

REVIEW OF GILSTON AREA CONCEPT FRAMEWORK (DECEMBER 2017)

The revised Draft Concept Framework (December 2017) circulated by Quod on 23 December 2017 has addressed many of the concerns raised by the community, but still leaves some grey areas that require further clarification and points that should be addressed before the Concept Framework (CDF) is finalised.

A principal outstanding issue relates to the status and purpose of the document. In the agreed minutes of the Steering Group meeting of 25 October (which were submitted by EHDC to the Inspector), it was stated that EHDC will own the document and formally endorse it to be used for development control purposes. As presented, however, the CDF is still a summary of the development intentions proposed by Places for People. We also note that subsequent to the revised CDF being circulated, EHDC has published for consultation the proposed Major Modifications to the District Plan which include the allocation of a 5 ha employment area within the Gilston development. This has never been considered in the context of preparation of the CDF and conflicts with the core CDF principles for village development. The CDF makes it clear that employment uses will be disbursed within the 7 villages and the concept of a large business park has never previously been discussed and would be totally contrary to the vision and objectives set out in the CDF.

The revised CDF has been circulated to the Hunsdon, Eastwick and Gilston Neighbourhood Plan Group representing the directly affected Parish Councils and was discussed at a Community Workshop held on 23 January in Gilston Village Hall. However, the revised CDF has yet not been the subject of wider consultation with the community which would be normal practice for a document of this significance. Indeed, we had been led to understand by EHDC that the revised document would be subject to formal consultation given its impact on the lives of residents. This would be in accordance with the proposed modification to Policy GA1 which states that the CDF 'is being *jointly* prepared by the landowners, the Council and the local community' rather than in consultation with local communities.

The CDF should present a robust set of guidelines to be used for Development Control purposes or eventually to be adopted as SPD. This will require EHDC to take responsibility for the CDF and make further amendments to the Draft document before it is finalised. The community continues to strongly support this course of action (as confirmed at the workshop), as this will provide a long lasting framework to guide change in the area.

It must be made clear in the document that the intention of the CDF is to provide further guidance on the proposals and development principles set out in Policy GA1, and therefore only relevant in conjunction with the Draft District Plan and the allocation of the land for development. The purpose of the CDF is not to justify or support the allocation, but to describe further how the development will take place in the event that the allocation is confirmed.

The revised Draft CDF has been reviewed by the NPG against the comments submitted to the Council during the formal consultation process taking into account the comments made at the workshop on 23 January. A ‘traffic light’ style system has been adopted as follows:

- **Green text** – the community concerns have been successfully addressed by the Dec 2017 version
- **Amber text** – further clarification or minor change is required to address the concerns raised by the community
- **Red text** – the concerns previously expressed have not been addressed
- **Purple-grey text** – essential areas which the community believes should be directly addressed by EHDC and further amendments made.

Where further information cannot be provided at this stage, the CDF must make clear what further technical work will be required before the submission of an Outline Planning Application. It should also specify what information will be required to be submitted with the Outline Planning Application. It must also clarify what elements of the CDF are illustrative and what matters will be determined at the planning application stage. This will provide confidence that further consultation on key issues will take place with the community as part of the planning application process.

We hope this approach narrows down the discussion and highlights the many areas of good work done to date.

A summary of the comments made by participants at the Workshop on 23 January is also attached for information.

Ref	Page	Comment	NPG Proposed Changes to CDF	Comments
SECTION 1: INTRODUCTION				
1	Page 6	The Concept Framework Status is confusing: here described as evidence to enable the site allocation, and in other instances (including Policy GA1) it is stated that the document is intended to be adopted as guidance for future planning applications	<ul style="list-style-type: none"> • Our recommendation is that the CDF is amended to become a Framework to guide future master planning and assess the planning applications. • If an evidence base document is needed, it should be titled in such a way to avoid confusion: ‘Summary of Proposals’ or similar 	<ul style="list-style-type: none"> • EHDC should review and provide clarifications. • Status of document still unclear- no reference to role in preparation and adoption by EHDC (only P4P’s development team are listed as contributors) • Concept Plan is a requirement of Policy GA1- to provide further guidance not just to support policy • Agreed minutes of meeting on 25 October- para 3: LH confirmed it was

				<p>an EH owned document which would be formally endorsed by Council</p> <ul style="list-style-type: none"> • Does not explain how it will be used- must be more than to inform: provides framework for development proposals: will be a material consideration: reference EH masterplanning approach • The Leader of EHDC commitment to high quality places should be included. This could be done as an introduction by the leader which is normal practice for documents of this type and would give greater confidence about the commitment of EHDC to the vision and principles in the CDF. • Clarification required of 2nd crossing- does not mention existing traffic congestion and what is meant by land to be acquired for crossing at 'appropriate stage'?
2	Page 7	<p>No reference is included to the need for the CDF to be prepared in consultation with local communities and how this has informed preparation of the draft CDF. Reference should also be included to Policy GA1 and the requirements of that policy as this sets the context for preparation of the CDF and specifies the considerations to be taken into account. The introduction should also explain the status of the document, how it is to be used and the</p>	<ul style="list-style-type: none"> • The current consultation should be seen as part of an ongoing process of engagement with the community before the CDF is finalised. • The purpose and expected outcomes of the consultation and timescales for further consultation to finalise the CDF should be clearly stated. • Text amendments to address points raised and provide necessary clarification. 	<ul style="list-style-type: none"> • Reference to community engagement included but needs to be made clearer that it is a three way process of collaboration: community engagement is not just an add on. In this respect we welcome the reference to joint preparation of the CDF by the landowners, Council and community and this should be reflected in the CDF.

