



HEGNPG

Supporting our Community

Hunsdon Eastwick and Gilston Neighbourhood Plan Group

Channoeks Farm

Gilston

Nr Harlow

CM202RL

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

Planning Policy
East Herts Council
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21st January 2021

FAO Ms Jenny Pierce by email

at Jenny.Pierce@eastherts.gov.uk

(cc. Mr Kevin Steptoe by email at Kevin.Steptoe@eastherts.gov.uk)

Dear Sir/Madam,

Gilston Area Applications – Outline Planning Application for Villages 1-6 and Detailed Applications for Central and Eastern Stort Crossings refs 19/1045/OUT, 19/1046/FUL and 19/1051/FUL

The Hunsdon, Eastwick and Gilston Neighbourhood Plan Group (HEGNPG), after consultation with the community and the Parish Councils of Hunsdon and Eastwick & Gilston, has concluded that the proposals included in **the revised planning application submissions for the Gilston Area cannot be supported and should not be approved without further integrations and modifications**. These are necessary to demonstrate a clear commitment to the delivery of development in the form of distinct villages, enhancing the natural environment and supporting infrastructure that addresses the needs of future and existing communities, as required by Policy GA1, the submission Gilston Area Neighbourhood Plan, the Gilston Area Charter SPD and other relevant guidance including the Gilston Area Concept Framework and the HGGT Vision and Design Guide. In addition, the

mitigation of impacts on the existing communities is not adequately addressed. Far too many of these measures are left vague and unspecific to be defined and secured through the s106 agreement and governance arrangements. We maintain that greater clarity and certainty on these critical matters is required before the current planning applications can, properly, be determined.

We acknowledge that the applicants have made some welcome additions and clarifications, while retaining strong commitment to quality building design and 40% affordable housing. Other welcome improvements are on public transport provision, heritage protection and increase of employment space within the village centres. However, we remain concerned that if East Herts Council (EHC) approves the applications in their current form, they will fail to achieve the agreed vision and objectives for development in the Gilston Area and fail to fulfil the Garden City principles set out in the District Plan itself

We outline below the key areas of concern of the local community. These are explained in further detail in the Addenda attached to this letter.

Summary of our Main Concerns (Relating to the Development Proposals as a whole)

Status of the Application Documents submitted for approval – The Parameter Plans (PP) and Development Specification (DS) are presented as the documents that will fix the boundaries of the built area, maximum heights and green spaces. This interpretation is confirmed in the DS (Section 6.2), which states that the role of the Strategic Landscape Masterplan (SLMP) and Village Masterplans (VMPs) is to apply the boundaries, parameters and principles identified in the OPA. This approach fails to present adequate reasoning and justification for the parameter proposed and invalidates the role of later master planning stages. It also shows unacceptable parameters (no meaningful separation, no integrated green infrastructure, unacceptable height parameters, etc.). It should be made clear in the Development Specification that subsequent design stages (SLMP and VMPs) will be the key documents where the boundaries of the Green Infrastructure and Buffers and the built-up area will be fixed, and that heights and density can only be set on the basis of a VMP which has the full engagement of the community. This is essential to ensure the Parameter Plans and Development Specification are not applied in a way which will constrain the masterplanning process and prejudice the overall vision and objectives for the Gilston Area (see Addenda G and I).

Development Contributions (s106) and Land Value Capture for the benefit of the whole community – We have raised these matters with EHC multiple times, but we are still informed that the Heads of Terms for the Section 106 agreements are far from settled and that most of the commitments required of the applicants remain to be negotiated. We understand that even the basis on which they will be formulated is not yet agreed, with the applicant's rejection of the HGGT Infrastructure Development Plan and reversion to its own draft heads of agreement submitted with the original application which are not accepted by EHC or the community. It is impossible to see if the full mitigation of impacts on existing communities and off-site enhancements for the benefit of existing and future residents will be secured. The extent and timing of the provision of services and community facilities in line with Garden City Principles are also obscure and uncertain.

This is a requirement of EHC's Policy GA1 that is unresolved and demands the clarity of unambiguous and detailed Heads of Terms, open for all to see and

upon which to base the wide and far-reaching decisions now required of the Councillors of EHC (see Addendum A).

Community Trust Land and Stewardship – Despite engaging with EHC and the Developers for 18 months on this matter, there is still no detail of what land will be transferred to the community, when the transfer will take place to meet the Policy GA1 requirement and how the long-term stewardship will be secured and funded; this is an unresolved requirement of EHC's Policy GA1 (see details in Addendum B).

Main Access Highways – The route from the Eastern Crossing to the entrance to Village 6 (and Village 7) is proposed as a sequence of isolated junctions and local access roads. At the same time, it is described as a strategic connection required to support the Garden Town as a whole, and relieve traffic from Harlow town centre (i.e. a road fulfilling the role of a by-pass). The lack of transparency about the real objectives of the proposals raises doubts that the benefits and impacts have been properly evaluated to justify the heavily engineered design and land take, which appears to be contrary to the objectives of containing vehicular traffic in favour of the promotion of sustainable transport and has massive impact on the existing community. The detailed highways applications fail to properly address the consequential impacts of their proposals; should they be consented (see Addenda C,D,E).

Comprehensive Development and Integration with Village 7 – Despite assurances, this has not been adequately addressed. A holistic approach is needed given that GA1 is a single allocation of 7 villages not 6 +1. A properly phased and clear delivery framework that knits all development together in a logical sequence (so including Village 7 and existing settlements) is not provided. We believe this should detail community facilities, green spaces network, footpaths and cycle routes and the promotion of social cohesion. The developers of Village 7 seem to be proposing a different design approach on many aspects; this is at odds with Policy GA1 and EHC's stated ambitions to have a strong masterplan led approach to major projects. To make decisions on villages 1-6 without the incorporation of the village 7 development will lead to disconnection and harm to the community.

Green Infrastructure Network and Adequate Separation between Villages – Meaningful separation between the 7 villages and the creation of a backbone of a continuous green infrastructure network surrounding the villages is not clearly set out. This could compromise the establishment of an appropriate balance between built areas and landscape, with implications for the Strategic Landscape Masterplan and Village Masterplans. The proposals for the areas north of the high tension power lines are not sufficiently developed and we are concerned that the proposals are not informed by a robust landscape framework (work on the Strategic Landscape Masterplan does not appear to us to have meaningfully started) – see Addendum G. (**NOTE** we have read the Hertfordshire County Council's (HCC) Landscape Officer's report and note that their concerns with the applications in many cases echo our concerns).

Treatment of Sensitive Sites (fields in front of St Mary's, to the west of Home Wood, south of Gilston Park House and around Hunsdon House) – There is insufficient clarity about the extent of the controls put in place to safeguard the setting of heritage assets and very exposed and prominent locations (see more details in Addendum H).

Development Heights and Built Form – Inadequate control measures are provided to ensure village quality and requests for potentially inappropriate flexibility in heights, location and development quantities without justification, establishing development parameters that could constrain the design-led approach of the Strategic Landscape Master Plan and Village Master Plan processes (see Addendum I).

Other Concerns (Relating to specific issues)

Other Transport Issues – Inadequate or no commitments to improved access to the stations by cycling and walking and to creating an efficient, connected network of essential routes for walking and cycling accessible to the new and existing communities (see Addendum J).

Industrial Uses / Business Park – Poorly integrated and prominently located employment uses, undermining the concept of ‘villages’ as set out in the Concept Framework. To achieve the objective of sustainable development and encourage local employment which reduces the need to travel, the village centres should be the focus of employment provision for the community rather than promoting the concept of a road orientated Business Park at the edges of the site which also reduces the green infrastructure at a key location and seems in conflict with EHC’s sustainability ambitions.

Provision for Travellers and Showpeople – Inadequate assessment has been undertaken of this sensitive land use, and the two safeguarded areas appear to have been included as an afterthought at the margin of the sites and, of even greater concern, within landscape areas outside development boundaries that are identified for green corridors, wildlife and biodiversity to be retained in perpetuity. Design criteria for the successful integration of this requirement should be set out in the Development Specification and EHC’s requirement to accommodate such uses post 2033 should be considered in the next Local Plan review on a cross District basis, not now. The insistence on making provision earlier has distorted what the District Plan requires. This and the developers’ refusal to allocate potential sites within their developable areas means that the Council and the applicants have lost the support and trust of the community on this matter and the proposal put forward is fundamentally unacceptable.

Biodiversity Net Gain – Lack of clarity about the strategy for achieving biodiversity net gain or any commitment as to when / or as part of which work proposals it will be made. A clearer commitment to this requirement should be added to the Development Specification.

Infrastructure Delivery Plan - Social Infrastructure – there appears to be no progress on our concerns on the timely delivery of local social infrastructure such as Schools, Health Care and other social needs. The proposed Infrastructure Delivery Plans left key items to be delivered too late in the development planning so making for unbalanced communities. **IDP -Transport** – A number of sustainable transport improvements have also been suggested too late. Early delivery of these will be critical to people changing their patterns such as public transport, cycling and walking, equally importantly who will deliver these and by when?

