contain details of the people and bodies who were consulted about the proposed Neighbourhood Plan
 - Explain how they were consulted
 - Summarise the main issues and concerns that were raised
 - Describe how those issues and concerns have been considered and, where relevant, addressed in the proposed Neighbourhood Development Plan.

A.2. Aims of consultation process

9. The Hunsdon, Eastwick and Gilston Neighbourhood Plan Group (HEGNPG) embarked on the process of community consultation with the following aims:
 - To involve as many people as possible in the Plan's development from an early stage.
 - To ensure that consultation took place at critical points in the process using a variety of consultation techniques.
 - To ensure that consultation was meaningful, that people felt listened to and that their input was valued; and
 - To keep people informed of the Plan's progress at regular intervals.
10. In addition, the HEGNPG has also committed to work collaboratively and constructively with the Council, the HGGT and the developers: with regular meetings, presentations and discussions, which have all help shape the Plan.

A.3. Background to consultation

11. Large scale development in the Gilston Area has been in discussion for some decades. The content of the Plan has its foundations on a Parish Plan of 2009 and, very importantly, on the collaborative work between community and developers undertaken during the revision of the Concept Framework, which led to its endorsement by the Council in 2018.
12. Development was initially conceived as an extension to Harlow (Harlow North) forming an integrated urban area; the project's massive alteration of the Green Belt was resisted by the community and initially rejected by Government policy and by the District Council.
13. Around that time (2008-09), Eastwick and Gilston Parish Council (Eastwick & Gilston are two parishes but with a joint Parish Council) embarked in the preparation of a Parish Plan, which focused on local needs and aimed to establish a locally-driven approach for the future of the area. The Parish Plan proposed actions to champion traffic calming at Pye Corner and the need to improve conditions on the A414, including safer access to the existing villages. It also highlighted the desire to make the Stort Valley a better recreational asset and improve the environment of Gilston Park and local woodlands and ancient trees.

14. By 2014, ownership of the estate had changed hands and allied to the need for East Herts Council to find sites for additional housing, the District Council changed its long-standing policy of protecting the Green Belt status and included the area as a potential development site for 10,000 houses and, with the support of new promoters (Places for People and City & Provincial), started investigating the sustainability and appropriateness of the approach as part of the District Plan process. The community did not welcome this. It noted that the allocation of development land was an allocation based on the landowners' ownership and no underlying scheme, so the allocation followed the owners' boundaries regardless of the need to release land not destined to be developed.
15. In late 2015/early 2016, the Parish Councils of Hunsdon and Eastwick & Gilston agreed the need to prepare a joint Neighbourhood Plan for the whole area referred to as "the Gilston Area" covered by the evolving East Herts District Plan, including the existing settlements of Eastwick and Gilston. This led to the formation of a Hunsdon, Eastwick and Gilston Neighbourhood Plan (HEGNPG) Steering Group, initially comprising some of the Councillors of the three Parishes and the chair of the earlier Parish Plan. Its first meeting was held February 2016. The boundary was initially established in September 2015, and eventually approved by East Hertfordshire Council on 28 November 2017.
16. The Group recognised the opportunity to create a neighbourhood plan that would allow the local community to have a greater say in how the Gilston Area would continue to evolve and meet the needs of existing and future residents. The HEGNPG also acted as a catalyst for communication across the three Parishes and as a point of reference for engagement for a range of technical documents which were being prepared as evidence to the District Plan both by the Council and the promoters of the allocation. The most relevant include:
 - East Herts Green Belt Review, 2015
 - Gilston Area Settlement Appraisal, 2016
 - Concept Framework (first draft – prepared by the promoters of the site), 2016
 - A full suite of evidence prepared by the promoters regarding landscape, environment, infrastructure, transport, design, density, etc. 2016
17. During this period, and until the adoption of the District Plan confirming the allocation of part of the Neighbourhood Plan Area in October 2018, the HEGNPG suspended the preparation of the Neighbourhood Plan but remained very active as the group mandated by the Parish Councils to influence decision-making regarding the future of the area and was very active in gathering and consolidating residents' views (see [Section B](#) below) through a variety of situations:
 - Active participation at various developers' exhibitions and workshops (summer 2017 onwards) and dissemination of information to the wider community.
 - Active engagement in the Examination in Public of the District Plan (October-November 2017), including community briefing evenings and writing of representations.
 - Participation in Steering Group Meetings set up by the District Council and including local authorities, developers/ promoters and the HEGNPG as representatives of the community.

- Participation in workshops held by the HGGT (2017 onwards) and dissemination of the work of the Garden Town to the community.
18. In particular, the HEGNPG was extremely active during the statutory consultation for the Concept Framework (Sept. 2017 to Jan. 2018), engaging large parts of the community in hands-on workshops and proactively working with the promoters, Places for People, on the revisions which led to a jointly agreed revised Concept Framework, which was eventually endorsed in July 2018 by East Herts Council.
 19. All this activity is documented on the Neighbourhood Plan website: <https://hegnp.org.uk/neighbourhood-plan#evidencebase>, demonstrating how consultation and engagement with the wider community on topics related to the character, infrastructure and potential future of the Gilston Area started well before the beginning of writing the Neighbourhood Plan itself.
 20. The preparation of a Neighbourhood Plan was agreed by the community and the Parish Councils as necessary to give policy status to some of the commitments made in the Concept Framework, allowing the community to be proactive in their dialogue with developers and further refine the policy context set out in the District Plan. It is also hoped that the Neighbourhood Plan will reduce the scope of contentious issues and therefore support harmonious development.

A.4. People and organisations consulted

21. Once the steering group for the neighbourhood plan had been established early in 2016, a number of workshops were held to enable the group to communicate the intention to develop this Neighbourhood Plan and establish a structured system of communication with the wider community and other stakeholders.
22. The Neighbourhood Plan Group has committed itself to working to secure a development of the Gilston Area of exceptional quality reflecting the exceptional case made for the release of the Green Belt land. During the course of 2019-20 alone, the Group has estimated to have spent around 3,000 volunteer hours¹ working towards shaping the future of the area, through the preparation of the Neighbourhood Plan, responding to various consultations of the HGGT and the District Council, liaising with stakeholders and engaging with local residents.

