

Hunsdon Eastwick and Gilston Neighbourhood Plan Group

Channoeks Farm

Gilston

Nr Harlow

CM202RL

BY EMAIL ONLY TO

Planning Dept.
East Herts Council
Wallfields
Pegs Lane
Hertford
SG13 8 EQ

FOR THE ATTENTION OF ADAM HALFORD

9th August 2019

Dear Sir/Madam,

**RESPONSE TO THE GILSTON PARK PLANNING APPLICATIONS –
PRIORITY AND GENERAL ISSUES**

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 the planning applications.

We would welcome further discussion with the authorities and with the 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 your District Plan Policy GA1.

The community recognises that the OPA includes some very positive and strong proposals which are to be welcomed, and these are highlighted in Section 5 below. However, due to the scale and impact of change in the area, we feel that more needs to be done to give the community the confidence they need that the impacts of the proposed development will be

adequately mitigated and managed and that it will be delivered in accordance with the agreed vision and principles set out in the Concept Framework; a key document presented by the applicants, and EHC, to the Examination in Public (EiP) of the Local Plan to justify Policy GA1 and so this development.

For this reason, the Parish Councils and their communities feel it necessary to express its overall **objection** to the outline planning application for the 6 new villages and the detailed applications for the Central and Eastern Crossings of the Stort Valley, as currently submitted.

OVERARCHING ASPIRATION

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. In these circumstances, the community has the right to expect an 'exceptional development'- something which was reiterated by the Inspector at the EiP. 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 the existing community. This is in line with the promises given to the public at the District Plan EiP, many of which were clearly demanded by the Inspector as necessary for approval of EHC's Local Plan.

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 District Plan EiP and during community consultation events. While many worthwhile elements are included in the application, we are of the view that changes need to be made before the scheme is one that can be considered for consent under Policy GA1.

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 should have been 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 District Plan Policy GA1:

- Documents for formal approval. It is understood that not all of the documents have been submitted for approval at this stage and many details will be subject to later approval. We have therefore focussed on the documents for approval as part of the OPA:
 - Application form – setting out the quantities of development proposed (8,500 residential units, 74,200sqm education and community floorspace, 25,100sqm or retail, business and leisure floorspace and 3,000sqm of sport and recreation facilities)
 - Drawings: including indicative access general arrangements and a number of Parameter Plans that will provide the framework for reserved matters applications.

- Development Specifications – providing details and sometimes sizes of elements within the development
- Strategic Design Guide – setting out the design principles
- Supporting Technical Documents, including the Environmental Statement, Housing Statement, Infrastructure Delivery Plan, Design and Access Statement etc. These are intended to provide evidence that the development is in conformity with planning and other requirements governing development – but they are not in themselves to be approved.
 - Of these a set of requirements for *Environmental Mitigation Works* will be agreed between applicant and planning authority and will become a planning condition.
- Supporting Strategies, describing the intentions of the developers on Housing, Landscape, Placemaking, etc. These describe the intended direction of travel.
 - Of these the Governance Strategy will presumably be used as a starting point for the *governance agreements* included in the S106 (among other things), which will become legally binding.

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.

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

1. Issues relating to the need for an integrated approach to development in the Gilston Area
2. Issues that form part of the Outline Planning Application and are not in accordance with the Concept Framework and the spirit of Policy GA1
3. Smaller scale issues which are not in line with the Concept Framework or Policy
4. Detailed Applications for the Central and Eastern Crossings
5. Issues relating to Delivery
6. Issues which have the support of the Community

1 – ISSUES RELATING TO THE NEED FOR A HOLISTIC AND INTEGRATED APPROACH TO DEVELOPMENT IN THE GILSTON AREA

The removal of Green Belt designation was justified at the EiP 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. The absence of the proposed Village 7 from the OPA severely prejudices the aspiration for exceptional quality across the whole area: in effect it makes this Application conditional on the promoters of Village 7, placing on them the duty to deliver the essential piece of the coherent and integrated overall plan promised in the District Plan. The present application does not consider ‘comprehensive and integrated development’ including:

- a) how present and future residents of Village 7 and Hunsdon will be integrated in the Garden Villages or become sharers of local infrastructure outside the scope of this application;
- b) the interface of the current application with the potential mineral extraction adjoining the site further west;
- c) the relationship of Villages 1- 6 and the wider Harlow and Gilston Garden Town initiatives and aspirations;
- d) Village 7’s highway connections to Villages 1 – 6 and the A414 at Church Lane.

