

Hunsdon, Eastwick and Gilston Neighbourhood Plan Group

Channoeks Farm

Gilston

Nr Harlow

CM202RL

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

BY EMAIL ONLY TO ADAM HALFORD

9th August 2019,

Dear Sir/Madam,

**RESPONSE TO THE GILSTON PARK PLANNING DETAILED APPLICATIONS
FOR THE TWO ACCESS ROUTES REF;
3/19/1046/FUL (Central Crossing) AND
3/19/1051/FUL**

The material submitted for the Gilston Park Estate (GPE) planning applications is very complex and will take several weeks for the community to assess in detail. As a result, our representations, which are being submitted within the 8 week statutory consultation period required by East Herts Council (EHC), are not exhaustive and whilst presenting some of the issues identified collectively by the community which we would like to bring to the attention of the Local Planning Authority at this stage, this should not preclude further detailed responses being made whilst the applications remain under consideration. This is particularly important given the requirement for further clarification to be provided by the applicant of some of the information submitted in support of these detailed planning applications.

We welcome further discussion with the authorities and applicants so that some of the issues raised in our representations can be addressed in advance of the applications being determined by the Council. The Neighbourhood Planning Group (NPG), which 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, has always been open to discussion and has endeavoured to provide constructive input in the interest of achieving good development. We therefore welcome this opportunity for further engagement in accordance with the criteria set out in Policies GA1 and GA2.

The community recognises that the Detailed Applications for the Central Stort Crossing and for the Eastern Stort Crossing are made in conjunction with the Outline Planning Application (OPA) for the development of most of the area identified in Policy GA1 and that they are not independent of the development.

However, as Detailed Applications they have to be considered on their own merits and satisfy the overall aspiration for the area to deliver:

- Development of **exceptional quality** in line with Garden City Principles;
- Strong commitment to sustainable mobility, supporting 60% of all journeys made by sustainable modes and supporting the Harlow sustainable transport corridors;
- Integrated infrastructure development to serve the needs of the existing communities, the future ones and the aspirations for the regeneration of Harlow.

The Detailed Applications for the Central and Eastern Crossings are, in our assessment, incomplete and need to be reviewed and better integrated with each other and with proposals in the OPA and wider Gilston Area before being considered again by the community. Both access roads as currently proposed would have considerable impact on the community as they:

- Provide essential access to all residents of the area, including the existing communities;
- Sever the Pye Corner Gilston community in two, by driving a major, cross county, trunk road between the historic part of Pye Corner and the newer Terlings Park and isolate Terlings Park from the wider Gilston Area;
- Change the nature of Pye Corner, from its historic countryside crossroads setting to a cul de sac;
- Dramatically impact and change the conditions for the properties of Terlings Park, with severance, noise, light pollution, imposition of noise barriers and (presumably) compulsory purchase of their amenity, playground and green space;
- Cause noise pollution and consequent 'urbanisation' of the currently tranquil Terlings Park parkland;
- Result in longer journeys for all residents of Gilston.

NOTE - We have also commented on the OAP separately by letter of even date.

SUMMARY

- The Detailed Applications fail to demonstrate that the access requirements of the future development would not seriously compromise the setting, quality and attractiveness of the existing communities, especially in Gilston.
- They fail to demonstrate effective mitigation and that every effort is being made to ensure that impacts are minimised and that high-quality walking, cycling and open space will be guaranteed to existing residents.
- In contradiction to Policies GA1 and GA2 of the District Plan and contrary to the objectives of Hertfordshire's Local Transport Plan 4, the Detailed Applications give vehicular movement a substantially higher order of priority over sustainable transport modes. This undermines the overall 60% sustainable travel approach for the Harlow Garden Town ambition as a whole and questions the basis for the planning applications.
- The Parish Councils therefore have no confidence that the proposed developments constitute the most effective access roads, or that they are seeking to minimise impacts and protect the amenity of existing residents.
- EHC and HCC, as responsible authorities have confirmed that they have not evaluated any other options when asking the developers to provide these links including an evaluation of

improving the existing alignment of the A414 through Harlow; this requirement is established in Policy GA2 and we see this as seriously undermining the proposals.

For these reasons, the NPG, Parish Councils and their communities feel it necessary to express its overall **objection** to both detailed applications for the Central and Eastern Crossings of the Stort Valley, as currently submitted.