		intention of East Herts regarding its formal endorsement.		
3	Page 7	Para 4 states that the document relates solely to the Gilston area. Development in the Gilston area, whilst very different from the 'urban extensions' being considered for Harlow, cannot be considered in isolation from the wider area. Consideration needs to be given to the cumulative impacts of development and the Visioning Work being undertaken for the wider Harlow & Gilston area and confirmation is required that this has been taken into account in preparation of the CDF. Clarification is also required of how the development and wider planning matters are being addressed in other cross boundary forums.	<ul style="list-style-type: none"> • Include reference to the wider Visioning Work for the Harlow & Gilston area and relevant governance structures 	<ul style="list-style-type: none"> • Reference to Garden Town initiative included but lack of clarity about how the Gilston Area will be progressed in synergy with the other sites and the expected interdependence. Gilston cannot be considered in isolation from wider planning matters. • Need to emphasise that there will be a need for coordination and commitment to working with other authorities to ensure necessary phasing and provision of infrastructure: also for planning applications to take account of cumulative impacts of wider growth. • Strategic implications of development at Gilston cannot be left to other forums without ensuring there is a clear link in decision making • Conditions precedent before development can be commenced need to be made clear
4	Page 7	The map should show the District Plan boundary of the Gilston Area, as informed by a East Herts led master planning approach - not limited to the land holdings of principal landowners. The map does not identify all villages within and adjacent to the development area; without this we believe that other landowners will seek to gain consents to add their land in a wholly unplanned	<ul style="list-style-type: none"> • Amend map to show boundary of Policy GA1 • Add Gilston, Eastwick, High Wych, Gilston Park and the full Stort Valley 	<ul style="list-style-type: none"> • The boundary of the Gilston area should correspond with Policy GA1 key diagram (Figure 11.1) not just the area allocated for development (Figure 11.2). Inclusion within the boundary does not imply all land will be developed but needs to be addressed by the CDF. • The map refers to 'Community Trust Open Space Land' – please add a

		manner. The lack of consultation on the District Council's master plan ambitions is a root cause of the issue.		note to explain status and include cross-reference to Section 5 Governance.
5	General	CGIs		<ul style="list-style-type: none"> In general, CGIs representing types of housing we can expect lack any form of likeness to what we would like to see or would be expected in a village setting. The CDF needs to set out requirements for high quality development and pressure must be applied to developers to comply with specific and detailed guidelines to create village character
SECTION 3: VISION & DEVELOPMENT OBJECTIVES				
6	Page 10 Gilston Area Vision	<p>The vision statement is positive in presenting a focus on people and community life. It also (second half) talks about local character and seven distinctive villages.</p> <p>It is however, somewhat generic and could refer to other new locations and does not clarify the relationship of the Gilston Area's 7 villages to Harlow and the existing villages: functionally interdependent but with strong identity as individual villages. The Vision offers no guidance of what is intended as high quality development. We are concerned that the 5 principles are not easily translated in design and development proposals and lack practical relevance when discussing implementation.</p>	<ul style="list-style-type: none"> Review Vision Statement to include reference to the well-being of all, including existing communities Clarify relationship to Harlow Emphasise that vision is based on 'Garden Village' principles Strengthen the commitment to delivery of 7 distinctive villages Include new principle relating to infrastructure provision at required time. Amend para 4 to include need to mitigate and manage impacts on local communities 	<ul style="list-style-type: none"> Vision statement has been amended as agreed Presented as EHDC vision on basis that it is an EHDC owned and adopted document Need to make clear that whilst Garden City principles will be followed where appropriate, specific development principles have been developed to reflect characteristics of Gilston Area and unique form of development proposed Need to make reference to 'buffer zones' around existing clusters of houses

		<p>A vision for change of this magnitude should be ambitious for the well-being and prosperity of all in the area – in particular, it needs to make clear that this refers not only to new development but also to existing communities, who make a significant contribution to local character, and community lifestyle.</p> <p>Infrastructure is key and the principles need to include reference to the provision and appropriate phasing of necessary infrastructure (which needs to be provided before development proceeds) and reference should also be included in para 4 to the need to manage and mitigate the impacts of development on existing communities- not just visual impacts.</p>		
7	<p>Page 10-11</p> <p>Gilston Area Vision</p>	<p>The birds' eye view and diagrammatic plan presented in this section have no caption nor explanation and do not match the vision or objectives for the creation of 7 distinct 'villages'.</p> <p>Both present the development like a suburban town or an urban extension rather than as villages in a landscape setting. The birds' eye image shows a very dense development with insufficient green space separating the villages and no evidence of individual character. The photo is also out of date as it does not include other largescale</p>	<ul style="list-style-type: none"> • Remove diagram showing layout of villages • Replace aerial view with more appropriate image which represents key principles underpinning the Gilston Area Vision and the spirit of village development 	<ul style="list-style-type: none"> • Diagram removed • New plan is more appropriate but needs also to highlight all green space and other existing buildings within GA1 policy area boundary including Gilston Park and airfield as these are key features. These areas form part of open setting of development but are faded into background • Remove words on page 11 after Garden City principles – not to confuse with the Place Making Principles further down

		<p>housing development which has taken place in the area (eg: Harlow Leisure Centre).</p> <p>The diagram ignores the local context and shows details of village layout which are clearly not consistent with village character. The street and block layout go far beyond the scope of the CDF.</p> <p>Whilst it may be argued that the images are <i>illustrative</i> we believe they are misleading and potentially very dangerous to include alongside the vision statement as they are not consistent with the aims set out in this section and suggest a very different form and density of development. The images are at also at odds with the site promoters pre- application material for the outline planning application which suggests 7 storey development which is unacceptable in the context of 'villages'.</p>		<ul style="list-style-type: none"> • More information required about principle of land value capture and phasing of new infrastructure to mitigate impacts of development (including on existing communities) • Need confirmation of scale of development and promise that development will not grow • Need to address Terlings Park integration-This is one community not separate entities and should not be divided by a main road
8	Page 12 Objectives	The use of the term 'aspirational' questions the commitment to delivering a high quality development and necessary infrastructure. It does not give the community confidence that the objectives will be achieved.	<ul style="list-style-type: none"> • Remove 'aspirational' from heading and amend to 'Meeting the Objectives' 	<ul style="list-style-type: none"> • Text amended • Protective green space needs to be sized to be protective • Wide open spaces need to be continued around existing dwellings to retain rural aspect
9	Page 12 Objectives	The objectives should all relate to the vision. 10,000 new homes should not be identified as a development objective, but a possible outcome. Objective 2 refers to a private estate	<ul style="list-style-type: none"> • Reword Objective 1 to read: Delivery of 7 new Garden Villages to provide for the future growth of East Hertfordshire • Qualify Objectives 4 and 5 	<ul style="list-style-type: none"> • Revised Objectives agreed • Need to define what is meant by 'genuinely affordable housing' • What is meant by Gilston Park is in need of landscape enhancement?