We therefore believe it is necessary for the scope of the Outline Planning Application to consider the whole of Policy Area GA1 and to provide at a unified vision, coherent landscape structure and governance strategy for the entire policy area. Should this not be possible, and the two areas (Villages 1-6 and Village 7) remain separate applications without a common vision and governance, we suggest that Village 7 should not be permitted in this plan period. Greater consideration should also have been given to the relationship of the development to the vision and Garden Town development principles for the wider area.

The application also fails to provide a comprehensive approach to the whole area in another aspect: it does not consider how to deal positively with the change imposed on the existing villages. The lack of consideration given to the existing settlements and the proposed mitigation measures are insufficient to demonstrate an ‘exceptional’ quality of development, when the existing villages will be so significantly impacted by new development. The community welcomes the measures indicated in Section 6.5 Early Wins of the Development Specification – but considers that **the developers should provide a more comprehensive approach to ensure that the existing settlements in the Eastwick and Gilston and Hunsdon Parishes are positively considered as part of the overall scheme: respected in their integrity, supported to flourish in a time of great change and placed at the foundation of the future community.**

The applicants should demonstrate that:

- The existing settlements will be enhanced as part of the overall scheme and be able to benefit from access to facilities, improved services, etc.
- Key views over the countryside from the settlements will be maintained and the rural setting / character retained.

- Existing wildlife habitats and corridors will be retained, and biodiversity preserved, or enhanced.
- There will be proper accountability for the implementation of local improvements and continuous communication to the existing and new community.
- All utilities (not only broadband) are brought into parity with the new development.
- Access to new community facilities and transport provision will be facilitated.
- The existing access for residents will be respected (Gilston Lane etc.)
- Early landscaping to reinforce and protect the settings of existing settlements will be implemented together with the transfer of land to community use and ownership.

- A. Policy GA1 clearly identifies the Concept Framework (CF) as a key benchmark and a material consideration for the determination of planning applications. Following extensive community engagement in the development of the vision and principles set out in the CF, the Council presented it to the District Plan EiP and subsequently endorsed the document in July 2018 for Development Management purposes. Indeed, the importance attached to this document by the Council was evidenced at the public exhibitions and information events relating to the planning applications, when several copies were made available together with copies of Policy GA1. The CF not only matters because of its planning status, but also because it has been the focus of such intense community involvement as referenced in Policy GA1. We are therefore concerned that the planning applications cannot be easily understood by the community in relation to the CF. The Design and Access Statement (DAS) adopts some of the formatting and illustrations from the CF, but does not adopt the Vision and Development Principles, which have been jointly agreed by promoters, local authority and local community. The Strategic Design Principles refer to the Garden Town vision but cannot be easily 'mapped back' to the CF. **The applicants should integrate their applications with a clear narrative on how the Vision and Development Principles of the CF have been carried through and how the details previously agreed have been followed to demonstrate that the CF has been used as a benchmark in accordance with Policy GA1.**
- B. Policy GA1 places great emphasis on collaborative working with the community and we welcome the reference made by the applicant to the Garden City principles of *strong vision, leadership and community engagement* (GA1/III first bullet point; also included by the applicants in the CF Vision Statement). However, the Statement of Community Engagement, which lists a number of occasions in which the applicant has met with the community over the years, fails to describe how input from the community has informed the options and design choices and in particular how the collaborative working on the CF has informed the planning applications. The Community, through the NPG has been championing the collaborative development of the Governance principals but this work has been thwarted by a consistent lack, over essentially the last year, of engagement with them to develop the concepts; in short there appears to be a real unwillingness to engage with the community. Overall, whilst the community feels that they have been made aware of the proposals (after they have been formulated), they have never had any genuine influence on the way development choices have been made. This is highlighted by the limited reference made to the CF consultation and to the applicant's preparation of

a new vision and set of development principles to accompany the planning applications. **To respond to Policy GA1/III the developers should provide clear evidence of how community input has resulted in material changes to the proposals.**

