

Hunsdon Eastwick and Gilston Neighbourhood Plan Group (The Group)

Channoeks Farm

Gilston

Nr Harlow

CM20 2RL

Louise St John Howe, Programme Officer

Cllr. Linda Haysey, Leader, East Herts

Adam Halford, Planning Dept., East Herts Council

Cllr Eric Buckmaster, Hertfordshire County Council

Mark Prisk MP

BY EMAIL ONLY

28 March 2018

Dear All,

Response to East Herts District Plan consultation on the Main Modifications following the Examination in Public of November 2017 – Gilston Area Proposals

1 Introduction

The Group is formed by the Parish Councils of Hunsdon and Eastwick and Gilston and community members. It represents and responds on behalf of the wider community in all the villages and house groupings directly affected by the Gilston Area proposals of Policy GA1. The Group has a website, is in constant communication with the community and has organised community workshops in September 2017 and January 2018, which were attended by 60-100 people each time.

The Group has been actively engaged at every stage of the District Plan process and this reflects the very widespread community concerns about the impact of the massive scale of development proposed in the Gilston area. Over the past months, we have worked with EHDC and Places for People (promoters of the Gilston Area development) in a spirit of trust and collaboration, so that the proposed development could be of a quality and nature compatible and appropriate to the character and identity – should the land allocation be approved, and the Green Belt modified (which of course nobody in our community supports as a matter of principle).

2 The Key Issue

Since September 2017 we had been led to believe that the Concept Development Framework (CDF – sometimes also called Concept Framework), would become a key Council document to be used to guide and assess any future site wide master plans and planning applications. This was confirmed, and minuted, in the Council organised Gilston Area Steering Group meeting of 25 October 2017, where we were given full assurances of the Council commitment to collaboration and joint work with the community, leading to a jointly developed CDF, which should have been subject to public consultation this spring prior to its formal adoption by the Council. The minutes of this meeting were submitted by the Council to the Inspector appointed to undertake the examination of the Draft District Plan in advance of the Gilston session that took place on 8th November 2017. The site promoters additionally confirmed to the Inspector their substantive agreement with the communities proposed amendments.

The community has worked really hard to help shape the Vision and Principles contained in the CDF calling for development as a series of distinctive and independent villages, within a rural setting, and distinct from the urban area of Harlow. This Vision and Principles were jointly developed and agreed between the community, EHDC and Places for People and a helpful number of our proposed changes, but not all, were integrated into a Revised CDF (December 2017). The Revised CDF was the subject of a community workshop in January 2018. While some aspects of the Revised CDF, such as Vision and Principles and some of the visuals, are a welcomed response to our concerns, the community continues to have concerns about the document as a framework for development in the Gilston area and require further review prior to its adoption by the Council. In particular, we must remark that:

1. The CDF has broadly remained a promotional document supporting the site allocation in the District Plan, rather than the promised guidance for development and the determination of planning applications.
2. Many of the details within it are in direct contradiction with the agreed Vision and Principles of distinctive and separate villages, in particular references to heights ‘typically 3-4 floors’ and 5 floors, a dual carriageway with side lanes as a Primary Street, separation between villages often not larger than a lane and hedgerows, etc.
3. EHDC has made, what appears to be an apparent U-turn as to the status of the document (as highlighted in the proposed Main Modifications), which is now that of simply an agreed document to be used as a ‘benchmark’ for the development, which we have been told will not be subject to any further consultation or revision despite the many outstanding concerns raised by the local community and other consultees.

Because of these three key concerns, we do not have confidence that the Revised CDF will be a sufficiently robust document to guide the development in its current form, nor to be used at planning application stage.

We are hugely disappointed, as we believe that a development of this scale, with such profound impacts on the countryside and massive alteration, on a national significance, to the Green Belt, should be subject to intense scrutiny and robust planning guidance. The CDF could have been developed into a Supplementary Planning Document developed collaboratively with the community, paving the way to a good master plan and less controversial planning application stages.

The status of the CDF and the need for a robust policy framework to determine planning applications was specifically raised by the Inspector at the Examination. Because of the weakness of the CDF, it is essential that the main policies of the District Plan provide clearer parameters for development and a consistent approach.

3 The Main Modifications

We are extremely concerned about many of the Main Modifications as we do not believe these reflect the agreed Vision and Principles in the Draft CDF or the issues raised at the Examination by the Inspector. They fail to address many of our fundamental issues of concern or to give confidence to the community that the impacts of development can be effectively managed.

We have therefore found it necessary to submit detailed representations in respect of a total of 21 Main Modifications- MM/3/04; MM/3/14; MM/3/16; MM/3/19; MM/10/01; MM/11/01; MM/11/02; MM/11/03; MM/11/06; MM/11/10; MM/11/11; MM/14/08; MM/17/01; MM/17/02; MM/23/02; MM/25/01; MM/25/02; MM/25/04; MM/25/05; MM/25/06; MM/A/01

In several places the Main Modifications once more contradict the agreed Vision and Principles and fail to provide an effective and clear policy position:

- The development is referred to in several places as one of several proposed 'Urban Extensions' (presumably to Harlow, in the case of Gilston), undermining the agreed vision for villages in the countryside – MM/3/14; MM/3/19;
- Generic 'Garden City Principles' are included as the only clarification of the quality of the development. While these are not necessarily wrong, they are very generic and obviously fail to capture the specificity of identity of the area and the agreed vision and principles for appropriate development that were jointly agreed – MM/11/01; MM/11/10
- A new 5ha 'business park' is a new inclusion, despite the fact that this has never been discussed with the community and the Gilston Steering Group, in its monthly meetings between November and March, and has not been included in the CDF. In our view a peripheral 'road based' business park is in direct contradiction with the vision of villages with mixed use village centres, and risks increasing the densities, heights or reducing the separation of the villages that are so poorly defined both in the policy and in the CDF - MM/3/04; MM/11/06;
- The Eastern Crossing (which cuts directly through the middle of the existing village of Gilston and its clusters of houses) is now described as a 'strategic relief road to Edinburgh Way' and 'preferred by Essex County Council'. This proposal will cut off the Terlings Park, a part of the Pye Corner community,

and the rest of the village of Gilston and undermine the life of the existing villages – as well as being in contradiction with the principles of sustainable transport in the new villages – MM/11/11;

- Other policy modifications would allow progressive intensification of the development, should housing delivery elsewhere be slower than planned, with no explicit limit to the density and scale of development allowed at Gilston and absence of any Supplementary Planning Document - MM/3/16; MM/25/04.

We are very concerned that the proposed Main Modifications do not address the issues raised by the Inspector at the Examination who recognised the need for a stronger policy framework for development in the Gilston Area. We believe she made it very clear that in the absence of clarity regarding the planning status of the Concept Framework, she expected to see more details about the vision and development principles for the area to be included in Policy GA1 in order to provide a robust policy framework against which to consider any future planning applications. To our recollection she emphasised that the policy needed to be more place specific - and to draw on the vision and development and delivery principles set out in the CDF. As currently worded, Main Modification MM/11/10 fails to do this.

In order to address the issues raised by the Inspector, we believe that Policy GA1 should be modified to include the *shared vision and development principles* set out in the Revised CDF (which are the key part of the document that has been jointly developed and agreed by the Council, developers and local community) rather than the standard Garden City principles currently proposed which could apply anywhere and do not reflect the very specific and unique circumstances of the Gilston Area.

The Council's intention, as communicated to us, is not to undertake any further consultation on the Revised CDF and to endorse it with minimum changes this is *contrary* to the intention of Major Modification MM/11/01, which places greater emphasis on the role of the community in the joint preparation of the CDF. In the light of this modification, we would expect the outstanding issues of concern raised by the community to be addressed prior to the Council's endorsement of the CDF.

