



HEGNPG

Supporting our Community

Hunsdon Eastwick and Gilston Neighbourhood Plan Group

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

Planning Policy
East Herts Council
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16th February 2023

FAO Kevin Steptoe by email at Kevin.Steptoe@eastherts.gov.uk

Jenny Pierce, Jenny.Pierce@eastherts.gov.uk

Dear Sir/Madam,

**Gilston Area Applications – Outline Planning Application for Village 7 ref:
3/19/2124/OUT**

This letter of representation constitutes the response of the Hunsdon, Eastwick and Gilston Neighbourhood Plan Group (HEGNPG) on behalf of the Hunsdon and Eastwick & Gilston Parish Councils and the local community. It should be read in conjunction with the previous representations submitted by the HEGNPG in February 2020, March 2021, January 2022 and March 2022.

Sadly, many of the serious concerns raised in our previous representations have remained unaddressed and unanswered and the clarification requested has not been provided by the applicant despite the numerous submissions made and meetings that have taken place.

This letter is divided into four parts:

- Part 1: recent expectations set out by Rt Hon Michael Gove Secretary of State for Levelling Up, Housing and Communities and how these apply to the proposals for Village 7 (V7).

- Part 2: the reasons why grave concerns still remain about the application in its current form.
- Part 3: recommended essential conditions which should be included in any approval.
- Part 4. Separate response on the Gilston Area Stewardship and Governance Strategy.

PART 1

The expectations set out by Rt Hon Michael Gove MP, Secretary of State for Levelling Up, Housing and Communities in his letters to Council Leaders and MPs (1st and 5th December 2022)

In early December 2022, the Secretary of State set out very clear expectations for future development and housing and changes to the planning system, which are relevant to this application:

- Planning should be about delivering “enough of the right homes in the right places and will do that by promoting development that is beautiful, that comes with the right infrastructure, that is done democratically with local communities rather than to them, that protects and improves our environment, and that leaves us with better neighbourhoods than before”.
- Local and Neighbourhood Plans will have more power under future legislation and should be considered the best form of community action – and protection.
- Council Leaders should ensure strong design leadership within their council and, working with their communities, turn visions for beautiful towns, cities and neighbourhoods into standards all new development should meet.
- Councils should also refuse planning permissions for development that is not well-designed and housing targets should not be used as justification to grant permission.
- The Planning Inspectorate should no longer override local decision making which is sensitive to and reflects local concerns.
- Local authorities will not be expected to build at densities wholly out of character with existing areas.
- Whilst a method will be retained for the calculation of housing need, changes are proposed that the housing number is an advisory starting point but not mandatory. The proposed approach states that it will be up to local authorities with their communities to determine how many homes they should provide taking into account what should be protected in each area.

The HEGNPG is well attuned to, and probably ahead of this Ministerial commitment and call to action:

- In its representations to the Local Plan (2018) and all the Gilston Area applications, it has consistently called for development of ‘exceptional quality’ – with very specific recommendations for what this means in the context of the local area (Neighbourhood Plan Policies AG1 to AG6).

- In 2021, working within the policy framework provided by the Local Plan, we completed the Gilston Area Neighbourhood Plan (GANP) for the development area including tailored policies and guidance to define what would constitute appropriate development in the Gilston Area and, very importantly, provide clear definitions of local character and what is to be considered ‘well-designed’ in the local context. The GANP won two national planning awards and a Landscape Institute award in recognition of its constructive approach to the promotion and delivery of quality development.
- Throughout 2020-2022, the HEGNPG has tried tirelessly to engage constructively with the Council and developers in the interest of better development. By doing so, it has abundantly and consistently demonstrated vision and design ambition for the Gilston Area.

It is therefore regrettable that our “community action” through proactive engagement and the appropriate and democratic use of planning tools, as advocated so strongly by the Secretary of State, is yet to produce any assurance that future development in the Gilston Area will be ‘beautiful’, supported by the necessary infrastructure and democratically delivered “with the local community”, rather than against it.

This is the time for the Council to show the strong vision and leadership that the Secretary of State expects. This includes a clear, transparent and honest response to the concerns that the local community, through the HEGNPG, has raised time and again since the outline application was submitted in October 2019.