C. The S106 Head of Terms should be revised to include:

- ***Comprehensive Governance Strategy*** - PfP have provided the framework for the future Governance of the area, with some good strong principles and some weaknesses. To date the Parish Councils have been denied the opportunity to have real input to the proposed governance structures and it will be very important that the Parish Councils and the community have time to adequately reflect on alternative possible governance structures and what role they will take. A seminar was held in October 2018 but none of the follow up actions have happened and, as a community, we have been requesting meetings to develop the governance anticipated in Policy GA1 in a collaborative manner but have not been given a further meeting. Further discussions need to take place with the applicants and the Council to agree what modifications to the Governance Strategy are necessary. **The Governance Strategy must relate to all 7 villages and not only the 6 covered by the current OPA, as guarantees are needed that the overall area will be managed effectively, coherently and in the interest of all current and future residents.**
- ***a Governance Structure / Community Vehicle*** (Schedule 6) with the open support of the Parish Councils and the existing community
- ***Comprehensive Infrastructure*** and development commitments (Schedule 1) should not only apply to new development but should also **address how the scheme integrates with the existing communities** and a CIL-equivalent contribution for necessary upgrades within the existing areas should be agreed.

D. Policy GA1 requires the transfer of part of the area designated as Community Trust Open Space Land in the District Plan to the north west of the site to a Community Trust Paragraph 11.3.7 of the District Plan refers to “delivery early in the overall development programme” and the Concept Framework states at pp140-1 that it will be “placed in a locked trust **prior to commencement** of the development”. Furthermore, Policy GA1/VII makes specific reference to the provision of “mechanisms to secure the long-term stewardship, protection and maintenance of the parkland, etc”. Hunsdon Airfield and Eastwick Woodland are important areas of open space for the existing communities, and the Airfield has a strong legacy within Hunsdon: for these reasons they cannot be considered resources to be planned only for the benefit of the ‘new’ communities – they already are very important for the communities of today. The Infrastructure Delivery Plan suggests the following trigger points, but the community considers this to be unjustifiably open ended:

- The timing for the ‘early’ transfer of land by the applicants is not set out in the application, nor the commitment to form a local working group to plan the future of these areas
- Interruption of non-conforming and noxious uses on the site (which have strong impacts within Hunsdon) have not been identified, but are a priority.

- Commencement of improvement works is suggested by the applicants as only after occupation of the first 1,000 homes, in contrast to the District Plan policies, as if the current residents did not count.
- Completion, is proposed by the applicants, only after occupation of 5,000 homes (60% of total site) – presumably in 10-15 years time so current residents alongside new residents will not benefit properly from this planning gain for decades which is at odds with District Plan policy.

Endowments for long-term maintenance need to be detailed and the suggestions of new commercial uses on the site should be excluded.

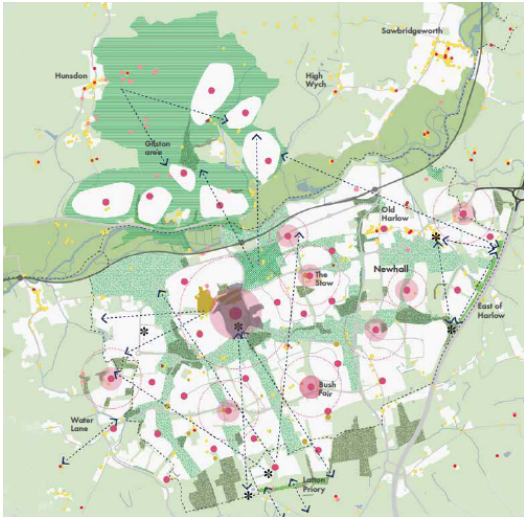
The applicants are invited to clarify the reasons for the unacceptable weak response to this requirement of Policy GA1. An earlier transfer of the land to a Community Trust with adequate funding streams in place had been anticipated to help to mitigate the impacts of development on the community. It is also an important component of Policy GA1 **so needs addressing now, not in years to come.**

E. The OPA is of a scale and volume of material that make it virtually impossible for the community to evaluate the proposals within a short consultation period. There are nearly 200 documents on the Council Website and the appendices of the Environmental Assessment alone comprise 76 documents and a total of 7,800 pages approximately, assembled over a period of years by a well-funded professional team. It is impossible for individuals to access and review these documents online. For example the Non-Technical Summary of the Environmental Assessment does not include the verified views of the development, which are contained in a separate document, making it both difficult to understand or cross reference (no indication is provided of what is in front or behind) and incomplete (no verified views have been provided of the proposed crossings - which is of great concern to us given that these are part of the detailed planning applications). **More should have been done to ensure that the community had access to the documents and had the opportunity to properly consider the submitted documents. This could potentially have included better summaries, clearly identified key documents on the portal and the local availability of hard copies of the key documents.**

