

**Hunsdon Eastwick and Gilston Neighbourhood Plan Group
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Sent by Post and Email

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Dear Madam,

Response to the Village 7 hybrid planning application – priority and general issues

The material submitted for Village 7 of the Gilston Area development planning applications has been reviewed by the community and been discussed in a public meeting in Hunsdon in January 2020. However, given that the consultation period included the Christmas and New Year holiday break and the public exhibition of the proposals took place in the busy period leading up to this, our representations are not exhaustive. Given the complexity and significance of the proposals, we would request that this should not preclude further detailed responses being made by the community whilst the application remains under consideration. In particular we may be submitting a more detailed response on the complex transport issues that arise from this scheme where the impacts are not clearly stated, in our view.

We would welcome further discussion with the relevant authorities and with the applicants so that some of the issues raised in our representations can be better understood in advance of the applications being determined by the Council. In particular, we would welcome an open discussion with the applicants of the two concurrent applications for Gilston, to better understand and be reassured about the degree of cooperation and integration (if any) between the schemes which are coming forward under the Local Plan Policy GA1 which anticipates a coordinated approach.

The Neighbourhood Planning Group (NPG), is mandated jointly by the Parish Councils of Eastwick and Gilston and Hunsdon, and represents the wider community who will be

affected by the proposed development, is in the process of preparing a Neighbourhood Plan, which includes the area of the application. The Neighbourhood Plan is currently under revision following Reg. 14 consultation and will be submitted to the Council for final consultation and examination in the next months. This Plan is being developed around the Concept Framework that was agreed by your Council, the developers and community.

Most of the observations made in this representation reflect both the concerns and aspirations of the community for this particular development and the broader emerging policies of the Neighbourhood Plan and adopted District Plan. As these are intended as constructive input in the interest of good development, we would welcome further engagement with the community in accordance with the criteria set out in Policy GA1.

While the community recognises that the OPA includes some positive proposals, such a safer junction on the A414, and shops and possible health services in the village, local people also raise a number of very strong concerns about the proposed development.

For this reason, the Parish Councils and their communities feel it necessary to express its overall **objection** to this outline planning application for Village 7 of the Gilston Area as presented in the application.

The issues below relate to our first consideration of the planning applications. These are presented under the following separate headings:

1. Overarching aspirations for the area
2. Issues relating to the need for an integrated approach to development in the Gilston Area
3. Issues that form part of the Outline Planning Application and are not in accordance with the Concept Framework and the commitments of Policy GA1
4. Issues that are part of the Outline Planning Approval and relate to transportation
5. Issues that are not in line with the emerging Neighbourhood Plan or smaller scale issues which contradict the Concept Framework
6. Issues relating to Delivery
7. Issues which have the support of the Community

1. Overarching aspiration for the Gilston Area relevant to Village 7

The Gilston Area development required the removal of the Green Belt designation, the largest in East Hertfordshire, and one of the largest in England, contrary to the presumption in favour of protecting the Green Belt as set out in the NPPF. The Green belt was released on the grounds that exceptional circumstances had been demonstrated; being the exceptional housing need and the circumstances were supported by strong statements about achieving a development of exceptional quality as made at the EiP. In these circumstances, the community has the right to expect an 'exceptional development'- something which was reiterated by the Inspector at the EiP. The Inspector's Report on the East Herts District Plan Examination clearly referred to development in the Gilston Area being 'carefully designed around Garden City Principles'

(paragraph 21) and 'contributing significantly towards meeting the housing, employment and infrastructure needs in East Herts' (paragraph 70). Subsequently, Harlow and Gilston Garden Town (HGGT) has set out its vision for the creation of 'distinctive villages, each with their own character and identity' in the Gilston Area (HGGT Vision, page 8, Principle A1).

The Parish Councils and community would like to ensure that the removal of Green Belt status from this area genuinely leads to a development of exceptional quality, that will create distinctive villages each with their own individual identity set within an attractive rural landscape, while at the same time protecting and enhancing the existing settlements and delivering benefits for both the existing and the new community.

The Harlow and Gilston Garden Town (HGGT) Quality Review Panel has made clear that any development in the Gilston Area should be landscape led and set within the context of a Strategic Landscape Master Plan which encompasses all existing and future communities in a cohesive whole. The emerging Gilston Area Neighbourhood Plan also invites development to secure village character (Policies AG5 and AG6 of Draft for Consultation NP) and reflect the rural natural and landscape setting (Policies AG2 and AG3).

