



**EASTWICK AND GILSTON PARISH COUNCIL
HUNSDON PARISH COUNCIL
HUNSDON EASTWICK AND GILSTON NEIGHBOURHOOD PLAN GROUP**

IT'S NOT TOO LATE TO CHOOSE AN ALTERNATIVE!

Application Ref. No: 3/19/1046/FUL - Fifth Avenue/ Central Stort Crossing
Application Ref. No: 3/19/1051/FUL - New Road and Bridge/ Eastern Stort Crossing

February 2022



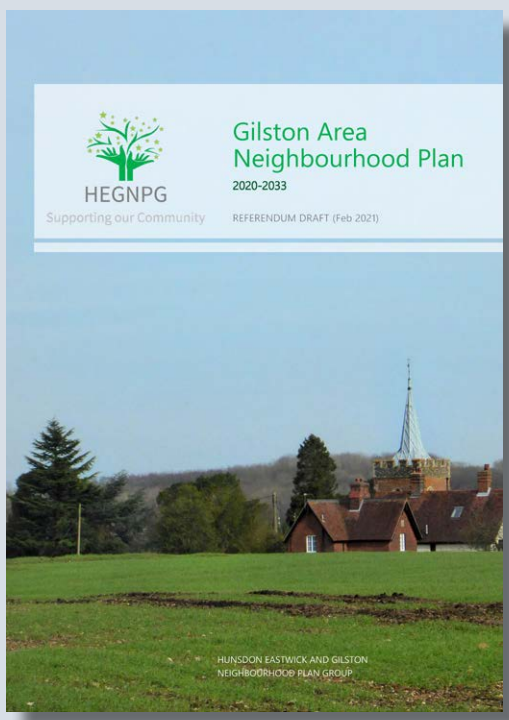
WHO WE ARE

This paper has been prepared by the Parish Councils of Eastwick and Gilston and Hunsdon. The communities we represent will be directly impacted by the proposed crossings and the area we live in irrevocably changed. We would therefore urge you to take full account of our concerns before reaching a decision on these applications- in the knowledge that once this decision is made, there will be no going back.

Under the banner of the HEGNPG (Hunsdon, Eastwick and Gilston Neighbourhood Plan Group) we have committed time and financial resources to engage proactively with East Herts Council and the developers to ensure that the shared vision for the Gilston Area is delivered and development is of the exceptional quality necessary to justify the release of such a large area of land from the Green Belt.

We prepared the award winning Gilston Area Neighbourhood Plan (GANP), not with the objective of creating obstacles to the delivery of houses – but to ensure that development is respectful of the character and beauty of the local area and delivers on the Garden City principles enshrined in the District Plan. The GANP has now been adopted following an independent examination and legally has the same weight in the determination of planning applications as the District Plan. This is critical in your determination of these applications.

The GANP has achieved national recognition for its balance and quality: it won the overall Planning Award (Editor's Award) for 2021, the Planning Award for best planning policy document, and the Landscape Institute Award for promoting good balance between landscape and development.



PHOTOS OF THE STORT VALLEY AND TERLINGS PARK



Well my Honourable Friend makes a very, very important point, it's thanks to the work of organisations, like the Hunsdon, Eastwick and Gilston Neighbourhood Plan Group that we involve local communities in making these uniquely sensitive decisions. And as we consider our plans for the future, one of the things we do want to do is to make sure that the voice of local people is integrated more effectively into planning decisions

OCTOBER 2021 - <https://twitter.com/JulieMarsonMP/status/1452940047875985409>

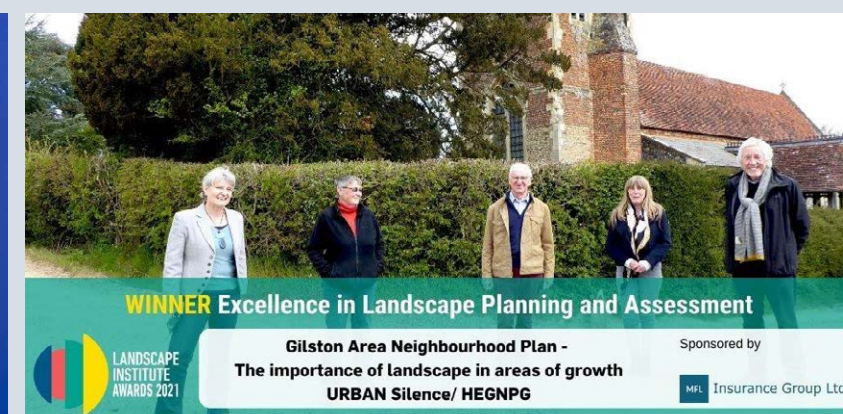
The Editor's Award 2021 was accompanied by this statement:

"This is the best, and maybe only way, to plan large scale developments in future."

Mary Parsons, former project leader for the developers Places for People (PfP), Gilston said in June 2021:

"All credit to an incredible group of local people and the leadership they gave. They took the brave decision that, if the development was going to happen, they would set aside their personal views to work with the developers and Authorities and use the Neighbourhood Planning process to try and ensure the highest quality development and secure the best possible outcomes for their communities."

It is in this spirit that we urge you as members of the planning committee to take full account of the Gilston Area Neighbourhood Plan and the very real concerns of local people in determining these applications. We recognise the need for housing and fully support the early delivery of necessary infrastructure, but **not at any cost and not if this prejudices the delivery of our shared vision** for the Gilston Area and the quality of that development for existing and future communities.



1. APPROVING THE APPLICATIONS WILL BE A TERRIBLE MISTAKE

Determining the applications for the two Crossings is a huge responsibility: it will set the tone and character for the future of the area and directly impact the lives of the 35,000 residents, new and old, who will live in the Gilston Area. The implications of the decision you make will be immense.