Residents

23. In order to keep residents informed of the Plan's progress, a website www.hegnp.org.uk was set up and publicised in all communication. Progress was also documented on the Parish Councils' websites.
24. A standing item (Neighbourhood Plan Update) was published as part of the minutes of the Parish Councils and included in the Eastwick & Gilston Parish Council Magazine, hand delivered to all local households.

¹ Hunsdon Eastwick and Gilston Neighbourhood Plan Group, Report and Accounts 2019/2020

25. Residents are also invited to take an active role in the Neighbourhood Plan Group, which includes representatives of all three communities:

- Anthony Bickmore (Gilston resident – NP Group Chairman)
- Sarah Bagnall – (Gilston resident)
- Janine Bryant (Eastwick & Gilston Parish Councillor)
- Kirsty Elliot (Gilston resident)
- Terry Minkey (Gilston resident)
- Mike Newman (Hunsdon resident)
- Mark Orson (Eastwick & Gilston Parish Councillor)
- Frank O'Shea (Hunsdon Parish Councillor)
- Bob Toll (Hunsdon Parish Councillor)
- Mayer Nissim (Gilston resident – Secretary and Communications Lead)

Previous members included:

- Bernadette Dunthorne (former Hunsdon Parish Councillor)
- Wendy Carter (Priest in Charge, High Wych and Gilston with Eastwick) - moved out of the area
- Other residents who chose to attend and contribute at various times.

26. Regular meetings and presentations were held in the communities as part of the neighbourhood planning or in the context of other strategy, guidance and planning applications being submitted. A summary of consultation activities is included in the next section of this statement.

Elected Representatives

27. The Neighbourhood Plan Group has kept a constant dialogue with local elected political representatives, and in particular:
- Mark Prisk, MP – 2001 to 2019, who attended at least 6 public meetings in Gilston and Hunsdon and with his help the Group held a meeting with the Secretary of State for The Department of Communities and Local Government (resulting in him awarding the Group grant funding to help the community make professionally informed responses to the Gilston scheme as it moved through the planning process)
 - Julie Marson, MP – elected in 2019, briefed on the activities of the Neighbourhood Plan Group and confirmed her support for the Group
 - Linda Haysey, Leader of East Herts District Council and member of the HGGT Board and Chair of the Gilston Steering Group
 - Bob Brunton East Herts District Councillor until 2019
 - Eric Buckmaster, County and present District Councillor and member of the HGGT Board – who has attended virtually all public meetings and a number of meetings between the developers/ the District Council/ HGGT and the NPG.
 - Widford Parish Council representative in attendance at the EHC Steering Group meetings
 - High Wych Parish Council –as invitees to the EHC Steering Group meetings

28. The Neighbourhood Plan Group has had frequent meetings, exchanges and conversations with planning officers of the District Council and officers, the Chair and members of the HGGT, through a variety of means:
Participation at all Steering Group Meetings (at monthly and bi-monthly intervals since 2017), attended by:
- Anthony Bickmore (Gilston resident – NP Group Chairman)
 - Mark Orson (Eastwick & Gilston Parish Councillor - Chairman)
 - Bob Toll (Hunsdon Parish Councillor - Chairman)

This Steering Group's role is:

- (1) to provide a space for the councils, developers, parishes and the neighbourhood plan group to consider issues raised through the neighbourhood plan, workshops and other community engagement events;
 - (2) provide a steer for continued community engagement to ensure that the wider community's views are fully captured and responded to;
 - (3) enable more complex issues to be considered in detail and find ways of ensuring wider community engagement in these issues;
 - (4) to share and understand the broad development programme and delivery of the infrastructure required by the development.
- Meetings, exchanges and multiple phone conversations with EHC Neighbourhood Plan officer from 2018 to date
 - Discussions meetings and interface with other planning officers for the purpose of the preparation of the District Plan, Concept Framework, the Gilston Area Charter and other SPDs and in response to the planning applications for the area.
 - Meetings and dialogue with Guy Nicholson, Chairman of the HGGT Board and Claire Hamilton the senior HGGT Officer through regular engagement meetings
 - Meetings seminars and participation at workshops organised by the HGGT and formal response to their guidance documents to reflect the principles and aspirations of the community emerging from the Neighbourhood Plan.
 - Presentation of the Draft Neighbourhood Plan (interim version between Pre-Submission Draft and Submission Draft) to the HGGT Quality Review Panel.

Landowners / Developers

29. An open dialogue has been kept with the landowners/ developers (and their predecessors) at various stages:
- Early 2017 joint participation in the Steering Group Meetings (above) – feeding into the preparation of the District Plan and Examination in Public (November 2017)
 - Mid 2017-2018 – dialogue emerging from the revisions to the Concept Framework, which resulted in a vision statement and set of principles shared and agreed between the East Herts Council, the developer/landowners and the local community. The Concept Framework formed the basis of a Statement of Common Ground between the two main developers (Places for People and City & Provincial / later Briggens Estate I) and the District Council, indicating how the work of the HEGNPG was

shared by all parties. The statement of Common Ground was agreed prior to the EiP and put before the Inspector as a legal document.

- 2019 and ongoing- Coordination of community response to various planning applications put forward by the developers, including public meetings to ascertain people's views, share ideas and provide detailed feedback to each of the (four) planning applications to date.
- Summer 2019 and ongoing – Updates and meetings to discuss the emerging Neighbourhood Plan, the planning applications, HGGT papers and policies, draft Charter SPD and ongoing work in the Gilston Area.
- September 2019 – Reg 14. Formal consultation responses from the developers and other stakeholders/statutory consultees to Draft Neighbourhood Plan
- February 2020 – Shared interim revisions of the Draft Neighbourhood Plan and meetings with the technical consultants of both developers, where the plan was presented and discussed, inviting comments and feedback. Responses received in March 2020.

Other Statutory Consultees

30. A full range of statutory consultees were contacted directly as part of the Regulation 14 consultation (see Phase Five below). Most of them have in depth knowledge of the area and development proposals, as they have been involved in various consultations for the District Plan, Concept Framework, Charter SPD, Garden Town documents as well as the outline planning applications for the two main sites.
31. The NPG has reviewed most comments made by statutory consultees for the area as part of other consultations, as well as considered all specific comments to the Neighbourhood Plan as described below.