In our opinion, based on our assessment of the submitted information, **we do not believe the applicants have demonstrated that the proposals constitute development of exceptional quality set within a cohesive landscape and reflecting the character of local villages** (see also Section 3 below). Critically, the application does not at all explain how it is embracing Garden City Principles, and making Village 7 exceptional in quality:

- There is no explanation of how the landscape has informed the layout and provided the framework for village development and integration with the wider Gilston Area.
- There is no reference to Land Value Capture being used for the benefit of the future and wider communities (including meeting the infrastructure needs of East Herts as advocated by the Inspector).
- There are no details on how community stewardship of land and facilities is going to be delivered.
- The applicants' proposals to achieve sustainable transport measures which encourage walking, cycling and the use of public transport are ill-defined, under-developed and appear, in all probability, undeliverable.

Based on the material submitted as part of the OPA, it is not clear how the development of Village 7 is responding to the 'exceptional circumstances' that justified the release of the Green Belt designation or is in any way different from other developments that do not form part of the government backed 'Garden Town' initiative. There is no evidence in the OPA of 'strong vision, leadership and community engagement' (Policy GA1) and this is clearly contrary to the wider vision for the Garden Town, the aspirations of the community and of course the requirements set out in Policy GA1 of the District Plan.

2. Issues relating to the need for a holistic and integrated approach to development in the Gilston Area

The allocation of the Gilston Area for development in the District Plan was justified on the grounds that comprehensive and integrated development in the Gilston Area was the most sustainable way of meeting future housing needs. This has been further reiterated in the Local Plan and all the documents of the HGGT. The requirement for comprehensive and integrated development therefore underpins Policy GA1.

The proposals for Village 7 have been submitted for consideration *in isolation* from the other 6 new villages (which are the subject of the separate but concurrent application). It is being presented either as a standalone development *or* alongside the other 6 villages - an approach which gives rise to significant concerns as outlined below. Similarly, whilst reference is made to road infrastructure changes within Harlow, no consideration has been given to the wider context for development, taking into account changes in employment or residential availability and quality within Harlow or other nearby towns.

We believe the application severely prejudices the aspiration for exceptional quality across the whole Gilston Area in accordance with Policy GA1: in effect it makes this Application conditional on the promoters of the rest of the GA1 allocation to ensure Village 7 forms part of the coherent and integrated overall plan promised in the District Plan, this approach is unacceptable.

The present application does not consider 'comprehensive and integrated development' including:

- *The unclear relationship between current residents of Hunsdon, north and south of the A414, Eastwick and Village 7* - The OPA presents Village 7 as self-contained and self-sufficient: it does not consider if and how future residents will access facilities within other parts of the Gilston Area villages or the existing settlements (the existing churches, historic sites, old pubs, other community assets and countryside walks) and if / how existing communities will make use of the proposed school, health centre, sport pitches, shops and employment. No comprehensive plan of integrated paths is presented. No specific assessment of likely trips and modes of transport between the new and existing communities is made.
- *The absence of an integrated approach to landscape* – Section 2.3 of the Design and Access Statement presents a very narrow interpretation of 'local context' as the area of the proposed development and the immediate surroundings. As a result, viewpoints, topography and green / wildlife corridors are only studied for the immediate area and not as part of the wider GA1 allocation. Views of the village edges across the whole length of the powerlines, which should clearly be identifiable as separate villages when seen from the Hunsdon Plateau are not considered in their entirety. There is no proposal / commitment to have continuity of landscape and it is unclear how the SuDS system of this development will be affected by the wider allocation and how the whole development will impact the Stort Valley downstream.
- *The absolute reliance of Village 7 on services and infrastructure provided by others* – this is a matter of major concern and includes access to Secondary School places which will be provided offsite (with the only realistic option provided by the provision to

be made by Village 1-6); widening of the Central River Crossing; widening of the pedestrian footbridge and provision of cycle routes off site through private land; improvement to rail station facilities at two stations; creation of jobs elsewhere, etc. This is surely unacceptable and in complete contradiction to the requirement of the HGGT, whose Infrastructure Delivery Plan states (Section 3.1): 'The successful delivery of the Garden Town needs to be underpinned by *a comprehensive package of infrastructure, phased and delivered in a timely way*, ahead of, or in tandem with the development it serves'.