*These roads are over-scaled, massively expensive and carry with them huge environmental, economic and social impacts.
They are not the right solution.*

MISTAKE 1. HIG FUNDING IS A POISONED CHALICE

- Despite the officers' remarks, the timing of this is all driven by the HIG funding - but it is a poisoned chalice: the monies are not extra funding, and they will be passed on to the applicants as an upfront loan leaving them with the risk of cost overruns. The cost of what has been planned is greatly in excess of the HIG funding and the gap will only widen.
- This will add significantly to the cost of the houses and/ or there will be cutbacks to the funding available for other necessary infrastructure elements (such as sustainable transport, schools, health, recreational, cultural and open space facilities, public transport subsidy and so on...)
- The HIG funding allocates £36m to the Central Crossings, £92m for the Eastern one. This dwarfs the £65 million set aside for the access roads in the original Viability Assessment (see Appendix A).
- PfP have raised concerns about their ability to deliver all the planning obligations they have previously committed to. A new Viability Assessment is underway and PfP are preparing to renegotiate the promises made when the site was allocated in the District Plan. It would be unwise for members to determine these applications until the outcome of that viability assessment is known and the implications can be properly assessed. **Especially as the roads are not a good solution for Gilston.**

MISTAKE 2. APPROVAL WOULD NOT NECESSARILY UNLOCK THE DEVELOPMENT

- Essex County Council suggest that 22% of the costs of the Eastern Crossing should be recovered from other sites. 100% of the cost of the Central Crossing needs to be met by the Gilston sites. How is this to be secured when the roads are being promoted by a single private developer? There are no legal agreements in place: yet PfP are being required to deliver infrastructure to serve wider, unspecified, objectives. With huge financial risks, it is doubtful that they will be able or willing to build the roads unless contributions from others are secured - making the timescale for housing delivery uncertain.
The costs of major infrastructure typically escalate with detail design - there can be no doubt that the current estimates will increase again: detailed flood modelling has not been undertaken, CPO and mitigation costs are uncertain and the design of the promised 'signature' pedestrian and cycle bridge is not yet available.
- The Eastern Crossing still requires land acquisition and permission to build over the railways. This will be very difficult for a private developer to obtain. Will this not put the funds at risk anyway?

MISTAKE 3. THE HARM TO THE FUTURE OF THE AREA IS VERY REAL

- The scale and design of the crossings will seriously compromise the achievement of the Garden City Principles and the vision for well-integrated and harmonious sustainable development: heavy traffic will split Gilston from the Stort Valley without any demonstrable advantage to Harlow.
- Road building on this scale will make the sustainable transport targets for the Garden Town difficult to achieve.
- These new roads will attract traffic and HGVs to the Gilston Area making it impossible to deliver 'seven villages in the countryside' and encourage walking and cycling. Development will inevitably be car-dominated and unsustainable.
- It is likely that the retail box centre along Edinburgh Way will be strengthened, attracting even more traffic to the area.
- The environmental harm will be significant: the tranquil landscape of the Stort Valley and its leisure and cultural significance will be compromised forever. Traffic noise will be pervasive. The Terlings community will be cut off from Gilston and future residents will have to cross 6 lanes of traffic to walk or cycle to Harlow.

THE AREA AS IT IS TODAY



ALL IMAGES FROM THE
APPLICANT'S DESIGN AND
ACCESS STATEMENT

WHAT YOU ARE ASKED TO APPROVE

THE EASTERN CROSSING STRUCTURES: DO THEY REALLY CAUSE ONLY 'LESS THAN SIGNIFICANT HARM'?