B. Consultation Stages

Phase 1: Background preparation – pre 2010

32. Prior to 2009 the Parish Council of Eastwick and Gilston identified the need for a Parish Plan. With the support and encouragement of the Parish Council a steering group was brought together with the aim to invite the views of all the residents and businesses of Eastwick and Gilston and encourage them to actively participate in the writing of said Parish Plan.
33. A comprehensive survey, comprising 50 questions, focussing on Population, Transport, Services, Housing, Environment, Community and The Future was delivered to every household and business in the Parishes of Eastwick and Gilston. Members of the steering group followed up with personal visits to every house and business to gain as many responses as possible, resulting in a survey return of 2/3rds (out of 200 distributed).
34. The results of the survey were analysed by The University of Hertfordshire Statistical Unit with a summary being presented back to the Community for further comment at a workshop. The workshop event was publicised by hand delivered leaflet to every household in the parishes.
35. Following which the Parish Plan was written around the four key themes, identified in the survey, Transport, Community, Housing and Local Environment, plus a table of desirable actions for future planning.
36. The final Parish Plan was printed and delivered to every household in the Parishes of Eastwick & Gilston.
37. The Parish Plan and Survey Analysis can be found at:
<http://www.eastwickandgilston.org.uk/parishplan.php?id=133>

Phase 2: Creation of the Hunsdon, Eastwick & Gilston Neighbourhood Planning (HEGNP) Group

38. There is an overlap in time periods of Phases Two, Three & Four as the District Council started preparation for the drafting of their District Plan, for the period 2018 to 2033, for the whole of the East Herts geographical area, in 2008, with said plan being adopted in October 2018.
39. In late 2015 / early 2016 the Parish Councils of Hunsdon and Eastwick & Gilston agreed the need to write a joint Neighbourhood Plan for the whole area referred to as “the Gilston Area” covered by the evolving East Herts District Plan. This led to the formation of a Hunsdon, Eastwick and Gilston Neighbourhood Planning (HEGNP) Steering Group, to provide a dedicated response covering all three parishes and so a single point of contact for developers and Councils. Initially the group comprised some of the Councillors of the said Parishes and the chair of the earlier Parish Plan, its first meeting was held February 2016. Both Parish Councils, Hunsdon and Eastwick & Gilston, added a Neighbourhood Plan Update as a standing agenda item to their Parish Council meetings.

40. The communities of Hunsdon, Eastwick and Gilston were informed and encouraged to participate by:
- Publication of all Parish Council minutes on the relevant websites:
<https://hunsdon.org.uk/parish-council/>
<http://www.eastwickandgilston.org.uk/documents.php?id=5>
 - In addition, the Eastwick & Gilston Parish Council minutes are published in the Parish Magazine which is hand delivered to all households in the two villages (approx 400 houses).
 - The residents of the 3 villages were informed of the creation of the HEGNP Group and were invited to join as members through publications in the two Parish Magazines Parish Council minutes and a new website created as a source of information, <https://hegnp.org.uk/>
 All minutes of the HEGNP Group are published at
<https://hegnp.org.uk/mdocuments-library>
41. As a Neighbourhood Plan needs to be in general conformity with the strategic policies of the District Plan and the National Planning Policy Framework, the drafting of the Neighbourhood Plan itself was delayed until the new NPPF was published (Feb 2019) and East Herts District Plan had been adopted (Oct 2018), confirming the allocation of development in the Gilston Area (See Phase 3 for East Herts Council's timetable).

Phase 3: Engaging the Communities for the East Herts District Plan 2018-2033

Table 1 - District Plan timetable

Stage	Date
Adoption	The District Plan was adopted at an Extraordinary Council on 23rd October 2018
Inspector's Report	Received on 9 July 2018
Examination	The Examination in Public was held between October 2017 and January 2018
Submission	31 March 2017
Pre-Submission Public Consultation	3 November 2016 - 15 December 2016
Preferred Options Public Consultation	27 February 2014 - 22 May 2014
Issues and Options Public Consultation	2 September 2010 - 25 November 2010
Awareness Raising	2008-2009

42. The evolving East Herts District Plan 2018 – 2033 proposed significant development, in the region of 10,000 dwellings, in the “Gilston Area” and the removal of Green Belt status from much of the land surrounding the villages of Eastwick & Gilston. Due to the significant impact the draft District Plan had on the Hunsdon, Eastwick & Gilston Neighbourhood Plan area the HEGNP Group put considerable effort into ensuring

residents were fully informed of, and consulted on, the proposals within the District Plan and given opportunities to comment on the draft District Plan.

43. During the period between January 2017 and October 2018 the HEGNP Group:
 - arranged several community events which were published by hand delivered communications to all households, and
 - advertised on the 3 websites and Parish Magazines
44. It is estimated that the HEGNPG reached, by various methods, in excess of 1,000 households.
45. In addition, Steering Group meetings held between the HEGNP Group and East Herts Council and landowners were minuted and published by EHC (until October 2019) and disseminated by the same means, ensuring all residents were being kept fully informed of how the District Plan would affect their locality and could, therefore, influence the future of the Gilston Area.
 - Several examples of the communications to residents are included in the [Appendices](#).
 - Not surprisingly, the community broadly opposed the release of Green Belt and the location of such large-scale development in their area. During this period the HEGNPG and Parish Councils, in conjunction with East Herts Council and the developers, held or spoke at a number of public meetings in the villages to coordinate the community's response and made detailed representations on their behalf.
 - The HEGNPG and over 50 residents also attended the Examination in Public and the Parish Councils and HEGNPG made formal representations.
 - The Group published regular updates to the community, eg Update leaflet Responses to Main Modifications – [March 2018](#)
46. East Herts District Plan 2018-2033 was adopted by East Herts [October 2018](#).

Phase 4: Contributing to the revision of the Concept Framework for the Gilston Area

47. Policy GA1 of East Herts District Plan, 2018 – 2033, related to the development of 10,000 homes in the Gilston Area, specifically mentions (GA1 (II)) that “A Concept Framework is being jointly prepared by the landowners, the Council and the local community. The Concept Framework identifies design principles, potential land uses, infrastructure requirements and phasing, and will be used as a benchmark in reviewing proposals for development.”
48. An earlier version of the Concept Framework (2016), included in the evidence base to the District plan, had attracted significant opposition through the many (more than 7) well attended workshops and events held by the Council and the developers, accompanied by information leaflets distributed to all households.
49. With an imminent Examination in Public, Places for People agreed to help the community via the NPG by offering independent professional planning advisory support, to enable the community / NPG to respond effectively and constructively to the revisions of the Concept Framework.