- *The road access requirements of Village 7* – This cannot be considered in isolation from the wider development, as Village 7 relies on Church Lane for two access points and on the possible connection to Village 6 for alternative access and for bus services. Church Lane not only serves Village 7 but also Hunsdon, Widford and Much Hadham further north and the impact of the proposals on the residents of these areas has not been assessed, nor has the adequacy of Church Lane as a main means of access in case of closure of the access on the A414 and in the absence of a suitable connection with Village 6.
- *The potential illogical sequencing of development* – With no comprehensive plan for phasing development in the Gilston Area, development will occur without strategic direction all around the area, with no possibility of delivering sustainable services in any one village: bus services would be undeliverable, wildlife corridors would be interrupted, services and schools would be difficult to reach, cycle routes would have no continuity. Not only is it foolhardy to allow Village 7 as a standalone development, it is illogical to permit it to be phased in priority to the other villages in GA when it stands on the edge of the site farthest away from the core at Village 1 and relies on others to solve the adverse impacts it creates.
- *The application fails to consider how to deal positively with the change imposed on the existing villages.* The lack of consideration given to the impact of development on existing settlements is of great concern. The proposed mitigation measures are insufficient to demonstrate an 'exceptional' quality of development, given that the existing villages will be so significantly impacted by the proposed development. To permit the application as it stands will at the outset lose the trust of the community that promises made at the EiP and subsequently detailed in the District Plan will be fulfilled. The community considers that **the developers should demonstrate a more comprehensive approach to ensure that the existing settlements of the Eastwick and Gilston and Hunsdon Parishes are positively considered as part of the overall scheme.**

We therefore believe it is necessary for the scope of the Outline Planning Application for Village 7 to consider the whole of Policy Area GA1 and to provide:

1. A unified vision
2. A comprehensive governance strategy for the entire policy area
3. A coherent landscape structure and strategic master plan
4. A logical phasing of the villages and complete access strategy for each phase of the development

5. Full consideration of how the existing communities will be positively respected and integrated during the development period and after completion.
6. Certainty regarding the timely delivery of necessary infrastructure to serve the development and recognising both the current infrastructure deficits and policy aspirations to achieve a 60% modal transport shift from the start of any development.

We believe that this should be possible given that the planning application for Village 7 is being considered concurrently with the application for Villages 1-6 and we would expect the Council to ensure full alignment between the applications and any associated legal agreements in order to deliver the vision and objectives for the Gilston Area as set out in Policy GA1 and the Gilston Area Concept Framework. Should this not be possible, and the two areas (Villages 1-6 and Village 7) remain separate applications, we recommend that Village 7 should not be permitted in this plan period given the concerns regarding its integration with the wider area.

3. Issues that are part of the Outline Planning Approval and not in line with the Concept Framework and the spirit of Policy GA1

These issues primarily relate to the content of the OPA Parameter Plans or Specification (submitted for approval), and therefore to the material proposals put forward by the applicant. **The Parish Councils and their communities do not consider that the Parameter Plans are in line with Policy GA1 and the Concept Framework and will require significant change, integration or clarification before they can be approved to ensure that the proposals are in line with strategic policy objectives and local aspirations for the development.**

Below we set out the contradictions between the proposed development and the key District Plan policy requirements (Policy GA1 in particular) and the principles agreed in the Concept Framework (2018) which has been endorsed by the Council as a benchmark to guide development:

- *No evidence that the Concept Framework has guided development:* It should be noted that the Planning Statement (Paragraphs 5.83-5.86) does not acknowledge that the Concept Framework (2018) has been endorsed by the Council. It also appears to refer to the older version of the Concept Framework, (the one before extensive community engagement was undertaken and not the one containing the vision statement and development principles which have been informed and are shared by the community. Indeed the text refers to alignment with the 'Illustrative Concept Masterplan' which no longer forms part of the agreed Concept Framework of 2018, as the community could not support it. Other supporting illustrations within the OPA (for example the Open Space Strategy) also refer to the old plan which was rejected by the community; the Development Principles outlined in the DAS also do not reflect the endorsed Concept Framework. The applicant's website (www.gilstonvillage7.co.uk) states that the development's 'strong vision' emerges from the 'Concept Framework' but provides a link to the version of the document that attracted deep criticism and was subsequently replaced by the new version endorsed by the Council in July 2018. The reasons for the applicants referring back to early drafts which have been rejected and not endorsed by your Council is unclear.

