



HEGNPG

Supporting our Community

Hunsdon Eastwick and Gilston Neighbourhood Plan Group

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

Planning Policy
East Herts Council
Wallfields
Pegs Lane
Hertford SG13 8EQ

14 January 2022

By email only

Nikki Dawney, Nikki.Dawney@eastherts.gov.uk
Kevin Steptoe, Kevin.Steptoe@eastherts.gov.uk

Dear Sir/Madam,

**Gilston Area Applications – Revised Outline Planning Application for Village 7
East Herts Council Application Reference 3/19/2124/OUT**

The Hunsdon, Eastwick and Gilston Neighbourhood Plan Group (HEGNPG), on behalf of the Parish Councils of Hunsdon and Eastwick & Gilston, has concluded that the **revisions to the planning application for Village 7 in the Gilston Area raise serious cause for concern, especially as it appears that none of our previous comments have been addressed and new planning policy documents (the award winning Gilston Area Neighbourhood Plan and the NPPF (July 2021)) have been disregarded.** As a community group widely praised for our spirit of collaboration in the interest of good development, we must note the applicant's apparent unwillingness to consider what will make the Gilston Area a development known for quality and sustainability for the years to come.

In our previous representation (17th March 2021) we stated that the application was not fit for determination without changes and integrations: there has been ample time for the applicant to address our concerns and it would appear that none of the suggested changes and integrations have been considered. **For this reason, the HEGNPG and the Parish Councils maintain their strong objection to this application and the approach to development it represents.**

Key Concerns of Principle

1. Insufficient attention to policy and guidance

The Gilston Area Neighbourhood Plan (GANP) was passed at a referendum on 27th May 2021 and formally 'adopted' in July 2021 and now forms part of the East Herts Development Plan. It has since won three national awards for planning and landscape and has been hailed as 'the best and possibly only way to develop in areas of growth'. Our Neighbourhood Plan Group was widely praised for being constructive and forward looking.

The Government and DLUHC keep stressing the importance of Neighbourhood Planning as a key component of planning and development decision making. This is reflected in the revised NPPF published in July 2021 and in the recent House of Lords report on Housing, which also commends proper community consultation and supports the importance of Neighbourhood Planning all of which the applicants appear to be deaf to.

Savills, who submitted the Village 7 second set of amendments on behalf of the applicant, have been well aware of the GANP throughout its preparation. They appeared at the Neighbourhood Plan Examination Hearing (Nov 2020) and participated in the discussions which led to the agreement of modifications. Savills have had access to the Referendum Copy of the GANP since April 2021 and would have been well aware of it having been to referendum and its subsequent adoption at the time the amendments to the application were submitted.

Not only do the amendments make no attempt to respond to the policies of the GANP, the GANP is not even acknowledged in the list of relevant planning policies in Section 2 of the updated Housing and Infrastructure Delivery Strategy. Yet, a thorough review of the proposals against the GANP Policies would have provided valuable guidance to the applicants and potentially would have prevented many of the '**non-conformities**' identified in the assessment **contained in Appendix 1** of this letter.

This omission displays an unacceptable disregard for statutory planning policy. It also undermines development as a plan-led activity with the engagement of the community as intended by law and by Government policy and guidance. It would set a terrible precedent for communities across England, should East Herts Council choose not to uphold Neighbourhood Planning in determining planning applications - particularly where the community has adopted a steadfast approach of collaboration and the plan has been so widely commended.

The applicants additionally continue to be dismissive of other guidance, such as the Concept Framework and the HGGT Infrastructure Delivery Plan.

For these reasons, we urge the Council to require the applicant to submit an updated Planning Statement which addresses the requirements of Policy GA1 of the District Plan and compliance with the relevant policies of the GANP, including appropriate revisions to the Parameter Plans and Specifications as indicated in the attached Appendix 1.

2. Poor collaboration with the community

The Gilston Area has a well organised community, strongly represented by the HEGNPG as demonstrated by the high turn-out at the GANP referendum and the

eminent support for its work. The HEGNPG has been mandated by the Parish Councils to represent the community in matters pertaining to the development since its constitution in 2016. The Group has since been a key focal point for communication, has been part of the Gilston Steering Group within the Council and has been proactive on various fronts.

It has also promoted and led the preparation of the GANP and has always been constructive in its engagement with the promoters of development in the area: offering local insights, backing up observations with evidence, contributing to the Concept Development Plan and being open to dialogue.

The HEGNPG therefore has a pivotal role as an effective and credible community organisation which deserves **to be treated and considered a key consultee**. It should have a clear framework for better access to Council's officers and greater representation in the Council's processes, particularly at the Development Management Committee meetings, so that it and the Parish Councils it represents are enabled to represent the full community effectively and constructively, which is essential for a development of this scale and complexity.

We have to note, in addition, that the applicants for Village 7 have made no efforts to meet the community and explain their amendments or offer a response to our previous extensive representation and concerns. This is a far cry from the duty to *"fully, meaningfully and collaboratively engage with the community"* as required by GANP Policy D1.1, the Garden City Principles of Policy GA1 and the Gilston Area Charter SPD.

The current and previous developers promoting Village 7 have never effectively engaged with the Community; their consultation via leafleting and their open efforts to direct what the community responses should be are the reason for very poor confidence on our side and that of the community. This approach to development is therefore **clearly contrary to policy requirements**.

3. Determination to develop a 'standard housing scheme'

It appears that the main purpose of the amendments submitted by the applicant is to demonstrate that Village 7 can be approved in advance or even regardless of the rest of development in the Gilston Area on the grounds that it will enable the early delivery of housing. The Housing and Infrastructure Delivery Strategy gives great emphasis to early delivery and completion of Village 7 by 2030 (pg.7). On pg. 8, para 3.6 it is stated: *"there is therefore no logical reason to hold up bringing forward development in the Gilston Area that can be developed, unless some form of identifiable planning harm were to result from such early delivery. None has been identified."* This conclusion is breath-taking in its assumptions. It ignores the many representations that have been made in previous consultations by ourselves, other councils, landowners, statutory undertakers and national Environmental and Heritage organisations.

The approach is clearly contrary to Policy GA1 and the GANP which require a comprehensive approach to be adopted to development in the Gilston Area.

But it now appears that the proposed development is being openly presented (and illustrated) as a suburban housing estate disjointed from the rest of the Gilston area, existing communities and future development:

- The application makes no reference to the HGGT area and how V7's early development will contribute to the wider aspirations of Garden Town and the Gilston Area as a whole. This is contrary to Policy GA1 of the District Plan.
- There is no study of context and landscape integration as required by GANP Policy AG1 (see Appendix 1 for details) and no outline of the necessary contribution to the wider Green Infrastructure Network required by GANP Policy AG2 in anticipation of a Strategic Landscape Master Plan- yet to be approved. Despite early workshops on the Strategic Landscape Master Plan, little has emerged about integration of land owned by the applicants despite many requests from the NPG. There seems to be little appetite for coordination with the wider development or Garden City Principles or landscape led development of the Gilston area.
- The main benefit of the development put forward in the application documents is the number of houses which could potentially be delivered in a District that could fall behind its delivery targets. This is offered as the one and only inducement for approval, with no mention of quality, sustainability or future well-being.

We again challenge the assertion that no planning harm will be derived by the early and independent development of Village 7. Should this application be allowed to proceed as a stand-alone development, all efforts to provide exceptional quality and high standards of sustainability (including sustainable transport ambitions) will be futile. The potential to respond to the Climate Change Action declared by the Council (July 2019) and the Sustainable Hertfordshire Strategy (2020) will be impossible.

- When considered in isolation, Village 7 does not provide nor adequately contribute to the creation of natural greenspace and a continuous network of high biodiversity and wildlife areas (GANP Policy AG2).
- It does not include the variety of uses, employment and community facilities required to reduce the need to travel (as required by the HGGT and by the government decarbonisation strategies) and achieve the sustainable transport targets required by GANP Policy TRA1. This is confirmed by the Transport Assessment Addendum (pg. 6) which clearly presents a commuter estate with 90-100% of all trips taking people off-site (local trips being limited to use of the local café, the primary school and community activities).
- There is reliance on transport infrastructure to be delivered off-site and by others: the necessity of the widening of the Central Stort Crossing (which is in itself dependent on development elsewhere in the Gilston Area and an application which is being separately promoted) and a variety of other junction improvements to be delivered by Essex County Council within Harlow.
- There is an assumption that many of the residents will walk, cycle or use the bus (aiming for 50/60% targets), yet cycle routes and bridge upgrades essential to the deliverability of the scheme have not been secured, many rely on third party private land with no indication of any discussions as to deliverability with those

landowners. This gives no confidence that the policy requirements will be met and proposals will not result in an extensive car-dominated housing estate.

- As a stand-alone development, it seems unlikely that the proposed bus routes and Sustainable Transport Hubs will ever be viable or even an attractive alternative to car use.
- Village 7 is entirely dependent on other development in the Gilston Area for a variety of social infrastructure. There are no available facilities within walking or cycling distance for: healthcare, secondary and vocational education, public leisure centre/ gym or outdoor sports (other than provision for community football pitches).
- Social and green infrastructure - including essential water management and noise attenuation (Table 3, pg. 3 of Housing and Infrastructure Delivery Strategy) - is dependent on a community organisation which has not yet been identified. The viability of the Football Hub is dependent on the identification of a commercial operator or club for its operation.

This is not the vision which underpins the District Plan and the Gilston Area Neighbourhood Plan.

This application as a stand-alone development puts the future of Village 7 and the sustainable development of the Gilston Area as a whole in serious jeopardy. It leaves essential matters unresolved and paves the way for conventional unsustainable development, creating a legacy of additional costs and challenges and leaving existing and future communities vulnerable. The achievement of the Council's carbon targets will be made more difficult and development elsewhere will need to compensate for the opportunities lost here.

Even when considered as part of the GA project, the timing of the proposed development is completely out of step with transport and social infrastructure provision. Even in the most optimistic scenario, Village 7, if approved now, will be an unsustainable standalone commuter suburb for the next 10-15 years. It will then be impossible to retrofit it into the Garden Town Vision and aspirations. Consenting the creation of a separate estate is clearly poor planning, driven by numbers rather than quality and sustainability: it is contrary to everything that was said at Examination for a carefully planned Garden Town project of the utmost quality.

Other Concerns

Inaccurate information

It appears the submission was prepared in the summer but not validated until 25th November. The covering letter and revised Development Specification are both dated 9th August 2021 and the Open Space, Landscape and Public Realm Strategy Assessment is dated December 2020 which pre-dates the last amendments and round of consultation. As a result, we would question whether the information provided is up to date.

There are inconsistencies in the Housing Delivery Strategy which was updated in August 2021. The indicative milestones set out in para 3.8 do not accord with the milestones set out in para 7.1 which have not been updated and still suggest a start on site in January 2022. The document needs to be revised as the information presented is inaccurate and misleading.

No reference has been made to the revised NPPF (July 2021) and how the proposals respond to its requirements. The NPPF (2019) is still used for reference, which is obviously inappropriate and again needs to be updated.

Lack of clarity about the changes made and their impact

The covering letter states that changes are mainly in response to comments from East Herts Strategic Masterplanning and Urban Design Officers and Hertfordshire Landscape Officer but no specific information is provided of actual changes within the Parameter Plans.