Our detailed responses are attached, together with the community responses made to EHDC and Places for People to the Revised CDF following our community workshop of 20 January 2018. These paint a clear picture of the pragmatic and constructive approach adopted by the community and the Group time and time again. I also enclose photographic journal from the two workshops we organised to further underline the depth of the work we have put into giving serious and thoughtful community feedback.

We trust that you will consider our response carefully and support our aspiration for stronger planning and clearer policies to be provided in the District Plan in the interests of a better and more sustainable development, which is more respectful of local identity and the collaborative approaches between existing communities and promoters of big change which the NPPF promotes.

Yours faithfully,

Anthony Bickmore, Chairman

Main Modification

Please state the relevant reference number that you are commenting on (e.g. MM/3/01):

MM/3/04

Do you consider the Main Modification to be legally compliant and sound?

| | | |
|---|------------------------------|--|
| Legally Compliant: | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |
| Positively Prepared: | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |
| Justified: | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |
| Effective | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |
| Consistent with national policy: | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |

Please make your comments below, taking account of whether you feel the Main Modification is legally compliant and sound. Additional sheets may be attached to this form.

The Hunsdon Eastwick and Gilston Neighbourhood Plan Group (HEGNPG) strongly objects to this Modification on the grounds that it has been introduced into the District Plan without any justification or prior consultation. Furthermore, the proposed modification is totally contrary to the vision and principles for the Gilston Area set out in Policy GA1 and the draft Concept Development Framework (CDF), which the HEGNPG has been encouraged by the Council to consider as the guiding document for the development and which has been the basis of community consultation since August 2017.

The allocation of a site of 5 ha within the Gilston Area would require a total review of the CDF and would have very significant highways and environmental impacts which have not been subject to any form of assessment. The only rationale for a 5 ha allocation would appear to stem from the identified quantitative requirement for employment land which has been increased from 11-12 ha to 19-20 ha as a result of new data being presented to the Examination. There is no justification as to why such a significant proportion of this increase should be allocated to the Gilston Area or why this is considered to be the appropriate location for this scale of business park development given constraints on local infrastructure particularly access and the capacity of the strategic highway network.

Development in the Gilston area requires a significant release of Green Belt land. The proposed allocation of a site of 5 ha for employment development in addition to the land required to accommodate the proposed number of new homes and associated infrastructure suggests that a further release of Green Belt land would be required unless the quantum of houses is reduced to compensate for this. No exceptional circumstances have been identified for the release of Green Belt land to accommodate a separate business park of this size in the Gilston area.

The Gilston area is not a suitable location for a large business park and the need for a business park to meet local employment needs has not been demonstrated given the proximity to strategic employment locations in Harlow and the wider region – which were

used to justify the need for housing at this location.

The CDF is based on the principle of the development of 7 distinctive **villages** each with a local centre which would include employment provision as part of a mixed use development. The distribution of activities and employment between the village centres is a key principle of the draft CDF and will contribute to the development of sustainable communities. As employment space is likely to be delivered as part of mixed use development schemes, the reference to land area should be replaced by number of jobs or floorspace. The village centres would not be suitable locations for B2 industrial or B8 warehousing uses as this would be contrary to the development principles for the Gilston area and would adversely impact on adjoining uses and the vision set out in Policy Ga1 and the CDF.

Please set out the change(s) you consider necessary to make the proposed Main Modification legally compliant or sound.

Amend MM/3/04 (para 3.2.8) as follows:

- i) The reference to employment needs in terms of 'business park' or land requirements is misleading and should be deleted. It would be more appropriate to express employment needs in terms of floorspace or number of jobs rather than land area.
- ii) Employment uses in the Gilston area are likely to form part of mixed use developments and cannot be expressed in terms of a specific land area.
- iii) Amend reference to employment development in Gilston area: '**A total of up to 20,000 sq m of B1 employment floorspace or other employment generating uses will be provided in the Gilston Area, to be distributed between the village centres in accordance with the principles set out in Policy GA1**'.

Main Modification

Please state the relevant reference number that you are commenting on (e.g. MM/3/01):

MM/3/14

Do you consider the Main Modification to be legally compliant and sound?

| | | |
|---|------------------------------|--|
| Legally Compliant: | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |
| Positively Prepared: | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |
| Justified: | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |
| Effective | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |
| Consistent with national policy: | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |

Please make your comments below, taking account of whether you feel the Main Modification is legally compliant and sound. Additional sheets may be attached to this form.

The Hunsdon Eastwick and Gilston Neighbourhood Plan Group (HEGNPG) strongly objects to the proposed Modification to Policy DPS2 and the description of development in the Gilston area as an 'Urban Extension'. This is incorrect and contrary to the principles set out in Policy GA1.

Policy GA1 and the draft Gilston Area Concept Framework (CDF) which has been developed in consultation with local communities make it explicit that development in the Gilston area will comprise a number of distinctive and separate garden villages and will **not** form an extension to the urban area of Harlow. This is a key underlying principle which **must** be reinforced in the District Plan.

Please set out the change(s) you consider necessary to make the proposed Main Modification legally compliant or sound.

Amend MM/3/14 (Policy DPS2) as follows:

I. The strategy of the District Plan is to deliver sustainable development in accordance with the following hierarchy:

- Sustainable brownfield sites;
- Sites within the urban areas of Bishop's Stortford, Buntingford, Hertford, Sawbridgeworth and Ware;
- Urban extensions to Bishop's Stortford, Hertford, Sawbridgeworth and Ware, and to

the east of Stevenage and east of Welwyn Garden City ~~and in the Gilston Area;~~ and

- Garden Villages in the Gilston Area in accordance with the principles set out in Policy GA1; and
- Limited development in the villages.

Main Modification

Please state the relevant reference number that you are commenting on (e.g. MM/3/01):

MM/3/16

Do you consider the Main Modification to be legally compliant and sound?

| | | |
|---|------------------------------|--|
| Legally Compliant: | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |
| Positively Prepared: | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |
| Justified: | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |
| Effective | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |
| Consistent with national policy: | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |

Please make your comments below, taking account of whether you feel the Main Modification is legally compliant and sound. Additional sheets may be attached to this form.

The Hunsdon Eastwick and Gilston Neighbourhood Plan Group (HEGNPG) believes that para 3.3.12 and the reference to the potential for accelerating the delivery of homes in the Gilston area to provide a greater amount of development within the plan period requires further clarification.

It must be made clear that any acceleration in the rate of housing delivery would be subject to the delivery of necessary infrastructure and would **not** result in an increase in the total number of residential units proposed in Policy GA1. It must also be made clear that development must be in accordance with the principles set out in Policy GA1 and that an accelerated rate of delivery would not impact on the quality of development.

Please set out the change(s) you consider necessary to make the proposed Main Modification legally compliant or sound.

Amend MM/3/16 (para 3.3. 12) as follows:

Flexibility could also be provided by accelerating the delivery of homes at the Gilston Area, thereby providing a greater amount of development within the Plan period **subject to the provision of the necessary infrastructure and provided that development is in accordance with the principles set out in Policy GA1**. The potential to achieve this will be considered through joint work in relation to the Harlow and Gilston Garden Town, **the Action Plan for the Gilston Area to be prepared in accordance with Policy DEL4 and in consultation with the local community**.

Main Modification

Please state the relevant reference number that you are commenting on (e.g. MM/3/01):

MM/3/19

Do you consider the Main Modification to be legally compliant and sound?

| | | |
|---|------------------------------|--|
| Legally Compliant: | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |
| Positively Prepared: | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |
| Justified: | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |
| Effective | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |
| Consistent with national policy: | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |

Please make your comments below, taking account of whether you feel the Main Modification is legally compliant and sound. Additional sheets may be attached to this form.