Further Considerations

Many matters have developed or changed over the last 15 months and should be reflected in the revisions, these include further elaboration of how the developer is intending to respond to:

1. The Covid pandemic, leading to an economic shift, different lifestyles and development requirements.
2. Phasing of development and infrastructure provision and changes to the housing trajectory.
3. The additional urgency to address the climate emergency, including more stringent targets for carbon neutral development including EHC's consultation on its own Sustainability Strategy and greater recognition of the importance of achieving a biodiversity net gain of a minimum of 10%. The recently published Future Homes Standard also needs consideration.
4. The Charter SPD and Community Engagement SPD have been approved since the submission of the planning applications. Clarity is required with respect to the full planning strategy for the development, including a matrix of what will be approved as part of which application in accordance with the Charter SPD, the scope of the masterplans and how the community will be meaningfully engaged at each stage in accordance with the Community Engagement Strategy SPD.
5. The emerging Gilston Area Neighbourhood Plan (GANP)

Proposed Way Forward

The HEGNPG advocates that the following main integrations and revisions are made before the proposals are in a condition to be decided or, we suggest capable of being recommended by Officers for approval:

1. **Fixing Development Parameters**; It will be necessary to establish a clearer development process and schedule of what it is fixed and what remains to be determined as part of this application. The extent of development, green corridors, heights and densities indicated in the Parameter Plans and Development Specification cannot be fixed at this stage without further justification. There is a real danger that development will be built to the maximum extent leaving no separation, that the top range of the height envelope (4-5 stories) will be the norm and that minimum width of the green corridors will be 'filled up' with other requirements (as already happening in the application). It must be agreed that the Parameter Plans and Development Specification only set out high-level development principles which must be further developed at the masterplanning stage. It is premature for critical elements of Parameter Plans to be fixed at this stage when the Landscape Masterplanning work has not yet started and further necessary assessment work has not been undertaken. The Parameter Plans submitted for approval can only be agreed as 'indicative' and not to be applied as a set of 'control documents'. Boundaries of the green corridors and built-up areas, heights, density etc. will be fixed through the Strategic Landscape Master Plan and Village Masterplans in full consultation with the community.
2. **Confirmation of the Heads of Terms and content of the S106**. More transparency and clear detailed proposals are required to understand how impacts on the existing community will be addressed and off-site enhancements to manage the development's impacts delivered. The Developers are pushing

back on their responsibilities for transport and other infrastructure (VDAR Appendix 9) and it is not clear how or if the development impacts at Gilston will be mitigated or the promised enhancements delivered. There is a fundamental disagreement between the Council and the HGGT on the one hand and the applicants on the other as to Delivery of Infrastructure and the appropriate Plan for its delivery which has to be resolved with clarity and transparency before this application can proceed. Furthermore, the infrastructure triggers are 'indicative' and we are disappointed that so little progress appears to have been made on agreeing the subject matter headings, let alone detail heads of terms. In the absence of the above, councillors will be delegating matters to officers which they themselves should be deciding and/or will be making decisions without the necessary and appropriate facts before them. This will be a breach of the legal and democratic process and to proceed in this fashion will leave them open to serious and inevitable challenge.

6. **Stewardship**; the Community have participated in discussions with the developers but there has been no effective progress. The timing and nature of community ownership, and the essential funding mechanisms all remain outstanding. There have been some modest 'early win' proposals but almost none of these have progressed over the last 18 months. The planning applications should not be agreed without clarity about transfer of land, its timing and the stewardship arrangement, as this is contrary to Garden City Principles, Policy GA1 (VII) and the Concept Framework and the emerging Neighbourhood Plan.
7. **Highway justification**; A highway strategy document is required explaining the options considered and how the proposals maximise opportunities for sustainable transport and minimise impacts on the environment and local communities. Without a robust framework, design solutions that cause significant severance, landscape loss, involve massive land take for vehicular traffic and will likely require CPO of private property cannot be justified. In addition, the proposals leave many areas unfinished as a consequence of the proposed highway changes and that seems to be a critical omission for a detailed planning application. Suggestions for better connections to Harlow Town Station are made but lack any substance or commitment on the part of the Developers or other bodies. Approval of proposals relating to the corridor between Temple Fields and Church Lane (V7) (detailed applications and general arrangement plans) should be suspended pending the publication and consultation of a detailed A414 Strategy for Segment 14 in the context of overall priority being given to sustainable and convenient active transport between the Gilston Area and Harlow.

Conclusion

EHC has achieved the largest release of Green Belt land in England in recognition of the exceptional circumstances made in its Local Plan. The Community have been assured by the Council before, during and after the Local Plan Examination that the Gilston project would be delivered to meet exceptionally good standards in reflection of the exceptional circumstances advanced at the Examination. The developers

championed this aspiration at the time but have yet to show precisely and clearly how they will achieve and deliver it. As a community we have worked tirelessly to help shape the development to achieve the undertakings made to us, we have prepared a Neighbourhood Plan that sets out how we see the Gilston allocation being delivered to achieve this objective. We have consulted extensively with the Council and applicants on this.

We regret that these three applications still require much further work before they can be supported. Indeed there are major omissions, which we feel means the applications are not capable of being determined without considerable further work. Our community remain ready to continue to engage with all parties to see this development emerge as an exceptional development of quality.

Yours faithfully

D A Bickmore, Chairman

CC Cllr Linda Haysey, EHC Leader
Cllr Eric Buckmaster EHC and HCC

Development Contributions (S106) and Land Value Capture for the benefit of the whole community

Issue:

The terms of the S106 agreements are unknown and it is not possible to see if full mitigation of impacts on existing communities and off site enhancements for the benefit of existing and future communities will be included and the extent and timing of provision of services and community facilities in line with Garden City Principles. The application merely proposes that the uplift in land value will be used to pay for the 'minimum' infrastructure requirements rather than meet the policy ambitions of GA1 and the HGGT; this is a substantial dilution of the Council's original vision as a Garden City. It is regrettable that the applicants show reluctance to provide more than the minimum that their narrow and legalistic interpretation of the legislation would permit. This is in direct conflict with the provisions of the District Plan Policy GA.III. If that is incapable of implementation, then the policy is predicated on a false and impossible premise. If that is the case, the District Plan will have to be revised and resubmitted for Examination and approval. This is something which EHC have to address before they go any further with the application.

The Development Specification state that a Strategic Delivery Plan will be submitted to and approved by the local planning authority before development commences on site and that this will accord with broad Delivery Principles proposed. This does not provide us with the necessary confidence that infrastructure will be delivered in a proper and timely manner to meet the needs of the whole community in accordance with planning policy and Garden City Principles. It is also unclear how the necessary triggers and contributions will be captured in the S106 agreement and how these will apportioned across Villages 1-6 and Village 7.

Related to Planning Documents:

Supporting information – informing S106 negotiations:

Village Development Addendum Report (VDAR):

- Delivery Statement (Appendix 8)_
- IDP Response Table (Appendix 9)
- Draft Infrastructure Triggers (Appendix 11)

Development Aspirations:

District Plan Policy GA1 states that development will be based on the principle of land value capture to deliver the social and physical infrastructure for the benefit of the community.

HGGT IDP sets out the infrastructure required to accommodate development based on assessment of existing capacity to meet the comprehensive needs of new and existing communities.

Submission Gilston Area Neighbourhood Plan Policies AG9 and D2 requires infrastructure capacity to be phased to meet the comprehensive needs of new and existing communities and to ensure necessary physical and social infrastructure is provided at time of need.

Concerns:

- The Delivery Statement does not provide confidence that the necessary infrastructure required to accommodate the development will be provided at the time of need or that contributions will be secured to deliver the full range of infrastructure identified in the HGGT Infrastructure Delivery Plan and mitigate impacts on the existing community. The applicant states that this may affect the viability of the scheme and that only infrastructure considered 'appropriate' to mitigate the impacts of development will be funded through the development. This is a cause of great concern to the community, especially as the applicants decline to provide information on viability. It is difficult, if not impossible, to see how viability will be a factor in what is said to be a £2.8 billion pound development.
 - The approach adopted by the applicant is not in accordance with Garden City Principles and it appears that the concept of Land Value Capture is being abandoned.
 - We have asked to see the S106 HoT's covering the development and have been told by EHC that no HoT's for this exist in any meaningful form. This is of critical importance given the short timescale set by EHC for determination of the application. The application cannot be determined without full and detailed HoT's and it is impossible for the community to form a view on the adequacy of these measures based on the information submitted. The VDAR (para 4.9) states that these matters will be resolved with the local planning authorities as part of the continued determination of the applications, *'the outcome of which may have a material bearing on project viability'*. Far too many commitments are left unspecified and uncosted with only a proposal to examine their feasibility within S106 negotiations. In too many instances the applicants have not yet entered into meaningful discussions with other third party landowners or stakeholders to bring forward realistic proposals that are capable of delivery and which they are prepared to be obliged to pay for. This leaves us to seriously doubt whether the necessary infrastructure will be delivered at the appropriate time and we strongly contend that the application is not ready for determination in its current form.
 - Without the opportunity to see the S106 HoT, it is impossible to understand the phasing of infrastructure. We are concerned that the draft triggers proposed will allow for the development of a substantial number of new homes without the necessary infrastructure being secured. This highlights again the importance of a coordinated approach to the Infrastructure Delivery Plans and planning obligations for Villages 1-6 and Village 7 as the Council and its partners at HGGT are well aware. But this is not something which the applicants are prepared to commit to.
 - The draft infrastructure triggers are not evidenced by an assessment of impacts on existing infrastructure capacity and would not deliver the necessary mitigation to manage the impacts of development on existing communities in
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the early stages of development. The triggers for the completion of parkland and landscaping works are considered to be too late in the development programme. Development will almost be completed before completion of the parkland and necessary landscaping/ woodland restoration. Needs should be identified and closely integrated with development programme.