		and there are no specific proposals to satisfy this objective. Objectives 3 and 8 are supported. Objective 4 needs to be qualified as it would be expected that there would be a hierarchy of villages and that this would be reflected in the location of social infrastructure and facilities. Objective 5 needs to distinguish between drainage and water supply. There is inadequate explanation and justification for objective 10- regeneration of Harlow. It is noted that at the EiP for the East of England Plan the benefits to Harlow regeneration were challenged. This objective highlights the need to take into account the visioning work for the wider area.	<ul style="list-style-type: none"> • Review Objective 10- this should be informed by the wider visioning study • Additional objective: Mitigate and manage the impacts of development on existing communities and ensure that existing communities benefit from development • Add new objective: Ensure the provision of adequate infrastructure to meet the needs of existing and new development 	
10	Page 12-14 Objectives	We feel the image is 'promotional' and misleading (no cars, etc) and perhaps not representative of village character. The provision of parkland within the villages overlooked by direct frontages is welcomed.	<ul style="list-style-type: none"> • Consider replacing/ amending image 	<ul style="list-style-type: none"> • CGI removed and replaced with precedent images
11	Page 14-21 Strategic Influences	We are generally supportive of the Strategic Influences but are concerned that the reference to Gibberd's legacy suggests that the development is perceived as an extension to Harlow and a town, rather than villages. It is a factor to take into account in promoting good planning but we understand that Gibberd advocated land to the north remaining green. The visioning work being undertaken by Allies and Morrison has highlighted that a different	<ul style="list-style-type: none"> • Amend or remove Strategic Influence 2 to make clear that this is not an extension to Harlow • Amplify text to include more specific inspiration from local references 	<ul style="list-style-type: none"> • Welcome further analysis on Village anatomy as a strategic driver- • We disagree with reference on p14 to villages being characterised by up to 5 storey development (Scale and composition). None of the examples referred to demonstrate this: all largely show 2 storey properties even in village centres. Reference should be made to local villages (or cross reference included to Chapter 4).

		<p>form of development will be appropriate in the Gilston Area. We agree that the landscape and village life are important influences but would question the integrity of these objectives given that the development will impact so significantly on existing villages, heritage and landscape quality. We believe that the text needs to be more specific to the local area with references to existing landscape assets and villages and the need to mitigate and manage impacts on existing character.</p>		<ul style="list-style-type: none">• Legacy of Garden Cities- need to make clear that whilst Garden City principles are promoted, Gilston is not a Garden Town but 7 distinctive villages. Text suggests Howard's model will apply to the Gilston Area- not just the principles.• Gibberd's principles- need to make clearer that Harlow is not being used as model, as it was planned as a town and not as villages. Reference to the urban form of Harlow can be made, but any lesson from Harlow (both good and bad) will need to be <i>adapted</i> where appropriate to the village approach of Gilston. Not just concerns about replication but also that Gilston will be viewed as an extension to Harlow. Reference to the Stort Valley as a definite boundary identified by Gibberd should be made. Images of Harlow green space and Stort Valley may be more appropriate than town centre.• English landscape tradition- need to make clearer that this tradition relates not only to formal parklands and vistas but also to agrarian landscape and the open landscape setting characteristic of villages. Would it be possible to amplify the role of countryside setting in this section? This was an issue highlighted by Historic England.
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				<ul style="list-style-type: none"> • We are unclear of the reference to Blenheim Palace as being relevant to the context being proposed (p21) • Need to emphasise that definition of a village 'usually found in a rural setting' means that there is a need for space around each village to provide this setting and avoid it becoming a town • p15- pictures of Gilston and Eastwick should be included. Wheathampstead is not an appropriate example as it is a town.
SECTION 3: CONTEXT				
12	Page 24-25 Strategic Context	The Strategic Context makes no reference to the proposals for the Harlow & Gilston Garden Town and the wider visioning work being undertaken. What are the implications of this for the Gilston development? The Gilston Area needs to be considered in the wider context and the cumulative impacts of development in the Harlow area need to be fully assessed to ensure that there is adequate infrastructure capacity to accommodate the level of growth proposed. The Strategic Context is the only section in the CDF which considers risks and opportunities but no mention is made of the impacts of the development on local communities. For example the CDF makes no reference to the immensely important Stort Valley corridor and/ or commitments to this as remaining in the Green Belt.	<ul style="list-style-type: none"> • Review and update text • Update plan to show development proposals in wider area • Identify all other development and growth areas, including those of Harlow and Gilston Garden Town 	<ul style="list-style-type: none"> • Relocation of section improves legibility and works well • As well as the regional (London-Cambridge) context, this section would be clearer if it expanded on the Harlow and Gilston Garden Town initiative, with a map of the overall development areas, employment locations and expected infrastructure improvements (sustainable transport corridors and Junction 7a) as in map on page 145 . • It should clearly state any interdependency and describe how development and infrastructure upgrades will be in synergy. • It should describe expected changes (for example in traffic flows and destinations) as a result of the Garden Town initiative.