50. An NPG led Community workshop, held 23rd September 2017 attended by more than 100 residents, led to a substantial number of recommendations for improvement (60 amendments of which 58 were accepted). A list of community inputs and minutes of the meetings at EHDC in which amendments were discussed are included in Phase Four of the Appendices.
51. The revisions included:
 - A new Vision statement – broadly the same as the Vision of the Neighbourhood Plan
 - A set of development principles – adapted as Objectives for the Neighbourhood Plan
 - Agreement to strengthen the developers’ commitment to the concept of local village character, low density (33dph on average) and removal of all illustrations presenting urban / suburban development character and approaches.
52. The draft of the revised Concept Framework was the basis of the Statement of Common Ground (Appendix Four, 4l) signed by both developers and the District Council ahead of the EiP and the commitment of the developers became part of the evidence in support of the allocation.
53. The draft revised Concept Framework was presented again by the HEGNP Group to the community in January 2018, in a second hands-on event attended by over 80 people, planning officers from the District Council and Places for People, where the revisions gained local support and more stringent parameters were suggested as appropriate (Phase Four of the Appendices, items 40, p & q). The Council and Places for People at the time suggested that parameters like minimum corridor width, height and density would be clarified at Outline Planning Application stage.
54. The HEGNP Group unsuccessfully pressed the Council to transform the revised version of the Gilston Area Concept Framework into a statutory document, as it was thought that an SPD would consolidate the commitment of the developers. The Concept Framework was eventually endorsed, but only as a “benchmark against which future development proposals will be assessed” by the Executive Committee of the East Herts Council in June 2018². However, the Council did accept some further changes requested by the community when the Concept Framework was endorsed by Council as a material consideration for Development Management in July 2018.
55. While in its revised format the Concept Framework addressed many of the concerns of the community, it still did not provide minimum green corridor widths, stricter requirements for buildings over two floors and maximum densities. It did, however, incorporate stronger commitment to village character, respect of local setting and natural countryside landscape and protection and enhancement of heritage.
56. During the period of preparation and revision of the Concept Framework all residents of Hunsdon, Eastwick & Gilston were sent regular updates of progress, offered opportunities to contribute and influence through community events, questionnaires, etc. All information leaflets, invitations, etc were delivered to every household in the 3 villages, frequently by members of the HEGNP Group; overall in excess of 15,000 leaflets and updates were produced and delivered to all households.

² <https://www.eastherts.gov.uk/planning-building/planning-policy/other-material-considerations>

57. In addition, the community was kept informed through the minutes of the HEGNP Group, published on the www.hegnp.org.uk website and through updates at every Parish Council meeting of Hunsdon Council and Eastwick & Gilston Council, whose meeting minutes are published on the websites and (for Eastwick & Gilston) also published in the Parish Magazine which is hand delivered to every household in Eastwick & Gilston. An annual report to the Parish Councils is written by the chair of HEGNP Group and published on all 3 websites and in the paper copy of the E&G Parish Magazine.

Fig. 1 - September 2017 Concept Framework Community Event





Fig. 2 - January 2018 Concept Framework Community Event







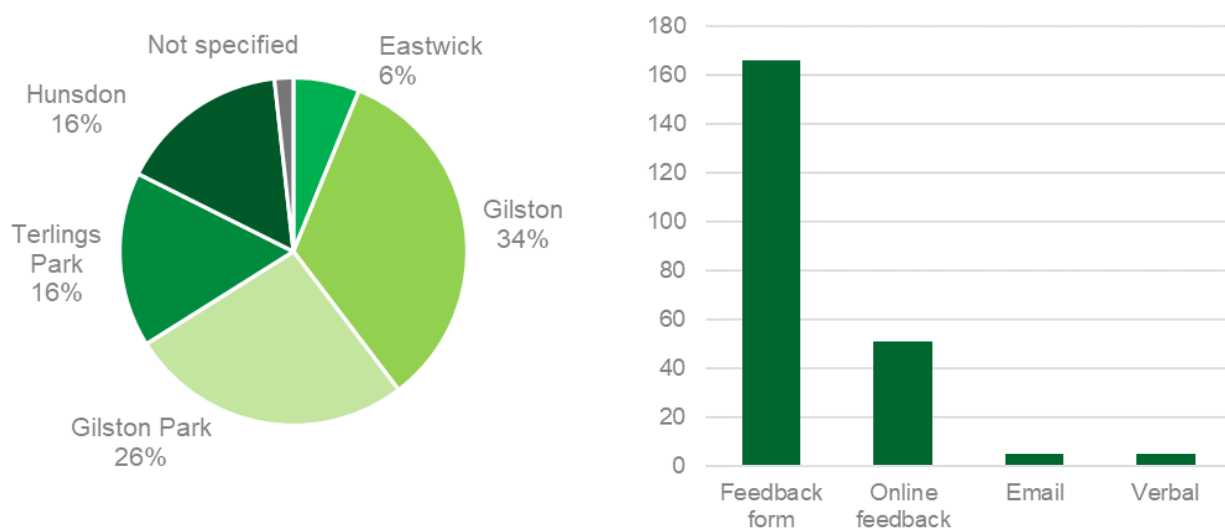
Phase 5: Preparation of the Gilston Area Neighbourhood Plan Statutory Consultation (Regulation 14)