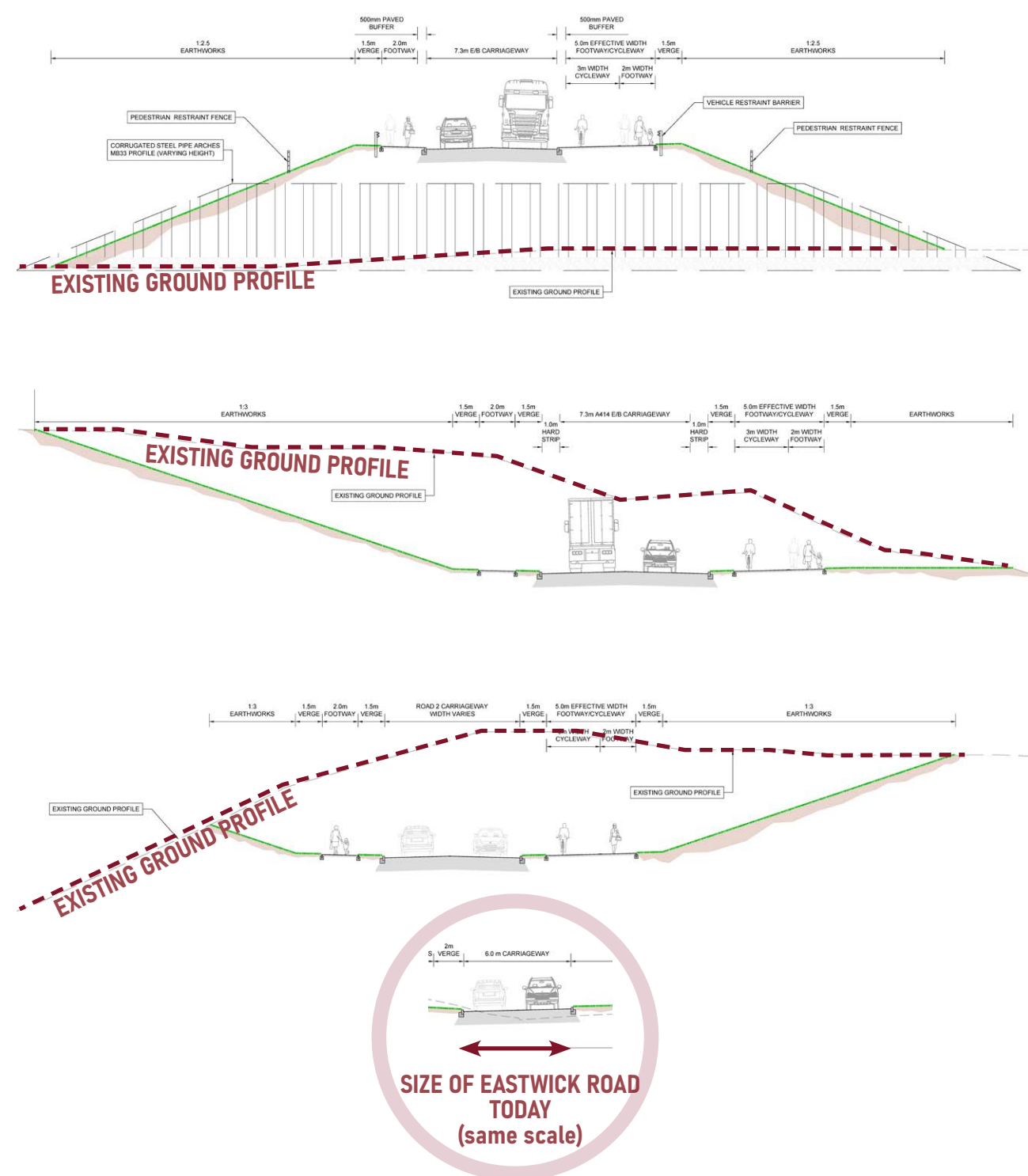


ALL IMAGES (INCLUDING SITE AS EXISTING) FROM THE APPLICANT'S
DESIGN AND ACCESS STATEMENT AND OTHER SUBMITTED DOCUMENTS

WHAT YOU ARE ASKED TO APPROVE

IS THE SCALE OF THE ROAD JUSTIFIED AND NECESSARY TO SERVE VILLAGES AND 'RETAIN THE COUNTRYSIDE CHARACTER' (AS DEMANDED BY POLICY)?

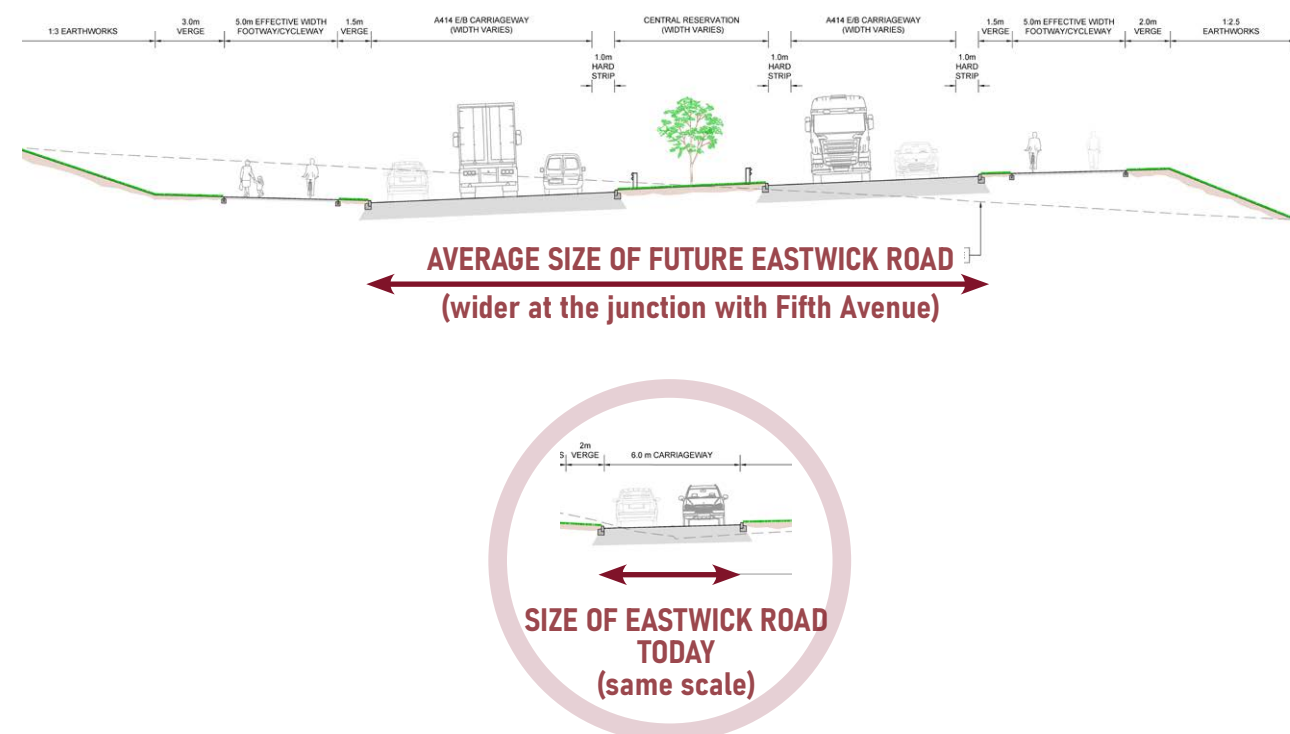
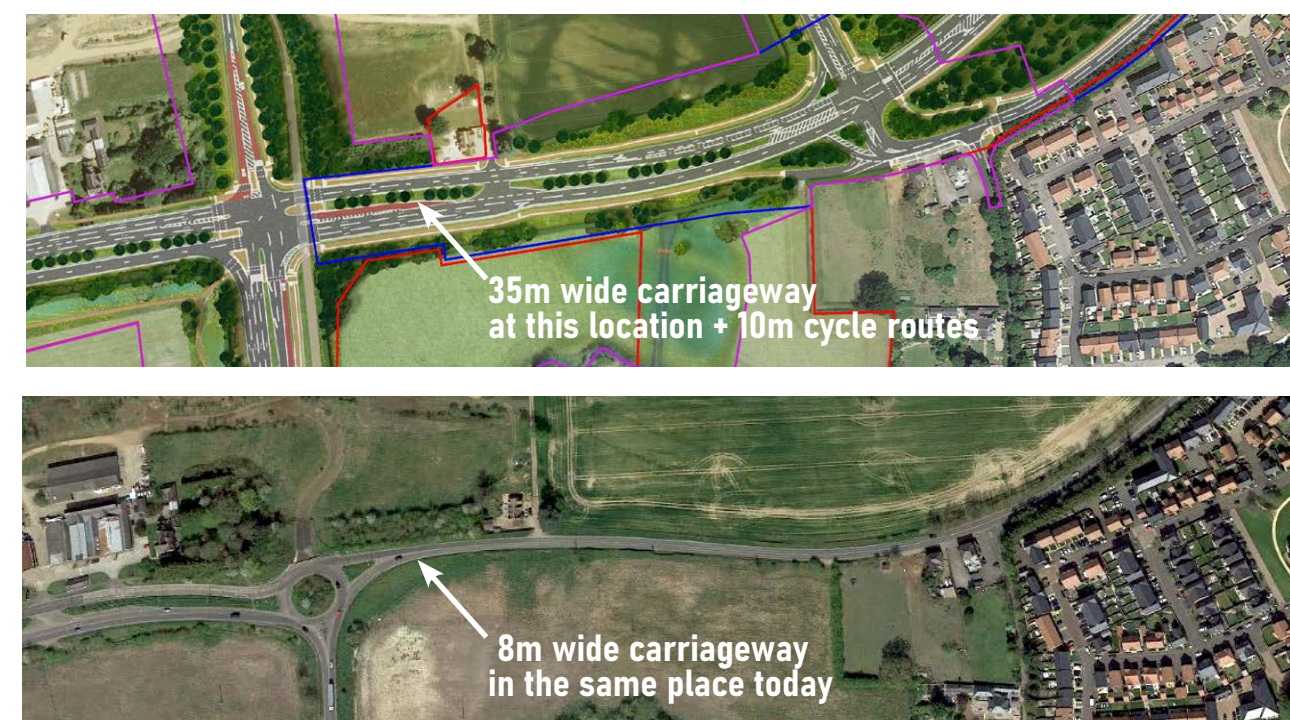
EASTERN CROSSING