				<ul style="list-style-type: none"> • This section should include all the references to Harlow found in other parts of CDF as part of strategic context (e.g. page 144-145) • Reference should be made to working arrangements and EHDC commitment to collaborative working with adjoining authorities. • We suggest EH includes a text box to emphasise that cumulative impacts must be fully assessed at planning application stage to ensure there is adequate infrastructure capacity/ provision to accommodate growth requirements in the wider context. • The strategic context ignores the Stort Valley corridor, the Lammas lands and wider green links to Epping and Hatfield forests as regionally significant ancient forest areas
13	Page 26-27 Local Context	The Local Context contains limited reference to existing villages and the need to manage and mitigate impacts of development on existing communities & the smaller house “groupings”. The section does not identify risks and opportunities presented by Local Context eg: traffic and capacity of infrastructure.	<ul style="list-style-type: none"> • Include summary of risks and opportunities from a local perspective (as in case of Strategic Context) • Amend map to highlight existing villages & smaller house “groupings”, roads and network of paths. 	<ul style="list-style-type: none"> • Plan should include smaller housing groupings, roads and footpaths in addition to villages. • Does not include summary of local risks and opportunities- it was previously agreed this would be added
14	Page 28 Planning Policy Context	This section should make clear the status and purpose of the CDF and how East Herts intend to use it. No reference is made to Policy GA1 which provides the planning policy context for preparation of the CDF.	<ul style="list-style-type: none"> • Amend and update text to include details of Policy GA1 • Include reference to status of proposals and DCLG support for Harlow & Gilston Garden Town. 	<ul style="list-style-type: none"> • Needs to acknowledge that District Plan is still in Draft Form • Clearer presentation of key proposals and principles set out in Policy GA1 required including purpose of the CDF.

		We do not agree with the final paragraph on page 15 (see ref. 1): the purpose of the CDF should not be to support the allocation of the site in the District Plan but to set out the principles for development and provide a framework for future planning applications. It would also be appropriate to include reference to the status of proposals and DCLG funding for Harlow & Gilston Garden Town.		<ul style="list-style-type: none"> • Include reference to EHDC involvement with adjoining authorities and work on Garden Town initiative: all part of local policy context. • Still states that purpose of the Concept Framework is to support Policy GA1- we think this is wrong: it is to provide further guidance on development principles and framework for preparation and determination of planning applications
SECTION 4: BASELINE SUMMARY				
15	Page 32-33			<ul style="list-style-type: none"> • Introduction needs an update-purpose is not to justify the allocation but to identify key constraints and opportunities to be addressed in the CDF and subsequent planning applications/ detailed masterplanning. • Map on page 33 – remove Gilston Park from transparent white area of proposals land • Photograph on page 43 is misleading, there is no such facility being planned unless this links to the proposed quarry by village 7 which we object to
16	Page 34	We agree with the baseline summary of archaeology and heritage and the importance placed on this.		<ul style="list-style-type: none"> • No further comments
17	Page 46-47	Many local groups are deeply interested in local wildlife, which is one of the key assets of the area. We would	<ul style="list-style-type: none"> • Add reference to the need to involve local groups in the identification and protection of natural habitats and wildlife 	<ul style="list-style-type: none"> • Reference included • Add in reference to barn owls sparrow hawk, buzzards and kestrels now in area,

		welcome reference to involvement of local groups		
18	Page 48 onwards	We do not feel that sufficient analysis has been undertaken of the existing villages, the various small pockets of houses and built form. Over-emphasis is placed on Harlow and there is limited analysis of the constraints (and opportunities) presented by existing villages. The plans of existing villages contain errors and need to be reviewed.	<ul style="list-style-type: none"> • Further analysis required of exiting villages and constraints and opportunities these present for proposed development. • Review plans of villages to ensure correct 	<ul style="list-style-type: none"> • Welcome detailed analysis of the villages- • Rather than population density (of limited informative value), please add maximum height and maximum net density of a residential area (same approach as calculations on page 109) • Further analysis of constraints and opportunities and need to mitigate impacts is needed
19	Page 46 Surface Water Drainage & Flooding	We are very concerned about the capacity of existing infrastructure and are being given conflicting information. The final para states that the existing Rye Meads Sewerage Treatment Works has capacity for development up until the year 2040, which includes development in the Gilston Area. The development will not be completed within this period and it is unclear what allowance has been made for other development in the area and development beyond 2040.	<ul style="list-style-type: none"> • Further and more detailed information is required. 	<ul style="list-style-type: none"> • Amended text states that there is capacity at Rye Meads upto 2036 but development of 10,000 homes will not be completed by this date? Clarification required
20	Page 50-51 Access & Movement	We do not feel that (given the importance of the issue and current problems) this section presents a sufficient baseline analysis of congestion and bus and rail transport facilities.	<ul style="list-style-type: none"> • Need further information on existing highway capacity and public transport provision • Need a diagram or table that clearly identifies the current problem areas and deficiencies that need to be addressed or considered by the developers. 	<ul style="list-style-type: none"> • The section on Access and Movement does not provide details of existing capacity issues (road and rail): more information required on current proposals/ funding for network improvements and what should be in place before further demand is added to the network

			<ul style="list-style-type: none">• Need a map indicating all key routes and current traffic levels• Include information about safety and accidents	
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21	Page 64 Utilities		•	<ul style="list-style-type: none"> The community is concerned about the lack of recognition of existing deficiencies to <u>existing properties</u> (especially water, mobile connectivity and broadband). They would like a commitment to provision of the same standard of service as the new properties.
22	Page 69 Market demand	We do not think the image reflects the vision and should be removed. The form of buildings proposed (a crescent 4-5 times larger than the one in Bath) is not in keeping with village character and is more representative of an urban setting.	<ul style="list-style-type: none"> Remove image 	<ul style="list-style-type: none"> CGI removed
23	Page 70-71		•	<ul style="list-style-type: none"> The opportunities and constraints mapping should also highlight the need to protect the character and setting of existing villages, housing groups and heritage assets and to ensure adequate separation between villages.
SECTION 5: SPATIAL FRAMEWORK				
24				<ul style="list-style-type: none"> Could the concept plan on p79 also include heritage features, footpaths/ cycle routes. Key required – education campus and playing fields need to be identified and distinctive from village centres. Emphasise areas to be retained as open space The current Rights of Way network is incorrectly stated at various points; this adds to confusion.