2 – 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 Development Specification (which we understand have been 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 the Concept Framework and Policy GA1 and will require 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.**

A. *Villages in the landscape* – The Harlow and Gilston Garden Town makes a clear distinction between Gilston and Harlow. This is reinforced by the Development Principles of the Concept Framework (‘Well Connected but Distinctive from Harlow’). It is also very explicit in the illustrations and diagrams in the Garden Town Design Guide (one of which is included here), which show villages set in the landscape in the Gilston Area, and interlocking districts separated by green wedges in Harlow. This different balance of development and landscape between urban districts and villages has not been embraced by the applicant whose Parameter Plans show a compact set of interlocking districts separated by corridors of minimum width (see B and C below).



The applicant should demonstrate how the concept of individual villages in the rural landscape will be secured as part of the Parameter Plans. Redefinition of the village boundaries and a clearer separation between villages is required to reinforce the concept of 7 separate and distinctive villages in the Gilston Area.

B. *Distinct villages with meaningful separation – Village Corridors*: The Parameter Plans identify Village Corridors as the ‘meaningful separation’ for the purpose of planning and avoidance of coalescence. The Village Corridors are indicated as being between 10-40m wide in the Development Specification (i.e. the size of a garden). There is no national guidance on how wide the separation should be- it must be determined in the context of the vision and development principles for the Gilston area. However, typically, in this type of context, it would be more that an agricultural field, or around 200-300m. The gap between Hunsdon and Widford (which is described as a virtually continuous development by the applicant) is 70m wide. The proposed separation between existing settlements (for example Eastwick around St Botholph’s Church, at the back of the properties east of Gilston Lane and Channocks Farm) and at the edge of the site towards Village 7 as currently shown on the Parameter Plan is non-existent.

The principle of avoiding coalescence between settlements is very well established in planning policy, and the applicant has failed to respond to the principles set out in the Concept Framework (the joint creation of which they were deeply involved in), in the Garden Town Design Guide and in good practice. Redefinition of the village boundaries is required to ensure that an adequate separation distance and open landscape corridor is provided between individual settlements.

- C. *Distinct villages with meaningful separation – Strategic Green Corridors*: These are required not only for separation but are also identified as important wildlife corridors running north-south (we note that there are no east-west corridors identified and no justification for this is provided). There is also no identification on the Parameter Plans of how the development area will interconnect with the wider wildlife network (linking to the Stort Valley, Lee Valley Park, Epping Forest, Hatfield Forest etc). To the east of Gilston Park the corridor is broken up and only one hedgerow wide: this is clearly inadequate to provide a suitable corridor for wildlife to flourish. Most of these ‘Strategic Corridors’ are narrower than the urban wedges of Harlow, and are proposed to be flanked by access roads and front facing properties, and therefore affected by light and noise. This would diminish their biodiversity value.

The applicant has not provided adequate justification as to the effectiveness of the corridors for wildlife, especially for larger animals.

- D. *Country Parks and Community Parks*: The Parameter Plans and Development Specifications do not make a sufficiently clear distinction between Country Parks and Community Parks as both types of park are identified as having a range of recreational / commercial facilities. The agreed vision set out in the Concept Framework clearly refers to an ‘enhanced rural setting’ and development in the Gilston Area taking inspiration from the Hertfordshire countryside. This concept is not clearly addressed in the Design and Access Statement and it is blurred in the Development Specification. Country Parks should be clearly rural in character, have minimal and peripheral parking, no new buildings and no non-conforming or noxious activities. Commercial / built leisure which would attract large volumes of visitors and car borne traffic and detract from the rural setting of a Country Park (such as a rope-walk park) should be excluded in favour of the informal enjoyment of wildlife and countryside. Community Parks are located in very sensitive positions, affecting views and the setting of major heritage assets: it should be made clear that parking will be limited and lighting and buildings designed to minimise impact, especially at night. There should be provision for flood-lit sport facilities outside these parks and other sensitive open land to remove pressure and reduce impacts at these locations.

Clarification is needed as to the role and character of the Country Parks as opposed to the Community Parks, with the provision of clear guidance and restrictions to ensure an ‘enhanced rural setting’ is provided taking inspiration from the local Hertfordshire countryside.