ALL DRAWINGS FROM THE APPLICANT'S DRAWINGS FOR APPROVAL (EASTERN CROSSING)

THE FUTURE ACCESS ROAD WILL BE 4.5 TIMES WIDER THAN EASTWICK ROAD - WILL THIS 'MINIMISE SEGREGATION' (AS DEMANDED BY POLICY)?

CENTRAL CROSSING

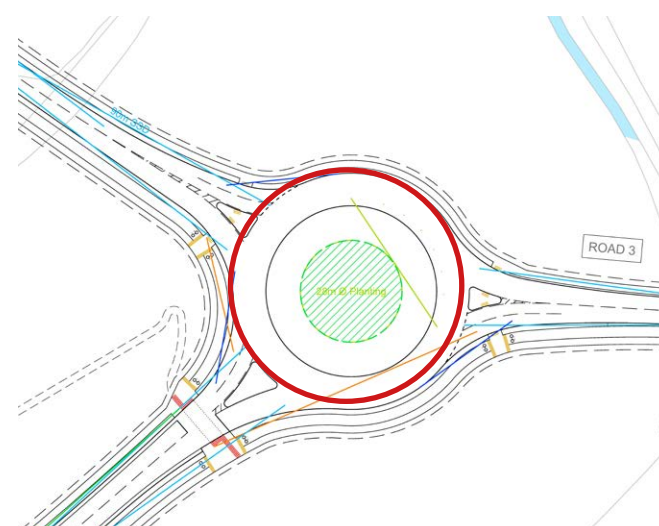


ALL DRAWINGS FROM THE APPLICANT'S DESIGN PROPOSALS FOR APPROVAL (CENTRAL CROSSING)

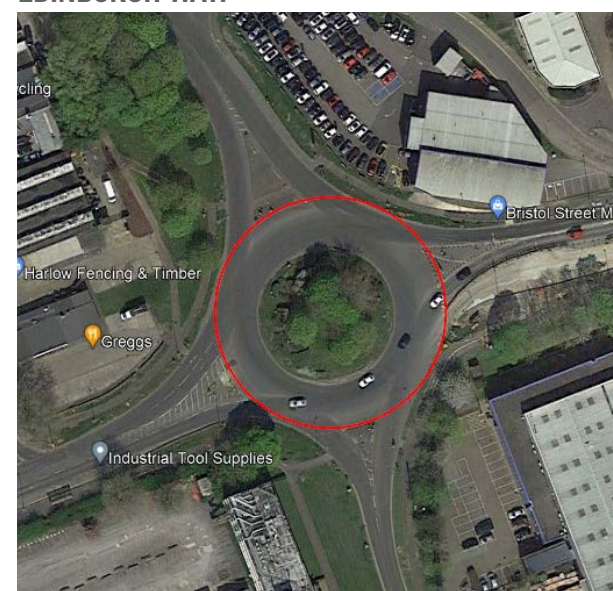
WHAT YOU ARE ASKED TO APPROVE

IS THE STORT VALLEY ROUNDABOUT DEMONSTRATING THAT EVERY EFFORT HAS BEEN MADE TO 'MITIGATE URBANISING EFFECTS'?

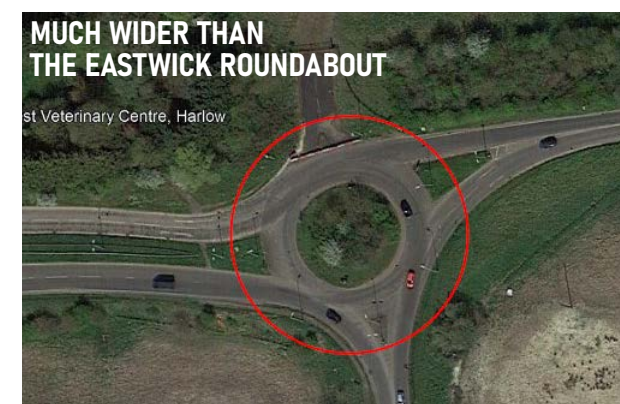
THE PROPOSED 64m DIAMETER ROUNDABOUT (75 WITH CYCLE) ROUTES IS ALSO SET ON A MASSIVE EMBANKMENT - IS IT NECESSARY?



SAME SIZE AS THE ROUNDABOUTS OF EDINBURGH WAY!



MUCH WIDER THAN THE EASTWICK ROUNDABOUT



AND THE SAME SIZE AS THE ROUNDABOUT AT WATER GARDENS IN CENTRAL HARLOW



SIGNIFICANTLY WIDER THAN THE A414 ENTRY TO WRITTLE/ CHELMSFORD



ROUNDABOUT FROM THE APPLICANT'S DRAWINGS FOR APPROVAL (EASTERN CROSSING) - RED CIRCLE ON MAPS =64m

DO THE PROPOSALS REALLY ENCOURAGE PEOPLE OUT OF THEIR CARS AND PROMOTE SUSTAINABLE AND ACTIVE TRAVEL?