- The Design and Access Statement Addendum only relates to the Greenway and impact of the bund on Brickhouse Cottages. It concludes by stating that this can be dealt with at the detailed design stage. This provides us with no confidence that the impacts can be appropriately mitigated. It fails to assess the impact of the acoustic bund on homes and natural open space south of the A414.
- There is no justification for the omission of the temporary education provision which was to be by occupation of 100 houses, and how needs are to be met prior to occupation of 250th dwelling - or by 500th as indicated in section 7 of the HIDS . There is no identification of potential secondary schools which could be expanded to receive students from the development.
- The revised Drainage Strategy and Flood Risk Assessment appear to have been commissioned in response to comments from the Environment Agency. However other comments from the EA relating to biodiversity- buffer zones and requirement for net biodiversity gain do not appear to have been addressed.
- The impact of the changes to surface drainage on Scheduled Ancient Monuments such as the Fishponds and Hunsdon Brook has not been addressed (Historic England letter 24th December 2021).
- The only other design reference is to an amendment to the height of development along the northern boundary from 2- 3 storeys, but this is referred to as a typographical error on the Parameter Plan and not an amendment to masterplan.
- There is no reference to the Harlow and Gilston Garden Town Sustainability Guidance & Checklist (March 2021) and whether any amendments have been made in response.

No apparent changes in response to our previous concerns

In January 2021, the HEGNPG expressed a number of concerns and proposed a constructive and practical way forward. This was a way for the developer to positively engage with the community and respond with a proposal that would be more appropriate to the local context. The applicant has made no attempt to discuss these concerns with us and appears to have totally ignored our previous comments without any justification. The schedule of changes provided at our request by the applicant merely serves to confirm the very limited nature of the amendments which have been made to the application and their failure to address the concerns raised by ourselves, other key stakeholders and the community.

We attach our March 2021 representation as Appendix 2 to this letter and restate the concerns set out in that submission in full. We believe that the unwillingness of the applicant to address local issues is sufficient cause for rejection of the application.

Our previously identified concerns relate to:

- Standalone application contrary to the principles of comprehensive development.
- The proposals for infrastructure provision are vague and ambiguous with a lack of commitment to delivery.
- Unclear provisions for stewardship and transfer of assets to the community.
- Main access junction: lack of comprehensive assessment of the multiple new junctions on the A414 and / or impact of effective single point of access in case of stand-alone development.
- Transport dependency of V7 for offsite infrastructure.
- Traffic through the village centre.
- Green Infrastructure Network and Adequate Separation between Villages.
- Sensitive Development Areas and Sites especially on Hunsdon House and St Dunstan's Church.
- Design, Heights and Built Form.
- Football Hub.
- Provision for Gypsies and Travellers.
- Biodiversity Net Gain.

Conclusion

The HEGNPG remains of the view that the **application still departs from policy objectives and the vision for the Gilston Area in too many aspects to be considered acceptable**. The reluctance of the applicants to address recently adopted planning policy points to conventional and unsustainable development, driven solely by housing numbers and early profit lines and not by quality, values and responsibility. A failure to get this right now will jeopardise delivery of the vision for the Gilston Area and Garden City principles. Our assessment of the lack of compliance with several of the policy requirements of the DP and GANP are set out in the Appendices, which are to be considered an integral part of our representation.

We regret that this application still cannot be supported. Our community remain ready to continue to engage with all parties to see development in the Gilston Area emerge as an exceptional development of quality in accordance with the vision and objectives in the District Plan and Neighbourhood Plan.

Yours faithfully

D A Bickmore, Chairman

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

Enc. Table of assessment against the GANP policies
HEGNPG representation already made 17th March 2021

Appendix 1 – Assessment of the proposals in light of the Gilston Area Neighbourhood Plan

POLICY No.	TITLE	MAIN OBJECTIVE	Village 7 (V7)
1. Accommodating Growth			(Standalone application)
AG1	Promoting Sustainable Development	A general policy which supplements Policy GA1 to ensure future development is comprehensively planned as a single allocation, landscape-led and informed by local character and distinctiveness.	Non-conformity. The application for development at Village 7 fails to demonstrate how the proposals are an integral and integrated part of a comprehensive development which also takes into positive consideration the setting of Hunsdon (including St Dunstan's and Hunsdon House), Eastwick and potential future villages (V6 in particular) (AG1.1.i, AG1.1.ii. and AG1.1.iii) The design approach has been clearly that of ring-fencing the V7 boundary and working in isolation. No reference is made to the identity of V7 in respect to other villages (AG1.3) and no integrated approach is proposed for the phasing of comprehensive infrastructure needs of the area and the creation of an integrated network of green spaces (AG1.4). The delivery of V7 as a standalone development is still dependent on works outside the OPA boundary- widened CSC and a walking and cycling commuter route. No clarity about how these will be secured without wider development.

Appendix 1 – Assessment of the proposals in light of the Gilston Area Neighbourhood Plan

POLICY No.	TITLE	MAIN OBJECTIVE	Village 7 (V7)
AG2	Creating a Connected Green Infrastructure Network	Seeks to promote the creation of a continuous network of natural greenspaces and to protect the water environment in the Gilston Area.	Non conformity. The application identifies green buffers and green infrastructure within its boundaries, but fails to identify how these ensure the integrity of the landscape setting and contribute to the creation of a comprehensive Green Infrastructure Network (AG2.2). Moreover, Parameter Plan PP3, which identifies a Strategic Green Corridor also indicates that this definition includes allotments, formal sport pitches, and ancillary structures: the application fails therefore to identify correctly the Green Infrastructure Network, which is composed of Natural Greenspace. It is also unclear how the development enhances and, where possible, extends existing wildlife sites and woodland at an early stage of the design process (AG2.1.ii and AG2.1.iii). The landscape proposals are illustrative and insufficiently developed to give confidence that the proposed landscape structure in PP2 and PP3 which have been submitted for approval satisfies the requirements of connectivity, integration and Natural Greenspace placed by Policy AG2.

Appendix 1 – Assessment of the proposals in light of the Gilston Area Neighbourhood Plan

POLICY No.	TITLE	MAIN OBJECTIVE	Village 7 (V7)
AG3	Protecting and Enhancing the Countryside Setting of New and Existing Villages	Identifies the measures required to mitigate the urbanising effect of development and protect the countryside setting of villages (existing and new) in order to retain the character of the area.	Non-conformity. The proposed development at V7 makes no effort to respond to Policy AG3. It has no clear approach to the protection or enhancement of the countryside setting of the development. It does not maintain the open land outside the village boundary (PP3) as Natural Green Space (AG3.1.iii), does not integrate paths and bridleways (PP4) as required in AG3.1.v and locates a very urban Football Hub (with artificial pitches, floodlighting, large car park, buildings, etc) towards the open countryside and within the setting of Grade 1 Listed Hunsdon House without any detailed assessment of the impact on the countryside and heritage setting (AG3.2). No assessment is made of the visual encroachment and noise impact created by the development and proposed noise barriers on the tranquillity of the Stort Valley (AG3.3).
AG4	Maintaining the Individuality and Separation of all Villages	Aims to ensure that the open space separating new and existing villages is meaningful and designed to emphasise the individuality of each settlement within a cohesive whole.	Non-conformity. The village buffers identified in PP2 are not assessed and justified to prove that a landscape-led approach has been adopted to define the boundaries of the areas to be built and that the separation is meaningful (AG4.1.i). Also in PP3, the separation is described natural and semi-natural open space but excluded from the Strategic Green Corridor contrary to what is required by AG4.1.ii. It is not clear whether these buffers and separation are of sufficient width, as required by AG4.4.
AG5	Respecting Areas of Local Significance	Seeks to respect the integrity of the setting of existing settlements, heritage assets and landscape features of the area by identifying Local Green Spaces, community identity and locally cherished views.	More details required. The V7 proposals make no reference and fail to explore the impacts on Cherished Views D, E, K, L and long-distance view C. This is a requirement of VMPs (Policy AG5.4)

Appendix 1 – Assessment of the proposals in light of the Gilston Area Neighbourhood Plan

POLICY No.	TITLE	MAIN OBJECTIVE	Village 7 (V7)
AG6	Creating New Garden Villages with a Distinctive and Locally Inspired Character	Seeks to promote new villages with a distinctive character, appropriate to context and inspired by the typical characteristics of Hertfordshire settlements. The design of each village should draw from the appreciation of the existing landscape, topography, local village form and heritage assets and should aim to achieve the best possible balance between landscape, height and density.	Non-conformity. The V7 proposals make no reference to Policy AG6 nor to locally inspired character. PP6 includes taller buildings along the main spine and at the edges of the villages, in contrast with the specific requirement for no visually prominent buildings at the edges made by AG6.2.ii The applicants propose in alternative a Strategic Design Guide with generic principles, which do not incorporate or respond to the requirements of this Policy.
AG7	Creating New Countryside Parks at Hunsdon Airfield and Eastwick Woodlands	Establishes the Airfield and Eastwick Woodlands as a combined area of significant natural greenspace which can provide substantial benefits to new and existing communities, making a positive contribution to the natural environment and the countryside setting of the villages.	Non-conformity. PP3 and PP4 ignore the landscape continuity and footpath/ bridleway connections from V7 to the proposed countryside parks.
AG8	Minimising the Impact of Traffic and New Transport Infrastructure on Existing Communities	Seeks to ensure that new transport infrastructure is planned and delivered in a way which minimises adverse impacts on existing communities in terms of safety, noise, pollution and local character. The interrelationship with the A414 and with east-west strategic movement will also need to carefully address any severance issue and be considered in the context of the Garden Town's sustainable mobility strategy.	More details required. The proposals for V7 alter significantly the access from Hunsdon towards Harlow, as Church Lane is realigned to go through the core of V7. The TA submitted with the application does not satisfy the requirements of AG8.1 which includes demonstration that impacts are minimised. This should include delays to access the A414 from Hunsdon, additional traffic generated by the development on Church Lane (AG8.1.vii) and potential safety implications on the narrower part of Church Lane north of St Dunstan's Church.

Appendix 1 – Assessment of the proposals in light of the Gilston Area Neighbourhood Plan

POLICY No.	TITLE	MAIN OBJECTIVE	Village 7 (V7)
AG9	Phasing of Infrastructure Delivery	Places great importance on making sure that infrastructure provision is phased to provide adequate capacity to meet the comprehensive needs of new and existing communities.	<p>Non-conformity. The application for development at Village 7 fails to demonstrate how infrastructure will be delivered to meet the cumulative needs of existing and new communities:</p> <ul style="list-style-type: none"> - Standalone development at V7 still relies on essential transport and social infrastructure provided elsewhere on a timescale independent of the needs generated by V7. - Cycling and pedestrian connectivity to essential destinations (stations, Harlow town centre, etc) are not secured. - Primary healthcare facilities cannot be provided within reasonable distance. - The first 500 families will have no access to primary school places and secondary places will not be funded until 1,000 families have moved to the area, and may never be provided within reasonable distance.
2. Delivering Quality Places			
LA1	Landscape within the New Village Boundaries	Aims to ensure that the overall landscaped approach in a countryside setting will be reflected within the villages themselves, which should draw inspiration from the landscape within existing settlements in the Gilston Area and elsewhere in Hertfordshire.	<p>Risk of pre-empting Village Masterplan. Whilst this policy relates to the VMPs it is necessary to ensure the principles in the approved Parameter Plans are acceptable. This is a matter for the VMP- need to ensure these matters are conditioned and not fixed as part of the OPA</p>

Appendix 1 – Assessment of the proposals in light of the Gilston Area Neighbourhood Plan

POLICY No.	TITLE	MAIN OBJECTIVE	Village 7 (V7)
BU1	Housing and Residential Neighbourhoods	Aims to provide direction for the preparation of Village Masterplans and the design of each village to encourage community life and minimise travel for shopping, leisure, education and other activities.	Risk of pre-empting Village Masterplan. The policy requires that height and density respond to the creation of character areas appropriate to create village character. PP5 (Land Use) and PP6 (Heights) will potentially fix important elements of character without a clear definition of character areas. This is a matter for the VMP- need to ensure these matters are conditioned and not fixed as part of the OPA.
BU2	Village Cores / Centres	Focuses on the creation of mixed-use village centres offering a range of services and community facilities, critical to the promotion of sustainable development and village identity.	Risk of pre-empting Village Masterplan. The policy requires that the village centre provides a clear identity and a mix of uses. PP5 (Land Use) and PP6 (Heights) will potentially fix important elements of the centre without a clear definition of its character or identity. This is a matter for the VMP- need to ensure these matters are conditioned and not fixed as part of the OPA
BU3	Employment Areas	Supports the provision of employment space , as long as employment uses are designed and integrated in a way that makes a contribution to the character and life of the villages.	Risk of pre-empting Village Masterplan. The policy encourages the location of employment areas as part of the village centre to provide a clear identity and a mix of uses. PP5 (Land Use) identifies the employment area 'at the back' of the centre rather than integral to it. This will reduce the potential for a varied and well integrated employment space that contributes to the life of the village. It appears a provision ready to be 'designed out' at more detailed stages. This is a matter for the VMP- need to ensure these matters are conditioned and not fixed as part of the OPA