The Hunsdon Eastwick and Gilston Neighbourhood Plan Group (HEGNPG) objects to the proposed Modification to Policy DPS3 and the description of development in the Gilston area as an 'Urban Extension'. This is incorrect and contrary to the principles set out in Policy GA1.

Policy GA1 and the draft Gilston Area Concept Framework make it explicit that development in the Gilston area will comprise a number of distinctive and separate garden villages and will not form an extension to the urban area of Harlow. This is a key underlying principle which must be reinforced in the District Plan.

Please set out the change(s) you consider necessary to make the proposed Main Modification legally compliant or sound.

Amend MM/3/19 (Policy DPS3) as follows:

(Heading to the Table)

Urban Extensions to the east of Stevenage, east of Welwyn Garden City and Garden Villages in the Gilston Area:

Main Modification

Please state the relevant reference number that you are commenting on (e.g. MM/3/01):

MM/10/01

Do you consider the Main Modification to be legally compliant and sound?

| | | |
|---|---|-----------------------------|
| Legally Compliant: | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> |
| Positively Prepared: | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> |
| Justified: | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> |
| Effective | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> |
| Consistent with national policy: | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> |

Please make your comments below, taking account of whether you feel the Main Modification is legally compliant and sound. Additional sheets may be attached to this form.

The Hunsdon Eastwick and Gilston Neighbourhood Plan Group (HEGNPG) supports the strengthened wording in the section on Neighbourhood Plans and the District Council's aim to give local communities greater power to shape their neighbourhood by taking a more active role in the development of planning policies at the local level. It also supports the District Council in wanting to give Parish Councils the opportunity to empower local people to take a proactive role in shaping the future of the areas in which they live, and give local people greater ownership of the plans and policies that affect their local area. It is important to ensure, however, that this commitment to working with Parish Councils and local communities in shaping the future of their local areas is carried through to developing the vision and proposals for the strategic sites and not just in the preparation of Neighbourhood Plans.

Preparation of the Neighbourhood Plan for Hunsdon will be of particular importance and will need to respond to the cumulative impacts of the proposed development of 10,000 new homes in the Gilston Area.

Please set out the change(s) you consider necessary to make the proposed Main Modification legally compliant or sound.

Amend MM/10/11 (Para 10.2.3) and as follows:

'The District Council wants to give Parish Councils the opportunity to empower local people to take a proactive role in shaping the future of the areas in which they live, and give local people greater ownership of the plans and policies that affect their local area. **This principle applies equally to the preparation of Neighbourhood Plans and the development of a vision,**

proposals and master plans for the strategic sites which affect the areas in which people live identified in Chapter 11.'

Main Modification

Please state the relevant reference number that you are commenting on (e.g. MM/3/01):

MM/11/01

Do you consider the Main Modification to be legally compliant and sound?

| | | |
|---|------------------------------|--|
| Legally Compliant: | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |
| Positively Prepared: | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |
| Justified: | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |
| Effective | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |
| Consistent with national policy: | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |

Please make your comments below, taking account of whether you feel the Main Modification is legally compliant and sound. Additional sheets may be attached to this form.

The Hunsdon Eastwick and Gilston Neighbourhood Plan Group (HEGNPG) supports the greater weight placed on the involvement of the local community in the joint preparation of the Concept Framework for the Gilston Area. However, the modification fails to clarify the status of the Concept Framework and how it will be used in the determination of planning applications. This issue has consistently been raised with the Council by the HEGNPG and local community and was highlighted by the Inspector at the Examination.

The Inspector specifically questioned the status of the Concept Framework at the Examination and whether it would be adopted by the Council. In the absence of any clarity regarding the planning status of the Concept Framework being provided by the Council at the Examination, the Inspector made it clear that whilst she considered Policy GA1 to be 'functional', more details about the vision and development principles for the area needed to be set out in the Policy in order to provide a framework against which to consider any future planning applications. The Modification fails to do this and therefore fails to adequately address the issues raised by the Inspector.

The reference to the Concept Framework being used as a 'benchmark' introduces greater uncertainty about how the principles and guidelines in the Concept Framework will be applied. This is despite the District Council's commitment at the Steering Group Meeting in October 2017 that the CDF would be a Council 'owned' document which would be formally adopted.

In practice, the community has been advised that there will be no further consultation on the draft CDF and that it is the Council's intention to endorse it with minimum changes despite the fact that *significant areas of concern raised by the community and agreed to by the promoters in their representations to you at the formal EiP as "insignificant" have not been addressed and no explanation/ justification was given.* We believe this is contrary to the intention of the proposed Modification which places greater emphasis on the role of the community in the preparation of the CDF as a joint document, *an emphasis which the Council have suggested in the formal representations but is not being given credence to in*

the review of the CDF.

In the absence of any certainty regarding the status of the CDF, Policy GA1 needs to be further amplified to address the issues raised by the Inspector and to provide a robust framework for the consideration of planning applications.

Please set out the change(s) you consider necessary to make the proposed Main Modification legally compliant or sound.

Amend MM/11/10 (para 11.1.4)

A Concept Framework is being jointly prepared by the landowners, and the Council, and the local community, which identifies design principles, potential land uses, infrastructure requirements and phasing. ~~and will be used as a benchmark in reviewing proposals for development.~~ **It will provide further guidance on the principles set out in Policy GA1 and will be endorsed by the District Council as a material consideration in the determination of planning applications.**

Main Modification

Please state the relevant reference number that you are commenting on (e.g. MM/3/01):

MM/11/02

Do you consider the Main Modification to be legally compliant and sound?

| | | |
|---|------------------------------|--|
| Legally Compliant: | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |
| Positively Prepared: | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |
| Justified: | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |
| Effective | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |
| Consistent with national policy: | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |

Please make your comments below, taking account of whether you feel the Main Modification is legally compliant and sound. Additional sheets may be attached to this form.

The Hunsdon Eastwick and Gilston Neighbourhood Plan Group (HEGNPG) considers the Modification as worded to be inappropriate as it suggests that the proposed allocation in the Gilston area has already been approved.

In practice, the District Plan is still in draft form and the proposed allocation in the Gilston Area and proposed release of land from the Green Belt have not yet been approved. To suggest otherwise is to undermine the due process for preparation and adoption of the District Plan and to pre-determine the outcome of the Examination and the Inspector's report. The wording should therefore be amended.

It is also important to make clear that if approved, development in the Gilston Area will be required to comply with the principles set out in Policy GA1. Reference to the Harlow and Gilston Garden Town fails to acknowledge that development in the Gilston Area is being planned as a number of distinctive and separate Garden Villages and not as part of an urban extension to Harlow..

Please set out the change(s) you consider necessary to make the proposed Main Modification legally compliant or sound.

Amend MM/11/02 (Section 11.2) as follows:

11.2 Harlow and Gilston Garden Town

11.2.2 On 2 January 2017, the Government announced its **in principle** support for the Harlow and Gilston Garden Town. The Councils share a bold vision and set of objectives, recognising that areas in and around Harlow **are very varied in character but** present a number of

opportunities to deliver growth of considerable scale and significance. Such growth is key, not only to meet growing pressures of housing and infrastructure need locally, but also to delivering broader regeneration and change for Harlow. **The Garden Town will be based on a number of key principles including the effective engagement of local communities in shaping the vision and proposals.**

11.2.4 The Garden Town will comprise various new developments in the wider Harlow area, within the three local authority areas **including the proposed development of a number of distinctive Garden Villages in the Gilston Area in accordance with the principles set out in Policy GA1.** ~~The proposed development in the Gilston Area forms a key part of this ambitious project.~~ As such, the development of proposals for the Gilston Area should complement whilst **being distinctive in terms of character and form,** and have regard to, ongoing work relating to the Garden Town **and the delivery of the required infrastructure to accommodate the cumulative impacts of development.**

Main Modification

Please state the relevant reference number that you are commenting on (e.g. MM/3/01):

MM/11/03

Do you consider the Main Modification to be legally compliant and sound?

| | | |
|---|---|--|
| Legally Compliant: | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> |
| Positively Prepared: | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |
| Justified: | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |
| Effective | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |
| Consistent with national policy: | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> |

Please make your comments below, taking account of whether you feel the Main Modification is legally compliant and sound. Additional sheets may be attached to this form.