OVERARCHING ASPIRATION FOR GILSTON

The Gilston Area development required the removal of the Green Belt designation - the largest in East Hertfordshire and one of the largest in the country, contrary to the presumption in favour of protecting the Green Belt as set out in the NPPF on the grounds that exceptional circumstances had been demonstrated at the Examination in Public (EiP). In these circumstances, the community has the right to expect an 'exceptional development'- something which was reiterated by the Inspector at the EiP. 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**, fulfilling the promises made at the time of the EiP for the District Plan and during community consultation events. The EHC endorsed Concept Framework, developed with the applicants and community and used by EHC at the EiP as evidence, sets out a transport vision for Gilston as:

“To create a development where people have the opportunity to undertake many day-to-day activities within the site and the choice of sustainable transport modes for travel within and outside the site. To provide transport infrastructure and service enhancements that bring forward improvements that benefit local communities in East Hertfordshire and Harlow. To introduce travel planning that acts as a catalyst to shape the habits of the local community.”

This Vision seems to have become diluted; the applications do not provide detail in support of delivering this agreed vision. The applicant should demonstrate what transport infrastructure and service enhancements are required to support the development and what impact these have on the wider Harlow area, particularly if a 60% sustainable transport modal share is achieved. The NPG believes that the following questions need addressing by the applicants especially as they relate to the Central crossing:

- i. How many trips are forecast to be made to Harlow Town and Harlow Mill stations in peak periods?
- ii. What does this increase to if 60% of trips are to be made by sustainable travel modes as reflected in the highway modelling assessments?
- iii. By what modes does the applicant envisage these trips being made?
- iv. Is there sufficient space car and cycle parking at Harlow Town and Harlow Mill stations to accommodate the increased demand from the 10,000 new homes?
- v. Is there sufficient space to accommodate additional bus and taxi movements in the design of the station interchanges while allowing for disabled and drop off facilities?
- vi. Are the routes to the stations of sufficient quality to accommodate the additional demand in walking and cycling trips – is the footway on Station Approach of sufficient width as well as other accesses from the proposed villages?

The highway impacts of 60% sustainable travel modal share; while the ambition of the Vision is commended, even if the detail is missing or hard to find, given the existing transport pressures the applicants should address the following questions:

- i. What would the highway impact of the development proposals be should the 60% sustainable travel mode target not be achieved?
- ii. What assurances and commitments are the applicants providing that they are committed to achieving this travel mode shift?
- iii. What steps will the applicant take if the 60% sustainable travel mode shift is not achieved?

Transport Review Group; The applicants have proposed establishing a Transport Review Group (TRG) with HCC and ECC highway authorities and other stakeholders. The TRG will have resources to allocate funding from an 'Unforeseen Impact Fund' to identify and resolve unforeseen transport impacts arising from the development. The NPG welcomes this but pending clarification of the funding and remit reserves its judgement; assuming it is established then the NPG believes it should be represented on the TRG, as of right, as it represents the community now, and in its proposed expanded form.

CONTENT OF THE APPLICATIONS

Outline Planning Application - covering the area of the 6 new villages and *not* the whole of Policy GA1 area. This is an issue of major concern to the community, as we believe the cumulative impacts of all 7 new villages anticipated in Local Plan Policy GA1 should be considered to ensure the impacts of development can be adequately mitigated and the development is planned and delivered in a holistic way in accordance with the Concept Framework and statements made to the Inspector when EHC championed 'exceptional circumstances' for the removal of the Green Belt designation at the EiP. There is therefore no "Gilston" wide approach to the transport needs resulting from Policy GA1 and, for example the junction of Church Lane with the A414 and other impacts in Hunsdon.

Detailed Planning Applications for Central and Eastern Crossings:

- Documents for formal approval. These are detailed applications and we understand that it is intended that the submitted proposals will be approved in full:
 - Drawings: including engineering and landscape technical drawings
- Supporting Technical Documents, including the Environmental Statement, Options Report, Design and Access Statement etc. With the exception of the Options Report, these are not specific to the impacts and design of the crossings.
- Of these, a set of requirements for *Environmental Mitigation Works* will be agreed between applicant and planning authority and will become a planning condition.