Appendix 1 – Assessment of the proposals in light of the Gilston Area Neighbourhood Plan

POLICY No.	TITLE	MAIN OBJECTIVE	Village 7 (V7)
BU4	Village Streets and Lanes	Identifies village streets and lanes as essential elements of villages character and the public realm. Their treatment should include features typical of villages: big trees, hedgerows, mixed shrubs and verges with a clearly defined relationship with adjoining buildings and open views onto the landscape where possible	Risk of pre-empting Village Masterplan. The V7 proposals include a Strategic Design Guide with generic principles for streets and lanes within the development, which do not incorporate or respond to the requirements of this Policy. This is a matter for the VMP- need to ensure these matters are conditioned and not fixed as part of the OPA
H1	Celebrating Existing Heritage Assets	Requires that heritage assets, an irreplaceable resource intrinsic to the character of the Gilston Area, should be protected and, where possible, enhanced to retain significance in the life of the future communities and guide the design of the new villages.	Non-conformity. The proposals for V7 do include a specific assessment of their impact on the heritage of the area, particularly on the setting of St Dunston's Church, Hunsdon House (both Grade 1 Listed) and on the Fishponds (H1.1). Historic England considers that the harm to the archaeology caused by water discharge / SuDS on the Fishponds will be very significant. The development of the Football Hub at the proposed location is contrary to the requirement to provide open space in this location order to preserve the setting and key views of heritage assets (H1.2.iii). No real options have been provided to justify the football development and no effort is made for adequate mitigation of impacts (change of setting, lighting, noise, etc). Opportunities to increase public appreciation and enhancement of historic setting (H1.3.i) have not been addressed.

Appendix 1 – Assessment of the proposals in light of the Gilston Area Neighbourhood Plan

POLICY No.	TITLE	MAIN OBJECTIVE	Village 7 (V7)
C1	Community Facility Provision	Requires development of strong and sustainable communities through the provision, in close proximity to home, of necessary community facilities which will meet the needs of new and existing residents over the lifetime of the development.	<p>Non-conformity. The application fails to demonstrate how community facilities will be located to provide easy and convenient access by walking, cycling and public transport (C1.1.ii) in event of standalone development at V7:</p> <ul style="list-style-type: none"> - There will be inadequate community sport facilities within the village (only a football hub for formal play). No justification for this facility at the exclusion of a more rounded provision is made. - There will be no primary healthcare facilities within reasonable distance or accessible by sustainable modes. - The first 500 families will have no convenient access to primary school places. - Secondary places may never be provided within reach of sustainable travel modes. <p>No specific provision is made for the long-term stewardship of the proposed community hall, football club and playgrounds.</p>
EX1	Existing Settlements	Aims to ensure the impacts on existing settlements created by the scale of the proposed development are mitigated and existing settlements may benefit in terms of access to improved infrastructure and facilities	<p>Non-conformity. The application for V7 makes no provision for mitigation and long-term protection of the character of the existing streets and lanes such as Church Lane (north of the site), which will potentially require a significant change in character to improve safety as a result of the proposals.</p>

Appendix 1 – Assessment of the proposals in light of the Gilston Area Neighbourhood Plan

POLICY No.	TITLE	MAIN OBJECTIVE	Village 7 (V7)
TRA1	Sustainable Mobility	Requires development in the Gilston Area to make an essential contribution to sustainable transport choices advocated for the Harlow and Gilston Garden Town through provision of a comprehensive sustainable mobility strategy and design choices for the new villages and the existing communities.	Non-conformity. The application for V7 fails to demonstrate how it will, as a standalone development, achieve the sustainable mobility targets of the Gilston and Harlow Garden Town (TRA1.1) and reduce overall need to travel, as it does not include variety of uses, employment and community facilities and (in the TA submitted with the application) predicts that 90-100% of all trips will take people off-site. The application fails to demonstrate how these medium-long distance trips will be natural candidates for active travel, when no off-site cycle or pedestrian link are delivered, or for public transport use in absence of the Central Crossing and of the scale of passengers required to make public transport viable. However, a standalone development would still be dependent on works outside the OPA boundary- widened CSC and a walking and cycling commuter route. No clarity about how these will be secured without wider development.
TRA2	Access to the Countryside	Seeks to ensure that new development delivers an extended network of footpaths, rights of way, cycleways and bridleways which will link existing and new villages to each other and the wider countryside.	Non-conformity. The application for V7 fails to identify in PP4 and through the development specifications a comprehensive plan for a safe network of footpaths, cycleways and bridleways.
3. Implementation and Delivery			
D1	Establishing a Partnership with the Community	Aims to put community engagement at the heart of delivering growth in the Gilston Area in accordance with Garden City Principles. Accordingly, the community must be fully engaged at each stage of the planning and development and in future governance arrangements.	Non-conformity. No meaningful interaction with the developers has taken place, with no interaction at all since the site has changed ownership. The community's previously submitted representations and requests for details or small alterations have been ignored. No meaningful engagement has taken place for the development of V7.

Appendix 1 – Assessment of the proposals in light of the Gilston Area Neighbourhood Plan

POLICY No.	TITLE	MAIN OBJECTIVE	Village 7 (V7)
D1	Community Ownership and Stewardship	Establishes criteria for future governance and stewardship of greenspaces and community assets so that arrangements are in place in a timely manner and in the interest of the whole community, including the existing one. It also requires a clear understanding of how future assets will be managed in perpetuity and identification of appropriate sustainable funding.	Non-conformity. No meaningful discussion with the developers has taken place on future stewardship and governance. No details have been included with the planning application.

Appendix 2 – Letter of Representation dated 17 March 2021

Ref: 3_19_2124_OUT-
98Z_HUNSDON__EASTWICK_AND_GILSTON_NEIGHBOURHOOD_PLAN_GROUP-17.03.2021-
1641255



HEGNPG

Supporting our Community

Hunsdon, Eastwick and Gilston Neighbourhood Plan Group

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

17 March 2021

Dear Ms Page,

**Gilston Area Applications – Outline Planning Application for Village 7 East
Herts Council Application Reference 3/19/2124/OUT**

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 **revised planning application for Village 7 in the Gilston Area continues to give serious cause for concern and without major amendment is not fit for determination; at the very least it requires further comprehensive alignment with Villages 1-6, commitment to infrastructure delivery and design modifications. As it stands it fails to comply with Policy GA1 in the District Plan, falls short of benchmarks laid down by the Concept Framework and does not follow the Garden City principles specified in the District Plan.**

Amendments are critical in ensuring that development in the Gilston Area takes place as a single, comprehensive and integrated allocation and in the form of distinct villages, separated by robust and permanent green infrastructure and served by adequate infrastructure, as required by Policy GA1, the emerging 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 existing communities is not adequately addressed and it is unclear how it is intended that these measures are to be secured through the S106 agreement and governance arrangements. Far too many essential measures lack the level of detail and commitment required to give confidence to the community that the impacts of the development can be adequately mitigated.

We maintain that much greater clarity and certainty on the critical matters of comprehensive development and design intent, the mitigation of development impacts and infrastructure provision are essential before the current planning applications can be properly assessed and determined by the local planning authority.

The limited breadth of the application as a stand-alone development puts the future of Village 7 and the sustainable development of the Gilston Area in serious jeopardy. Whilst we acknowledge that the applicants have made some welcome additions, particularly the introduction of Sensitive Development Areas (SDAs), a more flexible approach to heights and an improved junction on the A414, we remain concerned that the application in its current form may result in piecemeal development, potentially forming an isolated suburban housing estate, disjointed from the rest of the villages for the next 20 years and maybe forever.

This is not the vision which underpins the District Plan and the Gilston Area Neighbourhood Plan now ready to proceed to referendum. With few cultural or social facilities on-site and with no easy connections to facilities in Villages 1-6, this application would, we fear, lead to social problems with disaffected young people and anti-social behaviour rather than the inclusive and balanced communities to which HGGT planning aspires.

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

Standalone application contrary to the principles of comprehensive development – despite assurances to the contrary, the issue of standalone development has not been adequately addressed and remains our key concern and one shared by the Council's partner authorities in the Harlow and Gilston Garden Town. A holistic, connected approach is needed given that GA1 is a single allocation of 7 villages not 6 +1 with a clear delivery framework which is common to both applications.

The proposals for infrastructure provision are vague and ambiguous with a lack of commitment to delivery – It is unclear if the full mitigation of impacts on existing communities will be secured and the extent and timing of the provision of services and community facilities in line with Garden City Principles, as needs arise is left unresolved in too many areas. The application's lack of commitment to the HGGT IDP is of heightened concern and gives us no confidence that the necessary infrastructure will be secured in a way that does not put additional pressure on existing services and infrastructure. The Planning Committee should not seek to determine the application before these details have been agreed and are clearly

defined in Heads of Terms. We believe that clear and agreed Heads of Terms, which have the community's support must be settled first.

Proposals for mitigation which have no clear route to delivery should be ignored. Promises of future feasibility studies and unsubstantiated reliance on third parties' co-operation are no substitute for secure, feasible and properly costed measures.

Unclear provisions for stewardship and transfer of assets to the community –

There is still no detail of what land will be transferred to the community, when the transfer will take place to meet Policy GA1 requirements and how the long-term stewardship will be secured and funded. This is an unresolved requirement of EHC's Policy GA1 and we cannot see how it can be capable of being properly resolved within Heads of Terms for the Section 106 Agreement.

Main access junction – We are concerned that the impacts of the proposed access arrangements have not been fully assessed and a comprehensive assessment is required in the context of the timescale for the development of Villages 1-6. The integration of Village 7 with the wider development is brought sharply into question and we are concerned that if the proposed development were to proceed in advance of the provision of connections to Villages 1-6, it would become isolated and dependent on a single point of egress and entry onto the A414. The proposed early delivery of Village 7 will inevitably lead to a continued reliance on car use and undermine the policy objective of promoting sustainable transport modes.

Transport dependency of V7 for offsite infrastructure and failure to deliver sustainable travel

– The inability of the applicants to control the extension of the Sustainable Transport Corridor beyond their site boundary to the rest of the Gilston development is of fundamental concern and is not alleviated by the applicant's proposal to fund, if allowed, an interim cycle and pedestrian link. The new residents of Village 7 may have to wait for 10 or more years before the STC is extended to the rest of the development and in the meantime, all public and private transport will have to use the A414.

The proposals clearly rely on infrastructure to be provided by V1-6 and on essential off-site cycling routes to key destinations. The assessment of these requirements for the deliverability of the overall scheme is not set out to be capable of scrutiny. The absence of discussions with third party landowners, not to mention legal agreements or other mechanisms to secure delivery provide no assurance that targets for sustainable travel will be met. The applicant's proposals to achieve these objectives. should not be counted as deliverable commitments or obligations.

Traffic through the village centre and beyond – Whilst the revised plans show a Sustainable Transport Corridor (STC) through the village, this appears to simply be a renaming of the previous Primary Vehicular Route. The same corridor is also a bus station and a through route to Hunsdon and beyond. The design intentions to create a pedestrian-friendly environment may not be deliverable. We strongly question the diversion of all through traffic on Church Lane through the centre of Village 7 and would urge that further scrutiny takes place before decision making.

