



HEGNPG

Supporting our Community

**Hunsdon Eastwick and Gilston Neighbourhood Plan Group**

Channoeks Farm

Gilston

Nr Harlow

CM202RL

<https://hegnp.org.uk/>

Claire Sime,  
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**BY Email only to [planningpolicy@eastherts.gov.uk](mailto:planningpolicy@eastherts.gov.uk)**

3rd October 2020

Dear Claire,

### **Sustainability Supplementary Planning Document Consultation**

As a community group representing the communities affected by the Gilston Local Plan Policy GA1/ GA2 and now the subsequent planning applications we are interested in this document. In general terms we support bringing together the many threads of Sustainability policy into a single document.

As a community we have championed the cause that the Gilston development, of 7 villages set in Hertfordshire countryside as anticipated in the Local Plan, should be of exceptional quality reflecting the exceptional reasons for releasing a large Green Belt site. This ambition needs to be carried through in sustainability policies and given the scale and duration of the project we are surprised that there are no mentions of Gilston and your Local Plan, Policy GA1/GA2

**Policy Context** - We understand that the Harlow Gilston Garden Town Board are also in the process of producing a similar document, if that is the case there seems to be an opportunity for cross boundary coordination to avoid having two sets of policy documents on the same subject?

**Design Led Approach** - We note and support the statements at 2.6 on Hertfordshire's historic environment. In Gilston historic landscapes are under threat through, for example, diluting the quality of the landscape around the historic Gilston Park and Hunsdon House. These are specific opportunities not being fully recognised and, given the importance and scale of the Gilston Policy GA1, they are surely worthy of specific mention?

**Green Infrastructure** (para 4.2.) - We welcome the importance placed on green infrastructure in 4.21 **BUT** there is no mention of the importance of the green infrastructure being managed into the future, the developers will have a short term ambition to deliver their project and move on! The green infrastructure should be transferred to the Community together with a suitable endowment (similar to what was formerly a commuted sum payment). This omission needs addressing as otherwise, as we have seen already the green infrastructure may not be properly managed which can dilute its importance.

**Green Walls and Roofs (4.24)** - While these are welcomed in general terms without the right sort of planting their contribution to biodiversity might be compromised; they need to be planted to increase pollinators who are facing such a decline.

**SuDS (4.2.4)** - The text does not make it clear that SuDS can and should be a part of the green infrastructure rather than potentially being of 'industrial scale/design'. They can support biodiversity and so a multiplicity of uses, including of course recreational and leisure uses. They also need a developer funded endowment to ensure they are maintained into the future and not, as seems EHC's current policy to ask residents to fund through annual Service Charges; the text should be changed to make both points, (multiple uses and long term funding) clear.

**Air Quality** (6.10) - We welcome the general approach but fail to understand why EHC does not seem to champion this when it comes to a flagship policy like Local Plan GA1/2 where it is proposed to extend the A414 through the middle of an existing community without providing the community with the sort of information the Policy champions. Can the Council make it clear that it will **from now onwards** not support any schemes which are not clear to residents on the impact on air quality?

**Light Pollution** (6.2) Supported, this is especially important for the Gilston project and its aim to create 7 distinctive villages without light pollution linking them in hours of darkness given the small size of the buffer lands between the villages. There is however no indication of how light pollution post initial development will be controlled, this feels like a significant omission, good planning needs to be for the long term?

**Noise pollution( 6.3)** We believe that this should be addressed in this draft SPD rather than deferred with the vague promise that "noise guidance will be available for applicants in due course. Hertfordshire noise guidance is being developed jointly by a number of Hertfordshire local authorities".

**Biodiversity** (7) We support although feel that given the importance and scale of the Gilston project alongside its interface with the Stort Valley with its floodplain that these areas should have been identified as priority areas for attention - they represent opportunities to make

positive and strategic gains, balancing the desire for social recreation with environmental protection, including supporting pollinators who are in serious decline - 'green' alone does not address the needs of reversing pollinator decline.

**Sustainable Transport 'Gear Change'** (8.3) We support the general approach on transport. What is missing when it comes to cycling provision is that the focus appears only on new provision, the need for connectivity with existing local communities and the lack of existing infrastructure needs addressing as does the need to maintain what little there is; surely EHC have a policy position to achieve better provision, if so why not state it? On new provision developers should make commuted sums available or endowments to provide for the long term maintenance needs. There needs to be a rethinking of the design of cycle routes to make them attractive to users; at Gilston EHC appears to be encouraging a cycle and walking bridge of over 300m length to simply cross a C classification road at Eastwick roundabout when a signalled crossing with priority for pedestrians and cyclists would be more user friendly and better value? EHC seems to have made no option analysis other than side with vehicle users at odds with your suggested strategy to give priority to walking and cycling; why?

While the focus on cycling and walking is commendable, we would draw attention to:  
" Garden Villages and Garden Towns: Visions and Reality. (Text copyright © 2020 Transport for New Homes and the conclusion, in section 4, that; -

*"Public transport is very popular but unfunded. Nearly every garden town wanted excellent public transport. Equally the vast majority of garden villages put sustainable transport at the heart of their vision. Funding was however, very uncertain and pushed a long way into the future - there was little definite. We could find no garden community where the sustainable transport elements were costed and funded with delivery dates."*

Without a clear policy for funding public transport, the conclusion is that the car will dominate these new communities as it does the old ones.

**Missing section - Funding** From the above you will see that we have a concern that the strategy asks developers to do or provide 'things' BUT there is no suggestion that they should have to provide for their long term maintenance. Matters are made worse by EHC's policy approach making new residents pay service charges to cover these requirements. It is equally reasonable to seek Landowners, who are making massive gains in land value, or developer funding. In our view a whole new section needs to be added to address this; we are of course happy to help develop the thinking, if useful!

Yours sincerely,

**Anthony Bickmore, Chairman HEGNPG**

Cc Cllr Eric Buckmaster, EHC  
Cllr Mark Orson, Eastwick and Gilston PC  
Cllr Bob Toll, Hunsdon PC