- The application states that 40% of all housing will be affordable. However, the applicant's previous commitment to retaining the affordable housing has not been reconfirmed and it is unclear how this will be delivered. We are concerned that if this commitment is now in question, their position on other important matters such as Stewardship may also be open to review.

Proposal:

1. Further details of the S106 HoTs and proposed infrastructure triggers and a more comprehensive delivery strategy are required before the application can properly be determined. The community and other consultees should be afforded the opportunity to comment on these before the application is reported to planning committee.
2. HoTs should also include mitigation measures for impacts on existing local communities and off-site enhancements for the benefit of existing and future communities in accord with the land value capture principles in the District Plan, the Concept Framework Document and the emerging GANP.
3. The report to planning committee must include detailed unambiguous HoTs as these will be material to determination of the planning application, and a necessary pre-requisite without which the Councillors cannot make an informed and balanced decision. The applicants claim the total S106 contribution is over £600m; such a sum cannot be left not detailed.

Community Trust Land and Stewardship

Issue:

The applicant has provided an outline framework for the future governance of the area but to date the Parish Councils have not been given the opportunity to have real input. It will be very important that the Parish Councils and the community have time to adequately reflect on alternative possible governance structures and what role they will take.

Despite requests for further information, there is still a lack of detail of:-

- What land will be transferred to the community
- When the land will be transferred and
- How long term stewardship will be secured and funded.

Related to Planning Documents:

Supporting information – informing S106 negotiations:
Village Development Addendum Report (VDAR)

Development Aspirations:

District Plan Policy GA1 (11.3.7) and the Concept Framework states that the transfer of the Community Trust Open Space Land should take place **early** in the overall development programme to deliver local ownership and management of these assets.

Submission GANP Policy AG7 states that funding and design support should be secured through a legal agreement prior to the transfer of land and made available at the **early** stages of development. Policy D2 states that arrangements for future governance and stewardship will be secured as part of the planning process.

Concerns:

- Agreement on stewardship of community assets has not meaningfully advanced since the first submission of the outline planning application (May 2019). However, it is a key requirement of Policy GA1. Whilst we welcome the commitment to form a local working group, the timing for the 'early transfer' of the land by the applicant is still not set out in the application. In fact it is now stated that the transfer of the land will be "at the end of the development" (Development Specification- Governance Commitments p 67)
 - Discussions have been held but we are no closer to having an agreed basis for taking this forward. The information submitted in November 2020 indicates that the Community Trust Land will be *delivered* at the end of the delivery programme: Work on Hunsdon Airfield parkland is to be completed on the occupation of 5000 homes and Eastwick Wood on the occupation of 7500
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homes. This could be in several decades' time. No trigger for the transfer of the land has been indicated. On the contrary the Development Specification states it will not be until the end of the development which might be in 25-30 years time, if ever. The countryside parks are integral to the development and represent important mitigation measures and must take place early in the development programme with clear obligations for the funding of the necessary work promised and a future endowment for the maintenance of it within the Community Trust.

- We are no closer to understanding the nature of community ownership and how the communal areas and buffers will be managed. Without a clear programme for the transfer of ownership and the establishment of a community land trust or similar mechanism, the proposed triggers and promises of triple locks are meaningless. We warmly welcome the concept of early wins and hope some can be delivered through the s106.
- Under Policy GA1 a large amount of land is due to be transferred to the local community and in granting planning permission, there must be greater clarity about how this land will be protected and funded and how future stewardship arrangements will work.

Proposal:

1. Clearer commitments regarding future governance arrangements and community ownership need to be secured as part of the outline planning application.
2. Commitments to working with the parish councils and the community must be secured in the S106 agreements.
3. The proposed triggers for the delivery of the Airfield and Eastwick Wood parkland are unacceptable and contrary to Policy GA1. Early transfer **and** delivery of the Community Trust Open Space Land and the necessary funding for this must be secured in the S106.

Main Access Highways – Approach to the Whole Route from Temple Fields to Village 7

Issue:

The route from the proposed Eastern Crossing to the entrance to V6 (and V7) is applied for as a sequence of isolated junctions and local access roads. At the same time, it is described as a strategic connection required to support the Garden Town as a whole, and relieve traffic from Harlow town centre (i.e. a road fulfilling the role of a by-pass).

The lack of transparency about the real objectives of the proposals raises doubts that the benefits and impacts are properly evaluated to justify the heavily engineered design and the massive road land take, which appears to be contrary to the objectives of containing vehicular traffic in favour of sustainable transport.

Related to Planning Documents:

For Approval

General Arrangement Plans for access to V1, V2, V6

PP4

Detailed Application Drawings – Highway design and Landscape design

Supporting Documents

CSC and ESC Options Report

Development Aspirations:

Eastwick Roundabout is a major constraint to movement in the area: for vehicles and for cyclists. Pedestrian provision is particularly poor. Traffic along Eastwick Road towards High Wych is too fast and causes problems at Pye Corner. Lorry restrictions, however, ensure that volumes, noise and pollution are generally contained.

The local community is determined to ensure that the Gilston Area is to be planned and delivered in accordance with Garden City Principles and Policy GA1 / GA2, including being designed such that walking, cycling and public transport are the most attractive forms of local transport. There is support through the emerging GANP and the HGGT Transport Strategy for upgraded infrastructure that does not create severance within the community (GANP Policy AG8) and promotes sustainable travel choices. We are open to consider proposals in their own merit, as well as in relation to the existing communities.

The community would like to be able to explore the options behind the proposals and be satisfied that the proposed arrangements and layout have been optimised for their purpose.

Concerns:

The route from Edinburgh Way to Church Lane / V7 is approximately 4.6km long and will be designed to accommodate 9 junctions (one every 3-500m) at 40mph speed. This route is openly referred to as reflecting the 'aspirations' of the two highways authorities (ECC and HCC) to deliver an improved strategic road corridor linking the A414 to Edinburgh Way to offer relief to Fifth Avenue (ESC Options Report - Exec Summary 1.1.3). This approach is also reflected in other aspects of the application:

- PfP pushing back on their responsibility to pay for the road upgrades and the ESC because of its strategic road (VDAR – Addendum 8).
- PfP indicating that triggers for its construction are dependent on delivery of houses elsewhere in Harlow (Appendix 11)
- Reference to proactive encouragement (in the form of reduced turning lanes) for traffic coming from the west along the A414 to use the ESC to reach Harlow, the Enterprise Zone and Junction 7a.

This has introduced the creation of a by-pass to Harlow (i.e. a strategic road with wider benefits) disguised as an access road to development.

The NPG (via Markides Associates) have questioned whether the proposed corridor represented the best infrastructure solution to enable the development and a response in May 2020 by the HGGT/ ECC and HCC confirmed that the proposals represent the preferred strategic solution.

The benefits and specifications of a new Harlow by-pass / strategic route via Terlings have never been openly presented as strategic options. The approved A414 Corridor Strategy (HCC, Nov. 2019) is very conceptual and does not constitute a proper assessment. In addition, in its Technical Report (Segment 14, pg. 248) it states: *The immediate priority for the Harlow and Gilston area is to ensure that the proposed Garden Communities including Gilston are **well connected to the existing town**, and that there are sufficient opportunities to facilitate sustainable travel on foot, by bike and by public transport. **A new direct east-west route from the M11 at J7a to the A414 at Eastwick could work against local priorities** and therefore has not been considered further as an immediate priority for investigation in the A414 Corridor Strategy.*

The HGGT Sustainable Transport Strategy echoes the same message, arguing that it is futile to build more road capacity to accommodate future growth and that a change in travel behaviour should be the key option.

The ambiguity about the role of the corridor is leading to potentially poor decisions:

- The corridor has 9 junctions, of which 6 (with 3 signalled crossings) between Edinburgh Way and the replacement junction of Eastwick Roundabout instead of the current 5 roundabouts. It is not therefore efficient.
 - It will create severance within the existing communities, splitting the Gilston community in two (Terlings Park and the rest).
 - It will increase through traffic in High Wych directed to the M11.
 - It will bring increased noise and pollution to a tranquil area.
 - It will potentially undermine efforts to promote sustainable and active travel
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between the future Gilston communities and key destinations within Harlow.