WILL THE CYCLE BRIDGE ACTUALLY BE ATTRACTIVE AND SAFE FOR CYCLISTS AND PEDESTRIANS?

A 280m long bridge with no means of escape - safe?



Footbridges (e.g. the one over the A414 at Briggs House) are typically 60-80m long



PYE CORNER WILL IMPROVE, BUT TERLINGS AND THE PARK WILL DISAPPEAR BEHIND ROAD INFRASTRUCTURE AND A 4.5m TALL NOISE BARRIER

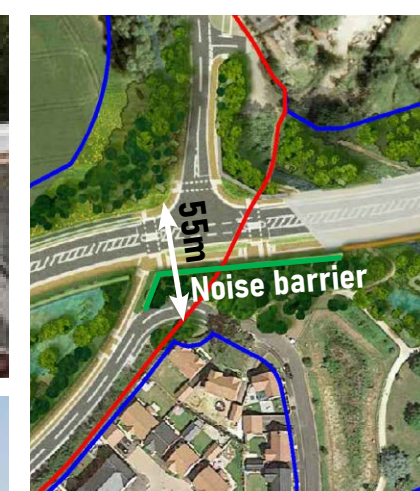


A 280m LONG ROUTE - INDICATIVE DESIGN

Is this suitable to promote village character?



INDICATIVE OF PROPOSAL



Noise barrier - indicative design



ALL IMAGES FROM THE APPLICANT'S DESIGN AND ACCESS STATEMENT AND OTHER SUBMITTED DOCUMENTS

2. THERE ARE **PREFERABLE** ALTERNATIVES

These problems could be addressed by adopting a **different and more considered approach that optimises road design and encourages sustainable transport** (in accordance with planning policy), with smaller and less intrusive infrastructure and, very importantly, less commercial risk. This will have a better chance of delivering housing on time, containing costs and creating a quality development in line with Garden City principles and the shared vision for the Gilston Area.

There are alternatives to the schemes which are before you and we would urge you to give serious consideration to these before reaching a decision:

ALTERNATIVE 1:

Only approve the application for the Central Crossing (Fifth Avenue), leaving the Eastern Crossing for determination when contributions from other development have been secured. The Eastern Crossing will not be needed anyway until after 2030 and there can be no reasonable justification for bringing delivery forward. This would enable proper assessment of future transport requirements once sustainable mobility is in place. A different and less intrusive design may emerge as a result.

ALTERNATIVE 2:

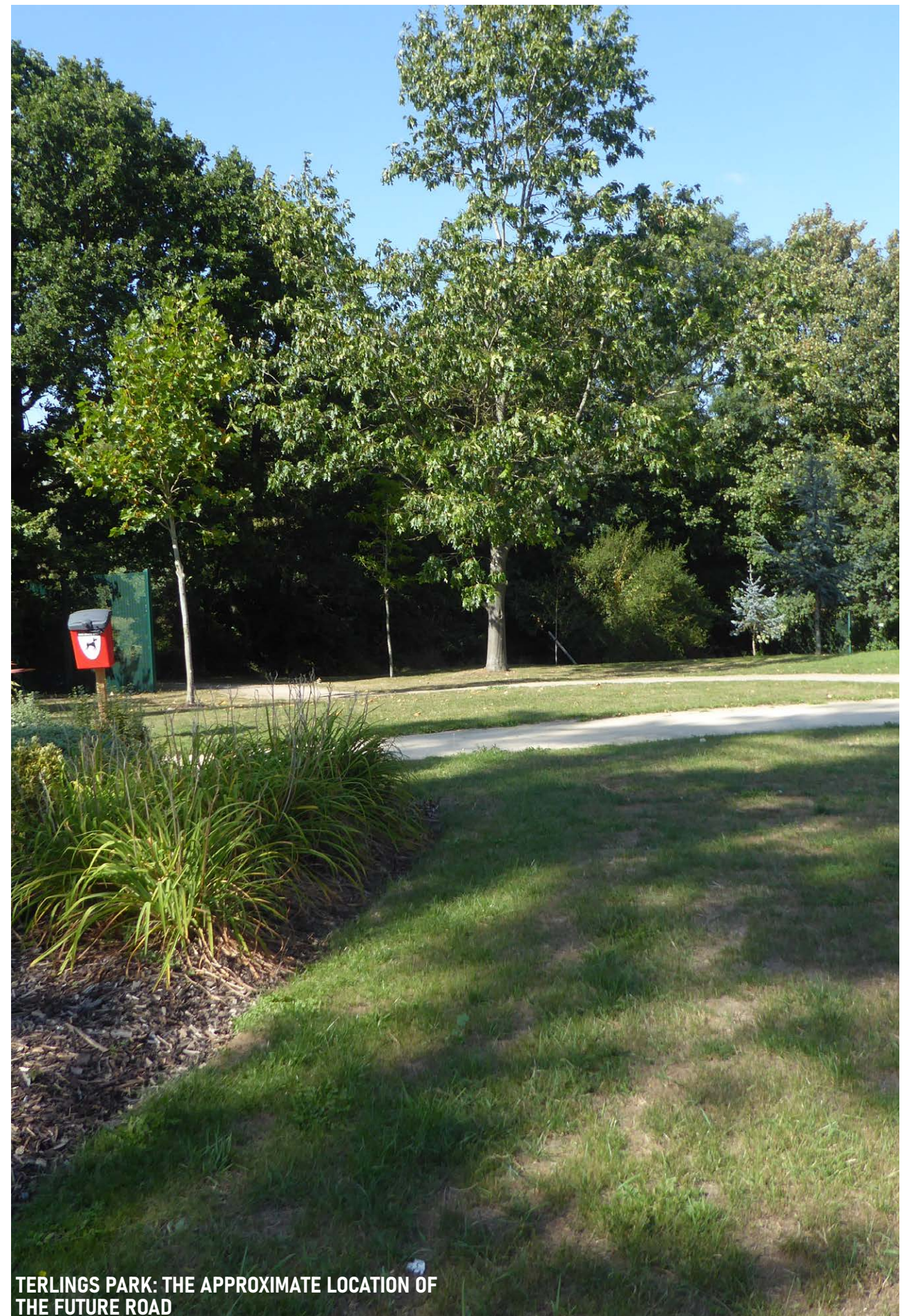
Require the two crossings to be redesigned to serve only the Gilston Area and not wider strategic objectives. These roads will be smaller, cheaper and better suited to the concept of villages in the countryside and their impacts could be more effectively mitigated. The wider needs of Harlow should not, after all, become the responsibility of the Gilston Area.