				<ul style="list-style-type: none"> Villages need to be numbered to correspond with section on Village development principles
25	Page 74-78 Place-making Principles	<p>We welcome the creation of village centres with houses, shops and community facilities.</p> <p>The image, however, shows a vast paved urban square and a wide road, not in keeping with village character. We believe this is detracting from the concept and is not appropriate for inclusion in the CDF. The Visioning work being undertaken (by Allies and Morrison) includes an analysis of the morphology of village settlements – this sort of understanding needs to be expressed in any revised CDF.</p> <p>Village 2 (in the caption of the picture) is perhaps intended to be the main centre with a supermarket and other services and it is therefore not representative of a placemaking framework that is inspired by villages.</p>	<ul style="list-style-type: none"> Replace with image which reflects the vision of a typical village centre 	<ul style="list-style-type: none"> Image replaced Need to define terms such as 'sympathetic', 'sufficient width', timescale for infrastructure provision and early improvements to green buffers Need clarification on how the new Green Belt will be protected to ensure it can never be built on
26	Page 80 Landscape led approach (text)	<p>We are supportive of the landscape led approach but do not consider this has been fully developed in the Spatial Framework and further work is required.</p> <p>The wording of this section should be amended to present the 'requirements' of the approach. For example instead of 'whenever opportunities arise...' the</p>	<ul style="list-style-type: none"> Amend tone and purpose of text throughout to reflect requirements and commitments Further detail is required to reinforce the landscape led approach Stricter requirements are needed to define the minimum separation between villages and 	<ul style="list-style-type: none"> p80- Landscape led Approach is supported We suggest that EHDC adds a text box with: <ul style="list-style-type: none"> a) guideline relating to separation between villages: separation of <i>adequate width</i> needed in form of open space (green corridor or buffer) to avoid coalescence and maintain distinctiveness and landscape setting

		<p>wording should reinforce guidance: the proposals 'should respect...', 'should integrate...' etc.</p> <p>We cannot agree with the statement in para 4 that the outcome is the protection and enhancement of existing assets- the proposals shown in the CDF would have a significant impact and change the character of the area. It would be more appropriate to say it 'seeks to minimise the impact on existing assets'.</p> <p>It does not appear that the landscape led approach is fully reflected in the concept masterplan and images. The landscape buffers and separation between villages need to be of sufficient width to avoid coalescence.</p>	<p>between new and existing dwellings.</p>	<p>b) definition of minimum separation distance (as a number in metres) between villages and new and existing dwellings</p> <ul style="list-style-type: none"> • Need to provide assurance of community ownership and long term management objectives • Need to include clear statement under landscape led approach (p80) regarding retention of open areas in accordance with Policy GA1 • Woodlands and hedgerows are incredibly special and contain significant wildlife. The document makes reference to ancient woodland being 'enhanced'. The word 'enhanced' worries us as it has obvious connotations. we would prefer to see the words 'protected' and 'managed'. Page 80 refers to 'woodland parks' and it should be made clear and we should receive assurances that 'woodland parks' should not and will not be built within any ancient woodland. Further, no ancient hedgerows should be taken out (p92).
27	Page 79-80 Illustrations	<p>We welcome the approach of only developing part of the site, leaving large parts as landscape.</p> <p>However, we do not consider that the main plan is illustrative of the vision and landscape led approach advocated in the document.</p>	<ul style="list-style-type: none"> • Use Diagram 4 as the main illustration of this concept • Remove prescriptive and detailed urban form from all plans and diagrams, which anticipates a development layout yet to be discussed and developed 	<ul style="list-style-type: none"> • Comments addressed

		<ul style="list-style-type: none">• The most prominent aspect of the images is the footprint of the villages and their (urban) street pattern: the landscape is dimmed out and incidental• The concept plan should <i>not</i> show layout of individual villages. The layouts suggest an urban form and density and further work is required to define village character. This level of detail is not appropriate for the CDF. The villages should be shown in outline only.• Landscape/ green buffers between villages need to be wider to prevent coalescence and maintain distinctiveness. The Illustrative Concept Master Plan suggest the villages merge.• The central crescent shaped housing is built over the green area identified as a Key Landscape Feature (diagram 1). It appears locally as an alien imposition on the local area and is deeply resented for its scale and for the way it splits the landscape: it should be removed.• It is inappropriate for Gilston Park to be surrounded by development and there is a need for better integration with open countryside to the north• The existing network of parks, views and paths is not acknowledged nor integrated	<ul style="list-style-type: none">• Simpler definition of the location of the villages and how they integrate and relate to the landscape and existing villages would be better	
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		<ul style="list-style-type: none"> It is misleading to talk about '7 villages of the Gilston Area' as this fails to acknowledge the existing villages. The existing villages need to be clearly identified on the concept plan. 		
28	Page 81 onwards 7 Villages of Gilston Area based on Illustrative Concept Plan	The concept shows area of land including the former airfield and Gilston Park being retained as open space but we have no confidence that the necessary measures will be put in place to ensure these areas will not be built upon in the future. More information and a clear commitment/undertaking to the retention of open areas in perpetuity is required.	<ul style="list-style-type: none"> Further information and undertakings required about the retention of open areas in perpetuity Further commitment to the prevention of further development in the nearby areas (outside the promoters' landholdings) is needed 	<ul style="list-style-type: none"> Appropriate buffers need better definition p81- village centre on axis with gateway frontage to Gilston Park unacceptable p82-83 Proposed buffer between Villages 2 and 3 is inadequate No mention of size of buffer around Channocks
29	Page 81 onwards Village Character	<p>We do not agree with the presentation of proposals for the villages and the rationale for different village layouts. All of the layouts appear to be of similar structure and density with an urban form inspired by Harlow and it is unclear how these have been derived and how they reflect village character.</p> <p>Moreover, it is unclear what is the urban design 'requirement' and guidance offered in this section.</p> <p>We need a longer and more meaningful discussion about how the villages will be distinctive and individual and suggest that the images in this section should be removed and the section revised to set principles for village</p>	<ul style="list-style-type: none"> Revise or remove Section on Village Character Set guidance principles for village development/character Include commitment to protecting character and distinctiveness of existing villages. Existing villages, heritage and landscape features should be considered in detail to inform the character of new villages. 	<ul style="list-style-type: none"> Changes to section on Villages and guidelines for village development welcomed Need commitment to protecting character and distinctiveness of existing villages as well as creating distinctive new villages Need to indicate what will be the steps to developing Village Masterplans and how the long term quality aspirations will be maintained Village 1- reference to higher densities due to proximity to Harlow Town Station- further clarification required. Further details required of width and treatment of Eastwick Village Buffer Village 2- further clarification required of proposal to develop a linear