- It may relieve traffic on Edinburgh Way, a commercial / industrial district, to put traffic across a residential community.
- Design road speeds have resulted into a sweeping alignment across the landscape with significant embankments and terrain alterations: *The extent of cut required to achieve an appropriate highway gradient, has resulted in a substantial area land of take, and feels disproportionate to the scale of the highways infrastructure* (HCC Landscape Report on the Planning Applications, Section 2.6). This is very pronounced on the ESC and the entrance to V6.

The NPG assumes that CPO will be required to deliver the ESC, given the complexity of ownerships and Terlings' residents' entitlement to the land. Without a clear and transparent narrative about the whole corridor and justifiable benefits, we cannot see how a CPO can be successfully advanced.

Finally, the provision for pedestrians and cyclists connecting to Harlow town centre and rail stations (Roydon and Harlow Town) is not given the same level of information and attention: for example flooding in Burnt Mill Lane and in the Stort Valley are not addressed, access along Station Road remains too narrow and no firm commitment is made to the station's northern access. There is no evidence that meaningful discussions have taken place between the applicants and third party owners and stakeholders. Yet pedestrian and cycle movement is a fundamental requirement of the development on which the road design also depend.

Proposal:

1. Reject or suspend approval for all proposals relating to the corridor between Temple Fields and Church Lane (V7) pending the publication and consultation of a detailed A414 Strategy for Segment 14 in the context of overall priority being given to sustainable and convenient active transport between the Gilston Area and Harlow.
2. Revise all access junctions to demonstrate a landscape-led approach which optimises land take, pedestrian and cycle permeability, respect for existing vegetation (as also advocated in HCC Landscape Report on the Planning Application).
3. Comprehensive and detailed design of a reliable pedestrian and cycle network as part of the detailed planning applications for the ESC and CSC extending to the two stations and Harlow town centre.
4. Ensure that the 'consequences' of the applications are evaluated and addressed (the quality of the spaces in Pye Corner and under the proposed new bridge, if it is to be built; Burnt Mill Lane, Eastwick road etc).

Central Stort Crossing (CSC) and new Village 1 access road**Issue:**

There is insufficient information to evaluate the design choices informing the CSC, the main access junction and V1 access road, which results into very significant land take, impact on the Stort Valley and confines pedestrian and cyclists on an inconvenient bridge over the roads. This is in addition to the issues related to the overall corridor (see Addendum C).

Related to Planning Documents:

For Approval:

Detailed Application Drawings: Engineering drawings, Construction access drawings

Development Aspirations:

The community supports the HGGT Vision and its Transport Strategy, which promote the creation of Sustainable Transport Corridors linking all parts of the Garden Town and constituting a backbone of pedestrian friendly connections prioritising active movement over vehicular one.

Concerns:

The design proposals are heavily engineered and clearly not guided by principles of place-making or landscape (see also Addendum C). This results in strong priority and visual dominance given to vehicular movement – contrary to Garden City principles and to the HGGT stated aspirations:

- Dedicating the direct access to V1 to buses only (promoted as a way to assert the prominence of public transport) appears a token gesture that massively increases road land-take to provide a vehicular access to V1 300m east.
 - The eastern arm of the junction has a carriageway width approximately 5 times the current road width – around double the size of any of the avenues within Harlow.
 - Pedestrians and cyclists are confined to a bridge nearly 400m long, which creates opportunities for anti-social behaviour, putting the likes of pedestrians with prams, young people and other vulnerable users at risk.
 - Pedestrian and cycle access to the station has not been properly secured: there is no commitment to delivering the northern access to the station (only unspecified financial contributions and the concept is not supported by any feasibility studies) and no proposals to improve the current access routes, which has narrow pavement and no cycle route.
 - How pedestrian and cycle access to Harlow town centre is to be upgraded is not presented / addressed. The critical transport infrastructure to meet the 60% sustainable movement targets stops before it reaches Harlow Station, a key issue still not addressed.
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Proposal:

1. Reject or suspend approval of the CSC Detailed Application pending the publication and consultation of a detailed A414 Strategy for Segment 14 in the context of the design of Sustainable Transport Corridors across Harlow.
2. Revise all junctions to demonstrate a landscape-led approach which optimises land take, pedestrian and cycle permeability, respect for existing vegetation (as also advocated in HCC Landscape Report on the Planning Application).

Eastern Crossing**Issue:**

There is insufficient information to evaluate the design choices informing the ESC, which results into very significant land take, impact on the Stort Valley and severance of Terlings Park from the rest of the Gilston community. The proposals also do not address the treatment of the downgraded Eastwick Road and improvements to Burnt Mill Lane and provide insufficient detail about the proposed Terlings Park acoustic barrier.

This is in addition to the issues related to the overall corridor (see Addendum C).

Related to Planning Documents:

For Approval:

Detailed Application Drawings: Engineering drawings, Construction access drawings

Landscape drawings

Development Aspirations:

The community supports the HGGT Vision and its Transport Strategy, and the overall objectives for pedestrian friendly and healthy communities. The emerging GANP (Policy AG8) states that new infrastructure should have minimal impact on existing communities and avoid creating severance. It also states (Policy EX1) that the impacts on existing communities should be adequately mitigated.

Concerns:

There is no strategy for the land acquisition required to secure the ESC and demonstrate it is deliverable. The NPG are not satisfied that the proposals are solely justified by the access needs of the development and that the proposed scheme and consequently the CPO is the best approach in the public interest to deliver social, environment and economic well-being.

The design proposals are heavily engineered and clearly not guided by principles of place-making or landscape (see also Addendum C). This results in a series of concerns and unanswered questions:

- The width, speed (40-50mph) and engineering make of the ESC are not fully explained and justified. Roundabouts are sized for major traffic loads, central ghost reservations intended to make travel at speed safe. The width of the bridge at Fiddlers Brook (26.7m wide bridge with a 20.8m carriageway) corresponds to a two lane carriageway width even if shown as a single lane.
- The impact on existing communities (including High Wych) of the removal of the Heavy Load restrictions is not fully explored.
- The overall arrangement results in Terlings Park being hidden behind the sound barriers and severed from the rest of Pye Corner and Gilston. The playground at Terlings will no longer be easily accessible for other residents of Gilston.
- The layout requires land take from Local Open Space (including felling a c.100-

year old oak) at Terlings Park and destruction of the designated Local Wildlife Area (both designations by the District Plan). Adequate mitigation for this loss has not been proposed.

- The proposals have great impact on the landscape of the Stort Valley and are great generators of noise. There is no confidence on the landscape, wildlife and pollution mitigation strategy associated with the proposals.
- The space of 'gravel and shade loving plants' under the Fiddlers Brook bridge (Landscape Drawing DR-L-5221) is approximately 30x60m, the size of a junior football pitch. The headroom under the bridge ranges from 2.5m to 3.5m: the height of a typical room. The resulting space is clearly unattractive and we believe is likely to become prone to antisocial behaviour. It will require artificial lighting 24/7 and cameras for surveillance; it seems irresponsible for the applicants to be creating such spaces.
- There are no proposals for the downgrade of Eastwick Road (so becoming a road to serve only Terlings as a result of the development): the road should be redesigned as a permeable surface. Given the likely low levels of traffic it is unlikely that segregated cycle routes (adding a further 5m of tarmac) would be necessary. A clear approach should be presented to ensure that the road does not become a parking place for the station. A 20 MPH home zone might be considered?
- There are no proposals for the downgrade of Pye Corner Eastwick Road (becoming a cul-de-sac as a result of the development): the road should be redesigned as a permeable surface, removing redundant engineering features and including it into the landscape proposals. The war memorial should be reset into the new context created by the development. Pedestrian and cycle provision should be made as part of the detailed application. A clear approach should be presented to ensure that the road does not become a target for informal parking.
- Terlings and Burnt Mill Lane provide an important cycle connection to the station. Upgrade of the routes and prevention of flooding should be included in the detailed application boundary because they are an essential component of access to the area. Commitment to delivery of the upgrades at first occupation of houses in V1 and V2 should be made.
- There is no clarity about the maintenance and adoption of the willow wall (sound barrier) and the almond shape space between Road 1 and downgraded Eastwick Road.
- There is no clarity of the construction impacts (site access, construction sites etc.)
- There seems no consideration of the consequential impacts car parking spilling over from the station into Pye Corner and Terlings given the planned improvements offering free and easy access to Harlow Town Station.
- Assessment of noise and air impacts have not been fully considered, particularly around moving the private vehicle main access to the development of 10,000 homes next to the Social Housing in Terlings Park. During the public consultation, it was clear that P4P and EHC have not considered this impact alongside the impacts of the ESC.