We would expect the officer’s report to the DMC to consider and reflect on the Government’s guidance that sensitivity to local concerns, local character and ‘beauty’ should be *overriding factors* guiding the planning process. The officer’s report should, therefore, include:

- 1. A detailed assessment of the OPA against Local Plan Policies and GANP Policies, recognising that the applicant has not explicitly or fully addressed the GANP Policies in its application or any of the supporting documentation. This is necessary as the GANP provides a stronger, locally informed planning policy framework for the Gilston Area and clearly sets out how to address community concerns.**
- 2. A statement of the Council’s interpretation of ‘beauty’ and local character in line with GANP Policies and GANP Appendix 3.**
- 3. A renewed commitment to the Council’s own Gilston Area Charter SPD (2020) that identifies the Strategic Landscape Master Plan (SLMP) as a comprehensive priority plan to be approved ahead of the approval of the first village masterplans. This is particularly relevant as the Applicant for V7 proposes that OPA, the Village Masterplan and SLMP should all be approved by the end of May 2023 (Housing and Infrastructure Delivery Strategy para 3.8). This is a totally unrealistic timescale given the lack of progress made on the SLMP and the need for full and effective engagement on both the SLMP and the Village Masterplan.**

4. A clear position and commitment to the development of Design Codes for the Gilston Area, so clearly identified by the Secretary of State's letter as a duty of all planning authorities to guide development and not a developers' supporting document.
5. Detailed response to the community concerns and expectations set out in this letter and previous representations, in particular how V7 can be said to have been considered in the context of the overall development of the seven Garden Villages when it will be geographically, spatially and physically disconnected from the centre of the rest of the development for many years to come with limited and unworkable sustainable travel links.

PART 2

Why there are serious concerns and the OPA should not be approved as it stands.

1. The priorities that led to the site allocation in the Local Plan and discussed extensively at the District Plan Examination in Public five years ago have fundamentally changed. There would now be a presumption against the release of land from the Green Belt and housing targets would be advisory rather than mandatory and required to take into account local constraints and concerns. There would be far greater consideration of the impact of the new Eastern Crossing on the floodplain of the Stort Valley and sustainable transport targets would require stronger evidence of deliverability. This is a long term project which will extend well beyond the current Local Plan timeframe and It is therefore imperative that the OPA is considered within the framework of future acceptability and policy compliance to ensure that development at Gilston is future-proofed and does not become outdated before it even commences.
2. The proposed integration of V7 with V1-6 (as required by Policy GA1 and GANP Policy AG1) is reliant on interdependent infrastructure delivery and triggers which are to be set in the S106 agreements to be entered into separately with each developer. This is highly problematic and introduces unreasonable complexity and substantial uncertainty regarding delivery. V7 is **entirely dependent** on the community facilities and sustainable transport links provided by V1, while V1 and V2 are dependent on V7 for contributions for access and for mitigation of impacts. But there is no clarity provided in the submitted documentation about how this will be secured at the right time with two parallel but independent and spatially disconnected developments. The imposition of complex conditions will be required in an attempt to keep the developments in lock-step but there is no evidence that the issues related to the phasing of development and infrastructure provision have been properly addressed.
In fact by permitting the applicants (and their predecessors) to press for the early development of V7 totally out of sequence and out of tune with the development of V1-6 and the delivery of necessary infrastructure, the decision-makers have been placed in the impossible position of securing contributions from one developer to support delivery of infrastructure on the site of the other: this applies to improvements to Pye Corner

(necessary to support V2 but paid for by V7), the provision of healthcare (needed by V7 but provided by V1) or even main access upgrades (reliant on V7 but necessary to start V1). It is clear that the application should not be determined until there is clarity and full confidence in the ability of the S106 agreements and necessary conditions to secure appropriate contributions at the right time, impose common trigger points across two landowners and applications and legally enforce contributions and conditions that are triggered by development elsewhere. This is absolutely essential to deliver a well-planned comprehensive development in line with the Development Plan policies. As we have consistently argued, the two applications cannot be determined separately and must be considered together because they are so clearly interdependent. A more sustainable sequence would be to start building from east to west which means V1-6 to finance all infrastructure until V7 is connected. At that point V7 could come on stream and make their infrastructure contribution towards subsequent phases. Assuming that the two developers will spontaneously coordinate and help each other or pay contributions ahead of their own delivery and sale plans is unrealistic and disingenuous.