Secondly, the proposals will result in increased traffic to the north of village 7 along narrow rural roads through Hunsdon, Widford and Much Hadham. But there are no plans for protecting road safety or preventing rat-runs along these roads. Appendix 14 of the Transport Assessment looks at these issues but contains no proposals to assess the impact on these villages or to investigate the means of mitigating it.

Mitigation measures need to be identified, costed and committed to in the S106 agreement.

Green Infrastructure Network and Adequate Separation between Villages – The Strategic Green Corridors forming the backbone of the Green Infrastructure Network and separation between villages appears to be considered not as the landscape framework that guides development (as required in a landscape-led approach), but the space where things that cannot be fitted elsewhere are located: allotments, car parking, built development for sport and housing for Gypsies and Travellers. This will undermine all efforts to respect the context of the development.

Sensitive Development Areas and Sites – We are pleased to note the identification of two Sensitive Development Areas. However, the application does not adequately address the effect of development on Hunsdon House and St Dunstan's Church, both Grade 1 Listed Buildings and on the Moated Site at Eastwick Hall Farm (a Scheduled Ancient Monument) and the reasons why these areas are not to be considered 'sensitive'.

Design, Heights and Built Form – Inadequate control measures are provided to ensure village quality and the proposed development parameters for heights and land use appear to reflect a development concept based on urban / suburban models (as indicated in the illustrative Housing and Land Use Plan) which could constrain the delivery of villages according to GANP Policy AG6, part of the Strategic Landscape Master Plan and Village Master Plan processes.

Other Specific Issues

Football Hub – The introduction of the Football Hub is a cause of great concern to the community given its scale and incursion into the Green Infrastructure network to the north of Village 7. This will impact on the character of the landscape setting of the village and the setting of heritage assets. It will be of doubtful benefit to the residents of V7, particularly in the context of a stand-alone application.

Provision for Gypsies and Travellers – Inadequate assessment has been undertaken of this sensitive land use and the proposal put forward is unacceptable. The landscape areas outside the development boundaries identified for green corridors, wildlife and biodiversity should be retained in perpetuity and are an inappropriate location for this form of development. If provision is to be made a site should be allocated within the developable area.

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.

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. Outdated surveys and traffic baseline at the foundation of the Environmental Assessment and Transport Assessment.

2. The Covid pandemic, leading to an economic shift, different lifestyles and development requirements.
3. Phasing of development and infrastructure provision and changes to the housing trajectory.
4. 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.
5. 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 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.
6. The Gilston Area Neighbourhood Plan (GANP), now recommended to proceed to referendum.

Proposed Way Forward

The HEGNPG remains of the view that even with the changes now made, the **application still departs from policy objectives and the vision for the Gilston Area in too many aspects to be considered fit for determination**. It is not presented in a form which should be approved by the Council without further very substantial amendments. In fact, it will remain fundamentally flawed if it is pursued as a standalone development or one which expects to be built before the other villages of the Gilston development are constructed in a logical, sensibly planned sequence.

We believe the changes required particularly with regard to integration with the wider GA1 allocation and the phasing of development and infrastructure provision **are so fundamental that we would strongly advocate the application be withdrawn to allow a comprehensive approach to be adopted**. With the focus on delivering quality development and more sustainable places, the Council should not be driven solely by housing numbers. It should carefully consider the phasing and integration of development and infrastructure in the Gilston Area. **A failure to get this right now will jeopardise delivery of the vision for the Gilston Area and Garden City principles.**

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 applicants 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, the promoters of Villages 1-6 and the applicants on this and our community remains ready to continue to engage with all parties to see development in the Gilston Area emerge as an exceptional development of quality.

Yours sincerely,

A handwritten signature in blue ink, reading 'Anthony Bickmore', with a horizontal line underneath the name.

Anthony Bickmore, Chairman

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

Standalone application contrary to comprehensive development**Issue:**

This is a standalone application for development that takes no account of the overall Gilston Area and Garden Town. This could be legitimate only if there were robust evidence of coordination and integrated planning between the two applicants of the Gilston Area reflected in the application documents.

We had understood that a Memorandum of Understanding was to be entered into by the parties. There is no evidence of this, yet there is obvious reliance of this application on Villages 1-6 for infrastructure and social provision, and unaddressed issues of interface between the two applications. No clear details of how these matters are being coordinated whether through legal Heads of Terms (including the respective level of contributions) or otherwise, is available.

As presented the application is in conflict with the fundamental aim of Policy GA1 to deliver comprehensive development.

Related to Planning Documents:

For Approval

Development Specification Statement (DSS)

Supporting Documents

Planning Statement

Housing and Infrastructure Delivery Strategy (HIDS)

V7 Transport Assessment

Open Space, Landscape and Public Realm Strategy Assessment

Development Aspirations:

District Plan Policy GA1 envisages a comprehensive development within a single allocation of 7 distinct villages separated by meaningful landscape with shared infrastructure and a clear collective identity – wholly reflected in the Concept Framework jointly prepared by the 2 landowners and EHC and the community.

The Gilston Area Neighbourhood Plan (GANP) Policy AG1 states that development will be supported where it can be demonstrated that proposals have considered the context of the overall development of the Gilston Area and have not been considered in isolation.

Concerns:

Given the lack of evidence of coordination within the Gilston Area, the NPG has serious concerns about the legitimacy of considering this application independently of the one of Places for People (PfP) for Villages 1-6. The main concerns are:

Lack of comprehensive approach- The adoption of independent approaches to development by the 2 landowners has resulted in a piecemeal application which will result in harm to the present and future communities. Should V7 be allowed to proceed in advance of the others, it would have every prospect of ending up as a suburban housing estate prematurely built in Hunsdon and separated from the rest of the Garden Villages for the next 20 years and maybe for ever if they do not all come to fruition. The Strategic Landscape Masterplan will require a comprehensive approach which considers all villages and the adjoining areas like the Stort Valley. and the application for V7 will not facilitate and should not anticipate the process.

Peripheral development without sensible phasing in relation to infrastructure provision. The applicants state they wish to commence construction in Jan 2022 and finish the 1500 houses by 2030 (HIDS). This is totally out of step with the rest of the development of the Gilston Area and the proposals for Villages 1-6 and delivery of strategic infrastructure. For example, the Central Stort Crossing will not be ready we understand until 2025. The rush to build housing at all costs without proper infrastructure planning will result in major harm and prejudice the overall vision for the Gilston Area.

Lack of integration- Lack of cohesion and connectivity leaves great uncertainty. There is complete reliance on PfP for delivery of key infrastructure which is essential to the creation of a sustainable community including the STC, a health centre, waste management, cultural, social and indoor leisure facilities for V7 residents. These may not arrive until much later in the development and there is no incentive or requirement for PfP or anybody else to make earlier provision for V7 residents if development is allowed before 2033.

Environmental Statement- There should be one overall EIA not 2 separate ones to enable the assessment of combined and cumulative effects of the Gilston Area. The impacts of V7 cannot be considered in isolation. The submitted EIA does not provide a robust and reliable basis for assessing the impacts of the proposed development.

Views of other key stakeholders- Essex CC in their representations on V 1-6 (para 2.1) state – “It is of fundamental importance the two applications are co-ordinated in an orderly, holistic and comprehensive manner to deliver the sustainable planning requirements set out in the GA1 allocation and other relevant policies and guidance. Failing to achieve comprehensive development between the two applications will very likely result in significant planning harm. The NPG fully endorse this statement.”

Proposal:

1. The application should not be determined until it can be demonstrated that a comprehensive approach is being adopted to Villages 1-7 and to a logical and sensible phasing of development and delivery of infrastructure. This will require the redrafting of key submission documents including the EIA and

Housing and Infrastructure Delivery Strategy and a review of the phasing of Village 7 as part of a comprehensive phasing plan for development of the GA1 allocation.

2. The requirement for a comprehensive approach should be reflected in the Heads of Terms of the s106 agreement.
3. Further clarification is 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 planning obligations. A single Governance Strategy supported by the community should relate to all 7 villages.
4. The requirement for a comprehensive and integrated approach to master-planning 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.
5. The Parameter Plans should be amended to show the integration of Villages 1-6 with Village 7 in respect of the STC, pedestrian and cycle routes and green infrastructure network.

Lack of commitment to infrastructure delivery

Issue:

The application does not give the community confidence that infrastructure and services will be provided at the time of need. The Housing and Infrastructure Delivery Strategy lacks detail and states that ‘the specifics in each case will be a matter for determination over the course of the drafting of the S106 agreement or formal heads of terms’. The revised submission provides no further details. We do not know at what stage of negotiation this may be with these applicants.

Related to Planning Documents:

Documents for approval

Amended Development Specification Statement (DSS)

Supporting Documents

Planning Statement

Housing and Infrastructure Delivery Strategy (HIDS)

Development Aspirations:

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

The HGGT Infrastructure Delivery Plan (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.

GANP Policies AG9 and D2 requires infrastructure capacity to be phased to ensure necessary physical and social infrastructure is provided at time of need, without relying on existing facilities, which are already under pressure.

Concerns:

Phasing- the applicants are trying to promote V7 as the first village to be built when logically it should be one of the last given the programme for delivery of strategic infrastructure.

Infrastructure delivery (see HIDS). The applicants do not accept the infrastructure programme presented in the HGGT IDP. They are vague about the level and timing of financial contributions, basing responsibility on legal minimums designed for smaller scale of development and not accepting the level of commitment defined in the IDP. Most off-site requirements necessary to deliver the scheme are only identified for unspecified ‘financial contribution’, for which the applicant appears not to have entered into any meaningful discussions with other parties, including PfP, to reach clear agreed solutions capable of being converted into binding legal commitments under S106 Heads of Terms. Far too many infrastructure aspects are vague, ambiguous and lack commitment from the applicants – deferring decisions to the S106 negotiations and beyond to reserved matters applications. The provision of key facilities and infrastructure assets

are not under the control of the applicants but no evidence is presented of legal agreements with third parties or other mechanisms to secure delivery- indeed in many cases it seems that there has been no, or no meaningful engagement with adjoining landowners to ensure land take or rights of access. Without these the feasibility of proposals cannot be examined or costed within normal S106 obligations.

This approach lacks transparency and potentially implies unwillingness to mitigate development impacts. If there is uncertainty over delivery, then other means of mitigating significant impacts should be identified, costed and committed to. Otherwise the likely outcome is that they will have to be scaled down at a later date or will not be provided at all due to cost or land access not being accounted for at the outline planning stage.

Primary school provision (including early provision for an embryo school) is welcomed. It is essential that provision is secured from the outset of development as there is no available capacity for any more children at Hunsdon, High Wych or other easily reached primary schools.

Secondary school provision - the proposals for secondary pupils are ambiguous and unclear. As identified in the Socio Economic Chapter of the Environmental Statement, there is limited potential for existing local secondary schools to accommodate pupils within the county administrative area and no evidence is provided of where there may be capacity to accommodate this demand. The EIA states that for early residents of Village 7, this may require temporary arrangements in Harlow or elsewhere in Hertfordshire which will inevitably involve travel - contrary to sustainable development objectives. The timescale for development of the new secondary school does not align with the needs arising from development of Village 7. Furthermore, if there is no sustainable bus or cycle connection (via the STC) from V7 towards V1/2, children will be forced to use the A414 to access the proposed secondary school. This will be harmful to the community and will, jeopardise the sustainable travel modal targets.

Heath Centre - We are concerned that the healthcare provision previously planned for V7 has been omitted. It is stated that the applicant will provide proportionate financial contributions towards delivery of a health centre elsewhere but no details are given of how needs will be met as they arise. This is likely to put further pressure on existing provision in the area.

The Delivery Plan does not provide the community with 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 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. Limited details have been provided of how and when infrastructure and other obligations will be secured.