The Hunsdon Eastwick and Gilston Neighbourhood Plan Group (HEGNPG) objects to proposed modification MM/11/03 on the grounds that it strengthens the case for the provision of accommodation to meet the needs of gypsies and travellers and travelling show people *without* providing evidence of local needs or effective guidance on the location of future provision. The inclusion of provision for self-build and custom build housing is, however, supported.

The Draft CDF for the Gilston Area does not include any guidance relating to the location of provision for gypsies and travellers and we are concerned this may impact on the achievement of the vision for Gilston, in particular the quality of development and integration with the proposed villages.

Please set out the change(s) you consider necessary to make the proposed Main Modification legally compliant or sound.

Amend MM/11/03 (para 11.3.3) as follows:

11.3.2 Housing: development in this location will provide a mixture of house sizes and tenures across seven distinct villages, including affordable housing and homes for older people. **Suitable provision will be made to meet The site will also provide for** the accommodation needs of Gypsies and Travellers and Travelling Showpeople **in appropriate locations subject to the identification of local needs and where this is consistent with the overall development principles for the Gilston Area. The site will also** make provision for self-build and/or custom-build opportunities.

Main Modification

Please state the relevant reference number that you are commenting on (e.g. MM/3/01):

MM/11/04

Do you consider the Main Modification to be legally compliant and sound?

| | | |
|---|------------------------------|--|
| Legally Compliant: | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |
| Positively Prepared: | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |
| Justified: | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |
| Effective | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |
| Consistent with national policy: | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |

Please make your comments below, taking account of whether you feel the Main Modification is legally compliant and sound. Additional sheets may be attached to this form.

The Hunsdon Eastwick and Gilston Neighbourhood Plan Group (HEGNPG) strongly objects to this Modification on the grounds that it is inconsistent with Policy GA1 and raises significant uncertainty regarding the delivery of the primary and secondary schools required to accommodate the educational requirements arising from proposed development in the Gilston Area. References to other essential elements of the development including employment and community facilities relate to the *provision or delivery* of these facilities- not just the 'delivery' of land. The developers must be responsible for the 'delivery' of educational facilities (*i.e.*: land and buildings) albeit that it is recognised that they will be required to work with the Educational Authority to do this. Reference to 'land' suggests that there will be no requirement to deliver educational facilities as part of the development and this is unacceptable in the absence of any other delivery mechanism to secure future provision. The development of new schools must be phased in line with the proposed development to ensure the demand for school places can be accommodated without placing unacceptable pressure on existing facilities. This highlights the requirement for an Action Plan and monitoring of development and infrastructure provision in the Gilston Area as proposed in MM/25/06.

Please set out the change(s) you consider necessary to make the proposed Main Modification legally compliant or sound.

Amend MM/11/04 (para 11.3.6) as follows:

11.3.3 Education: the site will provide ~~land for~~ **twenty forms of entry for both primary and secondary education** in order to fully cater for the needs arising from the development. Early Years Education will also be provided for.

Main Modification

Please state the relevant reference number that you are commenting on (e.g. MM/3/01):

MM/11/06

Do you consider the Main Modification to be legally compliant and sound?

| | | |
|---|------------------------------|--|
| Legally Compliant: | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |
| Positively Prepared: | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |
| Justified: | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |
| Effective | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |
| Consistent with national policy: | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |

Please make your comments below, taking account of whether you feel the Main Modification is legally compliant and sound. Additional sheets may be attached to this form.

For the reasons set out in our response to MM/3/04, the Hunsdon Eastwick and Gilston Neighbourhood Plan Group (HEGNPG) strongly objects to MM/11/06 and the proposed allocation of a 5 ha business park within the Gilston development. This proposal has been introduced into the District Plan without any justification or prior consultation and is totally contrary to the vision and principles for the Gilston Area as set out in Policy GA1 and the draft Concept Development Framework (CDF).

The allocation of a site of 5 ha within the Gilston Area would require a total review of the draft CDF and would have very significant highways and environmental impacts which have not been subject to any form of assessment. The CDF is based on the principle of the development of 7 distinctive **villages** each with a local centre which would include employment provision as part of a mixed use development. The draft CDF (which the District Council is proposing to endorse without any further significant changes despite these being agreed to by the Promoters before the EiP hearings) makes no provision for a large business park and would require significant modification to accommodate this. The Gilston Area already is seeking to create villages at a density which is very high for the underlying village concept contained in the CDF and agreed with the community; the Gilston Area therefore cannot accommodate a further imposition of this size **and** the proposed use is in conflict with the principles of the development concept, as proposed by the District Council and the Promoters and agreed in the CDF.

Development in the Gilston area requires a significant release of Green Belt land. The proposed allocation of a site of 5 ha for employment development, in the form of a Business Park, in addition to the land required to accommodate the proposed number of new homes and associated infrastructure suggests that a further release of Green belt land would be required unless the quantum of houses is reduced to compensate for this. No exceptional circumstances have been identified for the release of Green Belt land to accommodate a separate business park of this size in the Gilston area.

The Gilston area is not a suitable location for a large business park and the need for a business park to meet local employment needs has not been demonstrated given the proximity to strategic employment locations in Harlow and the wider region. Indeed this is acknowledged in para 11.2.6 which states: *'Residents will also be able to access more substantial employment opportunities within Harlow, including the Enterprise Zone. The proximity of the site to Harlow Town station will also enable sustainable access to employment opportunities further afield, including Stansted Airport, Cambridge, Bishop's Stortford and London'*

The distribution of employment land between the village centres is a key principle of the draft CDF and would contribute to the creation of sustainable communities. As employment space is likely to be delivered as part of mixed use development schemes, the allocation of a land area for employment development is considered inappropriate and should be replaced by number of jobs or floorspace. The village centres would not be suitable locations for B2 industrial or B8 warehousing uses as this would be contrary to the development principles for the Gilston area and would adversely impact on adjoining uses and the vision set out in Policy GA1 and the CDF.

Please set out the change(s) you consider necessary to make the proposed Main Modification legally compliant or sound.

Amend MM/11/06 as follows:

11.3.6 Employment: the development will provide local employment, including small scale office space. **This will be in the form of either a business park of 5ha or B1 employment and other employment generating uses** distributed across the village centres. Residents will also be able to access more substantial employment opportunities within Harlow, including the Enterprise Zone. The proximity of the site to Harlow Town station will also enable sustainable access to employment opportunities further afield, including Stansted Airport, Cambridge, Bishop's Stortford and London.

Main Modification

Please state the relevant reference number that you are commenting on (e.g. MM/3/01):

MM/11/10

Do you consider the Main Modification to be legally compliant and sound?

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|---|------------------------------|--|
| Legally Compliant: | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |
| Positively Prepared: | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |
| Justified: | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |
| Effective | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |
| Consistent with national policy: | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |

Please make your comments below, taking account of whether you feel the Main Modification is legally compliant and sound. Additional sheets may be attached to this form.