3. In addition, in design terms (and the Secretary of State urges Councils to reject applications that are not well designed), the notion of comprehensive development is very weak. In the Application for V1-6 Parameter Plan 3 (PP3), the Strategic Green Corridor has a different definition to that adopted in the V7 Application PP3 Plan and the corridors have no connection, except perhaps if the Gypsy and Travellers site is removed. This is contrary to GANP Policy AG2. Moreover, there is no indication of how village character will be addressed in a comprehensive manner. The Strategic Design Guide associated with this Application (a post-design replica of the V1-6 one prepared by PfP) provides only very generic statements of design performance, without addressing the fundamental issue of village character and village identity.
4. It was only in March 2022 that the applicant made clear its commitment to the delivery of no less than 40% affordable housing and it is hard to see how a reduction to 21.65% over this short period of time can in any way be justified or acceptable - or presented by the applicant as 'a minor amendment' as suggested in the covering letter. The changes introduced by the applicant's Financial Viability Statement (VS) appear to be entirely opportunistic (following the Council officers' regrettable acceptance of the V1-6 reduction in affordable housing) and result in such a poor outcome that should make them wholly unacceptable. This is why the Council should be renegotiating or rejecting the level of provision currently proposed:
 - a. A massive tract of Green Belt will be built upon to deliver a very low proportion of affordable housing which falls far short of policy requirements and local housing needs, thereby undermining the very argument played out at the time of the Local Plan allocation that building on greenfield land and at scale was the best way to deliver the affordable housing required to meet identified local needs and build sustainable mixed communities.
 - b. The Viability Assessment of V1-6 and the VS for V7 adopt very similar values for land and sale. However, V1-6 have much higher infrastructure costs (£809m net of

- other contributions, or £90,528/unit on average). V7 costs are much lower at £57,866/unit. How can it be therefore that the V7 affordable housing provision is lower even than that of Places for People (PfP) in V1-6?
- c. Taylor Wimpey (TW) only recently bought the site, fully aware of site capacity and infrastructure needs. In March 2022, they published a Final Housing Position Statement committing to 40% affordable housing with a 75% split of affordable rent and 25% intermediate tenure. In December 2022, this changed dramatically to 21.65% affordable housing and with only 60% affordable rent. Costs of supplies and construction have increased by around 26% (according to [Building materials and components statistics: January 2023 - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/statistics/building-materials-and-components-statistics-january-2023)) and wages by about 7%. These increases are significant but insufficient to explain the massive reduction in affordable housing in a long-term development.
 - d. The cumulative reduction in affordable units is striking and a cause for great concern (1445 less in PfP and 275 less in TW). The results will be a total of **1720 families without access to affordable housing**. Have the implications of this been fully assessed and how does the Council intend to compensate for the resulting undersupply at a time when we are faced with an affordable housing crisis?
 - e. Two key Supporting Documents set out very different propositions for affordable housing: Table 2 of the Planning Statement indicates that 102 flats will be affordable, whilst the Viability Statement (Tables 4.3-4.5) indicates 186 flats (i.e. 62% of all flats) will be affordable. This discrepancy risks invalidating either the planning proposal or the viability statement on which critical decisions rely.
 - f. The high proportion of affordable units provided as 1 or 2 bedroom units (60% of all units in the Planning Statement) will not provide the larger affordable family homes required to meet identified local needs. The Viability Statement suggests that 62% of all flats are to be affordable, raising questions about diversity, social inclusion and how service charges will be distributed and paid.
5. While there is more clarity about off-site infrastructure delivery compared to the 2021 submission, the proposals still do not rely on robust delivery assumptions. For example, the Roydon Commuter Link relies either on the Council exercising CPO/ Highways Act powers for private land acquisition or on an upgrade from footpath to bridleway which is very laborious/expensive/unpredictable and may be unsuccessful to secure where the landowners are not in favour ([How to apply for a Definitive Map Modification Order - Ramblers](#)). It also requires the unfunded safety upgrade of the parapets on the footbridge, as indicated on the Roydon Commuter Link Supplemental Note. It is also worth noting that Roydon Parish Council (letter to Council 10 Feb 23) considers that additional car traffic to reach to the station would be unacceptable and that, should the proposed link alignments proved to be undeliverable, there is no other viable alternative, as the canal towpath is unsuitable for environmental reasons (and contrary to the adopted Hunsdon Neighbourhood Plan Policy HE5).
- The Eastwick Commuter Link will have high volume and will be essential to connect the new development to schools, healthcare and jobs and can only be delivered through cooperation between the developers: how has this been secured? Small contributions