		<p>development/ character. It must also be recognised that this is not just about creating new 'distinct villages'- the existing villages want to retain their character and distinctiveness as well and we feel this has not been understood or addressed in the CDF. There needs to be clear thinking about the illumination of villages and alongside this light pollution in the context of 7 villages. There is no reference to this important matter of character and we cannot understand why this has been ignored.</p>		<p>serpentine form high street and village green. What has defined this? Further details required of width and treatment of Gilston Village buffer</p> <ul style="list-style-type: none"> • Village 3- what is meant by 'Developed at scale of model village'? Need to define minimum width of village buffer • Village 4- conservation and enhancement of setting of St Mary's Church should be a requirement. • Village 5- Plan needs to identify secondary school site on plan. Need to define minimum width of Eastwick Village Buffer • Village 6- Need to define minimum width of village buffer. Why is village centre proposed at highest vantage point- possible impact on views? • Village 7- need to define minimum width of village buffer • P89- composite plan needs to differentiate between village centres, education and leisure zones and existing villages in key • Map at page 83 shows separation still not right given village 3 and 4 form two sides of one valley • Map on page 82 shows C161 but describes it as the A414 – this is incorrect map at page 98 should make it clear that it is a C road and how the proposed eastern crossing road will be designed as it divides
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				an existing community ditto map on page 100
30	Page 84		•	<ul style="list-style-type: none"> • RoWs look incorrect on map- not in proportion • Seek to conserve and enhance St Marys- too woolly and needs amplification • No mention of buffer for existing village • No mention of buffer between Village 4 and Gilston Park (Blackthorn Cottage) • Buffer between Village 3 and Village 4 very tiny (existing road)
31	Page 85		•	<ul style="list-style-type: none"> • Names keep changing (Home Wood and Gibsons Shaw) • No mention of buffer in front of Homewood Cottages • Tiny buffer between Village 1 and Village 5 • Location of secondary school?
32	Page 86-87		•	<ul style="list-style-type: none"> • Buffer between Village 6 and Village 7 very tiny • Size of buffers and location unclear
33	Page 88-89		•	<ul style="list-style-type: none"> • Map needs better key (what are dotted lines, sports fields? Refer to new roads etc and show existing roads)
34	Strategy 1: Landscape Buffers	We do not think the Landscape Buffer Strategy has been adequately developed:	<ul style="list-style-type: none"> • Strategy 1 requires further development to address the comprehensive visual identity of the new and existing villages and 	<ul style="list-style-type: none"> • New Section on Response to Heritage Assets and existing villages welcomed- add 'and smaller hamlets and housing clusters' • Strategies have been developed

		<ul style="list-style-type: none"> ➤ There is no mention of the Stort valley as an asset and the landowners contribution to that as green infrastructure needs explanation and commitment; ➤ The landscape buffers are too narrow; ➤ Need for wider and connected green buffers to protect and enhance natural habitat; ➤ The green infrastructure network and links between the parklands are poorly defined; ➤ The plans for the parklands, buffers and other community assets need better explanation; ➤ Gilston Park and its locally listed garden setting, including 'home wood' are not fully exploited for the wider setting. ➤ Consideration needs to be given to the impact of sports fields/ floodlighting on adjoining woodland/ wildlife and existing local communities; <p>The site promoters own land between Eastwick and the A414- this could provide an opportunity to mitigate the sound and pollution from this busy dual carriageway but seems to be a missed opportunity.</p>	the visual green background to Harlow	<ul style="list-style-type: none"> • Minimum width and treatment of village buffers needs to be defined. • Minimum buffer around St Mary's needs to be defined now
35	Strategy 2 Minimising visual impact	<p>Strategy 2 should be about more than minimising visual impact but also about minimising impact on existing communities, local heritage and wildlife. The plans do not show how existing heritage and landscape assets will be</p>	<ul style="list-style-type: none"> • Develop and amplify Strategy 2 to show the requirements for minimised local impacts 	<ul style="list-style-type: none"> • Strategies have been developed to minimise local impacts on existing villages but have ignored other existing housing groups

		<p>protected and enhanced. In particular, we would note the following:</p> <ul style="list-style-type: none"> • Eastwick seems poorly thought about as a community. It has a distinguished Listed Church and war memorial as well as the opportunities to create sound and pollution buffers to the busy A414; • The plans for the parklands, buffers and other community assets need better explanation; • St Mary's is a Grade I Listed building with c1,000 years of history and we do not feel the future of this important community asset has been adequately addressed; • Gilston Park and its locally listed garden setting, including 'home wood' are not fully exploited for the wider setting; • Consideration of Hunsdon and Hundonbury, home to Grade 1 listed Hunsdon House and St Dunstan's Church as well as numerous other Grade II listed properties appears to have received scant consideration in assessing the impacts from the traffic generated by the proposal and the plans for the collection of historic buildings and garden at Brick House Farm are particularly poor; • The scheduled monuments are noted but little more is said about 		<ul style="list-style-type: none"> • Need to define minimum width of village buffers • p97 setback of Villages 5 and 6 needs to be defined • p98 and 100- maps show different access and new crossing strategy • There is no section on Gilston Park and surrounding houses • p99 View 3 text and photo incorrect • p99 Proposed green buffer in separate land ownership
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		<p>how they will be protected and enhanced;</p> <ul style="list-style-type: none"> The Pye Corner war memorial seems to be ignored rather than used as an opportunity to mark the respect it deserves, especially in the context of the proposed adjacent park. 		
36	Strategy 3: Learning from Harlow	<p>We do not understand the emphasis placed on the design of Harlow when the Gilston Area is being conceived as 7 distinctive villages and not as an extension to Harlow. Whilst some lessons may be learnt, the development of Gilston should draw from wider best practice and precedents in the development of Garden Villages- this theme needs developing as a part of the core vision.</p>	<ul style="list-style-type: none"> Strategy 3 should be reviewed to include references to wider best practice in the development of Garden Villages. 	<ul style="list-style-type: none"> Strategy 3: learning from Harlow removed- covered under strategic influences in Section 2
37	Former Page 70 / Current 102-103 Scale and Massing	<p>There is no clear rationale for the proposed height of buildings in villages. We are concerned that the proposed height of buildings is not appropriate to village character. Further work is required in relation to defining village character and the focus in the CDF should be on establishing broad principles. The images suggest an urban form of development with a uniform height of 4 storeys in Village 3 and 3 storeys in Village 4. Villages are characterised by a variety of building types and design. This is at odds with the developers' ambitions as set out in their consultation on the outline</p>	<ul style="list-style-type: none"> Set out a clear rationale for height control in the villages and distribution of massing to enhance individuality and separation. Remove and replace images with typical village 'mix' 	<ul style="list-style-type: none"> This section is descriptive and confusing – it does not give any clarity nor confidence that the village scale will be promoted. The topographic approach (by which 4 storey buildings on higher ground allow for 3 storey buildings throughout) is not supported. Villages should have 'softer edges and lower density Revised text states that scale and massing should be appropriate to village character drawing from the local character of Gilston, Eastwick and Hunsdon and the wider context of East Hertfordshire