The modifications proposed under MM/11/10 are absolutely critical in addressing the issues raised by the Inspector.

The Hunsdon Eastwick and Gilston Neighbourhood Plan Group (HEGNPG) objects to MM/11/10 on the grounds that they do not reflect the vision and objectives which have been developed in the Gilston Area Concept Framework and do not provide an adequate policy framework for the determination of planning applications. Our comments are made in respect of the numbered sections under Policy GA1 (as proposed to be modified):

- I. Further clarification is required to make clear that the number of units which can be delivered in the Gilston Area within the plan period will be dependent on the provision of necessary infrastructure to accommodate the cumulative impacts of development in Gilston and the wider area.
- II. We support the greater weight placed on the involvement of the local community in the joint preparation of the Concept Framework. This weighting needs to be given additional emphasis given the communities recent experience of matters being agreed with EHDC before the formal EiP hearings then either rescinded or agreements not given weight to. However, the modification fails to clarify the status of the Concept Framework and how it will be used in the determination of planning applications. As a result, the modifications do not satisfactorily address the issues raised by the Inspector at the Examination. The Inspector questioned the *status* of the Concept Framework at the Examination- whether it would be adopted by the Council, what form it would take and what weight it would have in providing a policy framework for the determination of planning applications. In the absence of any clarity regarding the planning status of the Concept Framework, the Inspector made it clear that she considered Policy GA1 needed to be amended to provide a more robust framework for the determination of planning applications. It is unclear what is meant by the Concept Framework being used as a 'benchmark' and this modification introduces even greater uncertainty about the status of the document

and how (and indeed if) the principles and guidelines in the Concept Framework will be applied in bringing forward this development. This is despite the District Council's commitment made and minuted at the Steering Group Meeting in October 2017 (as submitted by the District Council to the Inspector) that the CDF would be a Council 'owned' document which would be formally adopted. The revisions to the CDF have been prepared by the Promoters professional team and seem not to have had any scrutiny by the District Council. In practice, the community has been advised that there will be no further consultation on the draft CDF and that it is the Council's intention to endorse it with minimum changes despite the fact that significant areas of concern raised by the community have not been addressed. We believe this is contrary to the intention of the proposed Modification which places greater emphasis on the role of the community in the joint preparation of the CDF. In the absence of any certainty regarding the status of the CDF, Policy GA1 needs to be further amplified to address the issues raised by the Inspector and to provide a more robust framework for the consideration of planning applications and to ensure the vision and principles set out in the CDF are upheld. We believe that more detailed design work is required prior to the submission of planning applications together with the preparation of a site-wide masterplan and Infrastructure Delivery Plan for the area.

The Inspector made it clear at the Examination that she wanted to see more details from the CDF to be incorporated into Policy GA1. She stated that she considered the policy to 'functional' at best but that it needed to be more place specific- to be set in context and draw on the vision and development and delivery principles set out in the CDF revision of December 2017, which have been jointly agreed by Council, Developers and community, even if the HEGNPG has still unanswered concerns for other sections of the same document. The proposed modification fails to do this. The principles which have been incorporated in Policy GA1 are generic Garden City principles and do not relate to the very specific local context or the vision for this area- the development of 7 Garden Villages which has not been undertaken anywhere else and is unique to the Gilston Area.

In order to address the issues raised by the Inspector, Policy GA1 should be modified to include the *shared vision and development principles* set out in the CDF revision of December 2017 (which have been jointly developed by the Council, developers and local community – but note that other reservations, still outstanding from the original version and agreed just before the EiP by the promoters, are still outstanding for other sections of the document) rather than the standard Garden City principles which could apply anywhere and do not reflect the very specific circumstances of the Gilston Area.

III. The Community Development Strategy should be completed *before* the submission of any planning application. This should include engagement with the local community on a site-wide masterplan as well as the subsequent preparation of village masterplans.

IV. Policy GA1 should include further detail on the provisions and issues to be addressed by the development. This information can be extracted from the Draft CDF as proposed by the Inspector at the Examination. We are, however, concerned about the implications of a number of proposed modifications and believe these need to be addressed:

- h) There is no rationale for the deletion of the word *public*: This suggests that open space will not be publicly accessible;

- m) Whilst it is not proposed to modify the reference to the Princess Alexandra Hospital, we are concerned that the implications of this have not been further addressed in the District Plan or the CDF. As with the proposed allocation of a 5 ha business park, the potential relocation of the hospital within the Gilston Area would have very significant implications for achieving the shared vision and development principles for Gilston and could result in either densities unsuitable to the 'village concept' or pressures for further release of Green Belt/ development in the countryside beyond the village boundaries;
- o) Historic England requested that Policy GA1 should include a *strategy diagram* (as in the case of other strategic sites) which highlights the key issues to be addressed by development in the Gilston Area including the protection of existing heritage assets. The Historic England representative who attended the Examination advised the Inspector that this had been agreed in the Statement of Common Ground with the Council (para 11) but this has not been actioned in the proposed Modifications.
- q) The deletion of the previous reference to 'small scale office space to meet local needs' by an employment area/s of around 5ha is contrary to the vision for the Gilston Area and the development of mixed use village centres with a range of employment opportunities. The modification leaves open the potential for a 5ha business park which has not been considered in the CDF and would have serious highways and environmental implications;
- r) inclusion of reference to the development of local supply chains and opportunities for local employment and training for local people is supported;
- v) development in the Gilston Area will be required to fund and provide the infrastructure required to meet its needs and to assist in the provision of more strategic infrastructure required to accommodate development in Gilston and the wider area;

V. We support the requirement for an indicative phasing plan for the delivery of infrastructure and utilities across the villages. However, this must be provided and approved as part of the outline planning application for the WHOLE site and subject to a legal agreement. In addition we note with surprise the change (point k) from requiring schools to only mentioning 'land for twenty forms of entry for both primary and secondary education'. We were assured that all necessary community facilities will be provided. We would consider unacceptable that a development of this scale could only provide land for the facilities, rather than the facilities themselves.

VI. The items identified will be dependent on a number of different mechanisms which must form part of a legal agreement with the developers. Management of the construction process must be required to do more than just *address* impacts on existing communities and must provide effective mitigation. The modification fails to acknowledge the central role of the local community in achieving these objectives;

VII. The Gilston Area development must be considered in the context of the wider Garden Town but it is important to recognise that the Gilston Area is a distinctive area and not part of Harlow.

We object to the deletion of the final paragraph (previously numbered IV) and would wish to see this reinstated. It is the only reference in Policy GA1 to ensuring a comprehensive approach is adopted to development in the Gilston Area and the need to ensure that planning applications do not prejudice the implementation of the site as a whole in

accordance with the overall vision and development principles set out in Policy GA1 and the CDF.

Please set out the change(s) you consider necessary to make the proposed Main Modification legally compliant or sound.

Amend MM/11/10 (PolicyGA1) as follows:

I. In accordance with Policy DPS3 (Housing Supply 2011-2033), land at the Gilston Area is allocated for development to accommodate 10,000 homes, to be delivered within this Plan period and beyond. It is anticipated that at least 3,000 homes could ~~will~~ be delivered by 2033 **subject to the provision of necessary infrastructure.**

II. A Concept Framework is ~~to be~~ **jointly** prepared by the landowners, and the Council and the local community which identifies design principles, potential land uses, infrastructure requirements and phasing, ~~and will be used as a benchmark in reviewing proposals for development.~~ **It will provide further guidance on the principles set out in Policy GA1 and will be endorsed by the District Council as a material consideration in the determination of planning applications.** Prior to the submission of any planning application(s) further detailed design work through the pre-application engagement process will be required in order to agree, among other things, the quantum and distribution of land uses, access and layout principles and **infrastructure requirements and phasing.**

III. **DELETE** generic Garden City principles and **REPLACE** with **Vision and Principles sections from Draft CDF (December 2017) as jointly agreed by the Council, developers and local community covering land value capture and community ownership of assets and land which will not be developed.**

IV. A community engagement strategy will be prepared **prior to the submission of any planning application**, working with the two local parishes, which will include consideration of managing the effects on local residents, and opportunities for them to participate in the emerging new community. Engagement with the local communities and other relevant stakeholders shall take place through the planning application process and through the development **of a site-wide Masterplan and prior to the development of** village Masterplans.