58. After the adoption of the East Herts District Plan (October 2018), the general sentiment in the community and HEGNP Group was that the Concept Framework (2018) did not have a sufficiently strong planning status to guarantee the quality of development that the community aspired to.
59. With support from both Council and Places for People, the HEGNP Group decided to develop the Gilston Area Neighbourhood Plan on the foundations of the Concept Framework to achieve the following:
- Strengthen the vision and principles of the Concept Framework, which had been developed through intensive community engagement and had the support of developers and planning authorities (see Phase 4 above), by adopting them into the Neighbourhood Plan.
 - Support Development Control functions by articulating the concepts and proposals of the Framework into structured policies with clearer statements.
 - Expand the principles of the Framework to include the whole area, including the existing villages and the landscape.
 - Provide clarity about local issues: identifying the boundaries of local communities, describing local character and clarifying the relationship between existing settlements and the future development.
60. A deliberate choice was made by the HEGNP Group not to seek to include in the Neighbourhood Plan policies which introduced restrictions not previously agreed with the developers, even when these were considered essential by many in the local community (see Phase Four of the Appendices, Sept 2017 & Jan 2018 Community Events) specific restrictions in heights and density were avoided in favour of the agreed concept of 'distinct villages of local character'.
61. The intention to prepare a Neighbourhood Plan on this basis was communicated to the wider community via the Parish Council Chairs' own annual reports to their residents in May 2019 and monthly Parish Council Meetings.
62. A meeting with District Council officers (Neighbourhood Planning Officer and Planning Officer overseeing the planning applications for the Gilston Area) was held on 10 May 2019 to seek support and guidance.
63. The Garden Town and the developers were informed by the NPG Chair in April and May 2019
64. A first draft of the Neighbourhood Plan was prepared by a core group of the HEGNPG including: Anthony Bickmore (chairman, Gilston resident), Frank O'Shea and Bob Toll (Parish Councillors, Hunsdon), Mark Orson and Janine Bryant (Parish Councillors, Eastwick & Gilston).
65. In August 2019, the Pre-Submission Draft of the Gilston Area Neighbourhood Plan was ready for Reg. 14 Consultation and invitations were sent to the community (hand delivered to every household in Hunsdon, Eastwick and Gilston), and electronic copies sent to the developers and Statutory Consultees (see list in Phase Five of the Appendices).

Local Residents

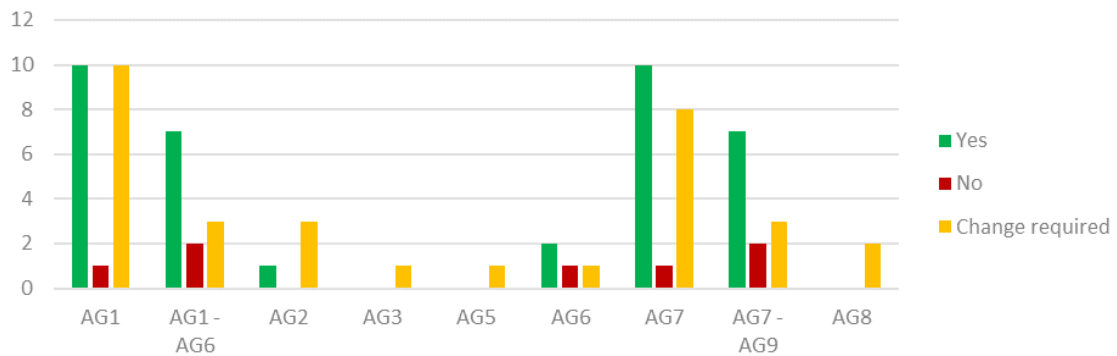
66. 100 printed copies and information posters were prepared for use during consultation events. The Pre-Submission Draft and the details of community events were publicised via the hegnp.org.uk website and through the Parish Councils.
67. Three community events took place:
- 14th September 2019 Gilston, St Mary's Church – 42 participants
 - 21st September 2019, Hunsdon Village Hall – 18 participants
 - 28th September 2019, Eastwick, St Botolph's Church – 32 participants
- Presentation delivered at the Community events – Phase Five, 5f of the Appendices.
68. 315 individual comments were submitted through various means and formally recorded, with resident inputs from all different communities.

Fig. 3 -Local Residents Responses, by type and residential location



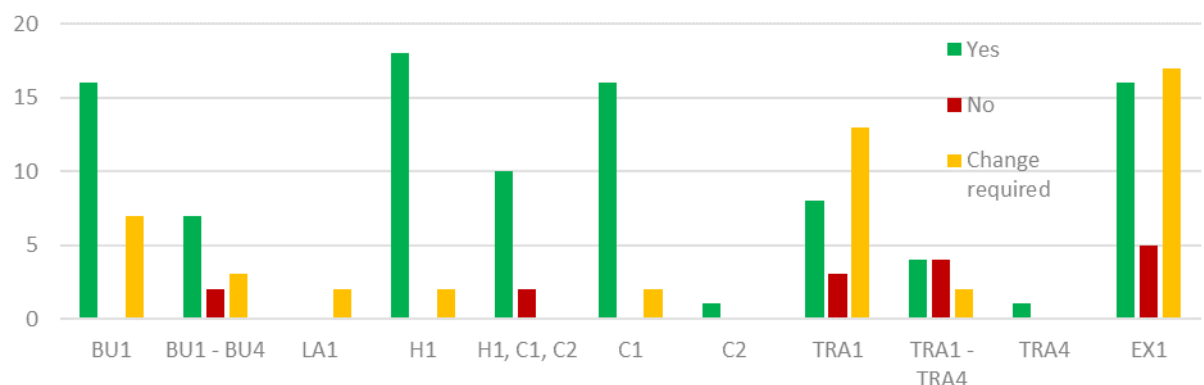
69. Of 311 local comments, 174 (56%) expressed support for particular policies or measures, 98 (31%) requested amendments and 26 (8%) expressed disagreement:
- Among the previous AG Policies, referring to the area as a whole, Policy AG1 (promoting Sustainable Development In Gilston) and AG7 (Infrastructure Delivery Ahead of Need) attracted both the most support and requirement for change.

Fig. 4 - Policies AG1 to AG8 - Overview



- Many of the changes have been taken on board (e.g. suggestion of early planting, clearer reference to villages and village settings, etc). Many (AG7) related to great concerns for transport capacity and impacts on existing roads. A number also suggested explicit reference to current deficiencies in sewage, water and electricity in the area.
- Other comments suggested more stringent policies: “Policies could go further as villages need to be well separated, and housing in keeping with village setting. Also could be tighter to protect countryside with no additional building after planning approval”; or “Don’t go far enough on impact on landscape and existing communities” (see Comments Logbook - [Appendix 6h](#)).
- Reasons for objection included the need for a northern entrance to the station and specific exclusion of bridges / flyovers to provide access to the new development.
- Of the more detailed policies, there was strong support for the policies regarding the design quality and components of the new villages (BU Policies), heritage (H1) and community facilities (C1). Transport (TRA) and improvement to existing villages (EX1) attracted support, as well as request for changes.

Fig. 5 - Other Policies – Overview



- Of the changes requested for TRA1, most relate to the scepticism about the 60% modal shift towards public transport, stress the inadequacy of public transport overall, and require a clear reference to avoid segregation of Terlings Park.
- Most of the changes required to EX1 (about existing settlements) refer to the need to avoid segregation of Terlings Park, improved access to bus services and community facilities and early planting – all points strengthened in the revised Neighbourhood Plan.