are proposed to the cycle route to Pardon Mill and Hunsdon: these are unlikely to make the routes deliverable to new national standards. There is also a complete lack of clarity about the connectivity of existing communities with new ones and to the outside world (as required by GANP Policy EX1) and this should be addressed before the application is determined.

6. V7 cannot be viewed in isolation and the development of a sustainable community in accordance with Local and Neighbourhood Plan policies is dependent on ensuring that V7 is properly integrated with V1-6 and the wider Gilston Area from the outset. This highlights the imperative of securing the provision of the STC prior to the first occupation of V7. However, details of the Sustainable Transport Corridor bus link and interim Transport Hub, both essential to fulfil the sustainable transport requirements set by policy and necessary to ensure there is no gridlock on the roads including the A414 and Church Lane, have not been substantiated or confirmed. We understand that PFP's position is that an STC link will not be allowed through their land until the development of V5 and V6, which may be 15 years away or more.
 - a. Without a full internal STC linking V7 to V1 for cars and buses, and not just a cycle and pedestrian way, this will never be an integrated village. V7 will remain no more than a standalone estate rather than a sustainable community, which is fundamentally contrary to Policy GA1, the GANP and the aspirations of the HGGT.
 - b. Travel to schools, work and shops will be wholly reliant on the A414 which means that for a generation, 60% sustainable travel will be impossible, contrary to GANP Policy TRA1, HGGT guidance and HCC/ECC policies.
 - c. There must be assurance there will be no occupation until there is a safe and sustainable route to school. The idea that 4 year olds should be bussed twice a day along the A414 dual carriageway trunk road to V1 is entirely unacceptable.
 - d. It is highly unlikely that viable bus services will use the A414 and divert into Village 7. A 'sensitivity test' is necessary to demonstrate that the impacts on the A414 and on the residents of Hunsdon going to Harlow in the morning peak remain acceptable, should bus services not be provided (a common occurrence as can be seen in New Hall, Harlow where bus services still refuse to serve the area).
 - e. This may also mean that queues at the junction between Church Lane and the A414 will be unacceptable and the Transport Assessment accompanying the application unreliable.

EHC have allowed this difficult position to emerge: if V7 happens before V5-V6 it will be a car-based detached housing estate, and if V7 is delayed, its 15% contribution to infrastructure to support V1 will not be available and the whole S106 will need to be renegotiated. This should never have been allowed to happen.

7. In March 2021, the HEGNPG provided a formal representation to the OPA (see main letter plus Addenda), to which a response has still not been received. The key points we

made before and have still had no answers to are summarised below: all these points need to be reiterated in the strongest possible terms:

- a. Traffic through the village centre – Whilst PP4 shows a Sustainable Transport Corridor (STC) through the village, this appears to simply be a Primary Vehicular Route with side parking (see Housing and Land Use Typology Plan). The same corridor is also a through route to Hunsdon and beyond. The design intentions to create a ‘village centre’ full of character and a pedestrian-friendly environment will not be deliverable with this approach and land use. HGVs serving farms and facilities in Hunsdon and beyond use this road, with a predictable impact on the safety and amenity of the V7 Village Centre. We strongly question the diversion of all through traffic on Church Lane through the centre of Village 7 and would urge that further scrutiny takes place before the application is determined.
 - b. Green Infrastructure Network and Adequate Separation between Villages – The Strategic Green Corridors forming the backbone of the Green Infrastructure Network and separation between villages appear to be considered not as the landscape framework that guides development (as required in a landscape-led approach), but the space where things that cannot be fitted elsewhere are located: allotments, car parking, built development for sport, the proposed football hub with its extensive areas of parking, floodlights and associated facilities and the provision for Gypsies and Travellers. This is contrary to GANP Policy AG2 and AG3.
 - c. Sensitive Development Areas and Sites – We are pleased to note the identification of two Sensitive Development Areas. However, the application does not adequately address the effect of development on Hunsdon House and St Dunstan’s Church, both Grade 1 Listed Buildings and on the Moated Site at Eastwick Hall Farm (a Scheduled Ancient Monument) and the reasons why these areas are not to be considered ‘sensitive’. The impact on key Cherished Views (GANP Policy AG5) should not be deferred to a later stage as suggested by the Applicant (letter to HEGNP March 2022), as the Parameter Plans (if approved as part of the OPA) will inevitably override the policy at that point.
 - d. Design, Heights and Built Form – Inadequate control measures are provided to ensure village character and the proposed development parameters for heights and land use appear to reflect a development concept based on urban / suburban models (as indicated in the illustrative Housing and Land Use Plan) which could constrain the delivery of villages which would comply with the criteria set out in GANP Policy AG6. The proposed approach which place taller buildings in the most prominent locations is contrary to GANP Policy AG6.2.ii and Appendix 3.8 / 3.9. The proposed taller buildings would typically comprise blocks of small / affordable flats: these will need to be of outstanding design quality and impeccably landscaped and maintained to fulfil their ‘image making’ role. How will this be secured?
8. Expansion of acute healthcare has so far been the responsibility of the Government and the NHS rather than funded through development. Yet with such an unprecedented increase in population, it must be acknowledged that there will be a lack of hospital care in the area without further investment and that the NHS Clinical Commissioning Groups

will struggle to staff the primary care centres within the development. The NHS has requested a contribution of circa £5.8m from V7 (and £39.4m from V1-V6) , for which the applicants have contested responsibility, claiming in their Healthcare Impact Assessment that ‘net additional needs’ may not accrue if 83% of future residents are from within Hertfordshire and new households may actually move elsewhere (para 2.3.3-2.3.4) and therefore will not be directly related to the development. This analysis is flawed as the applicant will clearly not turn away buyers from outside the county. The shortfall will obviously impact the existing population as a consequence. It will be highly irresponsible and socially unacceptable to allow the occupation of new homes unless a viable solution can be found and appropriate investment in acute and primary care and general healthcare secured. This is a major development and ignoring the issue will put lives at risk. We would urge the Council to give serious consideration to this issue and to impose conditions to step in housing completions in line with the delivery of new primary health care services and progress on the new hospital as the NHS is clearly going to struggle to meet increased demand.

9. Community engagement has been very poor and this is contrary to GANP Policy D1 (Partnership with the Community) and to the Garden City Principles enshrined in Policy GA1 of the Local Plan. The most recent Statement of Community Involvement is dated January 2021, over two years ago. The community has proactively sought to work with the developers but engagement has been poor – both by the current applicants and their predecessors. Since site ownership has changed, most of the documents for planning approval have been modified and the proportion of affordable housing has changed. A few meetings took place in 2022 with the HEGNPG, but there were never any adequate responses to the questions raised or clarification we had requested. One simple example was when we pointed out the opportunity to revisit the locations of heights in PP6 or the need for more comfort regarding safety issues on Church Lane past St. Dunstan’s Church and the internal STC No changes were made in response to our constructive suggestions and no explanation ever provided (see matrix of compliance attached as an Appendix to the Planning Statement – and erroneously excluded from the Policy Review).
10. The provision for employment is unconvincing. The Planning Statement (para 6.48) suggests a 3,000m² provision of employment floorspace in the town centre (subject to market assessment) and a “provisional additional 2,100m²” located nearby but subject to market demand. Both provisions are indicated as designed to allow to be “reverted to residential”. This approach is unlikely to result in well designed and attractive workspaces. Moreover, it should be clear that this should not be used to create an opportunity to increase overall housing numbers (and the proportion of flats) making the employment deficit and traffic worse as a result and undermining the objective of creating a sustainable community and promoting sustainable transport options.

Overall, our impression is that the proposed development aims for a ‘run-of-the-mill’ standalone housing estate approach: nothing special, no commitment to create a vibrant

24/7 village centre, no understanding of local character, no departure from the standard suburban approach that can be seen across the country. It is exactly this disregard to the quality of development and respect for local context ;that the Building Better Building Beautiful Commission first and DLUCH now want to prevent.