Proposal:

1. Comprehensive revision of the HIDS is required to identify all infrastructure and social facility requirements and how these will be delivered, with particular clarity when there is reliance on other parties for delivery (for example in V1-6).
2. 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. Given the heavy reliance on dealing with these matters within the S106 negotiations the community and other consultees should be afforded the opportunity to comment on them before the application is reported to planning committee.
3. HoTs should also include mitigation measures for impacts on existing local communities.
4. The report to planning committee must include detailed HoTs as these will be material to determination of the planning application. It would be premature to report to planning committee until these have been defined in detail.
5. HoTs must show that the feasibility of proposals has been examined and that the necessary agreements or acquisition of legal rights where third parties are involved, are capable of being secured.

Unclear provisions for stewardship and transfer of assets to the community

Issue:

The applicant has not provided an adequate framework for the future governance of the area, including what land and assets will be transferred to the community and what structure and funding will be secured. It will be very important that a single stewardship approach and governance structure is established for the Gilston Area. The Parish Councils and the community should be given the time to reflect on alternative possible structures and what role they will take.

Related to Planning Documents:

Supporting information

Planning Statement

Housing and Infrastructure Delivery Strategy (HIDS)

Village Centre Uses and Governance Strategy

Development Aspirations:

District Plan Policy GA1 states that the delivery of the Gilston Area will include a mechanism for securing the long term stewardship, protection and maintenance of the parkland, open spaces, play areas and community assets; managing the construction process to address potential impacts on existing and future communities; encouraging a successful and active community, including an innovative approach to create the conditions for local resident participation in the design and stewardship of their new communities.

GANP Policy D2 states that arrangements for future governance and stewardship will be secured as part of the planning process.

Concerns:

It is anticipated that the appropriate legal vehicles will be secured through the S106 agreement to ensure the Governance arrangements are in place at the time of implementation and arrangements set down for transfer and funding. The Governance structure should secure the long-term viability of both 'village level' infrastructure and Gilston Area strategic infrastructure and ensure that residents have a permanent role in determining their future use and management on behalf of their community.

We have been promised that by the time the proposed development is completed, the stewardship vehicle will be in place and ready to take on the on-going management of the transferred assets. We do not have confidence that the necessary mechanisms are being secured to achieve that and request further clarification of the Heads of Terms and of the future responsibilities of current Parishes.

Transfer of community land - The applicant's commitment to the transfer of community land or arrangements for the future governance and stewardship of the facilities in V7 is unclear. There has been some engagement on these topics

for over two years but little by way of detail has emerged other than PfP's preferred strategy which has not been compared to alternatives which may be more suitable or acceptable to residents of the Gilston Area and existing communities.

Insufficient details are provided in the submitted Strategy to guide future developers or the community. This is particularly important if (as assumed) the applicant is not intending to develop the site but to dispose of the land with the benefit of outline planning permission.

This subject is a key requirement of Policy GA1 and of the Garden Town for all development and must be properly secured through the planning process.

Without a clear programme for the transfer of ownership and the establishment of a community land trust or similar mechanism, the promises of green infrastructure to be retained in perpetuity are meaningless.

Parishes' role in the Governance – If it is anticipated that the S106 agreement will include an overall framework for Governance and identify key milestones for the establishment of a trust/third party vehicle, bodies such as residents, Parish representatives and other local civic groups must have an interest alongside the landowners and the local authorities. There must be greater clarity about arrangements, responsibilities and funding. We cannot see how HoTs can realistically settle the Governance arrangements without prior participation and proper engagement with communities to arrive at workable solutions which command support. What is being proposed looks illusory and will, it seems to us, amount to no more than a re-statement of principles already set down in the Development Plans without settling delivery in practice.

Expensive facilities - The management, operation and costs associated with the Football Hub are not clear (see also Addendum J). The HIDS states that it will be transferred to the Community Trust. There should be clear obligations for funding of the necessary works and a future endowment for its maintenance in perpetuity in a way that guarantees it will remain a facility for the local community without need for commercial operation.

Proposal:

1. Clearer commitments regarding future governance arrangements and community ownership need to be secured as part of the outline planning application in a way that takes account of the expectations of the community.
2. Commitments to working with the parish councils and the community must be respected and an agreed model is required which sets out the role of the community in future governance arrangements coupled with determining issues of finance and timing of land transfers.

Main access and proposed Church Lane / A414 junction

Issue:

The provision of a controlled and safer junction at Church Lane / A414 which includes pedestrian and cycle facilities is welcome and is considered an improvement over current provision. However, the route from the proposed Eastern Crossing to the entrance to V7 is affected by different applications proposing 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. As no clear overall strategic objectives are presented for the A414, it is impossible to evaluate the proposals on their merits alone.

Related to Planning Documents:

For Approval

- Parameter Plan 4 Vehicular Access and Movement
- Proposed A414/Church Lane signalised Junction

Supporting Documents

- V7 Transport Assessment (including Illustrative Plan to show Earthworks for Details of A414/Church Lane Access to Village and Framework Travel Plan)
- Environmental Statement- Chapter 8: Transport and Access
- Environmental Statement- Chapter 10: Noise and Vibration
- Housing and Infrastructure Delivery Strategy (HIDS)

Development Aspirations:

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 so that walking, cycling and public transport are the most attractive forms of local transport. There is support through the GANP and the HGGT Transport Strategy for upgraded infrastructure that promotes sustainable travel choices and does not attract additional traffic from outside to the Gilston Area.

The community would like to be able to explore the future framework for the A414 and be satisfied that the proposed arrangements for the access junction to V7 has been optimised for this purpose.

Concerns:

The new traffic light-controlled junction of A414 and Church Lane will have some benefit, principally safety, but its design outside the context of the overall area and study of impact on the surrounding settlement raises significant concerns:

The A414 as a whole - The route from the Eastern Crossing to Church Lane / V7 is described elsewhere (V1-6 application) as strategic in nature and with a 40mph speed limit. However, it is approximately 4.6km long and will be designed to accommodate 9 junctions (one every 3-500m). No overarching strategic analysis for the strategic function is offered in either of the two

applications or in documents of the highway authorities. No analysis of effective performance and speed is presented. Without this context, it is impossible to assess the proposals on their merit alone. In addition, the left turn radius and slip roads may or may not be appropriate depending on the desired speed of the revised A414.

The need for the Central Crossing – From the application it is unclear whether the proposed phasing of development in the HIDS (construction from 2022 and completion by 2030) can be delivered ahead of the Central Crossing upgrade and other road and public transport infrastructure provision. There is no clear presentation of the impact of allowing development and construction at V7 while roadworks are taking place at the current Eastwick Roundabout.

The noise and light – There is limited /unclear information about noise and light pollution impacts on the Stort Valley and residents of Hunsdon Pound. The proposed noise abatement bund along the A414 may have unintended consequences for existing dwellings south of A414 in Hunsdon Pound and Briggens House Road by increasing the already existing 55 dB (above LOAEL). Para 4.27 of the HIDS indicates that the bund will 'reflect back' noise towards the road and Figure 10.9 of the EIA indicates an increase of 1-5 dB. There is no obvious assessment of the noise increase (pollution) on the nearby Stort Valley at this location. In addition, a signalised junction will require additional lighting, which may result in light pollution in Hunsdon Pound and the Stort Valley. The junction and OPA should not be approved without details of impacts and identification of appropriate mitigation measures on existing residents and the Stort Valley.

The cycle routes – While the inclusion of cycle routes in the A414 junction may be welcome, there is a bland assumption in Appendix H of the Transport Assessment that the narrow rural lane south of the junction will be safe for cyclists stating "Lane from A414 to Hunsdon Lock is narrow but sufficient due to low vehicular use and rural character " There is no evidence provided to support this statement. The lane serves four houses in Hunsdon Pound and is their only means of access to the A414. It is not wide enough to accommodate both a car and a passing cyclist. Furthermore, this lane is a dead-end with no legal right of way across private land to the Stort towpaths. (see also Addendum E).

The misplaced architectural gateway – PP5 and the illustrative Housing and Land Use Plan indicate a tall 'landmark' building at the entrance of V7. The suitability of this concept is questioned in Addendum I as contrary to village character (GANP Policy AG6) and because of lack of commitment to exceptional architectural quality. According to the Noise and Vibration EIA (Chapter 10) this location is affected by high noise level, with the recommendation that open facades and windows facing the road are limited. We suggest that the development for this corner is revised and a solution that guarantee high design quality is committed to.

Proposal:

1. A full assessment of the role and specifications of the A414 and Eastern Crossing is made before the V7 junction is considered for approval.
2. The interdependency of V7 access from other (later) infrastructure such as the Central Crossing must be fully explored and no development should be

allowed if this compromises accessibility to the rest of the area. V7 should not be considered in isolation.

3. A full assessment of noise and light pollution on Hunsdon Pound and the Stort Valley should be made. Specific mitigation proposals should be proposed and assessed before approval.

4. A better rationale for cycle routes should be included to avoid encouraging inappropriate or unsafe cycling where there is no cycle provision.

Transport dependency of V7 for offsite infrastructure

Issue:

V7 is expected to be served by road links additional to the A414 and by bus and cycle routes that do not exist or require further study before being considered deliverable. There is no confidence that these essential links would or could be delivered. Further studies and commitments are required before considering the scheme acceptable in planning terms.

Related to Planning Documents:

For Approval:

Development Specification Statement (DSS)
PP4- Vehicular Access and Movement

Supporting Documents:

Housing and Infrastructure Delivery Strategy (HIDS)
Planning Statement
Transport Assessment (TA)
Environmental Statement- Chapter 8: Transport and Access (ES8)

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.

The GANP requires that impacts from traffic and road infrastructure on existing communities is adequately controlled (AG8.1.ii) and development seeks to deliver the sustainable mobility targets (currently 60%) set by the HGGT Transport Strategy. It also states (Policy EX1) that the impacts on existing communities should be adequately mitigated.

Concerns:

There are multiple concerns that relate: to the risks of Village 7 being brought forward as a standalone development while it relies on infrastructure delivered by others; to unstudied impacts on Church Lane; and to the uncertainty of the deliverability of essential infrastructure required to achieve 60% of movement by active and sustainable modes.

Impact on Church Lane north of V7 and the centre of Hunsdon – Fig 9.1.

on pg. 110 of the Transport Assessment confirms that the Paramics Model has not been extended to include study of traffic impacts north of V7. The need to extend the model to Church Lane and Hunsdon High Street had already been flagged up by the NPG in our representation in 2019. We consider that there was ample time to complete this assessment or to find a suitable alternative that would provide clarity to the residents of Hunsdon and confirm that the issue has been fully explored. We note in addition a discrepancy of approach and data, which raises serious concerns on the methodology used for the overall assessment, including:

1 - The classification of Church Lane (Link AD1 in ES8 para 8.7.33) as a 'low

receptor'. While it is true that in the immediate vicinity of V7 Church Lane is in open countryside, it also eventually leads to an inhabited area and eventually through the historic centre of Hunsdon. As most traffic taking this route will eventually travel through Hunsdon, this classification is misleading.

2 – No reference to the narrow parts of Church Lane north of St Dunstan's Church where large vehicles have to travel in the middle of the carriageway, without easy passing points. This is already a traffic hazard with current traffic levels.

3 – The major increase in vehicular movement indicated in ES8 para 8.7.33: which is very different from the Table 14.7 of the TA Amended. It is not clear if one assessment relates to traffic movement without mitigation and the other with mitigations, and which ones would they be. This assessment is unclear and potentially misleading. Likely traffic increase should be presented for the inhabited part of Church Lane / Acorn Street and for Hunsdon High Street with and without mitigation measures.

4 – The underestimation of safety and collision risks is made evident by not considering poor forward visibility and the narrow conditions of the carriageway, which will not allow 2 HGVs to pass each other.