ALTERNATIVE 3:

Accept that the Eastern Crossing is a strategic road that serves the needs of the Garden Town as a whole, and as such should be a proper public sector led scheme rather than developer-led. This way there will be clear objectives and detailed cost/benefit analysis.

ALTERNATIVE 4:

Take advantage of the flexibility offered by the HIG funding and divert some or all of the funds to the delivery of the sustainable travel measures required to support and enable the development. In this way the HIG funding will not be wasted, and it would be used for the long term benefit of the Gilston Area.



TERLINGS PARK: THE APPROXIMATE LOCATION OF
THE FUTURE ROAD

3.

YOU HAVE EVERY JUSTIFICATION TO REFUSE THE APPLICATIONS

- **The benefits of these road schemes do not outweigh the harm:**
if approved, they would irrevocably compromise vision for the Gilston Area and the achievement of the sustainability aspirations for the area, make houses considerably more expensive, reduce the funding available for other necessary infrastructure and result in significant environmental and social impacts. Above all, it has not been demonstrated that the scale of road infrastructure currently proposed is necessary.
- **Policy GA2 of the District Plan requires options to be reviewed**
to identify the optimal and most balanced solution to secure necessary transport improvements. We do not consider that sufficient consideration has been given to these options or that the local community has been consulted on these.
- **We do not consider that the applications have been adequately assessed against the policies in the Gilston Area Neighbourhood Plan,**
which unlike the HIG is a material planning consideration. The proposals fail to comply with a number of policies- for example, they create severance (Policy EX1), do not mitigate their urbanising effect on the Stort Valley (Policy AG3), do not minimise the impact of traffic on existing communities (Policy AG8). (See Appendix B)
- **The Landscape and Visual Impact Assessment (LVIA) is flawed**
and fails to accurately reflect the very damaging environmental impact the proposed roads will have. It uses an outdated baseline, does not follow current Landscape Institute Guidelines and clearly seeks to minimise the scoring against acceptable good practice. From the visualisations provided no one can possibly have a clear idea of the visual impact of the roads particularly the elevated sections across the Stort Valley and in close proximity to Terlings Park. The Stort Valley with its canals and navigation is a landscape of cultural significance and this has not been adequately addressed in the design.

Approving the roads now when there are so many unresolved issues and no clearly demonstrated benefits will leave the Council exposed to criticism and potential challenge. These are not a standalone highways schemes – they are directly linked to the applicant's own proposals for 8,500 homes and should be sensibly and properly heard only when there is clarity about the whole package of infrastructure delivered by the development: i.e. after a new Viability Appraisal and an outcome to the S106 negotiations.

If these applications are decided prematurely, this could result in irrevocable harm to the Gilston vision, its community, its heritage and environment and we would urge you to prevent a terrible mistake from happening and to defer consideration of these applications until you have given full consideration to the alternatives and in full knowledge of what you are being asked to agree.

We ask you to carefully consider the issues raised.



APPENDIX A: VIABILITY EVIDENCE

Deliverability was a key consideration when the Gilston area was allocated for the development in the East Herts Local Plan. The local community was given assurances that the necessary infrastructure would be delivered to meet the needs arising from the new development, taking into account existing capacity limitations.

Viability evidence was submitted by the developers to demonstrate that the obligations set out in Policy GA1 and the Gilston Area Concept Framework could be met and these commitments were carried forward to the Outline Planning Application for Villages 1-6 which was submitted to the Council in May 2019. The focus of this was the comprehensive delivery of the overall masterplan and vision. The infrastructure costs identified in the viability evidence are provided in the following table.

This included a provision of £65,345,695 for the two crossings.

No further viability evidence has been provided at this stage but it is now understood that PfP have raised concerns about their ability to deliver all the planning policy obligations they have previously made commitments to. Clearly the provision they had made for off-site roads is significantly less than the current estimates for the Central and Eastern Stort Crossings. This suggests that the funding available for other necessary infrastructure will be affected and/or the level of affordable housing reduced.

If this is the case, questions must be raised about the ability to deliver the requirements set out in Policy GA1 and the shared vision for the Gilston Area and the promised quality of development and landscaping if the developer is required to fund and deliver much more substantial roads to unseen and unclear specifications and increased costs.

Infrastructure Summary	Estimated Costs (8,500 units)
ON SITE INFRASTRUCTURE	166,570,204
Enabling Works and Demolition	10,482,931
Strategic Earthworks	4,410,000
Roads	51,592,102
Drainage	18,666,185
Utilities	34,144,362
Landscaping & Woodland	47,274,624
OFF SITE INFRASTRUCTURE	80,229,695
Roads	65,354,695
Drainage	750,000
Utilities Upgrades	14,125,000
COMMUNITY INVESTMENT	103,876,571
Sports & Leisure Facilities	4,200,000
Education	76,286,125
Health	8,032,500
Community Development	3,557,400
Transport & Travel	7,511,296
Environmental Management	220,500
Waste Management	1,968,750
Public Art	2,100,000
MISCELLANEOUS	68,160,945
Section 38 Agreement	10,646,579
Landscape Adoption Costs	4,727,462
Section 278 Agreement	12,820,939
Professional Fees & Survey Costs	39,965,965
SUB TOTAL	418,837,415
PHASING AND TEMPORARY WORKS	10,420,935
DESIGN DEVELOPMENT & CONTINGENCY	21,362,918
INFRASTRUCTURE TOTAL	450,600,000

SOURCE:
DEVELOPERS' VIABILITY EVIDENCE (APP. 8) TO SUPPORT THE ALLOCATION IN THE DISTRICT PLAN, 2014

APPENDIX B: COMPLIANCE WITH THE GILSTON AREA NEIGHBOURHOOD PLAN

The East Hertfordshire District Plan (Policy GA1) allocates land in the Gilston Area for 10,000 homes in distinct villages with at least 3000 to be delivered by 2033 along with employment development and supporting infrastructure including roads and sustainable transport, schools, health centres and public open space.