We have been disappointed that whilst we have attended meetings with the applicants (and the Council) to make our views known and to receive information about the progress of the development, most of our requests for clarification and suggestions have been disregarded and the GANP policies (which form part of the statutory Development Plan and therefore should carry significant weight in the decision making process) ignored even where clearly applicable or helpful. Furthermore and significantly, there has been no constructive engagement on the part of the developer regarding the SLMP or Strategic Design Guide.

The Council should not forget that this site was part of the Green Belt until a few years ago, and that it is unlikely that the Government today would allow its release and development. It should also reaffirm its commitment to why the Green Belt was lost: to deliver the maximum level of affordable homes, a development of exceptional quality and the timely delivery of a range of social and transport infrastructure through the development of villages of appropriate local character- all in accordance with Garden City principles. The Secretary of State and Office for Place are now very clear that quality of design and local acceptability should take priority over targets.

We expect the officers' report to address openly and clearly the twelve points above and to fully assess compliance with the GANP Policies (as well as the Local Plan) as part of its policy review of the proposals. We would also expect the officer's report to set out clearly how the delivery of necessary infrastructure will be secured and managed through the s106 agreement and who will be party to this. Given the reliance on third party land, is it proposed that PfP will be party to the s106 for V7 (and vice versa) to ensure the timely delivery of essential infrastructure which the applicant has no control over?

PART 3

Proposed additional conditions in the event that the Officer's report recommends approval of the OPA

As we have made clear above, the HEGNPG and the local community recommend that the OPA should be revisited to deliver a higher proportion of affordable housing and that amended Parameter Plans, Development Specifications and Strategic Design Guide are provided that are more closely aligned with adopted policy (Local Plan and GANP). We believe that this is what the Government would now expect to see and that a more appropriate set of proposals will provide a more robust development and delivery framework and eventually save time when considering Reserved Matters applications.

If this is not possible, additional conditions should be applied to ensure that future details and reserved matters applications will be “the right type of development in the right place” as advocated by the Government through the Secretary of State. In this context, we note the recommendations of EHC Conservation and Urban Design which have previously been provided in respect of V1-6 which we believe are equally applicable to V7. These highlight the many unresolved issues which should have been addressed at the outline stage and the need for conditions to be applied to control the scope and scale of the SLMP and Village Masterplans; the early delivery and establishment of landscape proposals and the scope and role of Design Codes.

A summary of the key additional conditions (or where appropriate s106 obligations) we would advocate is presented below:

1. **Securing interdependent infrastructure between Villages 1, 2 and 7: Cumulative milestones must be clearly set out and the development will not be allowed to proceed if essential infrastructure, improvements or mitigation measures are delayed or contributions not made by either of the two developers.** The development of V7 is intertwined with the first villages to be promoted by PfP: it is dependent on some aspects of infrastructure and a contributor to others essential to V1 and 2. A mechanism that ensures that the developments proceed in lockstep and the certainty of legally enforceable conditions across the two applicants are essential. This applies equally to transport or community infrastructure including schools, healthcare and recreational facilities. See also Point 8 below.
2. **Sustainable transport: No dwellings will be occupied until the internal STC to V1 is built for all modes of transport.** The proposal of a pedestrian / cycle route across fields and over a mile long is no substitute for a proper internal STC and does not represent a sufficiently robust approach to secure the 60% sustainable transport objectives for Gilston. The applicants are unable to commit to a date for the completion of this essential STC because it is wholly outside their control.
3. **Strategic Landscape Masterplan: A Strategic Landscape Master Plan will be prepared in collaboration with the local community for the whole area of the Gilston allocation (Local Plan Policy GA1) and submitted to and approved by the local planning authority before the approval of the first Village Master Plan (whether V7 or V1 or another) in accordance with the Gilston Area Charter SPD.** The Strategic Landscape Master Plan should respond to the requirements for a landscape-led approach in accordance with GANP Policy AG1 and the recommendations of the HGGT Quality Review Panel. Development and work on the Village Master Plans should not start until a convincing landscape-led approach is presented to define coherent Strategic Green Corridors (as in GANP Policy AG2) and the extent of meaningful separation between villages in accordance with GANP Policy AG4.1. Meaningful separation and a countryside setting should be secured between V7 and V6.