- *No evidence that engagement with the community has resulted in any change:* the Statement of Community Engagement refers to over 45,000 leaflets being issued, freephone line and freepost feedback and website. It is stated that this has resulted in 18 feedback forms having been returned. The exceptionally poor level of returns for a scheme with such enormous impact raises questions about the engagement strategy adopted and whether it has been sufficient to respond to the requirements set out in the Garden City Principles and Policy GA1. In contrast as a Community we held a public meeting to explain the proposals, this meeting attracted over 100 residents; quite where the 45,000 leaflets have been sent remains a mystery to us, I personally cannot recollect seeing one. In addition, the Statement of Community Engagement sets out clarifications to the observation raised directly by the community, but not how these have influenced the proposals and resulted in changes. Indeed, no reference is included in the Statement of Community Engagement to the extensive community engagement which helped shape the Concept Framework.
- *The Parameter Plans indicate an insufficient separation from other built up areas –* the 'Village Buffer' proposed is not measured, but based on the scale of the drawing it appears that this will be up to 75m wide towards Eastwick and Village 6 (which does not include a further buffer zone towards this edge). Towards Hunsdon Brook the width is less than 50m. By way of comparison, Harlow 'green wedges', intended to bind together and not avoid coalescence, are typically 200m wide. This 'buffer width' is wholly inadequate to avoid visual coalescence, provide the 'meaningful separation' agreed in the Concept Framework and guarantee the 'individuality' of each village stipulated by Policy GA1.
- *The Parameter Plans do not leave room for a Village Master Plan prepared in close collaboration with the community –* the very detailed and fine grain Parameter Plan 6 (Building Heights and Density), together with the strictly itemised specification of housing units and non-residential uses, are such that do not leave much room for collaboration on masterplan development and design choices: block patterns are broadly fixed, location of taller buildings fixed, etc. This is in contradiction with the requirement of preparing Village Master Plans in consultation with local communities.
- *Parameter Plan 6 proposes Heights and Densities that will not deliver development based on a village concept –* The majority of the development is shown to be 'no taller than 13m / 3 floors with buildings up to 19m / 5 floors in the centre and 16m / 4 storey blocks at the edges of the site in the most visible entrance locations. This approach, if approved, will make it impossible to deliver a 'Village Concept': villages have typically buildings lower than the crown of trees and 8-10m at most even where space in the roof is utilised for a half third floor; they have lower buildings at the edges and taller structures 'hidden'. They never have linear blocks of 4 or 5 floors, which are a suburban apartment model. In our estimate, allowing for a mixed-use component, 1500 homes can easily be delivered at an average net density of 30-35dph without any need for densities of 60dph at all. The HGGT Vision calls for a range of 25-55dph for sites in Harlow, which should be denser than the villages of Gilston. The HGGT Design Guide (Density and Typologies) indicates terraces and 3 floor terraced apartments as a good model for the mid density that should apply here. We strongly believe this Parameter Plan will seriously constrain masterplan development: it is too prescriptive and will result in an inappropriate form of development contrary to Policy GA1 and the design principles set out in the Concept Framework.

- *The village centre (as described in Parameters Plan 5 and 6, DAS and illustrative plans) is not fulfilling its promised functions* – Plan 5 indicates the mixed use area as 6.12ha, about half of which is to be developed at 60dph and the rest at 30dph (Plan 6). This means this area is planned to have around 270 housing units (approximately 20,000m² plus an additional 1640m² of residential units as part of the Health Care facility) and 4062m² of non-residential uses (retail, community centre, offices and 857m² of healthcare centre). This area will offer 206 jobs (excluding 64 more in the school and nursery) according to the Planning Statement (paragraph 6.124). The ‘mixed use’ offer is therefore small and insufficient to activate such a large area and a village centre over 250m long. Moreover the illustrative layout (2 roundabouts, large roads and echelon side parking) illustrates a concept that is not at all in agreement with the village analysis of the DAS, does not create a pedestrian orientated environment and is not resilient: it is more suited to an urban environment and will look sparse and empty from the outset.

We believe the village centre could make a more significant contribution to meeting the employment requirements set out in Policy GA1 (equivalent to 5ha employment or roughly 3-5,000m² of employment space per village, excluding community services).

- *There is no positive relationship with the heritage and existing landscape* – Within the site, the proposed reuse and indicative (very detailed) plans for Brickhouse Farm as part of the village centre are welcome but the setting of Brickhouse Farm House (different access and hidden behind a block of flats) is such that the relationship between the two is lost. In any event it strikes us as anomalous that Brickhouse Farm House has not been included in the application and that the applicants have not sought to bring in within their ownership.

In terms of valorisation of heritage and its setting in the immediate vicinity, the visual impact of the development from the cemetery and Church of St Dunston and from Hunsdon House is not clearly assessed: only Viewpoint 27 is presented (page 50 of Visual Assessment), from the car park looking east, from which the development has a significant visual impact. The impact on the Eastwick Moated sites (Scheduled Ancient Monuments – roughly from View 24) will be dramatic. The Theoretical Visibility Map (page 14 of Visual Assessment) appears to imply that the development will be clearly visible from the church, cemetery, Hunsdon House and Hunsdon Airfield, even if no visual impact study for these areas is presented.