Statutory Consultees / Landowners-Developers

70. 43 Statutory Consultees (see list in Phase Five, [item 5c](#)) were reached, and 267 individual comments were made by the following 12 organisations:
- East Herts District Council
 - Harlow and Gilston Garden Town
 - Harlow District Council
 - Hertfordshire County Council
 - Historic England
 - Environment Agency
 - Canal and River Trust
 - The Land Trust
 - Herts and Middlesex Wildlife Trust
 - National Grid
 - Places for People
 - Briggens Estate 1 Limited (previously City and Provincial)
71. A summary table of the Statutory Consultees items of response is presented below. How their comments were addressed is recorded in the Comments Logbook, in section [Phase Six](#) of the Appendices, item [6h](#)).

Table 2 - Summary of Response Points Provided by Statutory Consultees

	Support	Do not support	Change required	Notes and Additional Information
East Herts District Council			66	
Harlow and Gilston Garden Town	4		8	
Harlow District Council			21	
Hertfordshire County Council	10		15	15
Historic England	3		1	2
Environment Agency	1		15	2
Canal and River Trust	4		9	
The Land Trust	2		3	
Herts and Middlesex Wildlife Trust				1
National Grid				1
Places for People	1		27	5
Briggens Estate 1 Limited		3	40	1
Grand Total	25	3	205	27

72. Most of the required changes referred to precision of the language and clarity, need for cross-reference or integration with other policies / guidance of the authority, need to provide additional evidence to support the policy and some policies were over prescriptive.

73. The points of objection by Briggens Estate 1 Limited refer to the excessive weight given by the Neighbourhood Plan to the concept of villages and village character, the Concept Framework and the Harlow and Gilston Garden Town Infrastructure Delivery Plan (April 2019).
74. Most of the comments of the Statutory Consultees have been reflected in subsequent revisions of the Neighbourhood Plan (see Section C).
75. The Comments Log Book, section Phase Six of the Appendices, item 6h), records all comments and responses raised, how these have been considered in the plan-making process and changes that have been made to the Neighbourhood Plan as a result of the consultation.

Fig. 6 - The Reg. 14 Consultation



Phase 6: Gilston Area Neighbourhood Plan Interim Non-Statutory Consultation

76. A new interim draft of the Neighbourhood Plan was produced by January 2020, taking on board comments of the previous consultation. The following month the HEGNP Group provided digital copies to key consultees, and arranged meetings to seek further feedback:
- **11 Feb 2020 – East Herts District Council** (George Pavey, Neighbourhood Planning Officer) – who offered a further detailed revision and required more evidence to be produced to explain the elements of Village Character and how they should refer to quality of design and not compromise the allocation of Policy GA1. The documents following this meeting are included in Phase Six of the Appendices, items 6a & 6e.
 - **20 Feb 2020 – Harlow and Gilston Garden Town Quality Review Panel** – who made a comprehensive review and suggested that clearer references to the evidence base would be required. The Quality Review Panel stressed the importance of the preparation of a Strategic Landscape Master Plan and raised the issue of the balance between density, height and landscape, suggesting that the HEGNP Group could investigate this further. The presentation and formal report of the Harlow and Gilston Quality Review Panel-Report of Formal Review Meeting: Gilston Area Neighbourhood Plan is in Phase Six of the Appendices, items 6b & 6c
 - **28 Feb 2020 – Technical Teams of Briggens Estate 1 and Places for People** (the developers were also invited but only one could attend) – who provided clarification of their previous comments or additional ones (Quod on behalf of Places for People). The documents following these meetings are included in Phase Six of the Appendices, items 6d & 6f.
 - **Early June 2020 - Reference to East Herts DC (George Pavey)** for further guidance and views in respect of revised policy AG6 and Appendix 4. The Council's response is contained in the Note in Phase Six item 6g and the Logbook item 6h
77. The HEGNPG Comments Logbook of all responses both under Regulation 14 and in the second round non-statutory consultations with the District Council and the developers' teams mentioned above is within Phase Six of the Appendices, item 6h.
78. The way the Neighbourhood Plan responded is outlined below (Section C).

C. How the Neighbourhood Plan responded

79. The revisions to the Neighbourhood Plan were carried out in two main phases: one which led to the interim version of January 2020, and a second revision which led to the Submission Draft. Each phase had a number of internal revisions within the HEGNP Group and inputs from other interested residents.
80. Phase 1 of revisions (January 2020):
- Complete overhaul of language and policy wording, aligned with the comments from EHC and the landowners / developers.
 - Revision of Vision and Objectives, to ensure it was closely aligned with the Concept Framework and integrated to include existing villages in a coherent manner.
 - Revision of Policy AG1 to clarify sustainable development in Gilston.
 - Introduction of AG2 (amended from TRA1) to reflect important community concerns about new Transport Infrastructure.
 - Integrations to most policies to reflect input and changes required by the Statutory Consultees (see Comments Log Book in section Phase Six of the Appendices, item 6h).
 - Update of the Plan to reflect new guidance of the HGGT.
 - Amendment to some policies to incorporate community concerns to strengthen the Policies on village character, separation, importance of the landscape, early planting, avoidance of segregation in the old communities, early planting, etc.
 - Amendments to the maps in response to the comments.
 - Amendment to delivery and monitoring section.
81. Comments made by the community requiring stringent and measurable controls for maximum density, maximum heights, minimum separation between villages were found to be difficult to substantiate without full access to the analysis done by the developers and their technical teams. It was therefore decided that, although these additional controls would have been helpful, it would have been difficult to provide the evidence required for their imposition. These comments therefore remained unaddressed.
82. Phase 2 of revisions (March-April-May-June 2020):
- Further revision of the policy structure to improve readability and flow and to consolidate the number of policies to reduce duplication (see Comparison Table in Phase Six, item 6i), in response to comments on behalf of Places for People and by the District Council Neighbourhood Plan officer.
 - Additional evidence added to justify each policy, as required by EHC and the Quality Review Panel.
 - Additional specific evidence created to justify the designation of Local Green Spaces (requested by Places for People) and to explain Hertfordshire Village Character (requested by Quality Review Panel).
 - Inclusion of clear reference to a Strategic Landscape Masterplan, as advocated by the Quality Review Panel and included around that time in the then draft Charter SPD (subsequently approved by Council in June 2020).
 - Emphasis on the development having to provide evidence of balance and trade-offs between village character, landscape and allocated development. This is intended to provide flexibility to the developers without removing the commitment to delivering

‘villages’. It reflects the consideration given by the Group to EHC’s comments and further guidance on revised Policy AG6 and Appendix 4, the note of which is in Phase Six item 6g. The Group took on board the majority of those comments but not the term suggested of “Garden Villages” or that it was the Group’s role to stipulate design as that was felt to be the prerogative of the developers’ design teams.