Proposal:

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1. Reject, or suspend approval of, the ESC Detailed Application pending the publication and consultation of a detailed A414 Strategy for Segment 14 in the context of the design of Sustainable Transport Corridors across Harlow.
 2. Demonstrate deliverability by confirming the funding allocation across the Garden Town and providing demonstration that the proposals are the best solution in the public interest to deliver social, environment and economic well-being – sufficient to justify CPO.
 3. Revise and extend the proposals to include design mitigation on Eastwick Road and upgrade of Burnt Mill Lane to demonstrate a landscape-led approach which optimises land take, pedestrian and cycle permeability, respect for existing vegetation and minimization of pollution (as also advocated in HCC's Landscape Report on the Planning Application).

Comprehensive Development and Integration with Village 7**Issue:**

A holistic approach is needed given that GA1 is a single allocation requiring a comprehensive, phased development across the whole of the site allocation. A clear framework that knits all development together (including Village 7 and existing settlements) is not provided for community facilities, social and cultural cohesion, green spaces network, footpaths and cycle routes and connectivity within the site and the outside world around it. The applicant states in the Village Addendum Document that there has been *continuous engagement* with Briggens Estate 1 Ltd to ensure the integration of Villages 1-6 with Village 7 but this is not reflected in the Parameter Plans or the other documents which have been submitted for approval. Limited evidence is provided as to how the two developers are working together to provide a comprehensive framework for development and infrastructure provision and how this is to be addressed in a consistent and integrated manner in the respective s106 agreements

Related to Planning Documents:

For approval:

PP4 shows a Sustainable Transport Corridor and green corridor between Villages 6 and 7 but no connections between the villages in terms of green infrastructure network, footpaths or cycle routes, inter-dependency and shared cultural or social facilities planned from the outset. Village 7 is outlined on the Parameter Plans and illustrative material but is not shown as part of a comprehensive development.

Supporting documents:

VDAR Appendix 5 provides a Technical Report prepared by Grimshaw Architects to address the issues. This is limited to an overlay of parameter plans submitted in support of each application to show physical interactions.

Development Aspirations:

Policy GA1 requires future development to be planned as a single allocation informed by local character and distinctiveness. A comprehensive plan for the whole Gilston Area is seen as key to preventing piecemeal development and controlling the form and character of new development.

GA1 is single allocation - not a development of 6 + 1 separate areas.

Concerns:

- The application does not provide the necessary clarity or confidence that the development of Villages 1-6 and Village 7 will be brought forward as a comprehensive properly and logically phased development.
- The Parameter Plans do not demonstrate how the relationship between Village

6 and 7 will be controlled.

The community does not have confidence that the overall area will be managed effectively, coherently and in the interests of all current and future residents. Unless the two applications are considered together there is a real risk that decisions on villages 1-6 without the incorporation of the village 7 development will lead to disconnection and harm to the community.

Proposal:

1. The Parameter Plans should be amended to incorporate the details shown in Appendix 5 of the Village Development Addendum to show the integration of Villages 1-6 with Village 7 in respect of pedestrian and cycle routes and green infrastructure network.
2. Further clarification to be provided of how the developers will work together to ensure an integrated development and delivery of necessary infrastructure and mitigation. This should be referenced in the Governance documents and reflected in the s106 in terms of planning obligations. The Governance Strategy should relate to all 7 villages and not to the 6 covered by the outline planning application.
3. The requirement for a comprehensive and integrated approach to masterplanning and delivery of the GA1 allocation must be secured through the application of appropriate conditions and planning obligations. These must be applied consistently in the determination of the outline planning applications for both Villages 1-6 and Village 7.

Green Infrastructure Network and Adequate Separation between Villages

Issue:

Meaningful separation between villages and the backbone of a continuous green infrastructure network surrounding the villages is not identified in the Parameter Plans or Development Specification. The green corridors between villages (new and existing) are critical in providing a landscape setting, protecting and promoting biodiversity, accommodating pedestrian and cycle routes and a range of other functions. The case for a substantial release of Green Belt land has been made for a development of exceptional quality yet there seems to be little attempt to mitigate the Green Belt loss.

The Development Specification states that village corridors will be approximately 10-40m width. In some cases the VDA is shown right up to the boundaries of an existing settlement. It is unclear how far this has been tested to demonstrate that all the necessary functions can be achieved. The community believes these corridors will need to be wider than shown on the Parameter Plans to deliver the vision and objectives for the Gilston Area.

Related to Planning Documents:

For Approval
PP2 and PP3
Development Specification (DS)
Strategic Design Guide (SDG)

Supporting Documents:
Landscape and Green Infrastructure Report (Addendum)

Development Aspirations:

Policy GA1 clearly states that development in the Gilston Area should take the form of a series of distinct villages.

The Concept Framework sets a principle of buffers and 'meaningful separation' and the HGGT Vision clearly describes the villages as set within a continuous landscape.

Submission GANP (Policy AG2 and AG4) requires that a robust and permanent Green Infrastructure network is established and that the individuality and separation of villages in the Gilston Area is maintained.

Concerns:

- We remain concerned about the lack of clear landscape objectives, which are clearly set out within the Concept Framework, the HGGT Vision and Strategic Design Guide and the Charter SPD which contain landscape aims and
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objectives that should be taken into account even at this stage.

- The VDAR indicates that all areas and zones shown on the Parameter Plans are to be intended as fixed. This is in contradiction with the DS which states that the Village Development Area (VDA) is submitted in outline to provide the *necessary flexibility* for the detailed design of the scheme through the preparation of Village Masterplans and a Strategic Masterplan and the subsequent submission of Reserved Matters Applications. The Development Specification (para 4.3.4) recognises that the corridors cannot be fixed at this outline stage stating- 'There is a commitment to providing a Village Corridor *in the general location* shown on the Parameter Plan'. This is contradicted in the DS itself where it states that the Parameter Plans provide a framework of control for the masterplanning process. The Parameter Plans do not provide sufficient justification for the proposals and it is inappropriate for details of the Green Infrastructure Network and corridors between villages to be fixed without further landscape and visual analysis at the masterplanning stage. HCC Landscape Officers are of the same opinion (Landscape Report, Section 2.3.2).
- The PPs and Strategic Design Guide (SDG) do not comply with the requirement of Policy GA1 and the Concept Framework (requiring distinct villages separated by meaningful landscape) and the Charter SPD. Section 1.4 of the SDG describes the Strategic Landscape Master Plan as following the Village Masterplans and applying to the 'spaces around and in between each village' implying that the village boundaries take precedence over the landscape. This is wrong. The detailed configuration of green corridors and green infrastructure cannot be defined as the 'resulting land' after village development. This is contrary to the requirement for a landscape led approach.
- The Strategic Green Corridors (PP3) are incidental, rather than strategic. In places they are equivalent to the width of an existing lane (for example along Gilston Lane), without any landscape buffers and therefore no certainty that the minimal width will be maintained if the lane carriageway needs widening as a result of the development.
- The connectivity east-west from the Airfield through Home Wood to Gilston Park and beyond is severed; continuous and uninterrupted development areas are proposed from V5 to V4 (PP3, PP5) – this is clearly contrary to the requirement of District Plan Policy GA1 and emerging NP AG2. This also creates a continuous linear frontage in a very open and prominent location.
- Development areas extend right to the edges of private properties in Eastwick and Gilston without any buffers, effectively relying on third parties to provide green buffer and separation.
- Strategic Green Corridors, already insufficient, are indicated to be also the location of allotments, G&T safeguarded development land and other uses (VDAR Land Use Budget Section). This will further limit their ability to accommodate strategic landscape and biodiversity functions.
- Community Parks are discontinuous as they include fenced off developed areas like the schools playing fields and Play Areas inside Ancient Woodland and the Local Green Spaces identified in the GANP.

Proposal:

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1. The Strategic Design Guide and Development Specification should be modified prior to approval to:
 - a. Ensure that meaningful and continuous Green Infrastructure and Strategic Green Corridors and separation between villages is established as part of the Strategic Landscape Master Plan and that the boundary of the built area is only agreed once sufficient corridors, buffers and green spaces have been identified.
 - b. Avoid fixing the Village Developable Areas in the Parameter Plans in advance of a more detailed SLMP.
 - c. Make a clear commitment to meaningful minimum buffer widths that demonstrate settlements are clearly separated.
 - d. Confirm which types of activities are acceptable in each type of landscape and especially in the Strategic Green Corridors based on their visual impacts and requirement for fencing, lighting, biodiversity and access to the public.
 - e.
 - f. Exclude inclusion of play spaces and allotments within the existing woodlands (for example within Home Wood in PP3 and Village 5 Land Use Budget in VDAR)
 2. Flexibility along the 'village developable area' edge is vital to ensure that at the Masterplanning stages, the developable area boundary can be adjusted to reflect site conditions and tested as part of an iterative design process to ensure that the village development sits comfortably within its landscape and visual setting. This approach to flexibility is in line with Policy GA1, the Concept Framework, the HGGT Vision, the Charter SPD and the submission Gilston Area Neighbourhood Plan which promotes a landscape led approach to development.
 3. Parameter Plans should be amended to state: "Configuration of developable areas and green corridors subject to detailed design". Other proposals e.g.: removal of existing trees and hedgerows should also be 'indicative and subject to detailed design'.
 4. The Development Specification wording should be amended to state that the village developable area is flexible in order that its exact location and the configuration of the green corridors separating the villages can be determined at the masterplanning stages.
 5. The expanded narrative in the Development Specification should take precedence over the Parameter Plans.
 6. Alternatively, PP2 and PP3 should be amended to indicate clear separation between each village and between the future villages and the current communities as well as continuous green infrastructure in accordance with the Concept Framework and the key diagram agreed with the developers at the Examination of the GANP.