The Lighting Study indicates that the floodlit playing pitches will be clearly visible from all these locations and from most of the surrounding areas as far away as 2-3km, with a very severe impact on the darkness and tranquillity of the countryside setting. The impact of lighting on wildlife is not assessed.

The visual impact on the former Pond Park between Lords Wood and the Fishponds up to the Church and Hunsdon House has been ignored. There is no positive relationship with the Hunsdon Brook Fish Ponds (Scheduled Ancient Monument): the DAS states that ‘integration would not be practical or feasible’ (p. 102). Impact on heritage receptors is considered Moderate Adverse, and potentially mitigated by

careful design: we do not believe this will be possible if the current Parameter Plans are approved.

- *The OPA should demonstrate how Natural England's Standing Advice on Ancient Woodland and Veteran Trees has been applied with adequate buffers to Woodland and Hedgerows:* we are concerned that the proposed buffers of 20m around Ancient Woodland, 10m around Woodland, etc. will be inadequate to protect the landscape features and avoid deterioration in line with the requirements of the National Planning Policy Framework (para. 175C) and Policy NE3 of the District Plan.
- *There is no concept for the future integration of the Stort Valley:* The Stort Valley provides the remaining Green Belt separation between Harlow and Gilston and is clearly considered a 'natural boundary' from both sides. In the Concept Framework it was clearly indicated that development would lead to the creation of a natural park in the Stort Valley and consolidate the separation between the settlements. The OPA should include proposals for a positive landscape relationship between the two (see also section on cycling below) and the establishment of biodiversity and wildlife corridors. In terms of surface water drainage to the Stort, across A414, no consideration has been given to what would happen if SUDs overflow or in the event of exceptional rain in terms of either of risk to property and life for riparian householders or to the environment of the River and the Valley.
- *There should be more detail about the way net biodiversity gain will be delivered and wildlife corridors secured – we are unconvinced on the proposals and note that other objectors suggest that the calculator has been incorrectly applied.*

4. Issues that are part of the Outline Planning Approval and relate to transportation

- *The site cannot be delivered as a standalone development* – The transport model (TA Appendices) indicate that Village 7 on its own will result in further increase in delays (14-20% increase in journey time) on the A414 and central Harlow over the current level, unless the Central Crossing improvements are delivered. These are linked at present to the delivery of Village 1, and this highlights the importance of linking the development of Village 1 and Village 7 (if it is allowed to proceed) to allow the necessary infrastructure to be delivered. The Village 7 proposals should demonstrate that there is no reliance on Village 1 and the Central Crossing if for whatever reason they were not approved and/or delivered.

In addition, without the spine link between Village 7 and Village 6 all traffic from village 7 would be directed through Church Lane (north and south). The assessment of the capacity of Church Lane (north) has not been made, potentially making all traffic from the development reliant on a single access point at the Junction with the A414. This would be unsafe in case of emergency. According to the TA summary (page 142), the AM peak queue to exit Church Lane in a Standalone Scenario will be 44 vehicles (a tailback roughly reaching the middle of the Village Centre). This queue will reduce significantly (still remaining 22 vehicles long, however) with the opening of the link through Village 6, however this is still a significant queue which will cause delays to vehicles within Village 7 and the potential risk of users finding alternative routes

through the north of Church Lane. Developing a village predicated on a traffic queue through its heart seems a poor approach to delivering any community, even worse for one purporting to be of exceptional quality. In addition, bus services in a standalone scenario will come 'in and out' from the A414 from Church Lane, with no bus priority coming in from Harlow and buses getting caught in the long queue to get out (the short bus priority is not giving much advantage with a queue of 44 vehicles). Accordingly, the Village 7 proposals to not deliver viable bus services that will provide a reasonable alternative to car use. As a result Village 7 should not be allowed to proceed until the Central Crossing infrastructure and link through Village 6 is delivered and the provision of an efficient bus services is secured.