V. Amend details on provisions and issues with reference to Draft CDF

h) the provision of significant **community owned and managed and publicly accessible** open space and parklands and a limited number of buildings **supporting the proposed community and so** associated with that use, on the northern section of the site as identified in Figure 11.2, the ownership of which will be transferred to a community trust or other mechanism **that ensures the long term viability and stewardship of the open space and involves the local community in its governance for the benefit of new and existing communities;**

k) **education facilities for twenty forms of entry for both primary and secondary education,**

including Early Years facilities, subject to more detailed modelling. All schools should provide for the dual use of facilities for community purposes;

o) A Strategy Diagram should be included as agreed in the Statement of Common Ground between Historic England and the District Council to illustrate key issues and principles

q) Employment ~~area/s~~ space (of around 20,000 sq m), distributed across the village centres ~~within visible and accessible location/s~~, to provide local employment opportunities and assist in the development of sustainable communities;

~~which provides appropriate opportunities to promote self-containment and sustainability;~~

v) ~~assisting~~ Make provision for or assist in the delivery of all other necessary on-site and appropriate off-site infrastructure ~~to accommodate the needs arising from the development;~~

V. Any application for development will include an indicative phasing plan ~~and be subject to a legal agreement to secure~~ for the delivery of infrastructure and utilities across the villages in advance of emerging needs.

VII. The delivery of the Gilston Area will include a mechanisms for:

- securing the long term stewardship, protection, **funding** and maintenance of the parkland, open spaces, play areas and community assets;
- managing the construction process to **address mitigate** potential impacts on existing and future communities;
- encouraging a successful, **inclusive and** active community, including an innovative approach to create the conditions for local resident participation in the design and stewardship of their new community **including open space and other community assets.**

VIII **Proposals for development in the Gilston Area and associated infrastructure provision, ~~should be developed should complement, and have regard~~ should have regard to the ongoing work in relation to the Harlow and Gilston Garden Town to ensure the cumulative impacts of development can be accommodated.**

VIX Reinststate and amend para IV:

'In order to ensure that the site is planned and delivered comprehensively, any application for development on part of the site will be assessed against its contribution to the aims of the Concept Framework, and any other more detailed design work **including a site-wide master plan and subsequent village masterplans**, and will not prejudice the implementation of the site as a whole'.

Main Modification

Please state the relevant reference number that you are commenting on (e.g. MM/3/01):

MM/11/11

Do you consider the Main Modification to be legally compliant and sound?

| | | |
|---|------------------------------|--|
| Legally Compliant: | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |
| Positively Prepared: | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |
| Justified: | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |
| Effective | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |
| Consistent with national policy: | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |

Please make your comments below, taking account of whether you feel the Main Modification is legally compliant and sound. Additional sheets may be attached to this form.

The Hunsdon Eastwick and Gilston Neighbourhood Plan Group (HEGNPG) strongly objects to proposed modification MM/11/11.

The new wording seems to indicate that the eastern crossing is justified as a 'relief' to Edinburgh Way (A414), which was planned from the outset as a strategic commercial link serving a mixed employment zone with retail, warehousing, offices all set back from the highways. Providing relief to this strategic link by channelling strategic traffic through the village of Gilston (which is formed by a loose grouping of houses) and directly in front of the historic homes of Pye Corner is completely inappropriate. The new link will also:

- Remove the only playground in the area
- Increase noise and pollution in Terlings Park (parkland and homes) and Pye Corner
- Cut off Terlings Park residents from the rest of the Gilston Village
- Affect the tranquillity of the countryside.

The HEGNPG is vehemently opposed to the conversion of the C161 (single carriageway, 30mph, with weight restrictions) into a 'strategic relief road' and effectively the rerouted A414. Any proposal for highway modifications at this location should recognise its residential and village location, and ensure low volumes of traffic, low speed and safe pedestrian crossing.

Any small relief of traffic congestion on Edinburgh Way will have disproportionate impact on the Gilston communities, their environment and their ability to access the countryside.

For these reason, the HEGNPG considers that this proposal is contrary to national policy and unjustified. There is a lack of clarity about the option assessment and no evidence has been presented that the eastern crossing is the BEST option taking into account the vision and objectives for development in the Gilston Area. The eastern crossing may be preferred by Essex County Council on the grounds of potential, but not justified, STRATEGIC benefits but it will have a very significant impact on the existing community of Gilston and would be incompatible with the principles of village development as proposed under Policy GA1.

A full assessment of the need for an additional crossing and whether it might be a western or eastern crossing is required and the needs of the development in the Gilston Area should be separated from resolving congestion issues in neighbouring towns. Any solution should take into account the need to protect existing communities (including from light, noise and air pollution) and be in line with the vision and objectives for development in the Gilston Area.

Please set out the change(s) you consider necessary to make the proposed Main Modification legally compliant or sound.

Amend MM/11/11 (para 11.4.2) as follows:

Additional crossing options are also being reviewed, both to the east and the west of the existing crossing. New crossings both to the east and west are feasible, but deliver different benefits. The eastern crossing is the option preferred by Essex County Council, largely because of the way in which it as it provides relief to junctions along the western end of the A414 Edinburgh Way in Harlow, and enhances access to the Enterprise Zone and links through, potentially, to the proposed new motorway Junction 7a. **Options will be assessed against the needs of the proposed development and local areas and compatibility with the vision and objectives for development in the Gilston Area and be suitable to the character of the area. Any application proposals will need to address environmental factors such as noise, air quality and visual impact, impact on existing communities (including loss of open space, tranquillity and severance), ecology and flooding.**

Main Modification

Please state the relevant reference number that you are commenting on (e.g. MM/3/01):

MM/14/08

Do you consider the Main Modification to be legally compliant and sound?

| | | |
|---|---|--|
| Legally Compliant: | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> |
| Positively Prepared: | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |
| Justified: | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |
| Effective | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |
| Consistent with national policy: | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> |

Please make your comments below, taking account of whether you feel the Main Modification is legally compliant and sound. Additional sheets may be attached to this form.

The Hunsdon Eastwick and Gilston Neighbourhood Plan Group (HEGNPG) objects to proposed modification MM/14/08 in respect of provision for gypsies and travelling show people. No evidence has been presented regarding local need.

The criteria for identifying suitable locations for provision are very generic and do not take account issues of integration with existing and new communities. The requirement for provision in the Gilston Area has not been assessed in preparation of the Concept Framework and we believe it will be difficult to integrate provision at a later stage in the development process whilst maintaining the overall vision and development principles.

Please set out the change(s) you consider necessary to make the proposed Main Modification legally compliant or sound.