		<p>application where they suggest 7 storeys, which we feel is simply out of context and so should be specifically excluded by the CDF.</p>		<ul style="list-style-type: none">• P102: 'Generally the massing across the Gilston Area will be between 3 to 4 storeys in height, but the overall range will be 2 to 5 storeys'. Existing villages are mainly 2 storeys. These statements need further clarification, as the diagram seems to imply that the majority of buildings will be at least three storeys (GF+2).• Where is 5 storey development proposed? In Village 1 centre and other locations? This needs clarification. The proposed scale seems more of a town centre rather than a village• Revised text states that higher densities and development massing are also considered in the village centres and concentrated along main vehicular and public transport arteries, to optimise sustainable development principles. Further clarification required- suggests that development in 3 villages will be over 3 storeys.• We suggest that EHDC inserts a text box with clear guidelines for the location of maximum heights and maximum height requirements in line with the vision of village character.• The illustrative heights map is very difficult to read and needs to be made clearer- suggests extensive areas will have taller buildings. A
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				<p>map of maximum allowed height would be preferable.</p> <ul style="list-style-type: none"> The requirements for maximum height and massing to be included as part of planning application submission.
38	Former Page 71 Illustrative Concept Plan	The status of the Illustrative Concept Masterplan is unclear. We do not consider that it is consistent with the vision and objectives and should be amended as set out above (ref.20).	<ul style="list-style-type: none"> Include conceptual diagram about rationale for heights and massing Identify maximum heights 	<ul style="list-style-type: none"> Illustrative concept removed
39	Former Page 72-73 / Current 104-105 Density approach	We agree with the statement in para 1 that the focus should be on quality of place rather than quantity of development and support the approach of not building across the whole site. However, we find the explanation of density very confusing and further clarification is required. We would like to better understand what a development with an average net density of 33 dph would look like in terms of height and massing. The images contained in the CDF would suggest an urban form with a higher density than is characteristic of Garden Villages and we are concerned about the implications of this for the overall scale and form of development. We would like the CDF to establish clear guidelines which all developments will be required to comply with to ensure a high quality development based on Garden Village principles is delivered.	<ul style="list-style-type: none"> Clarification required of density calculation Establish guidelines for determination of planning applications Replace the precise footprints of the urban blocks with generic form 	<ul style="list-style-type: none"> Integrations and additions very welcome It would help the reader understand the 'visual look' of the various sites benchmarked if street views were to be included as well as plans Page 107 – the key is incomplete and the plan cannot be understood. Need to have lower densities close to existing dwellings (Gilston Park, Dairy Cottages etc) Maps show crescent in front of St Mary's as developed but p89 suggests otherwise Expected further clarification to be provided on broad density ranges. Reference to higher and lower density but no guidelines. Higher density area shown in area closest to Harlow but no indication of what maximum density would be. p109- calculation of net density: diagram indicates that Gilston Park has been included in calculation as

		We note that the separation of the villages is 'incidental' and the individuality of the villages is virtually undetectable		<p>'incidental open space'. Gilston Park is outside the development site and should not therefore be included in density calculation- clarification of approach adopted is required. What would the implication be of excluding Gilston House and Park from the density calculation?</p> <ul style="list-style-type: none"> • EHDC to add a text box with a specific maximum and maybe even minimum density and with required rationale and detail for planning application and methods for assessing suitability • EHDC to prepare a plan to show density bands. This could be addressed by high, medium and low density bands with appropriate ranges.
40	Former Page 74-75 Current Page 110-111 Green Belt	We disagree with the statement made in para 1 regarding the Green Belt. This is a matter which will be determined through the District Plan. Reference should be made to proposals in the draft District Plan and Policy GA1. The revised Green Belt boundary has not been approved. Amend title of plan to ' <i>Proposed Green Belt Boundaries</i> '. The justification for Green Belt review is not a matter for the CDF and will be determined through the District Plan and debated at the EiP.	<ul style="list-style-type: none"> • Amend section to reflect policy position and status of District Plan • Amend title of plan 	<ul style="list-style-type: none"> • EHDC to review and amend. • Reference should be made to DRAFT District Plan: text assumes that amendment to Green Belt boundary has already been approved. • Inconsistencies in approach to showing current RoW network
41	Former Page 76 to 81	We disagree with the opening reference to Harlow's Green Wedges, which are in an urban setting and between	<ul style="list-style-type: none"> • The Stort Valley will be a key separation from Harlow and needs to be treated with a 	<ul style="list-style-type: none"> • The expanded guidelines on Green Infrastructure and Open Space provision are welcomed.