Treatment of Sensitive Sites (fields in front of St Mary's, to the west of Home Wood and south of Gilston Park House)**Issue:**

Some positive changes have been made to address heritage concerns and we are pleased to note the revised sensitive development areas around the scheduled monuments and St Mary's Church. However, there remains insufficient clarity about the extent of the controls put in place to safeguard heritage settings or very exposed and prominent locations. The OPA should make direct and enforceable commitment to the protection of these sensitive areas. The application is strangely silent about the effect of development on Hunsdon House, a Grade 1 listed building. While that is more directly affected by the Village 7 application it borders the part of the site owned by Places for People and this illustrates the risk of harm in considering the two applications separately.

Related to Planning Documents:

For Approval:

PP2, PP5, PP6

DS Sections 4.3, 4.6, 4.7 and Appendix 5

SDG Village 4 and Village 5 Principles

Supporting Documents:

Land Use Budget and Density Report (VADR) – illustrative

Development Aspirations:

These three sites are very important to the community: one provides the important heritage setting to Listed St. Mary's Church, while Home Wood is visible for miles across the open plateau of the Hunsdon Airfield and the setting of Gilston Park House is also sensitive. It would be preferable for these sites not to be developed, but if development should take place, it is essential that it is discrete and 'lost in the landscape'. It is also important that views from Hunsdon Airfield do not present a continuous built form spanning across several villages. The role of the site in between V5 and V4 is essential in breaking this frontage by creating a different, primarily unbuilt frontage.

- The District Plan does not enter into this detailed topic, but clearly requires that villages are separate and distinct (Policy GA1) and that heritage and its setting are protected.
- The CF clearly indicates that these are sensitive sites to be treated differently from the rest of the development.

The emerging GANP clearly indicates that these are very sensitive locations where development should be restricted and where Cherished Views are to be protected

Concerns:

The area referred to as Gilston Fields (V4, opposite St Mary's Church):

- PP5 identifies the whole area as Sensitive Development Area (SDA) and indicates that half of it is allocated for residential development. PP6 indicates that the 'Maximum Height' at this location could be 20m towards Home Wood. The VDAR Illustrative Density indicates an average of 26.4 dph (the lowest across the VD, but without any differentiation across V4 – so there is no guarantee of lower density at this location).
- Appendix 5 of the DS intends to specify the limitations of development implied by the SDA designation. However, the language is vague and does not represent adequate control. For example, it states that 'height restrictions *may* help to protect the heritage setting'; or that buildings *close* to the church should be restricted – this does not give any certainty as there is no definition of 'close' or of 'near' or what commitment the applicant is making when stating that controls 'may' or 'should' be in place. What is clear is that there is no firm implication for the SDA definition, and this could open up to the application of the PP 'maximum' allowed height and development extent, which are completely inappropriate.
- The SDG for V4 indicate a building line that is well north of St Mary's and does not encroach on Gilston Fields. This, if approved, is in conflict with the PP and DS.
- Para 3.8.2, main bullet 9 of the DS refers to *A cricket club will be provided within **Gilston Fields** and this will include a minimum of two senior community grass pitches provided with **club house** and ancillary facilities;* This, if approved, is incompatible with the commitment to the protection of these sensitive areas.

Area to the west of Home Wood, identified as an Education and Mixed Use Area and located in the open landscape of the Hunsdon Plateau:

- This area has always been described as a very low-density education (Secondary School) and sport facility, where the proportion of build form over open land was limited. No controls of any kind are in place to secure this outcome.
- In PP5 it is identified as part of V5 and as an Education and Mixed Use Zone: no different from the other village centres. DS Section 4.6.3 makes no differentiation and allows retail, leisure, office space and the full range of community facilities.
- Furthermore, homes appear to be proposed on its western frontage close to the power line (Land Use Budget section of VDAR) creating a linear built frontage, a barrier and continuous development linking V4 and V5.
- PP6, if approved, would allow 15-20m tall buildings in the majority of the area.
- Para 3.8.2, 1st bullet point of the DC states:
A leisure centre will be provided within the Education and Mixed Use Zone of Village 5.

This section includes 4-lane swimming pool, sports hall, etc. which will cause a **massive impact** on open green space and could generate considerable traffic.

This, if approved, is incompatible with the commitment to the protection of

these sensitive areas.

- Para 3.8.2, Main bullet point 5 states: *The Village 1 and Village 5 Education and Mixed Use Zones will each accommodate one floodlit artificial grass pitch* This, if approved, is incompatible with the commitment to the protection of these sensitive areas.
 - It is noted that Historic England has raised concerns on heritage grounds, particularly about the road arrangement at Eastwick Hall Lane and the potential loss of non-designated heritage assets. We agree with Historic England that greater consideration should be given to the setting of the Sensitive Development Areas and recognition given that the definition on the Parameter Plans is not a hard and fast line.

Proposal:

The nature of these locations requires careful study, which can only be undertaken through a masterplan proposal where actual built form, heights and views can be determined. It will be therefore necessary, prior to approval, that:

- PP5 is modified to clearly identify a different nature of development at these two locations and differentiate between the sensitive area west of Home Wood and the other village centres (all currently Education and Mixed Use Areas).
- PP6 is rejected as inadequate to provide controls (see also Addendum I) and these sensitive sites should be clearly marked as locations where stricter controls are applied. The potential loss of non-designated heritage assets should not be shown on the Parameter Plans for approval and any decision regarding their loss should be made at the masterplanning stage.
- DS Section 4.7 and Appendix 5 is modified to clarify the commitment to develop buildings that have low density, low height, and are discrete individual elements within the landscape.

Development Heights and Built Form**Issue:**

The proposals are inadequate to provide control measures to ensure village quality and include requests for potentially inappropriate flexibility in heights, location and development quantities without justification, establishing development parameters which could undermine the role of the Strategic Landscape Master Plan and Village Master Plan processes. There is a real risk that these unjustified and generous maximum heights, density and boundaries will become the default 'built-to' parameters.

The appropriate distribution of heights needs to be tested through the masterplanning process based on a more detailed and rigorous process of landscape and visual analysis to ensure that the development sits comfortably with its landscape setting. There is an underlying assumption that a similar approach is suitable for each village but the ability of each village to accommodate heights is likely to be more varied dependent on topography and landscape character.

Related to Planning Documents:

For Approval:

PP5 Land Use and PP 6 Heights
Development Specification (Section 4.7)
Strategic Design Guide

Supporting Documents:

Land Use Budget and Density Report (VADR) – illustrative

Development Aspirations:

- District Plan Policy GA1 requires development to take the form of distinct villages of individual character. In other places, it also clearly refers to the requirement of designing in context.
 - The CF (pg. 102) establishes the principle of village character, drawing from the local character of Gilston, Eastwick and Hunsdon and other surrounding villages. It also indicates an average density of 33dph.
 - The HGGT Vision states that the characteristics of nearby villages should be used as design cues and a broad range of 25-55dph should be appropriate.
 - The emerging GANP gives a clear indication of what should be considered part of village character in Policy AG6 and in a supporting Appendix and proposes that this is defined as part of Village Masterplans.
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Concerns:

The Parameter Plans and supporting information do not provide adequate controls to deliver development in the form of villages (Policy GA1 of Local Plan, Policy AG6 of the emerging GANP, HGGT Vision and Design Guide):

- Parameter Plan 6 (Heights) proposes to limit heights within the visual envelope of buildings placed in the most prominent location. The rationale is shown the VDAR: if GF+3 (i.e. 4 stories) are proposed in the most prominent location (top of the hill), all the buildings on lower ground remain roughly within that envelope even if in some cases 6 floors high. This approach is predicated on the acceptance that 4 floors are acceptable on higher ground, which is not explained nor justified. It also means that from the lower ground (from Harlow) a sea of roofs extending all the way up the hill is presented. This parametric approach may secure maximum development but it has nothing to do with good placemaking or village design and should be rejected.
- The Maximum Height Zone allows a 10-15% of all buildings to reach 5 floors. This parameter is not transparent nor justified. It is not explained by development requirements (necessary to deliver the required number of units) nor is it conducive to the creation of beautifully designed villages. Taller buildings should be exceptional and justified on their merit as part of a master plan.
- The Density Note of the VDAR Land Budget Section indicates average density across the villages of 39.1 dph, and a range of 70-130dph within the village centres. This density is in contradiction with all policy and guidance and it does not correspond to the delivery of villages or to village character (Policy GA1, principles of the CF and GANP). The Illustrative Residential Density image in the same section clearly identify urban built form (Cambridge, Basildon, London). No indicative design in which high density suitable to villages has been proposed.
- The Strategic Design Guide does not define 'Village Character' for the development. It only proposes in Principle 4 building with materials and openings (fenestration) taking inspiration from East Hertfordshire and Harlow. This is a major shortcoming, which does not help understand and justify why the height, density and built form proposed is in accordance with Policy.