5 – The risk to walking and cycling is very high if a segregated footway-cycle path were not delivered as part of V7 offsite commitments, given encouragement given to active modes, the lack of alternative routes and the proposal in PP4 that a cycle route is provided along Church Lane up to the site boundary.

6 – The underestimation of seasonal agricultural traffic: the assessment of impacts on Church Lane is based on AADT (Annual Average Daily Trips) and on an average AM peak. This ignores the real context of the rural area, where at harvest time and at other times of the year, there are peaks of movement of agricultural vehicles and HGVs carrying produce. This agricultural peak should be included in the assessment.

V7 cannot be assessed as a standalone development – Hertfordshire CC representation on V1-6 states that "the Highway Authority has a significant level of concern with respect to how Village 7 is being promoted, and its reliance on infrastructure contained within Villages 1 through 6 to be viable". "The Highway Authority also has fundamental concerns with the assertion that 60% of travel will be by sustainable modes, of particular relevance given that Village 7 is the most isolated of all the wider Gilston development sites." Highways England in their representation (Feb 2021) also require further assessment of the overall development including offsite infrastructure delivery before assessing the application.

Reliance on connections to V1-6 for essential movement - The application promises a Sustainable Transport Corridor (STC) to the other Villages but only to the boundary of V7. The applicant cannot control the STC from there and relies wholly on PfP, who intend to develop this part of the site much later in the development programme. No agreement with PfP is put forward to confirm the timing of construction of this link or the respective share of the cost. This will be required to reach essential facilities such as healthcare and secondary schools provided elsewhere in V1-6.

The main assumption will need to be that no internal link road will be available until the latter half of 2030s and main traffic uses A414 and Church Lane (north) until then. This Scenario is not included as part of the TA

where all Scenarios test completion of V7 with the STC and both river crossings completed and the successful shift to 60% sustainable travel modal share

Pedestrian and cycle access to essential destinations – The Transport Assessment (pg. 106) is based on walking and cycling off-site representing 15% of all external trips and nearly 40% of all sustainable transport journeys off-site. This means that without deliverable walking and cycling routes the proposed scheme cannot be said to comply with the requirements for sustainable travel modal share. Deliverability of the off-site walking and cycling routes is not optional – it is essential to the scheme. The routes currently proposed (Transport Assessment Appendix H) and the interim route to Village 1 along the A414 pass through private land in the ownership of others, sensitive ecological areas or are in flood-prone areas. The main commuter cycling route proposed to Roydon will entail a reconstruction of the present footbridge over the A414. All these will need either construction from scratch or substantial upgrade. All are outside the control of the applicants, and no agreements are in place with the any of the owners of these areas, e.g Canal & River Trust, Briggens House Hotel, or private landowners in the approaches to Roydon or at Hunsdon Pound. Indeed it seems clear that no or no meaningful discussions have actually taken place with any of these owners. How a cycle link will be provided during construction of the Central Crossing is also unclear. The application does not include any detailed feasibility, design or delivery commitment to these essential routes; therefore it cannot be said to fulfil the policy requirement for sustainable travel (HGGT Transport Strategy and GANP TRA1). The Transport Assessment does not offer a sensitivity test with all external trips which cannot be confirmed as deliverable undertaken by car. The TA is therefore ‘aspirational’ and does not provide a sound assessment of how the sustainable travel target will be met.

Essential bus journeys key to modal share– The application proposes two bus routes to the site and makes vague promises about ‘pump priming’ services. External bus journeys are equally or more important than walking and cycling (16% of all external trips in the peak period). It is likely that bus services will not be viable for a very long time if V7 is developed decades ahead of V5 and V6. There should be a clear commitment to frequent and convenient services until they become viable or until they can be supported via alternative governance arrangements in the Gilston Area. As presented in the application, there is no confidence that the services will ever be delivered.

Improvements to the stations have not been properly secured - Appendix H clearly indicates Roydon and Harlow Town Rail Stations as important destinations (figure on pg. 3). The figures indicate a number of possible alternative alignments and also illustrates how current provision for car and cycle access and parking at Roydon Station is inadequate. Harlow Town Rail Station is already under pressure and there is no commitment to delivering the northern access or other improvements to the station as part of the V1-6 application. Impacts from additional car movement at each station is not presented and the concept for potential improvements at Roydon requires further study and commitment. No proper assessment of impacts on both station and deliverability of essential upgrades has been made.

Walking and cycling routes to existing villages and Stort Valley – These could be the same as the essential ‘commuter’ routes or alternative routes necessary for social cohesion, health and recreation. There is no

comprehensive plan of these routes, except to those connecting to Harlow: this is disappointing and contrary to the principles of creating sustainable communities.

Proposal:

1. Further clarity is required of the traffic generated by V7 and expected to travel through Church Lane / Acorn Street and Hunsdon High Street. The current assessment is partial and misleading and does not adequately consider local conditions and safety. Traffic calming measures (such as gateways, speed limit restrictions, addressing the narrow points on Church Lane) need to be identified to mitigate the impacts of vehicular traffic on this route to reduce speeds and improve safety which will also serve to discourage rat running journeys to the benefit of both Village 7 and the local communities.
2. Clarity about the reliance of V7 on links and routes to be provided via V1-6 needs to be improved and evidenced through agreements between the two applicants and a deliverable timescale of provision.
3. Scenarios should include situations in which the STC link to V6 is not delivered prior to completion of V7 and the Central Crossing is not included and in construction. No development at V7 should be allowed ahead of completion of these essential links as there is no evidence that the impacts can be sustained.
4. Stronger well-researched evidence of deliverability and commitment must be provided for all essential transport requirements, including the routes needed to deliver the assumed modal shift for public transport, walking and cycling.

The Sustainable Transport Corridor and the Village Centre

Issue:

The NPG is unconvinced that routing traffic through the centre of V7 will increase its viability and vibrancy as a mixed-use heart for the community where excellent public realm and a people-centred environment can be created. There are also doubts that a single primary vehicular corridor can also be a Sustainable Transport Corridor (STC) with a character and quality appropriate to a village location.

Related to Planning Documents:

For Approval:

Development Specification Statement (DSS)
PP4 Vehicular Access and Movement

Supporting Documents:

Illustrative Plan
Illustrative Secondary and Tertiary Routes and pedestrian and Cycle Routes
Design and Access Statement Addendum (DAS-A)

Development Aspirations:

The community supports the HGGT Vision and its Transport Strategy, and the overall objectives for pedestrian friendly and healthy communities. The GANP (Policy BU4) states that the quality and character of the STC should be comprehensively defined in the Strategic Landscape Master Plan and should make a positive contribution to the character of the village.

Concerns:

The NPG recognises that realigning Church Lane and providing a dog-leg to slow traffic down and change the nature of the link has theoretical merit. It also accepts that the urban design profession insists that it is difficult to generate commercial activity in new pedestrianised areas. However, it has also concerns that the proposals contained in PP4 and in supporting documents will not create a positive image for the new village, as the public realm will be dominated by transport requirements, which will not be people friendly. Key concerns can be summarised as follows:

General Traffic Level through the Centre – there is no indication of the traffic levels anticipated to travel through the village centre, but in ES 8.7.94 it is mentioned that on average over 12,000 vehicles a day are expected to use Church Lane just north of A414. The centre itself is a traffic generator and destination (Football Hub, all employment space and a primary school). Without the benefit of further details, it is reasonable to assume that a large number of vehicles will use the realigned Church Lane. This level of traffic normally requires formal crossing facilities and other measures to manage movement. Many high streets across the country demand a bypass when traffic reaches this level. The specifications in DSS para. 4.28 may not be deliverable.

Vehicular vs pedestrian presence will need to be studied in detail at the stage of Strategic Landscape Masterplan and Village Masterplan. However, PP4 is seeking approval for a Primary Vehicular Access, Sustainable Transport Corridor and Transport Hub without demonstrating that they can be delivered according to policy requirements for prioritisation of walking and cycling and local character. The Transport Assessment (pg. 107) assumes that around 80% of all internal trips will be by sustainable modes, with 68% by walking. These assumptions require that the village centre (presumably a key destination of internal short trips) is designed to attract walkers as a priority. The success of any trading activity in the centre is also dependent on the creation of a pleasant people-friendly environment. This is directly undermined by illustrative proposals with :

1 – A Transport Hub taking up most of the length of one of the dog-legs of the village centre with 30m width dedicated to through movement, with a very urban solution inspired by Oxford Bus Station (page 14-15 of DAS-A)

2 – A village centre (second part of the dog-leg) much wider than appropriate for a village and dominated by features that make crossing and socialising difficult. Echelon parking in its central area (with car reversing into traffic) and set back / segregated cycle route all contribute to the creation of a 'through' space, rather than a village environment where dwelling and socialising are the priority.

Underestimated HGV agricultural traffic – There is a high number of HGVs that currently use Church Lane on an average day. There is also a very significant seasonal peak linked to agricultural activities. These have been ignored by the proposals (see Addendum E).

The double role of STC as a priority for sustainable transport and the only primary vehicular route – The revised submission includes the introduction of STCs as a way to give more prominence to sustainable travel. The NPG is concerned that this change has been only nominal and that the route which previously was a Primary Vehicular Access (i.e. a primary local distributor road) has been rebadged without further study and without a conceptual shift towards sustainable and active transport. We are unconvinced that this route can serve the purpose of the STC, that of a Primary Vehicular Route and still retain the character of a people orientated village street.

Proposal:

1. The proposals for the STC and village centre should be integrated with further assessment of traffic and balance between the creation of a people-orientated centre and the needs of traffic. This is required to confirm that the alignment and arrangements put forward for approval with PP4 are actually deliverable and that the need for a bypass will not emerge as soon as the scheme is completed.

Green Infrastructure Network and Adequate Separation between Villages

Issue:

Meaningful separation between the villages and the backbone of a continuous Green Infrastructure network connecting the villages across the entire Gilston Area are not secured through the Parameter Plans or Development Specification as there is no unified approach across the whole Gilston Area and the two applications. This highlights again the principal concern that the development is being promoted in isolation from the wider GA1 allocation and, as currently proposed, it does not appear to fully embrace the vision and objectives for the Gilston Area.

Related to Planning Documents:

For Approval

Development Specification Statement (DSS)
PP2 and 3

Supporting Documents:

Design and Access Statement and Addendum
Open Space and Public Realm Strategy

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.

GANP Policy AG2 and AG4 require that a robust, permanent and interconnected Green Infrastructure network is established and that the individuality and separation of villages in the Gilston Area is maintained. Policy AG3 describes the quality of the landscape in between villages, and the countryside setting of the villages.

Concerns:

The main concern of the NPG is that the landscape setting of V7 is considered as 'fringes' and ancillary to the site, rather than the continuous and interconnected green countryside landscape that provides high biodiversity value and within which the proposed development is set. The proposed approach, therefore, cannot be said to respond to the principle of landscape-led development (Concept Framework) or 'village within the countryside' (HGGT Vision). This approach leads to these concerns:

Lack of Green Infrastructure continuity - The proposed landscape is conceived in isolation and the green spaces do not form part of an integrated Green Infrastructure Network. The proposed differentiation of the landscape, as natural / semi-natural buffers (southern 2/3 of the perimeter) and Strategic Green Corridor (northern 1/3, primarily parkland and active uses) appears not to

be compatible with the Places for People application, where their 'Strategic Green Corridor' is contiguous with that of V7, but is a natural / semi-natural space, and parkland is identified otherwise. This conflict of interpretation and terminology prevents the creation of continuous green biodiversity and wildlife corridors.

Green Infrastructure as the place for things other than natural greenspace or countryside – A more coherent and continuous landscape / natural greenspace is required to create an appropriate setting for the new village to ensure that the concept of distinct villages separated by meaningful landscape (Concept Framework, HGGT Vision and GANP AG4) is realised. The proposals appear to use the landscape as a 'supporting fringe' where buildings (sport centre – see Addendum J), artificial surface play facilities, allotments and accommodation (Gypsy and Travellers) are randomly distributed with limited consideration for views and the integrity of the landscape.