1 – ISSUES RELATING TO THE GENERAL APPROACH TO THE PROPOSAL

A. *Lack of Comprehensive Mobility Framework* - The removal of Green Belt designation had been justified at the EiP of the EH District Plan on the grounds of exceptional circumstances and that comprehensive and integrated development in the Gilston Area was the most sustainable way of meeting future housing needs. This would require comprehensive assessment of transport movement and a sustainable movement strategy for the whole Harlow and Gilston Garden Town aiming at maximising walking, cycling and public transport and facilitating access to the stations

and to key employment and leisure destinations in Harlow and in Hertfordshire. **A comprehensive movement strategy has not been prepared and we believe should be a requirement to understand the framework within which the two access roads are to be provided and to justify the claim that the development provides a comprehensive and integrated approach to housing delivery.**

- B. **Unclear Assumptions for Traffic Generation** - The Detailed Applications should be founded on a clear rationale and framework for:
- Distribution of strategic and through traffic – particularly for the future of the A414, which was explored by the Hertfordshire County Council A414 Strategy, presented for consultation in February 2019 and never progressed. The NPG and Parish Councils formally expressed during consultation their deep concerns at the lack of analysis and contradictory objectives particularly for Segment 14 at Gilston; we wait to hear the outcome of that consultation.
 - Clearly stated assumptions for future growth and traffic generation (encompassing all homes and jobs in the area, including Village 7, the possible hospital rebuilding/relocation, mineral extraction in Hunsdon, etc.);
 - Clear parameters for modal share of sustainable mobility across the Garden Town and identification of the measures required to deliver that share;
 - Assumptions for future trip generation and adjustments to the TRICS database, to reflect future mobility patterns.

As it stands, the assumptions made regarding the above and informing the design of the two Crossings are not clearly presented and therefore potentially not sound. It appears that, over time, wider strategic opportunities have been considered and somehow incorporated in the design without adequate scrutiny and assessment. **Before determination of the Detailed Applications, it is essential that the applicants present with greater clarity the assumptions, traffic requirements and sustainable mobility requirements for the Gilston Park Estate development, for the adjoining sites and for the wider area. In particular, the assumptions made for the future of the A414 and the role of Edinburgh Way should be clearly set out. Unless these assumptions are presented, justified and found reasonable, the development should not be allowed to proceed.**

- C. **Options Report:** The Options Report is inadequate as it only addresses minor options (i.e. the size of culverts and similar details), while assessment of real strategic options has not been provided (in accordance with Policy GA2). Without full justification, it is impossible to understand if the design proposed represents the best possible solution. Given local impacts and the need for purchase of land at Terlings Park and elsewhere (and so the assumed requirement for the use of CPO powers and need to present the planning justification to a public inquiry), it is important that the proposed solution is proven to represent the best option. As traffic movement on one Crossing will affect the design of the other (for example higher traffic on the Eastern Crossing may make the cycle bridge essential on the Central Crossing), both Crossings should be assessed together. **The Options Report should be integrated to include alignment options, the study of an option with minimum carriageway width and slowest acceptable speed, and the study of the impact of a Heavy Load Route / A414 realignment option – so that it can be adequately assessed if the proposals represent the best approach. The study should show the highways needed to support the applicant's proposals, after allowing for their 60% sustainable transport ambition on which their proposal has been founded.**
- D. **Lack of detailed Environmental Impact Assessment and Non-Technical Summary:** These have been provided for the whole of the development OPA and not specifically for the Detailed

Applications. As the EIA is made up of three volumes with a total of 9,000 pages or more, it is very difficult for the community to consider the Detailed Applications in sufficient depth. It has been prepared over apparently a long period, possibly years, but the community only has a short time, weeks, to consider its detail. There is also a concern that the level of detail in the EIA may not be adequate for the detailed applications. We are still in the process of reviewing the EIA documents, but it appears that the detailed assessment of key aspects of the Detailed Proposals are either missing or 'buried' in the general EIA and hard to find and assess. In particular:

- Photomontages and verified views should be presenting the proposed development in a comprehensive and detailed way:
 - View 17 (from Terlings Park towards the Eastern Crossing) should be presented before the planting is fully-grown and in winter. It should also be presented from the upper floors of the houses.
 - View 27 (new junction in front of Terlings Park) is missing from the EIA Appendix 13.3. It is presented as a non-verified illustration in the DAS, without road signs, road markings, guardrails, noise barriers and lighting. This should be integrated in the EIA.
 - View 25 from Listed Fiddler's Bridge, is also missing (only existing views are provided). No view of the new road bridge over the brook is provided.
 - View 19 or any other view from River Way towards the new crossing and roundabout is missing.
 - View / photomontage of the proposed noise barriers are not provided.
 - View towards the Central Crossing from all road approaches: view and photomontage of the new junction and cycle bridge are not provided.
- Zoomed in noise and air quality maps in sensitive areas affecting the community and Terlings Park in particular are not provided. Site-wide maps are not adequate to understand local impacts on individual properties.
- Impact on heritage assets and their settings (as required by Policy GA2/II) is only addressed in general terms as part of the overall OPA and is insufficient for the Detailed Applications, particularly in relation to the setting of listed properties in Pye Corner and the impact on Fiddlers Bridge. A full Heritage Assessment specific for the Detailed Applications should be provided.

A detailed EIA for the Crossings and a specific Non Technical Summary for each of the two Crossings should be provided to ensure that the Detailed Applications and the potential impacts of the proposed Crossings can be adequately considered and understood by the community, including illustrations of the Verified Views, consideration of heritage and details of predicted noise and air quality changes.

2 - DETAILED APPLICATION FOR THE CENTRAL AND EASTERN CROSSINGS

- A. *Eastern Crossing*: the Eastern Crossing Application is justified as being required to provide access to the development. However, at various locations in the Transport Assessment (TA) Application Drawings and supporting documents reference is made to future dualling, conversion of the Eastern Crossing into a Heavy Load Route and to rerouting of the A414 through the village of Pye Corner Gilston; we understand that there is no basis or request from Highways England for this and that it is, we understand, simply an informal request from ECC which has nothing to do with the highway impacts resulting from Policy GA1. The design and speed of the proposed road appears to be a 'hybrid' between a major road and a local one – clearly designed with the possibility of further capacity increases therefore necessitating large roundabout diameters, culverts and bridges. The proposal dissects a

village community, the NPG finds this an extraordinary concept and at total variance with the applicants proposals for their new villages so to that extent an unacceptable double standard which challenges their core thinking for the communities they are seeking to create.

- Justification of the merits of rerouting strategic and heavy load vehicles through the Eastern Crossing and away from Edinburgh Way and the impacts of such a move is not provided – a **full Cost-Benefit Analysis and study of the impacts of the A414 concept is needed before allowing ‘safeguarding’ of the potential for future changes and upgrading of the route.**
 - Edinburgh Way is also indicated for improvement and dualling, and despite this and growth in the area, according to available data in the EIA Noise Section Table 11.4.2, the route through a commercial area will experience a reduction of actual vehicular movement of 8% by 2040, while traffic in Eastwick Road (by the Dusty Miller), so through a residential area, will increase by over 60% and HGV movement will increase by 800%. This suggests that road schemes are not being studied with a view to achieving balance and minimising impacts and supporting the aims to assist the sustainable transportation objectives of the development. **Displacing traffic from Edinburgh Way may be desirable, but it is not demonstrated that it is necessary and sufficient to justify the impacts of the proposed Crossing at Pye Corner Gilston with its direct impacts on residents. This lack of analysis is compounded by EHC or HCC declaring that they have not prepared any analysis of the options; this is highly unsatisfactory.**
 - The criteria used for the design and the make-up of the traffic generation (local traffic vs. through traffic) is not explained. According to the same Table 11.4.2 of the EIA, expected vehicular movement on the Eastern Crossing will be 30% more than the current Eastwick Road / Pye Corner and about half of the A414 by Church Lane. **There is no clear explanation of what drives traffic increases (the development, displacement from Harlow / Edinburgh Way, or through traffic) and therefore no justification for the specifications of the proposed new roads.**
 - According to the Detailed Application, Pye Corner will be closed to through traffic. This is a considerable material change, which will make the current highway arrangements, road markings and signage redundant so the highway needs re-planning. Gilston Lane it is assumed will still carry the existing traffic serving businesses and residents currently in Gilston although we can find little detail on this and the interrelationship with the proposed village distributor road. **The Detailed Application should be extended to include the complete redesign and landscape design of Pye Corner as an essential component of the same proposals and the long-term use of Gilston Lane clarified.**
- B. **Central Crossing:** the application proposes a significant widening of the existing A414 Eastwick Road (western arm), C161 Eastwick Road (eastern arm) and Fifth Avenue to form a new signalised junction. The traffic requirements that drive the widening are, as indicated above, not clear. It is not clear if, and why, the C161 Eastwick Road is proposed as a significant strategic road (realigned A414) and a Heavy Load Route, or if the A414 is assumed to run along Fifth Avenue. **The applicants should clarify assumptions and design parameters before the proposals can be fully considered.**
- The proposals seek to maximise traffic capacity by only providing staggered crossings for pedestrians and cyclists at a location where sustainable transport movement should be maximised to integrate with Harlow’s sustainable transport corridors as a key part of the Concept Framework, as formally endorsed by your Council. **A study of detailed options and alternatives for pedestrian and cycle at grade crossings should be provided.**