The Neighbourhood Plan provides an additional level of detail and a distinct local approach without undermining the strategic policies of the District Plan. As a statutory planning document, the policies in the Neighbourhood Plan must be afforded the same weight as the District Plan.

We have undertaken an assessment of the planning applications against the policies in the Neighbourhood Plan and carefully read the rebuttal prepared by your Officers presented in Appendix B of the published Committee Reports. We do not have confidence that a balanced assessment has been undertaken- the assessment is clearly retrospective and we remain of the view that as currently proposed, the river crossings contravene the Neighbourhood Plan in a number of key respects.

No one can pretend that the proposed roads will NOT have a far reaching impact on the environment and local communities – yet this is what your Officers appear to argue: that the impacts will be managed by mitigation (as yet undefined) and local communities- in particular Terlings Park will benefit (when assessed against the original proposals) when all the evidence we have seen suggests the opposite.

- **Policy AG1- Promoting Sustainable Development:** Your Officers argue that there is no legal impediment to determining the applications in advance of the outline planning applications- equally, no convincing planning case has been presented for doing so, particularly the Eastern Crossing which everyone knows will not be required before at least the end of the decade. The applications overlap and determining the Crossings as independent and stand-alone applications prior to the outline planning applications would undermine the principle of comprehensive planning, unless it can be demonstrated that the proposals have fully considered the overall context of the development ; are landscape-led and sensitive to the transition between countryside and villages and retain the visual and physical separation from Harlow by the natural greenspace of the Stort Valley. Officers argue that the culverted section of the Eastern Crossing has been designed to enable planting on the embankment to soften its appearance and that the realignment of the Eastwick Road north of Terlings Park somehow allows for a betterment to Terlings Park. The aggressive engineering of the embankment and culverts of the Eastern Stort Crossing and the need for a double road along the current

C161 (to serve Terlings and Village 1) are clearly not landscape led and do not preserve the natural greenspace environment of the Stort Valley- furthermore they totally sever Terlings Park from the wider Gilston community. Policy AG1 requires an integrated approach which considers the phased delivery of necessary physical infrastructure to meet the comprehensive infrastructure needs of the area- the phasing proposals make no sense: why commence construction of the ESC before it is needed and build in so much spare traffic capacity when no consideration has been given to the potential impact of early delivery of CSC on future infrastructure requirements? It is also possible that the shape and content of the overall development- and its associated impacts could change as a result of the current viability work being undertaken by the applicant.

- **Policy AG2- Creating a Connected Green Infrastructure Network:** Officers argue that the proposed mitigation will manage landscape and visual impacts- but at this stage, we do not know what form this will take. The details will be secured by condition- indeed there is no guarantee that the local community will even be consulted. The proposals for the Eastern Stort Crossing with a major embankment and culvert will have a significant impact on the Stort Valley and local Wildlife Sites, the establishment of a comprehensive Green Infrastructure Network, access to and enjoyment of the River Stort and Navigation, the potential for interconnected green corridors with suitable wildlife corridors and walking and cycling access to the countryside. How can Officers argue benefits for the landscape with the loss of so much mature tree cover? The replacement planting will never have the same value as the existing and the planning benefits have been over-estimated.
- **Policy AG3- Protecting and Enhancing the Countryside Setting of New and Existing Villages:** Officers suggest that the landtake of the Central Crossing has been minimised and that the elevated sections of the Eastern Crossing will not have ‘visible’ harm. This is not substantiated by the evidence. The landtake required by the Central Stort Crossing (mostly built on greenfield land and doubling up Eastwick Road/ C161) and the proposed pedestrian and cycle overbridge will have a very significant urbanising effect on the approach to Village 1 and to the existing settlements of Gilston. While contextual planting is proposed, there are no details of measures taken to contain and mitigate the visual impacts on the landscape setting on the area or how the rural landscape and open views of the Stort Valley are protected from encroachment, The heavily engineered design of the Eastern Stort Crossing, with embankments, culverts, large roundabouts and concrete bridges will have a very significant urbanising effect on the approach to the Gilston Area, Gilston and Village 2. We do not accept that all reasonable alternatives have been explored to contain and mitigate the visual impacts on the landscape setting on the area or that the local community has been fully engaged. The Eastern Crossing has been designed to allow for its ‘potential’ widening to a dual carriage way. We are told that this is sensible ‘future proofing’ but if approved in its current form this is the inevitable outcome. The rural landscape and open views of the Stort Valley will be massively encroached with no apparent consideration of any more suitable and sensitive alternatives.
- **Policy AG5- Respecting Areas of Local Significance:** Officers argue that there will be a net benefit of open space at Terlings Park but fail to acknowledge that this will be a landscape buffer alongside the new road of significantly less amenity value than the designated Local Green Space and mature trees it will replace. The Eastern Crossing also changes Cherished View N (from Terlings to the open countryside) and cuts across the defined Community Boundary of Gilston. While this is for the purpose of strategic infrastructure, justification and an assessment of alternative seeking to contain encroachment and compensate residual impacts have not been provided. The protection of the integrity of the community of Gilston has not been secured as, according to the proposals, different parts of the same community will have completely different access routes which are not easily interconnected. These

impacts have not been adequately assessed. We acknowledge that there will be some benefits for Pye Corner (something for which residents have been waiting many years), but for Officers to suggest that the residents of Terlings Park will be 'slightly inconvenienced' by the new and convoluted connections to Gilston is a misrepresentation of the facts.