- *The proposals necessary to achieve 60% sustainable transport modes are not delivered and potentially not deliverable* – whatever the scenario adopted (standalone development of otherwise), it is evident from the TA that hundreds of trips to work and to school will need to take place using buses and bicycles, with approximately 200 external sustainable transport trips (35% of all external trips) in the AM peak hour (0800-0900). Accommodating these trips on the local walking, cycling and public transport networks are therefore critical to the success of the development and meeting the 60% sustainable transport mode share. The application does not provide any form of assessment as to what modes these external sustainable trips will be made and to which destination. As a result, there is no confidence that the applicant has soundly considered the impact of the development upon these modes. Without an understanding of how many walking, cycling and bus trips will be made how can the applicant ensure that adequate provision is provided in the appropriate location(s).
- The Infrastructure Delivery Strategy fails to demonstrate that the proposed movement strategy can be accommodated physically or delivered practically: the proposed routes run through third party land with, as far as we are aware, no land owner agreement(s) appear to be in place or designs for how the routes will be accommodated through the highly sensitive environmental areas which are also flood prone; the required footbridge widening has not been tested. For a development which prioritises sustainable modes of travel, as demonstrated in the applicants commitment to achieve the 60% sustainable travel mode share, we believe that the delivery of essential transport infrastructure (in this case adequately planned and assessed walking, cycling and bus routes) should form part of the application, on the same standing as safe access roads, and secured through a legal agreement rather than an untested contribution with no delivery trigger points.
- *Reliance on River Stort pedestrian and cycling facilities* – the application makes an assumption that a significant number of users will either walk or cycle to Harlow Town or Roydon stations as part of their commute to work. The reliance of these routes for a transport strategy is simply not robust given a number of specific factors:
 - a. The width of the footpath is insufficient for the majority of its length (circa 1000mm wide) to allow a pedestrian (including those with small children) and cyclist to comfortably pass each other without slowing down or stopping – it

does not therefore provide the capacity required for a reliable route to either stations / town centres;

- b. The route along the River Stort between Harlow and Roydon is not, in the majority of locations, of sufficient material quality to accommodate a significant number of additional users, particularly given that the route is prone to flooding and the footpaths becoming muddy and unusable without specialist equipment.
- c. The route along the River Stort is poorly lit and therefore unlikely to be used by a significant number of people for commuting during the months of poor day light. Given the routes are part of SSSI it is unlikely that adequate lighting could be provided even if it were being offered by the applicant.
- d. Th above notwithstanding, the 18 minute cycle to Roydon and 22 minute cycle to Harlow Town via this route is considered to be above the threshold that the majority of commuters will cycle to a station for.

Moreover, the applicant has made no assessment of these routes or demonstrated any understanding that the above issues will need to be addressed for these routes to be reasonably used. The reliance on walking and cycling mode share within the planning application is not therefore considered to be robust.

Bus provision – the application suggests that Village 7 will be served by four buses per hour through the village and that this may be subject to pump priming to ensure its early use. The applicant makes no attempt to understand the demand for bus trips from the development or their intended destination. If the applicant is proposing pump priming of the bus route, further details should be required including the identification of the bus service, the length of any subsidy and should be secured through the S106 to ensure that this commitment remains.

Harlow Town Northern Station access – the applicant loosely suggests that they will contribute towards a northern station access at Harlow Town upon “...confirmation from Network Rail and the Train Operating Companies of their intention to do this.” Any requirement for a northern station access is solely the result of the Gilston Village 1-7 developments and therefore the responsibility for delivering a new access to Harlow Town to improve journey times for new residents should lie with the applicant(s) and not Network Rail or the Train Operating Companies who have no real incentive to invest this way in the station. We would expect the applicant to take a lead (alongside the applicant of Villages 1-6) in promoting the northern station access, understanding its cost and provide a reasonable financial commitment secured through the S106 to ensure that it is delivered.

- *The A414 / Church Lane Junction should not be granted permission without proper assessment* – The layout of the junction is included as part of the Outline Planning Application, with a detailed design but no detailed assessment of transport, safety, signal times, visual, noise and air quality impacts. The access road should not be approved without appropriate forms of assessment. Given the scale of the proposals, we are surprised that the proposed works form part of the outline application and have not been submitted as a detailed application (as is the case with the highway works proposed in connection with Villages 1-6).

The proposed bus priority lanes do not appear to provide much advantage to buses and should be looked at in more detail (particularly in light of the queues that are forecast by the applicants between the A414 junction and the heart of the proposed village) and the reliance that the wider transport strategy for the development has for sustainable transport trips.

According to the Infrastructure Delivery Strategy which has been submitted (page 22) the junction is expected to be delivered before first occupation of the housing. This would mean that during construction the junction will be potentially unsafe: not only will it be a building site in itself, but it will also generate a large number of heavy construction vehicles. It is recommended that this is studied in detail and appropriate arrangements are put in place to deal with the construction impacts.