This is essential to demonstrate that the proposed bridge is really an advantage and that no reasonable alternative exists.

- The poor provision for pedestrians and cyclists proposed is to be compensated for by the provision of a cycling and pedestrian bridge for which no design is proposed, despite being an essential element of the detailed application and the 7 villages proposed in Policy GA1. The visual impact and functional desirability of the bridge as an appropriate route therefore cannot be properly assessed. In the Design Parameters it appears to include a steep incline towards Harlow to accommodate HGV clearance from Eastwick Road (without justification of the need for such provision, as a Heavy Load Route designation eastern arm of Eastwick Road is not agreed nor fully justified), infill bars, trash screens and speed chicanes given the length and height of the crest of the bridge. No Verified Views of the bridge have been provided. **The applicants should provide justification of the Design Parameters and at least a concept design for the bridge so that its suitability as an attractive pedestrian and cycle route can be assessed against the applicants declared aspirations of a 60% sustainable transport modal shift.**
- No detail is provided of provision for pedestrian and cycle journeys from other directions other than north-south. No quantification of the expected journeys is made, making it impossible to assess if sufficient provision is being made. **Quantification of expected pedestrian and cycle movements (representing, with buses, 60% of all movements) should be provided.**

3 – OTHER RELATED ISSUES

- *Strategy, objectives and targets for sustainable transport:* this is explicitly required by Policy GA1/ V and by Policy GA2 /I. No targets and no approach to the sustainable transport corridor to Harlow are provided. The Transport Assessment makes no assessment of the number of buses, cyclists and pedestrians using the Eastern and Central Crossings. **The applicants should clarify the degree of priority given to sustainable travel and the adequacy of the provisions made.**
- *Harlow Town Station and Access:* No study of the impact on the railway station, parking and cycle parking provision, and access to it by bus, walking or cycling has been made. Without it, it is not possible to understand if the assumptions for movement at the new junction (for all modes) are reasonable. The current station interchange facility does not work well and is poorly maintained, these proposals will make these weaknesses worse. The previous commitment, by the applicants, to deliver a northern station access for pedestrians and cyclists is no longer included, for no clear reasons. This omission needs to be explained given the assumptions on sustainable transportation on which the whole project is based, including at its presentation at the Examination in Public. **The applicants should quantify the assumed modal split of movements to the station; demonstrate that it is in compliance with the aspirations of the policies and that it can be accommodated within the facilities available.**

In summary, the proposals are not sufficiently justified in the context of a strategy which prioritises sustainable movement and the applicants make assumptions regarding strategic transport and HGV's to be rerouted away from a commercial area to run through the existing Gilston community without full assessment of the merits of such decision. The applicants also fail to demonstrate that the design is optimised to provide local access and minimum impact on the existing community and omit to present the full impact of their proposals.

The Detailed Applications should be substantially integrated and clarification of the design assumptions, provision and assessment of alternative strategic options and full visualisation of

impacts provided before the applications can be safely determined. Unless such an integrated approach is adopted, **the Applications should be refused.**

Yours faithfully,

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

cc Clr Eric Buckmaster EHC

Clr Eric Buckmaster HCC

Mark Prisk MP

Guy Nicholson, Harlow Garden Town