Erosion of meaningful separation between villages – Village 6 is proposed to be built without any buffers or set back towards the edge of their application boundary. It is therefore imperative that a full greenspace separation is maintained between the two. This is compromised by the interruption created by the accommodation for Gypsies & Travellers, which effectively results in continuous residential use across V6 and V7 (see also Addendum K). In addition, there is lack of certainty about the effective area dedicated to landscape, as the DSS (para. 4.16) appears to imply that only a minimum width of 30m is guaranteed and that the boundaries of the landscape in the Parameter Plans and the 'ancillary uses' to be located within the landscape corridors are to be defined by the Strategic Landscape Masterplan or the Village Masterplan.

Lack of objectives and contradictory landscape definitions – The landscape objectives are unclear. No reference is made to the landscape approach of V1-6, or of the Concept Framework or HGGT Vision. This is evident in the discrepancy between the maps and definitions of the Open Space and Public Realm Strategy, which are different from PP2 and PP3, where the same areas are called in different maps and within the same document a buffer or an amenity space or a semi-natural area or a green corridor, and none of the definitions are provided in the DSS.

Proposal:

1. The entire approach to the landscape setting and the delivery of an integrated Green Infrastructure network needs reconsidering for coherence and continuity. Perhaps the scope of this work is better carried out as part of the Strategic Landscape Masterplan. Should this be the case, PP3 should be amended to only contain a single definition of 'Strategic Landscape' including a minimum width and excluding all other uses which do not contribute to the function of the Green Infrastructure network.

Policy AG4.1.ii of the GANP proposes that the boundaries of the green corridors and of the 'meaningful separation between villages' are set by the Strategic Landscape Masterplan, while the Village Boundary (the built area) is defined by the Village Masterplan in consultation with the local community.

Sensitive Sites and Sensitive Development Areas

Issue:

Some positive changes have been made to address heritage concerns and we are pleased to note the identification of two Sensitive Development Areas adjoining Hunsdon Fishponds Scheduled Ancient Monument and to the south of Brickhouse Farm Barn. However, the application does not adequately address the effect of development on Hunsdon House and St Dunstan's Church, both Grade 1 Listed Buildings and on the Moated Site at Eastwick Hall Farm (a Scheduled Ancient Monument).

Related to Planning Documents:

For Approval:

Development Specification Statement (DSS)
PP2

Supporting Documents:

ES Vol II Appendix 11.1 Heritage Statement

Development Aspirations:

The District Plan (Policy HA1 and HA7) require a positive approach to heritage assets as they represent an irreplaceable resource and essential to the character and sustainable future of an area. The policies require attention not only to the physical structure, but also to their significance – defined in para.21.2.5 as the value of historic assets to this and future generations that derives from its physical presence but also its setting. Policy GA1.V.o, in addition, requires that heritage and its setting are protected and where appropriate enhanced.

Policy H1 of the GANP requires that heritage assets are 'celebrated', through appropriate assessment, protection of their context (specifically mentioning St Dunstan's Church and Hunsdon House) and protection from encroachment or pollution (noise or light). Policy AG5 also includes the identification of Cherished Views, which demand particular attention and consultation.

Concerns:

The NPG supports the principles and identification of the SDAs in PP2 and DSS, but believe that the approach proposed by the applicants does not go far enough and is potentially against the requirements of the District Plan (and GANP). The NPG would like further clarification in respect of the following:

The SDA identification south of Brickhouse Farm House and Barn is welcome, and so is the proposed development specifications (Pg. 19 of DSS) seeking to retain prominence of the House and Barn, including vistas and protection of the scale. There is no justification for the extent of the SDA, which appears to be determined by the size of the garden of the House, rather than an assessment of the context of the heritage assets.

Failure to acquire the Farmhouse is anomalous given the size of this project and will cause major disruption and harm to its resident/ owner and result in

piecemeal development. No specific mitigation strategy for this anomaly is proposed.

The identification of the SDA for Hunsdon Brook Fishponds is also welcome, although no explanation / justification is given in the DSS or in the Heritage Statement (5.4.13) to its definition and extent. Moreover, the measures identified for this SDA (Pg. 19 of DSS) include soft edges, a variety of building heights, sensitive lighting that limits overspill etc. All these design measures are positive but correspond to the requirement for Distinctive and Locally Inspired Character which apply to **all** development edges (GANP Policy AG6). It is not clear therefore how the proposed SDA seeks to add value and protect the significance of this particular asset.

The Heritage Statement does not explain why St Dunstan's Church and Hunsdon House (both Grade 1 Listed and identified as of Very High Significance) are not worthy of a SDA. Para. 5.4.4 and 5.4.5 of the Heritage Statement indicates that while views to Hunsdon House from the site are limited, the relationship between Hunsdon House grounds and the wider landscape remain significant. The Statement continues by asserting that a change from agricultural land to natural green space (Strategic Green Corridor / Green Infrastructure Network) is part of the 'next phase of evolution' of the House, and that the provision of a Football Hub is not a material change from natural green space and should therefore be acceptable. In Para 5.4.7 it is stated that "it is considered" that the Fishponds will be sufficiently screened from floodlighting from the pitches by existing mature trees. There is no evidence for this assertion and no equivalent assertion is made for noise and light encroachment on St Dunstan's Church and Hunsdon House (see also Addendum J). Without further analysis and evidence, PP2 and the proposals for the Football Hub cannot be said to be compatible with the requirements of the District Plan (GA1, HA1 and HA7) and the GANP (H1).

The Moated Site at Eastwick Hall Farm is set within an isolated and peaceful rural setting, which should also be identified as a SDA. This is noted by Historic England's comments (01.03.2021). The location of a Gypsies and Travellers site (see also Addendum K) within the Green Infrastructure network and in close proximity to this asset runs contrary to the aspiration to preserve its significance. Heritage assets are very important to the community. Listed St. Dunstan's Church is visible for miles across the open plateau of the Hunsdon Airfield and so it is important to carefully assess its setting and ensure that, if development within its setting should take place, it is discrete and 'lost in the landscape'.

It is noted that Historic England and the Ancient Monuments Society have serious concerns relating to this application and consider that there is a potential for harm to highly graded heritage assets. Historic England argues that the proposals, through the ambiguity of the use of the land within the Green Infrastructure, which is proposed to include accommodation for Gypsy and Travellers and a Football Hub, would cause a high level of harm to highly graded heritage assets and would not ensure that the development will not have a detrimental effect upon the historic environment as the application progresses to masterplanning stage.

Proposal:

The NPG considers that inadequate evidence has been provided to ensure the full understanding of potential impacts on heritage. It will be therefore necessary, prior to approval, that:

Further explanation of the criteria for the extent of the SDA is made, and that SDAs are linked to appropriate criteria for the retention of the significance of assets and their celebration as positive contributions to the future development. Further explanation is offered for the exclusion of St Dunstan's Church, Hunsdon House and the Moated Site from the SDA approach, particularly in light of the NPG's concerns above and the observations made by Historic England.

Full evidence is provided of visual, noise and light pollution impacts on heritage assets of the Football Hub and the Gypsy and Travellers' site (see also Addendum J and K) before these allocations are considered deliverable.

Design, Development Heights and Land Use

Issue:

The proposals are inadequate to provide control measures to ensure village quality and appear to be derived from an Illustrative Master Plan and Housing and Land Use Plan (supporting documents) that make no attempt to respond to the requirements for village character, identified very early on in the Concept Framework and subsequently clearly expressed in the GANP.

Related to Planning Documents:

For Approval:

Development Specification Statement (DSS)
PP5 and 6

Supporting Documents

Illustrative Master Plan

Illustrative Housing and Land Use Plan

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 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.

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 GANP, HGGT Vision and Design Guide):

Lack of Land Use Diversity - Parameter Plan 5 clearly identifies the whole of Village 7 as a residential area with a Mixed Use Zone and an area tentatively Safeguarded for Employment. The illustrative Housing and Land Use Plan identifies 6 office buildings and one employment space, with all other buildings allocated as Mixed Use Residential where other uses can be converted to apartment 'subject to needs assessment'. The NPG supports the 'mixed use approach' and the creation of an active centre for the village. There is a concern, however, that the proposed design takes inspiration from a city street (5-stories office blocks) and does not reflect the reality of workspace in smaller settlements. The nature and requirements of uses other than residential have not been fully considered and there is a risk that the proposed built form will

inevitably lead to conversions to flats or delay the delivery of the centre.

Heights– The new and more flexible approach to PP6 (compared with the previous submission of 2019) is welcome, as it will allow more study at Masterplan stage. However, it is considered that the plan is inadequate to control the height of the development because:

- The proposed heights do not appear to relate to either the topography (lower heights on prominent ground) or the SDAs. The lowest of the 'maximum heights' of 13m +/-2m is higher than any buildings in the area and is certainly unsuitable to exposed village boundaries and sensitive locations.

- The highest that would be allowed would be 19m +/-2m, comfortably including a 6-storey office block, without any justification of the need to build to this scale.

Urbanising Choices of Height and Built Form – It is evident that PP6 and the illustrative Housing and Land Use Plan are correlated and one helps explain the parameters of the other. The Primary Road Network and approaches to the village are dominated by 4-5 storey buildings (potentially 6 in places). The Secondary Road Network is presented as a sequence of 3 storey townhouses on both sides. These design choices have the clear effect of urbanising all the more public areas of the village, using urban / town forms and heights. This is contrary to the policies (District Plan and GANP) and to the principles of the Concept Framework. While PP6 remains possibly flexible, it equally does nothing to control the built form and ensure that village quality is delivered. Appendix 3 of the GANP makes explicit reference to village character being correlated to the higher buildings being discreetly located. This approach is clearly illustrated in the recent development at Terlings Park, where apartment blocks are discreetly located.

Lower Value Buildings potentially in the Most Prominent Locations - PP6 and the illustrative Housing and Land Use Plan clearly locate the tallest buildings in the most prominent locations. The illustrative plan and DSS identifies these buildings as predominantly small dwellings, affordable units and office space. There should be a clear commitment to design these buildings to ensure that they are the landmark and architectural high-value pieces that their position will require, regardless of commercial value or tenure.

Blocked off Landscape Features – in local villages (see Appendix 3 of GANP) there is a close penetration between woodland and fields and the built area. The proposed development is compact, has no soft edges, and where the opportunity arises of woodland within the village itself, this is blocked off by a row of apartment blocks and car parks. The opportunity to have the woodland as a key natural feature part of the character of the village is lost.

Proposal:

The NPG has serious concerns about the underlying design assumptions that have led to PP5 and PP6 and are so explicitly presented in the illustrative Housing and Land Use Plan. To address these concerns it will be necessary to:

1. Include in the DSS a commitment 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 GANP)
2. Modify the DSS 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. Ensure that this is reflected in the controls put in place by PP6.
3. Modify PP5 to ensure that there is commitment to a balanced set of uses and provide supporting information to demonstrate that a viable and resilient village centre will be delivered.
4. Modify PP6 to allow the woodland block to the north of the site to become a prominent natural feature for the development, rather than the means to hide taller buildings.
5. Commit to quality standards and design either as part of the DSS or through a separate Strategic Design Guide. This will be essential to support claims of sustainable development and justify heights and location of prominent buildings not in character with the local area.

Sport Pitches and Football Hub

Issue:

The proposed Football Hub is a potential source of traffic and pollution from light and noise and brings limited benefits to the residents of Village 7 or to the Hunsdon community.

Related to Planning Documents:

For Approval:

Development Specification Statement (DSS)
PP3 and 5

Supporting Documents

Housing and Infrastructure Delivery Strategy (HIDS)

Development Aspirations:

The community strongly support the provision of community infrastructure aimed at promoting healthy and active life-styles: each village should have easy access to sport and recreation opportunities to suit a range of ages and a variety of interests. Location of facilities should be appropriate to the countryside setting (GANP Policy AG3.2)

Policy GA1.III of the District Plan clearly requires development in the form of 'distinct villages' with a strong provision of recreational facilities within a walkable and sociable community.