- E. *Access to Natural Greenspace Standards*: The Development Specification does not indicate if Natural England’s Access to Natural Greenspace Standards (ANGSt) have been adopted as guidance in the provision of natural greenspace (as opposed to open space requirements relating to parks and recreation).

Clarification of the adopted approach and standards which have been applied to assess access to natural greenspace is required to demonstrate that the aspirations for ‘exceptional development’ will be met.

F. *Removal of Hedgerows* in Village 4 is not supported by any explanation and evidence and it is contrary to the statement of 'landscape led development' and retention of landscape features. Furthermore, it is considered premature to show landscape features and existing vegetation to be removed in advance of preparation of the Landscape Masterplan.

Clarification is needed of the reason and necessity to remove the hedgerows in Village 4. We would wish to see this deleted from the Parameter Plan and addressed in preparation of the Landscape Masterplan.

G. *Buffers to Woodland and Veteran Trees*: we are concerned that the proposed buffers of 20m around Ancient Woodland, 10m around Woodland, etc. are 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.

The OPA should demonstrate how Natural England's Standing Advice on Ancient Woodland and Veteran Trees has been applied.

H. *Stort Valley Park*: The Stort Valley is the remaining Green Belt separation between Harlow and Gilston and clearly considered a 'natural boundary' from both sides. In the Concept Framework it was clearly indicated that the land ownership and leadership provided by the Gilston Park Estate development would lead to the creation of a natural park in the Stort Valley and consolidate the separation between the settlements. The Stort Valley Partnership, which the developers say they will work with, has not played an active role in this area for some years. There is no indication that the developers have made any meaningful contact with the adjoining landowners along this part of the River Stort and other relevant stakeholders. Nevertheless, many promises were made in connection with the integration of this important resource in the development without any evidence of consultation or collaboration to ascertain if the creation of a park is supported or even viable. The community consider this of vital importance and feels that the current provision of a simple 'contribution' as referred to in the OPA lacks the leadership and vision embedded in Policy GA 1 and so strongly advocated by the Garden City principles. Without a clear commitment to providing the promised leadership to deliver the Stort Valley Park, we have no confidence this will happen or that the commitment to delivering the park is real.

The OPA should include a firm commitment to delivery of the Stort Valley Park in a collaborative, viable and meaningful way during the course of the development period and this should be reflected in the S106 Heads of Terms.

I. *Residential Development Area (Village 4)*: The Parameter Plans indicate residential development (Village 4) up to the edge of Policy Area GA1 underneath the pylons (which has been identified as an area where building will not be possible due to the safeguarding requirements associated with the pylons) and over Gilston Fields Community Park. This is not consistent with the Concept Framework and with the different designation of Gilston Park.

Clarification is needed as to the reasons for these discrepancies and why the land under the pylons has been included in the Development Area. We also request

reassurance that constraints on the development of this land due to proximity to the pylons will not result in higher densities across the developable areas of the site.

- J. *Heights*: The Parameter Plans are unclear and leave a lot of flexibility in all areas (from 10 to 15m ground to roof +/- 2m). Zones for 18m maximum height have a % footprint limit for the maximum height, but it is not clear how the remaining area will be controlled. Typically, taller buildings are shown as being located higher up the slope in more prominent positions. The verified views in Appendix III of the EIA are confusing and incomplete and will be analysed further in the coming weeks. Given that a typical village house is 10m high, and that 12m in contemporary development corresponds to 3 floors (with roof conversion), the controls are not considered sufficient to ensure compliance with the 'village' concept.

The Height Parameter Plan and Development Specification are inadequate to control visual impacts and to ensure that the design is reflective of the village concept required by Policy GA1 and the Concept Framework. It leaves too much uncertainty and lack of control over the height of future development.

- K. *Density*: an application of this scale and sensitivity would be expected to provide Density Parameter Plans with clear specification of average density and the maximum density of the main component parts of the proposals (villages and village cores) i.e.: to show areas of low, medium and high density and to specify the density ranges within each band. The density ranges should comply with the density ranges considered appropriate for Garden Villages and the guidance in the Garden Town Vision and Design Guide. No Parameter Plan has been provided and we have no confidence that development will proceed at an appropriate density.

The OPA should include a Density Parameter Plan with sufficient detail to provide appropriate guidance for future development.