Amend MM/14/08 (Policy HOU9) as follows:

I. To meet identified local needs in the District, pitches for Gypsies and Travellers and plots for Travelling Showpeople will **may** be provided at the following locations **subject to further site analysis and monitoring of local needs over the plan period:**

In order to identify exact locations within the areas allocated to meet the accommodation needs of Gypsies and Travellers and Travelling Showpeople listed above, and to assess suitability where planning applications are submitted for non-allocated sites, the following criteria should be satisfied:

- the site is in a sustainable location in terms of accessibility to existing local services;
- the site is suitable in terms of vehicular access to the highway, parking, turning, road safety and servicing arrangements and has access to essential services such as water supply,

sewerage, drainage, and waste disposal;

(c) proposals make adequate provision for on-site facilities for storage, play, residential amenity and sufficient on-site utility services for the number of pitches or plots proposed;

(d) the proposal is well related to the size and location of the site, and respects the scale of the nearest settled community;

(e) the site can be integrated into the local area to allow for successful co-existence between the site and the settled community;

(f) proposals provide for satisfactory residential amenity both within the site and with neighbouring occupiers and thereby do not detrimentally affect the amenity of existing and new communities and local residents by reason of on-site business activities, noise, disturbance, visual impact, or loss of privacy;

(g) proposals ensure that the occupation and use of the site would not cause undue harm to the visual amenity and character of the area and should be capable of being assimilated into the surrounding landscape without significant adverse effect;

(h) the site is not affected by environmental hazards that may affect the residents' health or welfare or be located in an area of high risk of flooding, including functional floodplains;

(i) within nationally recognised designations, proposals would not compromise the objectives of the designation;

(k) proposals for provision within allocated sites are considered in the development of site wide masterplans to ensure they comply with the vision and development objectives for those areas.

Main Modification

Please state the relevant reference number that you are commenting on (e.g. MM/3/01):

MM/17/01

Do you consider the Main Modification to be legally compliant and sound?

| | | |
|---|---|--|
| Legally Compliant: | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> |
| Positively Prepared: | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |
| Justified: | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |
| Effective | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |
| Consistent with national policy: | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> |

Please make your comments below, taking account of whether you feel the Main Modification is legally compliant and sound. Additional sheets may be attached to this form.

The Hunsdon Eastwick and Gilston Neighbourhood Plan Group (HEGNPG) supports policies which seek to secure the high standards of design in new development.

The further amplification of para 17.4.1 is welcomed but it needs to be made clear that the requirements of the masterplanning process apply to **all** strategic developments including the development in the Gilston Area.

Please set out the change(s) you consider necessary to make the proposed Main Modification legally compliant or sound.

Amend MM/17/01 (Para 17.4.1) as follows:

The District Council expects a high standard of design in new development and as such will require that all 'significant' applications (including but not limited to the sites identified in Policy DPS3) undertake a Master planning process. The significance of a development will be measured not only on its scale, but on the potential impact on the community and local character of the place into which it is to be introduced, and the ability to bring forward benefits to the community. Generally, a threshold of fifty homes or more will apply. However, in some cases, a smaller scale of development may be considered to have a significant effect. The Master planning process enables issues to be addressed collaboratively at an early stage, enabling applications to progress to detailed or hybrid stages more quickly, therefore speeding up the decision-making process and ultimately the delivery of development. The detail to be considered through this process will be commensurate to the specific proposal.

Main Modification

Please state the relevant reference number that you are commenting on (e.g. MM/3/01):

MM/17/02

Do you consider the Main Modification to be legally compliant and sound?

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|---|---|--|
| Legally Compliant: | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> |
| Positively Prepared: | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |
| Justified: | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |
| Effective | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |
| Consistent with national policy: | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> |

Please make your comments below, taking account of whether you feel the Main Modification is legally compliant and sound. Additional sheets may be attached to this form.

The Hunsdon Eastwick and Gilston Neighbourhood Plan Group (HEGNPG) support proposed modification MM/17/02 and the inclusion of new policy DES1. There is a requirement for a robust masterplanning approach to be adopted in bringing forward significant sites such as the Gilston Area-including the requirement for preparation of a site-wide masterplan to ensure that development proposals will not prejudice the implementation of the whole site in accordance with the agreed vision and development objectives.

We are concerned about the timing for preparation of a site wide masterplan and believe this must be agreed before the preparation of village masterplans and submission of detailed planning applications. The local community should be fully engaged in the preparation of the site-wide masterplan in accordance with the Community Development Strategy required under Policy GA1.

Please set out the change(s) you consider necessary to make the proposed Main Modification legally compliant or sound.

Amend MM/17/02 (Policy DES1) as follows:

I. All 'significant' development proposals (including but not limited to the sites identified in Policy DPS3) will be required to prepare Masterplans (including first a site-wide masterplan which will provide the framework for development) setting out the quantum and distribution of land uses; access; sustainable high quality design and layout principles; necessary infrastructure; the relationship between the site and other adjacent and nearby land uses; landscape and heritage assets; and other relevant matters.

II. The Masterplans will be collaboratively prepared, involving site promoters, land owners, East Herts Council, town and parish councils, **and with the active participation of local communities** and other relevant key stakeholders. ~~The Masterplan will be further informed by public participation.~~

III. In order to ensure that sites are planned and delivered comprehensively, any application for development on part of the site will be assessed against its contribution to the Masterplan as a whole.

Main Modification

Please state the relevant reference number that you are commenting on (e.g. MM/3/01):

MM/23/02

Do you consider the Main Modification to be legally compliant and sound?

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|---|---|--|
| Legally Compliant: | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> |
| Positively Prepared: | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |
| Justified: | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |
| Effective | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |
| Consistent with national policy: | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> |

Please make your comments below, taking account of whether you feel the Main Modification is legally compliant and sound. Additional sheets may be attached to this form.

The Hunsdon Eastwick and Gilston Neighbourhood Plan Group (HEGNPG) supports proposed modification MM/23/02 and the commitment to providing adequate wastewater infrastructure capacity in advance of development. We would however welcome clarification that this includes wastewater treatment facilities.

Please set out the change(s) you consider necessary to make the proposed Main Modification legally compliant or sound.

Amend MM/23/02 (Policy WAT6) as follows:

Development proposals must ensure that adequate wastewater infrastructure capacity (including waste water treatment infrastructure) is available in advance of the occupation of development.

Main Modification

Please state the relevant reference number that you are commenting on (e.g. MM/3/01):

MM/25/01

Do you consider the Main Modification to be legally compliant and sound?

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|---|---|--|
| Legally Compliant: | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> |
| Positively Prepared: | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |
| Justified: | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> |
| Effective | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |
| Consistent with national policy: | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> |

Please make your comments below, taking account of whether you feel the Main Modification is legally compliant and sound. Additional sheets may be attached to this form.

The Hunsdon Eastwick and Gilston Neighbourhood Plan Group (HEGNPG) supports proposed modification MM/25/01 and the commitment to monitoring the delivery of the second Stort crossing and other key infrastructure related to development in the Gilston Area and the consideration of alternative infrastructure provision where this demonstrates that key infrastructure would not be delivered in a timely manner. We are of the view, however, that the wording should be strengthened to ensure the Council does not permit development to proceed without the delivery of the necessary infrastructure to support it.

Please set out the change(s) you consider necessary to make the proposed Main Modification legally compliant or sound.

25.2.4 Where monitoring undertaken through the IDP demonstrates that any key infrastructure scheme/s (including, for example, a bypass for Hertford or second Stort crossing related to development in the Gilston Area) would not be delivered in a timely manner, this will trigger the need for the consideration of alternative infrastructure provision to facilitate delivery of development, or a review or partial review of the District Plan in accordance with Policy DEL1. **Development will not be permitted to proceed without the delivery of the necessary infrastructure required to support it.**

Main Modification

Please state the relevant reference number that you are commenting on (e.g. MM/3/01):

MM/25/02

Do you consider the Main Modification to be legally compliant and sound?

| | | |
|---|---|--|
| Legally Compliant: | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> |
| Positively Prepared: | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |
| Justified: | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> |
| Effective | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |
| Consistent with national policy: | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> |

Please make your comments below, taking account of whether you feel the Main Modification is legally compliant and sound. Additional sheets may be attached to this form.