4. **Parameter Plans:** Parameter Plans 3, 4 and 6 will be for illustrative purposes only and will inform detailed design work and the development of the Strategic Landscape Masterplan, Design Codes and Village Master Plans. The Parameter Plans are not based on any detailed assessment and there is a danger that as currently presented they could result in an inappropriate form of development which is not in compliance with Local Plan or Neighbourhood Plan policies. This includes the STC/ Church Lane diversion going through the village centre and the location and quality of taller buildings. Notwithstanding what is shown on the Parameter Plan, a building heights plan must be submitted and approved at the Village Masterplan stage prior to the submission of any reserved matters.
5. **Advance planting:** Planting of green corridors and buffers will take place in the first planting season immediately following the approval of the Strategic Landscape Master Plan to maximise the opportunities for screening, visual separation and wildlife protection in accordance with GANP Policy EX1. This will allow the establishment of new tree planting and landscaping in advance of development and assist with the integration of the development within its landscape setting. This is particularly important to reduce the visual impacts of the proposed football hub which we strongly maintain is the wrong type of provision, in the wrong location and oversized.
6. **Active travel:** A comprehensive active travel network of walking and cycling routes connecting key destinations and extending to existing settlements will be agreed as part of the Strategic Landscape Master Plan and developed in advance of the occupation of the first houses to support sustainable travel modes from the outset of the development. No occupation should be permitted until a safe and sustainable route has been provided from V7 to the primary school. This is in accordance with the sustainable transport strategy for the Gilston Area and GANP Policy TRA1.
6. **Design Codes:** An overarching Design Code will be submitted to and approved by the local planning authority prior to the commencement of development and approval of the Village Master Plan. The Design Code should be prepared in consultation with the local community and should clarify village character taking into account the character of typical East Hertfordshire villages, individual village identity, appropriate scale and massing, relationship between built form and landscape, etc in accordance with GANP Policy AG6. GANP Appendix 3 provides an adopted definition of local and village character which has the support of the local community. GANP Policy BU1 also makes specific reference to appropriate heights and densities.

The Design Code should provide the controls and details that qualify appropriate heights and scale, which are expected to be well below the 'maximum heights' identified in PP6, which should not be interpreted as consented typical heights (see above).

The HEGNPG suggests that a Strategic Design Code is also prepared by the Local

Authority and adopted as SPD, as envisaged by the Secretary of State's letter to all Council leaders. Only a public planning document will guarantee extensive and open consultation with the community. A Strategic Design Code should cover key matters such as village character, landscape edges, massing, heights and density.

7. **Mitigation of Traffic Impacts:** Development and first occupation of the residential or commercial units will not be permitted until a detailed assessment of the cumulative impacts of traffic (including development and construction traffic) on existing communities has been undertaken and adequate mitigation measures are put in place. This will include assessment of delays, road safety, pedestrian and cycle accessibility, air quality, noise and place-making at Church Lane, Acorn Street, Pye Corner, Gilston Lane and Fifth Avenue during construction (say at 5 years intervals or following agreed development milestones) and at completion. The requirement for mitigation is in accordance with GANP Policy EX1.
8. **Provision of other necessary Infrastructure:** Prior to the commencement of development, details of the following infrastructure provision will be submitted to and approved by the local planning authority:
 - a. **Burial grounds** in accordance with Policy GA 1 and considering that local cemeteries will not have the capacity to serve any significant increase in population.
 - b. **Flood mitigation**, including, but not exclusively, the Airfield and Hunsdon Village via Drury Lane and Cockrobin Lane.
 - c. **Education facilities** including details of the (cumulative) trigger points in housing delivery for the opening of the primary school in V7 which should be responding to actual needs and including needs that may be arising as a result of development in V1-6. A primary school should be provided in V7 as soon as the quantum of children to make that viable is achieved. That quantum is recognised by HCC as a half-form entry (15 children) which equates to 250 homes. Any delay in opening a school when that milestone is reached, for whatever reason, should preclude further occupation.
 - d. **Community facilities** including health and cultural facilities and facilities for children and young people.In addition, provision should be included in the S106 for the following:
 - e. **Sport and play facilities in Hunsdon and Eastwick** where a Multi Purpose Games Area and accessible open space and play space for children are already needed. GANP Policy EX1 stresses the importance of integrating with local existing communities: it is disappointing that so much funding is diverted to Harlow's needs (infrastructure and community facilities) while the needs of local communities, which will be so heavily impacted by the development, have not been considered.
 - f. **Support for local communities to deliver the Priority Projects identified in Appendix 4 of the GANP**