- L. *Soft edges – frontages*: The Strategic Design Guide submitted in support of the OPA proposes direct frontages and soft edges but fails to provide adequate illustration / specification of what that means. There is concern that direct frontages are typically compact, rather than soft, and will have an access road in front. Some of these proposed 'soft edge frontages' are separated from the next village by only by a hedgerow / 10-20m corridor which is supposed to represent a meaningful transition and a dark wildlife area: the concept put forward in the Strategic Design Guide is not sufficiently explained and needs clarification before it can be supported.

The intention of 'soft edges' with direct frontages and potentially fronting onto access roads as set out in the Strategic Design Guide should be clarified as part of the OPA as it is essential to evaluate the soundness of the landscape corridors separating the villages (point B above).

- M. *What makes Gilston an attractive place is dependent on embracing the heritage and character of the area*: The OPA Parameter Plans, Development Specifications, Strategic Design Guide and EIA indicate that listed heritage features are retained by the development. However, it is not clear how their setting is not only protected, but also how

it would be used as a driving inspiration for the character of the new development. The Concept Framework makes specific and frequent references to local character and Hertford villages. The unique history of the area (the manor houses, churches, Victorian model farms, etc.) is not sufficiently explored and used as reference in the design approach to village development. Too much emphasis is placed on the modern history of Harlow, with which Gilston and Hunsdon share only a functional link, but not a strong spatial and character connection. As a result, we are concerned that the character and heritage (including the setting of Listed Buildings) will suffer unnecessary deterioration, leading to loss of significance.

The applicant should demonstrate that heritage features (including Listed Buildings and Ancient Monuments) are not only protected, but that they are used as a driving inspiration for the character of the development, fully respecting their setting and significance. The Strategic Design Guide should be reviewed in order to better reflect and to protect and enhance the special character of the Gilston Area.

- N. *Primary Vehicular Corridor – Horizontal Alignment:* The Parameter Plan indicates that by Fiddler's Brook the Primary Vehicular Corridor will come very close to existing properties and will run parallel to Gilston Lane. It will also pass very close to Channoeks Farm. More detail of how this area will be designed and integrated to minimise impacts is required. There is no clarity of how the properties along Gilston Lane will be protected from through traffic and noise, and at the same time allowed convenient and safe access to the countryside and to the new facilities of the development which will be only a few hundred metres away. The future status of Gilston Lane, for both its connections to the south and north, indicates that it maybe closed but the applicants have not consulted with residents, or businesses on how they will access their properties.

Noise impact is indicated as locally significant and should be explored in more detail, rather than presented on a map in which they can hardly be noticed. No detail is provided about access and connectivity (vehicular and pedestrian / cycling) from the existing settlements, including Hunsdon. It is essential to understand how the proposals will provide enhanced connections to the existing villages, the vehicular arrangements for the existing properties and how access to the new facilities, bus stops and cycle routes will be secured.

It is not clear to what extent Village 7 transport requirements are taken into consideration and no clear indication is given of the effect of the development on Church Lane in Hunsdon or its junction with the A414, an important and busy junction on the edge of the development and what policy or strategy will be adopted for those. In the EIA noise section (Table 11.4.2) it appears that traffic in Church Lane will more than double on average, but it is not clear what would happen at peak and if this level of traffic already includes Village 7. There is a need for far more clarity on what would be the implications for noise and safety on this narrow lane with limited forward visibility and for traffic within Hunsdon.

Details of the intended arrangements for the Primary Corridor where this runs close to existing properties, the impact on Gilston Lane and Church Lane and

access to facilities from existing settlements need to be clarified before the Parish Councils and NPG can support the proposals.

- O. *Rail impact and access*: The presence of Harlow Town rail station and public transport interchange (and access to jobs along the London-Cambridge-Peterborough corridor) has been advanced as a key justification for locating substantial development in the Gilston Area. Presumably a large proportion of the new residents are expected to use the station on a regular basis. No assessment of rail travel demand or consideration of the need for increased services is provided, nor of access requirements to the station directly resulting from the development: car access, bus access, safe cycle access and cycle parking and footway widths. As a result, it is impossible to understand whether the current provision is adequate and what level of investment is needed to maintain functionality of the station. A development of this scale and ambition could potentially need to secure pedestrian and cycle access from the north, if the current station facilities are inadequate. A northern station entrance should be considered in any case as a more convenient alternative from Fiddlers' Brook via the towpath, from Burnt Mill Lane (by the Dusty Miller), and from Fifth Avenue. The applicants have alluded to the new northern entrance to the station but have declined to deliver it or show how it will be delivered; this cannot be just ignored- it is a major and foreseeable development impact.