- **Policy AG8-Minimising the Impact of Traffic and New Transport Infrastructure on Existing Communities:** By Officers' own admission, the new crossings will impact existing communities and suggest that further refinement will be made at the detailed design stage- what then is being approved as part of these applications? The design of the Central Crossing fails to demonstrate that every effort has been taken to minimise impacts on the existing communities. Pedestrian and cycle access relies on a long (potentially unsafe at night) segregated bridge and vehicular access to the various groups of buildings that make up the Gilston Community is disconnected and circuitous, while vehicular access to the new community is encouraged and facilitated. We are told that the design of this will be subject to a Design Competition but how is this to be conducted and how will the public be engaged? The intrusive design of the Eastern Crossing (with an over-sized roundabout and out of scale culverts) across the Stort Valley fails to minimise impacts on the character and river environment and provide good connections for walking and cycling in the valley. The new vehicular access arrangements do not meet the policy requirements- they have not been designed to minimise any increase in traffic on existing roads or to retain convenient access to existing communities. Severance within the Gilston Community would result as the road cuts off Terlings Park from the rest of Gilston and removes entirely vehicular connection between Terlings and the rest of Gilston, including access to village facilities. The design of the Eastern Crossing fails to demonstrate that the impacts of severance have been addressed. Too much has been left to conditions in respect of detailed design, landscape and mitigation and further design development is required to demonstrate how impacts are to be mitigated. It is not enough to argue that the benefits of the crossings outweigh the harm and this should be undertaken before the applications are approved.
- **Policy AG9-Phasing of Infrastructure Delivery:** Officers argue that the modelling demonstrates the need for the Eastern Crossing to be required to work alongside the Central Crossing- but it is not required at the same time and will not be required before the end of the decade. The timing of delivery of the crossings, including convenient cycling and pedestrian facilities, needs to meet the cumulative needs of the new and existing communities as they arise. Only indicative phasing plans have been provided. Delivery of the Eastern Stort Crossing is not necessary to support the Gilston Area development in its early stages and could be delayed until later in the development programme, when the sustainable travel patterns of the development and of the CSC are known. All the evidence shows that building more road capacity than is required will just encourage road usage and lead to car dependent development- rather than the sustainable communities to which we all aspire. This is highlighted in the recent report by the group Transport for New Homes¹.
- **Policy H1- Celebrating Existing Heritage Assets:** Officers argue that Policy GA2 was approved in the context of a Heritage Impact Assessment undertaken through the plan making process- what they fail to acknowledge is that Policy GA2 requires both Stort Crossings to 'protect and where appropriate enhance heritage assets and their settings through appropriate mitigation measures'. The proposals for the Eastern Crossing do not include a specific assessment of its impact on the heritage of the area or identify potential enhancements to their setting. They fail to acknowledge the heritage value of the Stort Valley and Navigation (despite identifying the valley as having 'medium heritage value' in the EIA) and to minimise or mitigate impacts on Fiddler's Bridge and Fiddler's Cottage, both Listed Grade II.

¹ Building Car Dependency: The tarmac suburbs of the future - Transport for New Homes (January 2022)

- **Policy EX1- Existing Settlements:** Officers highlight the benefits for Pye Corner but do not acknowledge the harm to Terlings Park and the wider Gilston community. Whilst residents welcome the closure of Pye Corner we are very concerned about the impacts of the Eastern Crossing on Terlings Park and the wider Gilston community. The Eastern Crossing proposals will have very significant impacts and make no provision for mitigation and long-term maintenance and protection of the character of the existing streets and lanes such as Pye Corner and Gilston Lane, which will dramatically change character as a result of the proposals.
- **Policy TRA1- Sustainable Mobility:** Officers place great importance on enhancements to walking and cycling routes- but what value will this have when it will be made so much easier for people to drive? We accept the principle of the Central Crossing as a Sustainable Transport Corridor but seriously question the proposed scale and capacity of the Eastern Crossing. The applications make no assessment of how as standalone developments, the proposed crossings will achieve the sustainable mobility targets of the Gilston and Harlow Garden Town. The application for the Central Crossing does not give a clear order of priority to walking and cycling over public transport and vehicular access. The early delivery of the Eastern Crossing will encourage car use and will not reduce the overall need to travel. In-building 'future proofing' to allow for future widening will merely serve to attract increased levels of traffic rather than promote more sustainable transport modes- creating a Harlow by-pass by stealth. The fact that the proposals do not make provision for convenient and separated access to Harlow Town and Harlow Mill Stations is a major failing- how will this ever be achieved if it is not addressed as part of a comprehensive transport strategy? The opportunity will be lost forever if this is not addressed now in the design and delivery of the road crossings and these applications are approved prematurely.
- **Policy D1- Establishing a Partnership with the Community:** Officers argue that the Parish Councils and Neighbourhood Plan Group have had 'unprecedented levels' of engagement with the applicant and the Council. We would refute this. While interaction with the developers has taken place at various stages, the community's repeated requests for exploration of alternative arrangements and scaled-back infrastructure have been ignored. No meaningful engagement on the proposed solutions for the Eastern Crossing has taken place and the community has not been engaged in the planning and development of the designs for the Central Crossing. Various requests for additional information and concept designs (for example of the critical pedestrian and cycle bridge) have been ignored.

The Council must consider the Neighbourhood Plan and give it equal weight to the District Plan in assessing the acceptability of the current proposals. Where the proposals are not in conformity with policy, it will be necessary to demonstrate that this would be outweighed by mitigation and the public benefits which would arise from the proposals and that an exception to policy is justified. It is only at our insistence that an assessment of the proposals against the Neighbourhood Plan has been reported and is now included in the recent Appendix to the Committee Reports.

We do not believe that sufficient details of mitigation have been provided nor that the benefits of the proposed road schemes would outweigh the significant harm which would be caused to the green belt, heritage, landscape, amenities and biodiversity. Our concerns have not been assuaged by the assessment provided by Officers in the amended Committee Reports.

It is premature to reference the benefits of development in the Gilston Area as the outline planning permission for Villages 1-6 has not yet been determined and may well be amended again before it comes before the Planning Applications Committee. If the road applications are determined in advance, Members will fetter their powers and discretions when it comes to determining the outline planning application. We believe this is a dangerous approach to adopt.



Eastwick & Gilston Parish Council
eastwickandgilston.org.uk

Hunsdon Parish Council
Hunsdon.org.uk

Hunsdon Eastwick and Gilston Neighbourhood Plan Group
hegnp.org.uk