PART 4

Gilston Area Stewardship and Governance Strategy

As we have previously stated in our responses to the V1-6 OPA, we broadly welcome this Framework document and support the concept of a single Community Body incorporated as a registered charity in perpetuity for the Gilston Area Development. The Stewardship and Governance of the Gilston Area is a massive subject in itself and will require expertise, commitment and leadership from the developers, the planners and the people who live here now and in the future.

We have commented on a previous draft though were disappointed that a number of our suggestions were not included in this version. Some were, which we were pleased to see. We have made our views known to PfP and to the planners at EHC.

One of our principal objections was that though it attempts to set the approach to place management, and to define the community assets and the structures to achieve their transfer and funding, it leaves far too much detail to the S106 agreement which the Council is negotiating with the developers. That is not a public document at this stage and will not be until it is signed, so we have no clear indication of the extent of the developers' financial commitments and legal obligations, nor will we until after the Outline Planning Application is heard when it will be presented as a "done deal". We have been told that heads of terms will be published soon to give some idea of what will be agreed but they will not be specific or exhaustive enough.

Secondly, the document is lacking in the following respects:

1. It is ambiguous and vague about the area and people it is intended to benefit- in our opinion, it should at this early stage be ready to make it clear that the Charitable Body will be for the general public benefit of the people who now or in the future live or work in the geographical area at present comprised within the boundaries of the Civil Parishes of Hunsdon, Eastwick and Gilston as this is where the development is intended to take place and the Charity should be accountable to those people. There should be no suggestion that a wider population outside this area or in Harlow should be beneficiaries of the Charity. We consider this a key point and if it is not agreed we see little prospect of being able to support the proposed structure.
2. The proposed participation in membership and on the Board of Trustees of the Charity will be an important element to ensure proper representation and accountability but we consider that the proposals in the document will leave the local parish councils under-represented which will prove to be undemocratic and lead to difficulties in the future . The Parish Council structures in the Area will need a wide scale review in due course so that they continue to fully represent the electors who live or come to live in the area and they can fulfil their role, both financially and democratically. The Framework Document makes certain suggestions on this but is in danger of seeking to impose a developers' solution rather than seeking a well thought out review which has regard to the views of local people.
3. We are pleased that the Document acknowledges the GANP policy D2 about Stewardship but it fails to recognise Policy AG7 which stipulates the early delivery of community ownership and the long-term stewardship, protection and maintenance of the

Community Trust Open Space Land identified for special protection in the District Plan. The Neighbourhood Plan is an important Planning document which forms part of the Statutory Development Plan and carries equal weight to the Local Plan and which neither the developers nor the planners can cherry-pick from and ignore what does not suit them - a point we have made elsewhere a number of times and will continue to make.

In Conclusion:

The HEGNPG are firmly committed to securing a high quality development appropriate to the local area, as initially identified in the Concept Development Framework which formed the basis of a statement of common ground between the developers and the Council (November 2017), and as subsequently enshrined in the adopted Gilston Area Neighbourhood Plan which has the widespread support of the local community and is now a formal part of the statutory development plan. We are not seeking to delay or impede progress of the project, only trying to protect and preserve the original concepts advanced by the developers and supported by East Herts and the local community and to ensure the development is in accordance with adopted policies in the Local Plan and Neighbourhood Plan. However, we have very serious concerns about the way this is progressing and the impact of the changes introduced by the developers which threaten to undermine the principles underpinning the allocation. With so many key matters unresolved, unless the necessary controls are in place in the outline planning approval, we are very fearful of the outcomes and the irreversible damage which will be done to our shared vision for the Gilston Area.

We believe that the Gilston Area has the potential to become an exemplar development of outstanding quality provided the issues set out in our representations are directly and openly addressed prior to determination of the outline planning application.

We look forward to further discussions with you.

Kind regards,

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