The OPA should be integrated with a proper assessment of rail access needs and the applicant should demonstrate why, given the scale and ambitions of the development, improved access to the station (including a Northern Access) is not necessary.

- P. *Transport in general*: 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 but fails to provide any specific analysis and targets or details of how this will be achieved:

- It does not provide a reasoned assessment of the infrastructure needs of sustainable travel to achieve 60% sustainable travel or certainty regarding future provision.
- It does not provide any data relating to expected bus journeys and pedestrian movement at key locations. As a result, no targets to serve these needs is possible.
- It appears that design road speeds and car parking arrangements are no different from a standard development, despite claims of cutting-edge sustainable transport.
- The proposed elevated footbridge and cycle route (including the steep climb from the Harlow side and likely speed break chicanes) is completely unacceptable in a development that claims to prioritise pedestrian and cycle movement.
- Huge reliance is placed on travel management with no assessment of the infrastructure requirements needed to make sustainable mobility a reality.

The applicant fails to demonstrate adequate development of a reasoned sustainable transport strategy and setting of specific targets and corresponding measures. This is not compliant with the requirements of the District Plan and the Local Transport Plan.

3 – SMALLER SCALE ISSUES THAT ARE NOT IN LINE WITH POLICY OR THE CONCEPT FRAMEWORK

In a development of this scale and complexity, it is understandable that a number of issues will be addressed at a later stage (for example through the development of the Village Master Plans, reserved matters applications and discharge of conditions).

However, it is important to note at this stage that a number of the documents submitted require review or have gaps which could result in later detailed submissions not complying with District Plan policy or the agreed vision and principles set out in the Concept Framework. The OPA should therefore provide the following clarifications and supporting information to ensure that the outline permission provides an appropriate framework and parameters for more detailed design work:

- The Strategic Design Guide should be reviewed and amplified to include more a in depth analysis of local character, and reference to Hertfordshire villages, rather than villages in general.
- It should also include specific details of the heights and massing, layout and street/ lane proportions suitable to a Hertfordshire village.
- The size and nature of a Village Centre as opposed to a Neighbourhood Green should be explained as there is no clear distinction between them in the Development Specification.
- The Placemaking Strategy should include a cultural and faith strategy.
- There should be a Community Integration Strategy with a clear approach to integrating the growing and changing community.
- There should be a detailed statement committing the applicants to the integration of the existing villages.
- The Parameter Plans should be reviewed and amended to address the points raised above and to ensure compliance with Policy GA1 and to reflect the agreed vision and principles set out in the Concept Framework.
- The community believes a more integrated approach to light pollution needs to be adopted, especially at the interface with the existing settlements

4 - DETAILED APPLICATIONS FOR THE CENTRAL AND EASTERN CROSSINGS

The Detailed Applications for the Central and Eastern Crossings are incomplete and need to be reviewed and better integrated 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 residential community in two, by driving a major 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 local 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.

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 Pye Corner Gilston and along Gilston Lane.

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 Garden Town as a whole and questions the basis for the planning applications.

In particular:

- A. *Eastern Crossing Design Objectives*: 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. 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.
 - Justification of the merits of rerouting strategic and heavy load vehicles through the residential community on the Eastern Crossing and away from Edinburgh Way commercial areas and the impacts of such a move is not provided – **a full Cost-Benefit Analysis and study of 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 will experience a reduction of actual vehicular movement of 8% by 2040, while traffic in Eastwick Road Pye Corner residential area (by the Dusty Miller) will increase by over 60% and HGV movement increase by 800%. This suggests that road schemes have not been assessed in a comprehensive manner, especially to support

the aims to assist the sustainable transportation aim of the development. **Displacing traffic from Edinburgh Way may be desirable, but it is not demonstrated that it is necessary for the applicant's scheme and sufficient to justify the impacts of the proposed Crossing on the residential community at Pye Corner Gilston.**

- 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, through traffic) and therefore no justification for the specifications of the proposed new roads.**

B. *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 other locations (and so the potential requirement for the use of CPO powers and a Public Inquiry), it is important that the proposed solution is proven to represent the best option. However, both your Council and HCC have confirmed that you have made no assessment of the alternative options before making an application for HE HiF funding. 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.**