Proposal:

The Outline Planning Application should not be approved in its current form without amendment or rejection of the Parameter Plans and Development Specification which pre-empt the study of the villages through a transparent masterplanning process.

Approving the proposed Parameter Plans and Development Specification would create a dangerous precedent and a drive towards building 'to the upper limit'.

The emerging GANP potentially offers a constructive way forward with Policy AG6,

where the best possible balance between density, height and built boundaries is defined in the Village Masterplans in consultation with the local community.

It will be therefore important to consider the following:

1. It is premature to fix height parameters at the outline planning application stage. PP 6 should not be approved, and the principles and content of Development Specification Section 4.6 should be redrafted.
2. A commitment should be included in the Development Specification to investigate options and best balance between height, density and built-up areas in collaboration with the community as part of Village Masterplans (Policy AG6 of the submission GANP)
3. The Strategic Design Guide should be modified to reflect the applicant's understanding and commitment to village character and village development taking into account Policy GA1 and the principles set out in the Concept Framework and HGGT Vision and Design Guide.
4. Height and built form should be determined as part of the village masterplanning process following further detailed assessment.

Other Transport Issues**Issue:**

While the proposals for bus priority and bus accessibility for the existing and future communities has been improved, the community is not satisfied that adequate provision is made to ensure a 60% sustainable transport modal share.

Related to Planning Documents:

For Approval:

PP4, PP5

DS

SDG

Supporting Documents

TA Addendum

Development Aspirations:

The community supports District Plan Policy GA1's emphasis on sustainable transport, LTP4 and the HGGT Transport Strategy, which requires 60% of all movement to be made by sustainable modes. The emerging GANP (Policy TRA1) makes specific reference to sustainable and convenient access to Harlow town centre, Harlow Town station and Roydon Station. It also states (Policy TRA2) that a full network of PROW will be required, with consideration of the need for tranquillity of the Green Infrastructure network and the privacy / amenity of existing residents where PROW pass very close to existing homes.

Concerns:

We have been reassured by the Developers that they fully appreciate the requirements of a 60% shift to sustainable transport modes for the design of the villages and infrastructure. Many on and off site measures will be required and we are unconvinced that these are a guaranteed part of the proposal.

Off site measures not fully addressed (see also Addenda C, D, E):

- Access to Harlow Town Station by additional buses: 15 additional buses per hour are proposed to serve the development at peak. It is not clear how these will be accommodated in the station interchange and town centre bus station.
- There will be high numbers of pedestrians and cyclists commuting via the rail station. There is only commitment to a financial contribution towards upgrades at Harlow Town Stations and no firm plan for delivery of a northern entrance, increased cycle parking or pedestrian and cycle routes to the current entrance.
- There is no commitment to the upgrade of Burnt Mill Lane and to the Stort Valley routes, which are subject to flooding and are in a delicate environment, where lighting, safety and pressure of pedestrian footfall is a concern.

On site measures:

- The Sustainable Transport Corridor (STC) will be the only vehicular route connecting across villages and beyond; it will also provide the only bus network across the sites and prioritise cycling and pedestrian movement. This approach of concentrating all modes of transport and all movements onto a single road will probably require large carriageways and engineering-led design rather than a landscape and place-led approach. The NPG raised the issue at the time of the Concept Framework and again in our representation to the first OPA. The issue has yet to be addressed.
- There is no comprehensive plan of PROW and cycle routes integrated with the Green Infrastructure Network. No adequate proposal for lighting that protects the quiet nature of the Green Infrastructure (see also HCC landscape Report for the Planning Application).
- There is no integrated plan for essential sustainable transport networks (PP4 only refers to 'leisure routes') linked to the destinations identified in PP5 and extending to destinations in V7.
- PP4 indicates existing leisure PROW weaving through the private properties of Gilston Park. These now serve a very small and local community and do not affect the privacy and amenity of residents. It is essential that the nature of these paths is retained as existing and alternative routes are provided.

Proposal:

1. Approval of PP4 and the detailed application for CSC should be made conditional to improved access to the stations (including off site) and upgrade of pedestrian and cycle links up to the two stations and the centre of Harlow.
2. The alignment and design of the STC remains indicative on PP4 and stronger commitment to pedestrian and cycle priority and suitable village character is made in DS (Section 4.5) and in the SDG (Principle 9).
3. Delivery of the north access to the station (rather than financial contribution to it) should be included. Alternatively, a clear demonstration that the north access is not required should be provided. (NOTE There is not even an indicative concept design showing how a new northern station entrance would be configured, even after all these years of work).
4. PP4 should be amended to ensure that a key network of essential pedestrian and cycle routes is identified (besides leisure routes) and that the amenity of existing private properties is protected from increased use in path use in close proximity. The DS should have a clear approach to limit lighting intrusion within the Green Infrastructure Network (see also HCC Landscape Report).

Industrial Uses / Business Park**Issue:**

The provision of employment space within the Gilston Area is an essential component of providing sustainable and mixed communities, provided the employment uses are designed and integrated in a way that makes a contribution to the character and life of the villages. Proposed amendments suggest a poorly integrated and prominently located employment area at the edge of Village 6 which would undermine the principle of villages in the landscape. The proposed location would encourage car use contrary to the ambition of promoting sustainable transport modes and the creation of sustainable communities.

Related to Planning Documents:

For Approval:

PP5

Development Specification

Development Aspirations:

District Plan Policy GA1 V(q) states that development in the Gilston Area is expected to deliver employment areas of around 5ha within visible and accessible locations which provide opportunities to promote self-containment and sustainability. The supporting text states that this will take the form of a business park or distributed across the village centres having regard to Garden City Principles. The inclusion of reference to a business park was added as a late modification to Policy GA1 and is not reflected in the Concept Framework or HGGT Vision which anticipates provision for employment uses in village centres. Policy ED1 states that the provision of new employment uses will be supported in principle where they are in a suitable location and access can be achieved by a choice of sustainable transport and do not conflict with other policies.

The focus of the HGGT is primarily on growth and investment in the Harlow Enterprise Zones at London Road and Temple Fields. In the Gilston Area, the Garden Town Vision identifies the village centres as the locations for investment and innovation with the potential for new employment typologies. The District Plan recognises that residents will be able to access more substantial employment opportunities within Harlow, including the Enterprise Zone.

The Draft Harlow and Gilston Garden Town Employment Commission gives consideration to employment land and premises in the Gilston Area as part of a comprehensive economic and employment strategy for the Garden Town. It suggests employment development should be primarily focussed around village centres and in locations with better access to the sustainable transport network.

Submission GANP Policy BU3 encourages employment uses in village centres as part of mixed-use areas. Proposals for employment development outside village centres will be required to demonstrate compliance with a range of criteria relating

to location, landscape setting, access by walking, cycling and public transport and consistency with the overall employment strategy for the Garden Town.

Concerns:

- No justification is provided for the selection of the area to the south of Village 6 for employment use and no guidance is provided on how this will be brought forward as a mixed use development. We are concerned this would be brought forward as a large free-standing business park or distribution facilities and that this would create a virtually self-contained employment space, car dependent and adjoining but not integrated with the villages.
- We do not consider the proposed V6 employment area accords with the vision and objectives for the Gilston Area as set out in the Concept Framework and HGGT Vision. This type and scale of development would have better synergies as part of the Harlow Enterprise Zones which are a focus for regeneration and investment by the HGGT. This is evidenced in the Employment Land Review prepared by Savills in support of the outline planning application for Village 7.
- A conventional business park at the fringes of Village 6 served by the A414 will inevitably be a car-based development which would undermine the ambition to reduce the need to travel and promote sustainable travel modes. It would also present an urban fringe type of frontage to Village 6 and make limited contributions to community life. This approach is contrary to good practice set out in the TCPA publication Understanding Garden Villages (January 2018).
- The suggested allocation on a green space on the Eastwick Slopes, separating Village 6 from the A414, and an important lateral buffer between Eastwick and Village 7 also immediately overlooks, and is visible from, the Stort Valley. For these reasons it is environmentally unacceptable and contrary to other policies within the Gilston area.
- The additional signalised junction on the A414 will affect all traffic and the access road requires very extensive land cutting that seriously compromise the setting of the development and views from the Stort Valley immediately to the south. .
- Employment development should be planned as an integral part of the Village Masterplans to enrich the life of village centres and provide a range of employment spaces targeting the local community and reducing the need to travel.