The Hunsdon Eastwick and Gilston Neighbourhood Plan Group (HEGNPG) support the proposed Modification to Policy DE1(MM/23/02) but is of the view that the wording should be strengthened to ensure the Council does not permit development to proceed without the delivery of the necessary infrastructure to support it.

Please set out the change(s) you consider necessary to make the proposed Main Modification legally compliant or sound.

Amend MM/25/02 (Policy DEL1) as follows:

d) **Undertake an immediate review of** ~~Consider~~ alternative infrastructure provision, or a review or partial review of the District Plan if evidence in the IDP indicates a changed outlook for the realistic prospects for delivery of infrastructure to support development. **Development will not be permitted to proceed without the delivery of the necessary infrastructure required to support it.**

Main Modification

Please state the relevant reference number that you are commenting on (e.g. MM/3/01):

MM/25/04

Do you consider the Main Modification to be legally compliant and sound?

| | | |
|---|---|--|
| Legally Compliant: | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> |
| Positively Prepared: | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |
| Justified: | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> |
| Effective | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |
| Consistent with national policy: | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> |

Please make your comments below, taking account of whether you feel the Main Modification is legally compliant and sound. Additional sheets may be attached to this form.

The Hunsdon Eastwick and Gilston Neighbourhood Plan Group (HEGNPG) recognise the need to be flexible and responsive to change but we are concerned that this will weaken controls over the quality of development and the timely delivery of necessary infrastructure required to support it. In particular, we are concerned with the implication that constraints on delivery may lead to pressures to increase density and the number of units to be accommodated on other sites including the Gilston Area, thereby compromising the vision for distinctive and separate villages.

Please set out the change(s) you consider necessary to make the proposed Main Modification legally compliant or sound.

Amend MM/25/04 (Policy DEL3) as follows:

I. The NPPF requires plans to be flexible and responsive to change. If delivery of housing in any given monitoring year falls below 110% of the annual requirement, the Council will consider implementing all or some of the following measures to bring forward development:

- Working with developers and infrastructure providers to remove obstacles to the delivery of sites;
- Seeking alternative sources of funding if problems with infrastructure provision is delaying development of key strategic sites;
- Consideration of the potential to increase density on allocated sites **provided this will be in accordance with other policies in this Plan;**
- Consideration of the ability to deliver strategic sites earlier in the Plan period **subject to the delivery of necessary infrastructure and providing this will not increase the total number of units to be delivered on that site in the Plan period;** and
- Working with other authorities under the Duty to Co-operate to address any unmet needs.

II. Where total delivery of housing is less than 75% of the annual requirement for three consecutive monitoring years, this will trigger the need for the consideration of a review or partial review of the District Plan.

III. The target for Affordable Housing is calculated annually based on average completions over the preceding three-year period. Where delivery is less than 75% of the annual target for three consecutive monitoring years, the Council will consider all or some of the following measures:

- Consideration of the potential to increase density on allocated sites **provided this will be in accordance with other policies in this Plan;**
- Consideration of the ability to deliver strategic sites earlier in the Plan period **subject to the delivery of necessary infrastructure and providing this will not increase the total number of units to be delivered on that site in the Plan period; and**
- **Working with other authorities under the Duty to Co-operate to address any unmet needs.**

IV. Where delivery of pitches and plots to meet currently identified accommodation needs of Gypsies and Travellers and Travelling Showpeople does not accord with the provisions of HOU9, the Council will work with site owners and developers to expedite delivery and ensure that need is met ~~in the specified locations~~ **subject to the criteria set out in Policy HOU9 and other policies in this Plan.**

Main Modification

Please state the relevant reference number that you are commenting on (e.g. MM/3/01):

MM/25/05

Do you consider the Main Modification to be legally compliant and sound?

| | | |
|---|------------------------------|--|
| Legally Compliant: | Yes <input type="checkbox"/> | No <input type="checkbox"/> |
| Positively Prepared: | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |
| Justified: | Yes <input type="checkbox"/> | No <input type="checkbox"/> |
| Effective | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |
| Consistent with national policy: | Yes <input type="checkbox"/> | No <input type="checkbox"/> |

Please make your comments below, taking account of whether you feel the Main Modification is legally compliant and sound. Additional sheets may be attached to this form.

The Hunsdon Eastwick and Gilston Neighbourhood Plan Group (HEGNPG) welcome the proposal to monitor development in the Gilston Area to ensure the delivery of the infrastructure necessary to support it. We recognise the requirement for some flexibility and the need responsive to change but are very concerned that the proposed modification will weaken controls over the quality of development and the timely delivery of necessary infrastructure required to support it. In particular, we are concerned with the implication that constraints on delivery may lead to pressures to increase density and the number of units to be accommodated on other sites including the Gilston Area, therefore compromising the vision for distinctive and separate villages.

The land value capture mechanism and the funding structure to secure long term maintenance of the community assets are central to the quality of the development and the 'promise' of the developers. Both should be publicly available and monitored.

Please set out the change(s) you consider necessary to make the proposed Main Modification legally compliant or sound.

Amend MM/25/05 (Para 25.4.2) as follows:

Given the size and complexity of the Gilston Area development, **the significant requirement for new infrastructure to support it**, and the fact that it is expected to make a significant contribution towards housing needs within the Plan period, it is considered important to closely monitor the **quality of the development, its implementation, infrastructure provision, and the land value capture and community funding model on** an annual basis in accordance with Policy DEL4.

Main Modification

Please state the relevant reference number that you are commenting on (e.g. MM/3/01):

MM/25/06

Do you consider the Main Modification to be legally compliant and sound?

| | | |
|---|---|--|
| Legally Compliant: | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> |
| Positively Prepared: | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> |
| Justified: | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> |
| Effective | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |
| Consistent with national policy: | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> |

Please make your comments below, taking account of whether you feel the Main Modification is legally compliant and sound. Additional sheets may be attached to this form.

The Hunsdon Eastwick and Gilston Neighbourhood Plan Group (HEGNPG) welcome the inclusion of Policy DEL4 and the requirement for preparation of an action plan but would wish to see greater clarity regarding the timing of this to ensure development and infrastructure provision is effectively monitored.

Please set out the change(s) you consider necessary to make the proposed Main Modification legally compliant or sound.

Amend MM/25/05 (Policy DEL4) as follows:

I. In order to ensure timely delivery of the Gilston Area, the Council will draw up an action plan setting out key milestones for the delivery of the site, including masterplanning, phasing of infrastructure and submission of planning applications. ~~and monitor its progress on an annual basis.~~ **The action plan will be prepared prior to the submission of any planning applications in consultation with the site promoters and local community and the Council will monitor its progress on an annual basis;**

Main Modification

Please state the relevant reference number that you are commenting on (e.g. MM/3/01):

MM/A/01

Do you consider the Main Modification to be legally compliant and sound?

| | | |
|---|---|--|
| Legally Compliant: | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> |
| Positively Prepared: | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |
| Justified: | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> |
| Effective | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |
| Consistent with national policy: | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> |

Please make your comments below, taking account of whether you feel the Main Modification is legally compliant and sound. Additional sheets may be attached to this form.

The Hunsdon Eastwick and Gilston Neighbourhood Plan Group (HEGNPG) is concerned about the lack of clarity regarding the revised Green Belt boundary in the Gilston Area and would request that this is addressed in the Key Diagram.

Please set out the change(s) you consider necessary to make the proposed Main Modification legally compliant or sound.

Amend MM/A/01 Key Diagram as follows:

Key Diagram to be amended to clarify the revised Green Belt boundary in the Gilston Area