- *The impact and delays for the citizens of Hunsdon will be significant and potentially unacceptable* – The Paramics transport model terminates at the edge of Village 7 and does not consider the capacity of Church Lane towards Hunsdon and the impact on the village itself, both from additional traffic from Village 7 heading north and from the delay caused to Hunsdon residents directed towards the A414 (notably more danger on Church Lane passing points, Primary School traffic, dog-leg through Village 7 centre and significant vehicles queues through the village at peak hour to access the A414). The application also fails to identify any means for encouraging safe walking and cycling along Church Lane, particularly to the north of the Village Centre and beyond.

The impact of large agricultural vehicles now using Church Lane (particularly at harvest time) and its suitability to passing through the village centre has not been considered

- *More detail is required for the need for improved rail access*: The OPA recognise the need for improvements at both Roydon and Harlow Town stations. However, no specific detail is provided and no quantification of the expected additional rail passengers, additional parking and cycle parking requirements and buses. The lack of assessment in this regard further undermines the sustainable travel strategy for the site.

Policy GA1/V is explicit about the need for measures which encourage sustainable transport including the setting of specific objectives and targets. It also refers to the Garden City Principles of 'Integrated and accessible transport systems'. The OPA adopts the Garden Town overall target of 60% of movement by accessible transport and provides an assessment of how this can be achieved. It also proposes car parking reductions and increase in facilities for electric vehicles and cycle parking. All this is very positive, but it cannot be relied upon without a more robust strategy to deliver sustainable transport infrastructure off site.

5. Issues that are not in line with the emerging Neighbourhood Plan or design issues which contradict the Concept Framework

The Neighbourhood Plan Group, with the active support of the Hunsdon, Eastwick and Gilston communities, is preparing a Neighbourhood Plan (NP) which includes the area of this development. The main objective of the Plan is to consolidate into planning policy the

aspirations of stakeholders, including the applicants, as set out in the Concept Framework (July 2018): not only the local communities, but also the local authorities, developers and statutory consultees. The Neighbourhood Plan is therefore seen by the community as a way to ensure that development lives up to the promises made and expectation raised.

The Neighbourhood Plan is in general conformity with the Strategic Policies of the Local Plan and is closely aligned with the principles that are to guide future development set out in the Concept Framework. The NP has been through the Pre-Submission (Reg. 14) Consultation, where it was widely presented and publicised, attracting over 500 comments from local residents, landowners, developers and most statutory consultees. The revised NP will be presented shortly to the HGGT Quality Review Panel and submitted to the Council in February-March. It may potentially come into force concurrently with the determination of this planning application.

The NP is underpinned by the Concept Framework which was prepared by the developers in collaboration with the community and the Council and subsequently endorsed by the Council as a benchmark for future development in the Gilston Area. It therefore carries some weight and is a material consideration for development management purposes. It has also received widespread scrutiny and inputs from a broad range of consultees. These are sufficient reasons, in our view, to take account of its direction and policies, even if the NP has not completed the statutory processes required for it to come into force.

Key additional issues to the ones already highlighted above include:

- *Unclear approach to the creation of a Green Infrastructure Network* for biodiversity / wildlife, to ensure clear individuality and separation between the villages and to provide walking and cycle access to the countryside in accordance with Natural England Accessible Natural Greenspace Standards (NP policy AG3). The Green Infrastructure Network should interlink with the proposals for Village 1-6 and extend to surrounding areas (Stort Valley, Lee Valley Park, Hunsdon, etc)
- *Requirement for a clearer strategy for the creation of new habitats* (NP policy AG3)
- *A stronger approach to mitigate the visual impact and reduce the encroachment of urbanisation on the countryside* (NP policy AG4). The position of taller buildings at the edges of the site and the proposed height of 5 floors (which is unnecessary to deliver the quantum of development required) and the proposed lighting and pitch floodlighting will have a significant urbanisation impact on the Stort Valley (view 22 of EIA), on the countryside and setting of Eastwick and Hunsdon heritage.
- *The proposals assume a suburban type of development, rather than village approach* – This is clearly expressed by Parameter Plan 6 and confirmed by the DAS and Illustrative Master Plan. Although the DAS includes analysis of villages, it also states that inspiration comes from Cambourne, which is a much larger settlement (four primary schools, secondary schools, supermarket, business park, etc.) with low densities of 25-40dph according to South Cambridgeshire District Council website and nearly the highest car ownership rate in South Cambridgeshire. NP policy AG7

identifies the following characteristics of local villages which are not reflected in the proposals:

- a. A central spine normally forms the image and identity of the village – in the proposals the ‘high street’ has tall linear blocks, urban widths and urban layouts. The DAS and TA (page 52-53) clearly show Oxford city bus interchange at the station as an inspiration and model, rather than a village high street.
- b. The countryside penetrates into the village and there are views out deep into the village. These are not indicated or represented. Tall blocks of buildings are placed to separate the main existing woodland block from the rest of the settlement, rather than visually drawing the woodland into the site.
- c. Arrival into the village is normally through green spaces and there never are taller ‘gateway buildings’ as proposed (Parameter Plan 6)
- d. Access roads are narrow and lined by ditches, trees and hedgerow bushes. While the proposed carriageway are narrow (DAS p.153-154), the proposed road sections are typically urban / suburban: parking lane with trees, segregated cycle route and hard paved footways with occasional trees, rather than landscape-led lanes. Tall (6-8m) lighting columns are not in keeping with the scale of village streets.
- e. Tertiary streets are ‘lanes’, green, slow, short and informal. Lighting should be minimal or absent.
- f. The edges of the built up area are typically soft: no long continuous outer roads as proposed, no long lines of aligned buildings and regular rooflines, outer edge planting effectively screening most of the buildings and blending the village in its countryside setting. Although the Master Plan and Housing Typology plan are for information only, they clearly indicate that the design approach has not embraced the principles of village design as required by the HGGT, EH Policies and Concept Framework.

6. Issues relating to delivery

- The delivery of social infrastructure (Schools/Health/Community) should take place at the time of need and not after the occupation of 500 or more houses. We understand that this is in line with standard practice requirements applied by HCC, but this development should be different, because it needs to have higher ambitions as a Garden Town and because of its scale. If all 7 villages adopted the same approach, there would be 3,500 homes before any services start to be delivered! There is already a shortage of school places in the area and no secondary school: the local community cannot take extra strains and local schools cannot offer any more places. Most local doctors’ surgeries are full to capacity and new residents already find it hard to be taken on.
- Standard trigger points for the delivery of services will be contrary to the HGGT Infrastructure Delivery Plan which calls for ‘a comprehensive package of infrastructure, phased and delivered in a timely way, ahead of, or in tandem with the development it serves’ (IDP, page12). Delayed services will also create additional

traffic as early new residents drive offsite to other schools, doctors and shops, making it impossible to achieve the modal shift targets both in the short and longer term (it is likely that children and their siblings will continue at schools offsite for entire schools cycles) and put pressure on village roads and facilities.

- The proposals make no reference and no explanation on how the applicant is addressing the requirements of Policy GA1 in respect to:
 - a. Stewardship and Governance proposals for undeveloped land and buffer land and endowment model
 - b. Contribution to the wider stewardship model for the whole of the area
 - c. Village common spaces and facilities maintenance provision and stewardship model
 - d. How the principle of Land Value Capture is applied for the benefit of the new and existing communities.

7. Issues that have the support of the community

The community recognises that there are aspects of the Planning Application that will be positive for the area – these are welcomed and openly supported:

- A new and safer junction between Church Lane and the A414
- The more developed approach to securing 60% sustainable travel, including extensive cycle routes to Roydon and Harlow (if deliverable), bus services (if feasible), lower than standard parking provision and increased cycle parking
- The provision of services, including school, possible healthcare facilities, shops, workspaces, playing pitches, etc. which have the potential to benefit existing communities but only if part of the overall development of the GA
- The commitment to 40% affordable housing.

8. Conclusion

In conclusion, we cannot support the application, as submitted, so would urge the Council to seek better outcomes or reject the application in its current form.

Based on the material submitted as part of the OPA, it is not clear how the development of Village 7 is responding to the aspirations that justified the release of Green Belt land or how it is in any way different from any other development that is not part of a 'Garden Town'. Village 7 cannot be considered as a standalone development and we believe it is necessary for the scope of the Outline Planning Application to consider the *whole* of Policy Area GA1 and to provide an integrated approach for the area. We believe this is entirely possible given that the applications for Village 7 and Villages 1-6 are being considered concurrently. However, should this not be possible, and the two areas (Villages 1-6 and Village 7) remain separate applications without securing the necessary integration and consistency, we recommend that Village 7 should not be permitted in this plan period given the concerns set out in this response relating to its integration with the wider Gilston Area, its compliance with the overall vision and objectives for the Garden Town and delivery of necessary infrastructure.

Before being considered for determination, the Outline Planning Application should undergo significant review and amendment (including further assessment of transport, impact on Church Lane and residents of the wider areas, deliverability of essential sustainable transport infrastructure, etc. Revisions are also required to the overall design approach to emphasise commitment to strategic landscape-led masterplan design of villages in consultation with local communities.

Yours faithfully,

**Anthony Bickmore, Chairman, Hunsdon, Eastwick and Gilston Neighbourhood
Plan Group**