C. *Environmental Impact Assessment and Non-Technical Summary*: These have been provided for the whole of the development 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. At least a **specific Non Technical Summary for each of the Crossings should have been provided and integrated to ensure that the Detailed Applications and the potential impacts of the proposed Crossings can be adequately considered and understood with illustrations of the Verified Views, and details of predicted noise and air quality changes.** In particular:

- 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. A full Heritage Assessment should be provided.
- D. *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. There is therefore no understanding of the degree of priority given to sustainable travel or the adequacy of the provisions made.
- E. *Rail 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.
- F. *Design of the cycle and pedestrian bridge*: This has not been included, despite forming an essential part of the Detailed Application. Its adequacy, desirability and feasibility are essential to the functioning of the junction and therefore the validity of the design proposed for Detailed Approval.
- G. *Pye Corner Gilston*: 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. 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.

4 – ISSUES RELATING TO DELIVERY

We have not had the opportunity to fully review the Heads of Terms of the S106 Agreement and we expect to be engaged in more detailed discussions with the applicant and Council, as many matter touch directly on the community. We would however wish to highlight some general concerns relating to:

- The trigger points for infrastructure provision- the Community has made clear its concerns about the capacity of existing infrastructure to accommodate the demands now, let alone those arising from the new development. The community would therefore wish to see the provision of necessary infrastructure in advance of development to ensure that needs can be adequately accommodated without placing further pressure on the existing community and the already overloaded infrastructure.
- The developers have indicated that new services will be extended to the existing communities but have made no firm commitment apart from indicating early provision of

improved broadband. The community would wish to have a stronger assurance that services will be provided to existing settlements on an equal level to the proposed new villages.

- Early transfer of land not required for development- as previously stated, the community would wish to see the early transfer of land to a Community Trust to help mitigate the impacts of development. This should be accompanied by adequate mechanisms to secure long-term stewardship and maintenance as stated in Policy GA1/VII. We do not want to wait until the end of the development to realise the community benefits promised within Policy GA1.
- Early wins- the community is faced with many years of disruption and would expect to see the early implementation of measures to help mitigate these impacts including advance planting and landscaping around existing settlements and enhancement of heritage assets.
- Construction noise- the community will expect to see further details of how the impacts of construction will be managed and mitigated before the OPA is approved.

6 – ISSUES THAT HAVE THE SUPPORT OF THE COMMUNITY

The community recognises that there are aspects of the Planning Application that are well above the standards of normal development – these are welcomed and openly supported:

- The OPA (Development Specification) commits to a high proportion of affordable homes and makes explicit reference to delivering a mixed and balanced community within each Village, “having regard to what has been specified in other Village Masterplans that may already have been prepared and ensuring that the approach proposed does not prejudice future village delivery” (3.3.4 of Development Specification).
- The commitment to distribution of a mix of affordable properties across the site, with tenure blindness, etc. and the commitment to include housing with associated support and care services and opportunities for custom and self-built homes (Strategic Design Guide Section 3)
- Statements in the Strategic Design Guide about the quality of homes, generous space standards, adaptability / flexibility
- Proximity of active open space from the new villages, enabling active and healthy lifestyles
- The concept of mixed-use community centres, planned to become the heart of each community with a distinctive ‘village’ character, and designed as a destination within each village, providing services and support to the community and laid out to be pedestrian friendly, adaptable over time and active.
- The developers wanting to retain long term ownership and so be a part of the community; this is to be welcomed

In summary, the OPA should be integrated to ensure that comprehensive and integrated development could be delivered at Gilston in a way that truly represents exceptional quality and a model of sustainable development. Clarification and tightening of the Parameter Plans in respect of separation between villages, strategic wildlife corridors, height and density are needed to ensure that Policy GA1 of the District Plan, the Vision for the Garden Town and the guidance of the Concept Framework are respected. The detailed road applications seem to have a conflict at their heart as they address not the needs arising from development in the Gilston Area but a reworking of the A414 as a strategic road corridor and so seek to move vehicle traffic from a commercial area to routing it through a residential area while the OPA claims to produce well designed new villages but dramatic reductions in the environment for existing community.

Despite the many positive statements as a community **we cannot support the applications, as submitted, so urge the Council to seek better outcomes or reject the applications in their current form.**

Yours faithfully,

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

cc Mark Prisk MP

Cllr Eric Buckmaster

Guy Nicholson, Chair, Harlow Garden Town Board