Proposal:

1. The VDAR (para 2.5) acknowledges that the final decision on the precise quantum and distribution of employment floorspace will be determined at a later stage following completion of a Needs Assessment. The identification of a residential/employment/residential area on the edge of Village 6 in Parameter Plan 5 is therefore considered to be premature and we are concerned that it

will be treated as a fix and will constrain the masterplanning process following completion of the Needs Assessment.

2. The employment notation should be removed from PP5. The key on Parameter Plan 5 does not include Village Centres. This should be added and should include reference to employment, retail and community uses in the Village Centres.

3. The Development Specification (para 3.3.5) should be amended to exclude reference to the zone to the south of Village 6 on PP5. The text should reflect the agreed vision and objectives for the Gilston Area and state that employment uses will be encouraged in the Village Centres or may be considered in suitable locations with good access to the sustainable transport network. Exact distribution will be determined as part of the masterplanning process following completion of the Needs Assessment and further technical analysis.

Provision for Travellers**Issue:**

The allocation of land for gypsies and travellers is a very sensitive matter. This has been introduced at a very late stage of the outline planning application process and has not allowed for adequate consideration to be given to how this will be successfully integrated into the wider Gilston Area. It appears that the safeguarded sites have been included as an afterthought. Therefore, the identified sites do not appear to have been the subject of detailed assessment or scrutiny: one is located on the margin of the sites and the second within part of the green infrastructure network designed to be retained, in perpetuity, as green space. We are concerned that the proposals will be treated as fixed and this will reduce the possibility to address the matter sensitively and with coherence.

Related to Planning Documents:

For Approval:

PP5

Development Specification

Development Aspirations:

District Plan Policy GA1 identifies the requirement for the provision of two serviced sites to meet longer term needs beyond the plan period comprising a site which should deliver 15 plots for gypsies and travellers and a site with 8 plots for Travelling Showpeople.

This requirement should take account of Submission GANP Policy AG2 and Policy AG3 aiming at establishing a permanent green infrastructure network and providing an attractive countryside setting for the new and existing villages.

Concerns:

- The proposals have been added to the outline planning application in response to a request from East Herts Council. There is no evidence that an informed assessment has been undertaken. No design or location criteria are offered in the Development Specification or SDG.

An analysis of options does not appear to have been submitted, and the Landscape and Visual Impact Assessment has not been updated to address the identified sites. This analysis is required to demonstrate the relative merits of each option and ensure that they will not result in any unacceptable harm to landscape character and visual amenity

- The development of serviced sites for gypsies and travellers outside of Village boundaries is contrary to the objective of a green infrastructure network, retained in perpetuity, around villages. Development of serviced sites should be contained within the Village Developable Areas and should not be considered a suitable use within the landscape buffers or green corridors.

There is concern for the potential adverse landscape and visual effects of each site. The site to the south of V6 is located within a green corridor, which was identified to provide an important buffer between V6 and the A414, and laterally between Eastwick and Village 7, overlooking and visible from the Stort Valley; and the site to the north of V3 goes beyond the site boundary and the logical development limit of Golden Grove into currently open countryside.

- We are very concerned about the implications of safeguarding land without a more detailed assessment particularly given that the sites are required to meet longer-term needs beyond the plan period. Any longer-term needs should properly be assessed on a District wide basis and consider a range of site options; such an analysis has not been undertaken by EHC. Provision of this nature needs to be carefully planned and the exact location of the proposed pitches should be determined at the village masterplanning stage.
- Insufficient assessment has been undertaken to justify the safeguarding of sites at the outline planning stage.

Proposal:

1. PP5 should be amended and the proposed safeguarding zones for gypsies and travellers sites should be removed.
2. The Development Specification (para 3.3.5) should be revised to reflect the changes to PP5. A statement should be included in para 3.3.6 to reiterate that the location of the sites will be identified at the masterplan stage and to include design criteria for safeguarded sites. This should include a requirement to minimise impact on the landscape character and setting of villages and the loss of green space outside Village Developable Areas.
3. The location and size of safeguarded sites should be defined as part of the masterplanning process, assuming any analysis across the District shows there to be a need post 2033.

Biodiversity Net Gain**Issue:**

The development will impact on areas of ecological importance through the loss of vegetation and habitat as a result of construction activities and during the operational phase through recreation or urban disturbance effects such as noise or increased lighting. The Environmental Statement states that measures outlined in the Biodiversity Strategy and other planning documents will help ensure that the development delivers the applicant's commitment to deliver a minimum of 10% net biodiversity gain. However, there continues to be a lack of clarity about when / as part of which work stage proposals will be agreed and implemented.

Related to Planning Documents:

For Approval:

Development Specification (3.16 Biodiversity Principles and Appendix 6 Sustainability Strategy commitments)
Strategic Design Guide (Strategic Principle 6iii)

Supporting information

Environmental Statement (Outline Ecological Management Plan)

Village Development Addendum Report (VDAR):

- Delivery Statement (Appendix 8)
- Draft Infrastructure Triggers (Appendix 11)

Development Aspirations:

District Plan Policy GA1 (III) states that development will be required to enhance the natural landscape providing a comprehensive green infrastructure network and net biodiversity gains.

Submission GANP Policy AG2 Creating a Connected Green Infrastructure Network seeks to ensure development retains and where possible enhances areas of ecological importance.

Concerns:

- It will be important to protect existing wildlife sites and biodiversity and retain wildlife connectivity across the wider area as the sites are developed. The government is to introduce a mandatory requirement for development to deliver biodiversity net gain of 10% at least and the development offers potential to achieve this in a number of ways for example, through the creation of biodiversity corridors between villages, species rich planted areas and woodland, and the restoration and enhancement of rivers and their corridors.
 - Based on the information provided in support of the outline planning application, we simply do not know how the biodiversity benefits will be achieved. This is of significant concern given the extent of green belt land to be lost to development. There is concern that the applicant's Environmental studies are out of date, e.g. in the Stort Valley and fail to reflect current habitats and wildlife, e.g. presence of water voles and otters.
 - The draft infrastructure triggers give rise to concerns regarding the timing of essential landscape works. We are particularly concerned about the late
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delivery of the key strategic parklands Hunsdon Airfield Park and Eastwick Wood Park so late in the delivery programme. These areas are vital for the delivery of important landscape and visual mitigation measures such as offsetting the impacts of increased recreational pressure upon the character, quality, and visual amenity and biodiversity of the Stort Valley.

We would wish to see the timescale for landscape enhancement to be brought forward including a requirement for 'early wins' in the form of advance planting and woodland management. The requirement for biodiversity net gain should be stipulated in the planning obligations and appropriate planning conditions.

If specimen mature trees are to be felled to facilitate this development there needs to be a proper assessment of their qualities and ways of addressing such a loss. There is no evidence of this approach, for example, the detailed road application requires a c.100 year old oak tree to be acquired under CPO powers and felled without a proper case being made for such a loss.

Proposal:

1. The strategy commitments listed in the Development Specification Appendix 6, should be amended to include reference to habitat 'creation' in addition to habitat enhancement to mitigate adverse effects on biodiversity, landscape character and views. For example, it is proposed to create significant new woodland in Eastwick Wood Park, as confirmed within the Landscape and Visual Impact Assessment.
 2. The wording of Section 3.16 of the Development Specification should be strengthened to include a clear commitment to the delivery of net biodiversity gain and details of how this will be delivered. The requirements for the masterplanning process need to be clearly specified.
 3. The Biodiversity Principles need to be translated into a clear strategy for the delivery of net biodiversity gains and this should be reflected in the planning conditions and planning obligations.
 4. The proposed Infrastructure Triggers must be reviewed prior to finalisation of the HoTs of the s106 agreement to ensure funding and delivery is secured for the early implementation of landscaping, woodland management and habitat enhancement and creation to secure net biodiversity gains and to mitigate the impacts of development.
 5. Reference to the Biodiversity Net Gain Target in the Strategic Design Guide (Strategic Principle 6.iii Landscape and Green Infrastructure) requires amplification and should be cross referenced to the Biodiversity Principles in the Development Specification.
 6. A new approach to managing the village buffer areas and land not to be developed needs to be put in place now working with the community, as anticipated within Policy GA1, to secure biodiversity net gains. This should not be put on the 'back burner' until the majority of the housing has been built as the developers seek.
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LIST OF ABBREVIATIONS

CF	Concept Framework
CSC	Central Stort Crossing
DS	Development Specification
EHC	East Herts District Council
ESC	Eastern Stort Crossing
GANP	Gilston Area Neighbourhood Plan
GI	Green Infrastructure
GT&TSP	Gypsy, Traveller & Travelling Showpeople
PP	Parameter Plan
PROW	Public Rights of Way
SDG	Strategic Design Guide
SLMP	Strategic Landscape Masterplan
STC	Sustainable Transport Corridor
V	Village
VDA	Village Developable Area
VDAR	Village Development Addendum Report
VMP	Village Masterplan