- Revision and consolidation of policies regarding governance and community stewardship (in response to comments made by Places for People).

D. Conclusions

83. Development in the Gilston Area has been discussed within the community and with the relevant authorities, landowners and developers for a long number of years. Consultation on the future of the area has taken different forms in different context (Parish Plan, District Plan, Concept Framework, Neighbourhood Plan) and has run alongside other events related to the Outline Planning Applications for the area and the strategic guidance documents of the Harlow and Gilston Garden Town and Gilston Area Charter Supplementary Planning Document (SPD)
84. The drafting and preparation of the Neighbourhood Plan has built upon the inputs of all stakeholders, and through successive revisions and integrations has identified a policy platform that can be shared by community, planning authorities, statutory consultees and developers for the delivery of sustainable and high quality development suitable to the local context of Hertfordshire villages and with the potential to mature into a harmonious and distinctive set of communities, old and new.

Appendices:

All appendices are held on the Hunsdon, Eastwick & Gilston Neighbourhood Planning website, <https://hegnp.org.uk/neighbourhood-plan#evidencebase>

If you do not have access to the internet to see any of these, you can write to the HEGNPG c/o Bridge End, Hunsdon Pound, Near Ware, SG12 8LF for paper copies; please add your telephone number and specify which documents you wish to see and include a large sae please.

Phase One

Background preparation – pre 2010

Original Gilston & Eastwick Parish Plan 2009, prepared by residents of Eastwick & Gilston

Appendix 1a Residents survey by Eastwick & Gilston Parish Plan Group and analysis of survey responses (Autumn 2008) <https://hegnp.org.uk/?mdocs-file=836>

Appendix 1b Eastwick and Gilston Parish Plan 2009 published (Spring 2009)

<https://hegnp.org.uk/?mdocs-file=838>

Phase Two

Formation of joint Hunsdon, Eastwick & Gilston Neighbourhood Planning (HEGNP) Group

Appendix 2a Parish Councils (PC) agree HEGNP to be a standard agenda item with an update reported to every Parish Council meeting, published in the:

Eastwick & Gilston PC minutes <http://www.eastwickandgilston.org.uk/meetings.php>

Hunsdon PC minutes <https://hunsdon.org.uk/parish-council/>

Appendix 2b Informing residents of the new HEGNP Steering Group & seeking volunteers (Spring 2016)

Introductory leaflet <https://hegnp.org.uk/?mdocs-file=910>

website notice <https://hegnp.org.uk/?mdocs-file=840>

Community update <https://hegnp.org.uk/?mdocs-file=900>

Appendix 2c HEGNP Community Updates (2015/16)

Extract from Eastwick & Gilston Parish Council Chairman's Report 2015/16

<https://hegnp.org.uk/?mdocs-file=842>

Extract from Hunsdon Parish Council Chairman's Report 2015/16

<https://hegnp.org.uk/?mdocs-file=1057>

Appendix 2d E&G Parish Council minutes (October 2016) published in the Nov 2016 copy of the Parish Magazine <https://hegnp.org.uk/?mdocs-file=844>

Appendix 2e Creation of the Hunsdon, Eastwick & Gilston Neighbourhood Planning website, launched 2016, <https://hegnp.org.uk>, with Key Objectives

<https://hegnp.org.uk/?mdocs-file=972>

Appendix 2f Minutes of all HEGNP meetings published on the hegnp.org.uk website and in the Parish Magazines (Ongoing)

Phase Three

Engaging the Communities in East Herts Council District Plan 2018 – 2033, including Examination in Public

Appendix 3a HEGNPG, EHC & landowners Workshop – minutes published in the parish magazine and community website (January 2017)

<https://hegnp.org.uk/?mdocs-file=855>

Appendix 3b Flyer informing communities of the EHC's District Plan Examination in Public (Autumn 2017)

<https://hegnp.org.uk/?mdocs-file=913>

Appendix 3c Parish Councils response to Examination in Public

<https://hegnp.org.uk/?mdocs-file=943>

Appendix 3d Various updates to the community; including:

HEGNPG response to District Plan <https://hegnp.org.uk/?mdocs-file=902>

Update leaflet Responses to Main Modifications (March 2018)

<https://hegnp.org.uk/?mdocs-file=898>

[full details of Main Modifications on EHC website]

<https://www.eastherts.gov.uk/planning-building/planning-policy/district-plan-examination-documents/main-modifications-consultation>

Appendix 3e East Herts District Plan 2018 – 2033 – adopted by East Herts (October 2018)

<https://hegnp.org.uk/?mdocs-file=858>

Appendix 3f Chapter 10 - Villages <https://hegnp.org.uk/?mdocs-file=976>

Appendix 3f Chapter 11 – The Gilston Area <https://hegnp.org.uk/?mdocs-file=978>

Phase Four

Contributing to the revision of the Concept Framework for the Gilston Area

Appendix 4a Governance – consultation with EHC and landowners, published in May 2017 edition of Parish Magazine (April 2017) <https://hegnp.org.uk/?mdocs-file=860>

Appendix 4b Concept Framework community event led by Landowners – Summary of comments received (August 2017) <https://hegnp.org.uk/?mdocs-file=864>

Concept Framework consultation led by EHC (August 2017)

Appendix 4c Feedback received <https://hegnp.org.uk/?mdocs-file=919>

Appendix 4d Notes from architects meeting <https://hegnp.org.uk/?mdocs-file=917>

Appendix 4e Infrastructure Workshop led by Landowners (August 2017)

<https://hegnp.org.uk/?mdocs-file=875>

Concept Framework consultation – Community Event led by HEGNPG (September 2017)

Appendix 4f Presentation (23rd September 2017) <https://hegnp.org.uk/?mdocs-file=1079>