Concerns:

The rationale for the selection of Village 7 as the location for a Football Hub is unclear, as the scale of development will meet more than local need, encourage access by car and appears to be a regional facility, potentially requiring a commercial occupier. This type of facility should not be located in community park or in the Strategic Green Corridor / Green infrastructure network, which provides important green space between Hunsdon House and the developable area beyond and is located in a position open to long distance views from the Hunsdon Plateau. The rural landscape and its lack of nearby artificial lighting are essential to the character of the area and the significance of Hunsdon House and should therefore be protected in the planning process (see also Addendum H).

The proposal to create a Football Hub as described in the DSS raises therefore a number of serious concerns:

Land Use / Development – while low impact grass pitches and recreational facilities could be considered 'open space' and successfully integrated in a Community Park which is part of the Strategic Green Corridor / Green Infrastructure Network in accordance with GANP Policy AG3.2, the same cannot be said for a development including a Football Hub Building (Land Use Class E, same as shops and offices) and artificial pitches and other pitches with dugouts, 60 car park spaces etc (Land Use Class F.2, same as community halls). PP3 and PP5 are therefore considered misleading, as they do not appropriately

identify the nature of the development proposed (para 3.13 of DSS).

Actual availability of facilities for the community – The proposed approach to create a single sport hub may secure excellent regional facilities for the Garden Town area in the long term but runs contrary to the policies of the District Plan and the aspiration for distinct villages, each provided with strong local facilities (Policy GA1.III) and with sport facilities with multiple use for the community and served by sustainable travel options (CFLR1). Our concerns relate to:

1 – The highly specialised nature of the proposed development clearly targets a specialised occupier / competitive club, which may or may not be a ‘community club’ open to all sporting abilities, genders and age groups. This is contrary to the aspiration for local community facilities (GA1.III).

2 – The proposed 60 car park spaces (presumably the largest single car park in the development) clearly indicates the expectation that these facilities will attract users from a much wider area, contrary to all efforts to reduce the need to travel and achieve a sustainable transport orientated development.

3 – **No other sport will be offered in Village 7 and only one pitch will be available for the use of the community.** This is contrary to District Plan Policy CFLR1 and not in the spirit of local standards.

4 – Other facilities and sports may be eventually offered within the Gilston Area, but there is no indication if these will be available when needed by the V7 community and whether they will be within appropriate easy access by sustainable modes. The OPA and HIDS do not provide a comprehensive assessment of needs and delivery phasing – this would be required by GANP AG9.

5 – Should V7 proceed as phased in the HIDS, it is possible / likely that the Football Hub will be delivered ahead of several other villages being occupied in the Gilston Area. This will mean that the Football Hub will be over scaled in the short term and will need to attract users / clubs from outside the area, eventually resulting in fewer facilities available to local residents.

Maintenance costs and funding over time – The HIDS (para 4.19) indicates that the Football Hub will be maintained as part of the normal open space Community Land Trust (or similar) vehicles. It is not clear how a development of this nature can be operated and maintained in perpetuity simply as part of open space provision. The requirement for a commercial operator will be contentious and contrary to the principle of provision of facilities for the local community.

Location and impact – As indicated in Addendum H, the location of the Football Hub is highly sensitive, close to two Grade 1 heritage assets and on a higher ground visible from a considerable distance. GAP AG5 indicates a few Cherished Views from which visual impact should be carefully considered with the community. Assessment and mitigation measures should include light and noise pollution from use from the perspective of maintaining the tranquil countryside setting and the setting of heritage assets. The artificial surface pitches are often used as ‘half pitch’ per team, with 50-60 people likely to be playing late in the evening most days of the week for training. On match days, the pitches could attract 200-300 players and spectators. The assessment of the noise generated by use of the development has been made only in respect of safety for receptors, i.e. ‘harmful levels of noise’ in the daytime (i.e. above 55dB). It is not clear if night time use of all floodlit pitches has been considered (EIA, Chapter 10 para 10.6.54). Light pollution is only considered in terms of

spill over of light outside the pitch itself. Pollution in terms of impact on the current countryside environment (i.e. where noise and light levels are very low) has not been assessed. The visual dominance of illuminated pitches on higher ground in the open countryside (for example on Cherished Views in GANP AG5) has also not been assessed.

The NPG considers that the need for the Football Hub is unproven and the impact assessment of the Hub is incomplete and deficient.

Proposal:

The proposed Football Hub cannot be supported until the proposals are better elaborated to address the following:

1. Parameter Plans altered to include the appropriate land use categories for the intended development (Class E for a gym / sport centre and Class F.2 for outdoor sport), which cannot be considered open space.
2. Clear assessment of sport facilities needs for V7 (including an appropriate range and variety of sports and level of ability), and clear indication of availability and access if these are to be provided elsewhere outside the V7 area. This is consistent with the objections put forward by Sports England (15.2.2021) calling for a Gilston Sports & Physical Activity Facility Strategy covering villages 1-7 and including formal and informal sport provision before this planning application is determined.
3. Comprehensive assessment of users and revenues of the Football Hub and means of funding over the long term / in perpetuity.
4. Assessment of visual impact from Cherished Viewpoints (GANP AG5) and of noise and light pollution of the Football Hub at full capacity and with a reasonable level of use in daytime and evening with maps illustrating the change in noise due to the Football Hub and cumulative of traffic noise. Visualization or analytic diagrams of the night-time view shed of the illuminated pitches should be prepared.

Provision for Gypsies & Travellers

Issue:

The allocation of land for gypsies and travellers is a very sensitive matter. This appears to have been introduced by the applicants as an afterthought to the proposals and without adequate consideration given to how this will be successfully integrated into the wider Gilston Area. The identified site does not appear to have been the subject of detailed assessment or scrutiny within a sensitive area of the green infrastructure network designed to be retained, in perpetuity, as green space. We are concerned that haphazard proposals on this topic in V7 and in V1-6 will result in conflicts in future.

Related to Planning Documents:

For Approval:

Development Specification Statement (DSS)
PP3 and PP5

Development Aspirations:

District Plan Policy GA1 identifies the requirement for the provision of serviced sites to meet longer term needs beyond the plan period comprising a site which should deliver 15 plots for Gypsies and Travellers (G&T) and a site with 8 plots for Travelling Showpeople (TSP).

This requirement should take account of 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 after discussions with representatives of the G&T community had taken place. No design or location criteria are offered in the DSS. As requirements for TSP normally involves trucks and equipment and requires larger vehicular infrastructure, it should be clear in the application whether the allocation is suitable for use only by the G&T community or by both.

It is disappointing that, with a development of this scale, neither of the two developers have engaged with this sensitive matter and identified a solution that minimises the risk of conflict and addresses local concerns.

The nature of the provision – Although low density and possibly occupied by temporary structures, this provision is a permanent allocation for residential use, and should be treated as such. It should not be indicated as green open space in PP3.

Lack of Assessment - 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 site. This analysis is required to ensure that there will not be unacceptable harm to landscape character and visual amenity.

Impact on the Green Infrastructure Network - The development of serviced sites for gypsies and travellers is contrary to the objective of a Green

Infrastructure network, retained in perpetuity, around villages. Development of serviced sites should be identified as a land use and should not be considered a suitable use within the landscape buffers or green corridors. The site is located within a green corridor, which was identified to provide an important buffer between V6 and V7 effectively joining the two villages.

Impact on the Heritage- This provision is within the setting of the Moated Site south of Eastwick Hall Farm (Scheduled Ancient Monument – See Addendum H). Historic England and others consider that the significance of this site lies not only in its archaeological potential but, also with an appreciation of its function and placement within the landscape. Having the G&T provision in this location would mean built form within this green corridor and an erosion of the open setting of the monument.

We are very concerned about the implications of safeguarding land without a more detailed assessment. 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. Insufficient assessment has been undertaken to justify the safeguarding of sites at the outline planning stage.

Proposal:

1. Provision of this nature needs to be carefully planned in synergy with similar provision in V1-6 and the location of the proposed pitches should be determined at the village masterplanning stage and as part of the Village Developable Area.
2. We consider that alternative location should be sought for this provision outside the Green Infrastructure network, that ensures continuity of landscape and adequate buffers maintained between villages. Any options should be evidenced by best practice and dialogue with the intended community that will use it.
3. Parameter Plan 5 should be amended and the proposed allocation for gypsies and travellers sites should be reconsidered or the Green Infrastructure extended to ensure separation and green corridors are maintained.

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. However, there continues to be a lack of clarity about when / as part of which work stage proposals will be agreed and implemented. The Herts and Middlesex Wildlife Trust has objected the application.

Related to Planning Documents:

For Approval:

DSS

PP3

Supporting information

EIA Chapter 13 Biodiversity

Open Space and Public Realm Strategy

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.

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

Concerns: The Site is known to support protected and priority fauna including bats, ████████ reptiles, deer and birds as well as significant individual trees, ancient woodland and historic hedgerows. The application documents state that the proposed development seeks to retain and safeguard these key features and integrate development alongside them with generous buffer zones afforded to each of these sensitive assets to mitigate against a direct loss of any trees, habitats and species of ecological importance. It has not been demonstrated how these measures will be secured.

We do not consider PP2 and 3 will ensure that the role and function of these important features are carried through to the detailed design stages. For example, PP3 shows existing hedgerow/tree line/scrub to be retained but adds the caveat- *To be retained as far as possible as set out in the Development Specification* with no details of how losses will be compensated for.

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.

An Outline Ecological Management Plan accompanies the Environmental Statement which will provide the overarching framework for the creation and retention of habitats and how these will be enhanced and managed sensitively in the long-term. It is understood that more detailed ecological management plans will be prepared as part of future reserved matters applications. At this stage, too much remains unspecified on how the biodiversity benefits will be achieved. This is of significant concern given the extent of green belt land being lost to development.

As suggested by the Wildlife Trust, PP2 should be amended to incorporate a 10 m buffer to retained hedgerows to ensure consistency with Policy NE3. There is concern that the applicant's Environmental studies are out of date, e.g. in the Stort Valley and may fail to reflect current habitats and wildlife. For example, the water vole and otter field surveys were undertaken in May 2016.

The biodiversity calculator included in the ES confirms that the development will result in 73.63 Habitat Biodiversity Units gain. However, as highlighted by the Wildlife Trust, the application must be reassessed against the Defra Biodiversity Matrix V2 and full details of condition assessments and habitat descriptions provided.

We are concerned about the lack of information regarding the timing of essential landscape works. 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. This should be stipulated in the s106 and planning conditions. The requirement for biodiversity net gain should be stipulated in the planning obligations and appropriate planning conditions.

Proposals

1. There needs to be a clearer commitment in the DSS to habitat 'creation' in addition to habitat protection and enhancement to mitigate adverse effects on biodiversity
 2. The wording of Section 3.16 of the DSS should be strengthened to include a clear commitment to the delivery of net biodiversity gain and details of how this will be delivered.
 3. The ecological management plan should be developed into a biodiversity strategy which should be appended to the DSS.
 4. The requirements for the masterplanning process and reserved matters applications need to be clearly specified.
 5. 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.
 6. The HoTs of the S106 agreement must 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.
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LIST OF ABBREVIATIONS

DSS	Development Specification Statement
EHC	East Herts District Council
GANP	Gilston Area Neighbourhood Plan
GI	Green Infrastructure
G&T	Gypsy & Travellers
GT&TSP	Gypsy, Traveller & Travelling Showpeople
PP	Parameter Plan
PROW	Public Rights of Way
SDA	Sensitive Development Area
SLMP	Strategic Landscape Masterplan
STC	Sustainable Transport Corridor
V	Village
VDA	Village Developable Area
VMP	Village Masterplan