Appendix 4g Part 1 Comments made by participants – Table discussions

<https://hegnp.org.uk/?mdocs-file=883>

Appendix 4h Part 2 Individual comments made by participants

<https://hegnp.org.uk/?mdocs-file=1005>

Appendix 4i HEGNPG's response to the Concept Framework after September 2017 community workshop

<https://hegnp.org.uk/?mdocs-file=1009>

HEGNP Group consultation with East Herts Steering Group (October 2017)

Appendix 4j HEGNPG's preparation for October meeting

<https://hegnp.org.uk/?mdocs-file=885>

Appendix 4k EHC led Steering Group's own minutes of October meeting

<https://hegnp.org.uk/?mdocs-file=888>

Appendix 4l Statement of Common Ground, Matters of Agreement between Places for People, City and Provincial Properties and East Herts District Council – The Gilston Area (November 2017)

<https://hegnp.org.uk/?mdocs-file=1055>

Appendix 4m HEGNPG Presentation to EHC Gilston Area Steering Group highlighting areas of improvement to Concept Framework (23 November 2017)

<https://hegnp.org.uk/?mdocs-file=1071>

Appendix 4n Community Update (December 2017)

<https://hegnp.org.uk/?mdocs-file=890>

Appendix 4o Notification of community workshop (January 2018)

<https://hegnp.org.uk/?mdocs-file=915>

Appendix 4p Community Workshop presentation by HEGNP (20 January 2018)

<https://hegnp.org.uk/?mdocs-file=892>

Appendix 4q Revised draft Gilston Area Concept Framework, December 2017 - Consultation comments summary (January 2018 event) <https://hegnp.org.uk/?mdocs-file=895>

Appendix 4r Community Update from HEGNPG (February 2018)

<https://hegnp.org.uk/?mdocs-file=905>

Appendix 4s HEGNPG Review of CDF (March 2018) <https://hegnp.org.uk/?mdocs-file=923>

Appendix 4t Eastwick & Gilston Parish Council minutes extract via Parish Magazine (May 2018) <https://hegnp.org.uk/?mdocs-file=873>

Appendix 4u HEGNPG's Chairman's Annual Report to Parish Councils (Spring 2018) <https://hegnp.org.uk/?mdocs-file=870>

Appendix 4v East Herts Council report (25 July 2018) adopting the Concept Framework (dated July 2018) <https://hegnp.org.uk/?mdocs-file=868>

Appendix 4w updated Gilston Area Concept Framework (July 2018) [full details on East Herts website] <http://democracy.eastherts.gov.uk/mgIssueHistoryHome.aspx?IId=22629&Opt=0&I=1>

Appendix 4x HEGNPG Chairman's Annual Report to Parish Councils Spring 2019 (January 2019)

<https://hegnp.org.uk/?mdocs-file=866>

Phase Five

Preparation of the Gilston Area Neighbourhood Plan Statutory Consultation (Regulation 14)

Appendix 5a Regulation 14 Community letter (September 2019)

<https://hegnp.org.uk/?mdocs-file=925>

Appendix 5b Regulation 14 letter to Statutory consultees (September 2019)

<https://hegnp.org.uk/?mdocs-file=933>

Appendix 5c List of Statutory Consultees sent Regulation 14 letter & invited to comment on NPv1

<https://hegnp.org.uk/?mdocs-file=1053>

Appendix 5d Invitation to Reg 14 Community Events (September 2019)

<https://hegnp.org.uk/?mdocs-file=927>

Appendix 5e Note on Regulation 14 Consultation <https://hegnp.org.uk/?mdocs-file=734>
Community events (September 2019)

Appendix 5f Regulation 14 Presentation on Consultation in full (September 2019)

<https://hegnp.org.uk/?mdocs-file=736>

Appendix 5g Community event response sheet <https://hegnp.org.uk/?mdocs-file=929>

Appendix 5h Community event photos <https://hegnp.org.uk/?mdocs-file=931>

Appendix 5j HEGNPG Chairman's Annual Report to Parish Councils (February 2020)

<https://hegnp.org.uk/?mdocs-file=935>

Appendix 5k East Herts Council Schedule of Comments to NPv1 with HEGNPG responses following Reg 14 Statutory Consultation (February 2020)

<https://hegnp.org.uk/?mdocs-file=1061>

Phase Six

Gilston Area Neighbourhood Plan Interim Non-Statutory Consultation

Appendix 6a notes of meeting between HEGNPG and EHC to discuss NPv2 (11 February 2020)

<https://hegnp.org.uk/?mdocs-file=964>

Harlow & Gilston Garden Town (HGGT) Quality Review Panel (QRP) (20 February 2020)

Appendix 6b HEGNPG presentation to HGGT QRP

<https://hegnp.org.uk/?mdocs-file=1050>

Appendix 6c HGGT QRP report to HEGNP <https://hegnp.org.uk/?mdocs-file=1114>

Appendix 6d HEGNPG Note of meetings with Landowners agents (28 February 2020)

<https://hegnp.org.uk/?mdocs-file=966>

Appendix 6e East Herts Council Additional Comments to NPv2 (March 2020)

<https://hegnp.org.uk/?mdocs-file=1089>

Appendix 6f Landowner of Villages 1 – 6 response to NPv2 (31 March 2020)

<https://hegnp.org.uk/?mdocs-file=1065>

Appendix 6g East Herts Council Policy and Implementation Note re amended Policy AG6 and Appendix 4 (sent 4 June 2020)

<https://hegnp.org.uk/?mdocs-file=1096>

Appendix 6h Comments Logbook holds a record of responses, comments and actions following Regulation 14 consultation and all subsequent non-statutory consultations and other references by EHC and the land owners in 2020

The Comments Logbook can be accessed in 4 ways:

Google sheet

<https://docs.google.com/spreadsheets/d/18fAjiZGhQsLOH2Bu7jrTyAgAFpoegcLyzlXzvLPDNIk/edit?usp=sharing>

Raw spreadsheet data, xlsx

<https://hegnp.org.uk/?mdocs-file=740>

PDF format

<https://hegnp.org.uk/?mdocs-file=1141>

Webpage

<https://hegnp.org.uk/neighbourhood-plan-logbook>

Appendix 6i Comparison Table of Neighbourhood Plan Policies

<https://hegnp.org.uk/?mdocs-file=1074>