	/ current 112-129 Green Infra-structure	<p>neighbourhoods of the same town. But we also note that the Harlow Wedges are wider and more generous than the village separation described in the vision and objectives of the development.</p> <p>We support the creation of new managed parklands, but we would like to see more emphasis on the integration of historic features, views and paths and equally important, the process for these being transferred to the community for long term management with endowed funds/assets to provide for their maintenance to the quality expected.</p> <p>The existing park and play area at Terlings Park are ignored. It appears that this area is targeted for an A road dual carriageway; that cannot be right?</p>	<p>comprehensive plan, not limited to the land ownership of the proponents</p> <ul style="list-style-type: none"> • Gilston Park and surrounding Key Landscape Feature (page 60) should be integrated in the proposals on plans on all pages. • The separation of the villages and the green buffers should be clearly identified as structural elements in both plans (plans on all pages) and text • Existing landmarks and paths should be integrated (plans on all pages) • The built crescent clearly interrupts a key landscape area and should be removed 	<ul style="list-style-type: none"> • P114-115 – the plans are at different scales and hard to read. The text does not explain how the site and proposals respond to the EHDC diagram and policy. Clarification needed. • Plan shows green link going through Homewood. This should be removed and replaced by a link via the back of property, where an existing path/bridleway already exists. • p116- East-west link 'primary green corridor' is missing • p117- map and key need to be updated • p117- plan shows a 'community play' area within Homewood. Homewood is an ancient forest and should not be open to having a community play area within it. This should be removed from the plan.
42	Page 126 onwards open space provision	<p>We support the spirit and approach to the formal open space provision, but we would like to see more and better local inspiration from the 'countryside' rather than managed municipal parks to reflect the core vision of 7 villages within a rural setting.</p> <p>Governance by the community in perpetuity is a strong concern alongside an assurance that it will not be 'rolled back' for future development.</p>	<ul style="list-style-type: none"> • It is evident that the crescent fragments the continuity of the landscape – it should be removed. • Pitches and managed open space should not be located in sensitive areas • Clear guidance for future control of pitch floodlighting and club parking in sensitive areas is required. 	<ul style="list-style-type: none"> • P126 – stronger reference should be made to community green spaces and village buffers being viable parts of the countryside (woodlands or fields), and not as parkland or leisure spaces. This is essential to the concept of villages in the countryside, rather than neighbourhoods in municipal parks. The character of parklands are 'country parks' rather than urban parks. Rural character to be retained and enhanced.

				<ul style="list-style-type: none"> • P126-127 – all sport fields outside the built-up areas of villages should have no floodlights. Need to strengthen reference to need to restrict floodlighting and parking controls associated with sports pitches. Sports facilities should be operated by the community for the village community as it will be and not cascaded to the Private sector by the landowners • P129- Homewood has been designated an area for 'Outdoor Sports Facilities'. Homewood is an ancient forest and should not be open to having a 'outdoor sports facilities' within it. This should be removed from the plan. • Include cross reference to governance and protection of open spaces in perpetuity. • Reference to detailed design of open spaces at masterplan stage is too woolly and needs more detail
43	Former Page 92 Current Pages 132-139 Village Centres Approach	The illustrations are mis-leading. They are not of villages but of towns (similar to Harlow) and are inconsistent with the vision. The fact that they show specific villages is of concern as this suggests design work is further developed than has been stated. This level of specificity is anyway inappropriate to the CDF which is a guidance document. The first Placemaking principle that 'Gilston will exploit the rural setting with	<ul style="list-style-type: none"> • Remove/ replace images with more appropriate illustrations of village environments • Delete first sentence of first placemaking principle • Clarify place-making guidance in relation to village vision. 	<ul style="list-style-type: none"> • The revised presentation of villages, their size and facilities is much clearer and welcome. • The plans are helpful but need keys • Statement regarding phasing is very general and there is still a lack of detail regarding phasing and timescale for provision of community. • p 132: revised text states that Gilston Area will have a phased delivery of community and services provision in

		all the amenities of a <i>town</i> ' could be misinterpreted.		<p>line with the progress of the development. There is still a lack of detail about the level of provision required to serve the needs of new population and how provision will be phased in relation to development.</p> <ul style="list-style-type: none"> • EHDC should integrate with a statement clarifying the approach to ensure appropriate and timely infrastructure provision and what will need to be provided before any new loads are applied to existing infrastructure already under strain. • p135 – added note 'Provision to be confirmed in due course' to be replaced with a clear statement of when provision will need to be confirmed. • EHDC to require an Infrastructure Delivery Plan to be submitted with Outline Planning Application • Concerns with regard to proposed provision. Village 7- 1500 homes but no school or health facility proposed
44	Former Page 92 Village Centres Approach	We support the second placemaking principle- provision of a range of high quality low-carbon homes		<ul style="list-style-type: none"> • Agreed
45	Former Page 92 Village Centres Approach	We do not agree with the last placemaking principle that development will promote more sustainable transport choices and high density development is appropriate near station. Existing services are at capacity and this principle is meaningless without a commitment to	<ul style="list-style-type: none"> • Amend last placemaking principle to include reference to commitment to provision of improved public transport. 	<ul style="list-style-type: none"> • Add key or written statement to confirm that all village centres will be served by public transport and cycle routes and will be pedestrian friendly.

		improving the frequency and capacity of bus and rail services		
46	Former Page 92 Village Centres Approach	The CDF provides no guidance about how the development of the centres and community and service provision should be phased and subsequently managed. The inclusion of details regarding phasing in the CDF is a requirement of Policy GA1. We are concerned that provision will not be made until the later phases of development giving rise to increased pressures on existing facilities.	<ul style="list-style-type: none"> • Provide guidance relating to phasing and timescales for village centres and provision of community facilities 	<ul style="list-style-type: none"> • EHDC to write adequate statement (see point 34 above)
47	Former Page 92 Village Centres Approach	No guidance is provided regarding the proposed size of each village or how these relate to existing villages. There appears to be an assumption that each village will have a range of facilities but it would be expected that there would be a hierarchy of service centres. Policy GA1 requires the provision of serviced sites for Gypsy and Travellers and Travelling Showpeople. The CDF does not identify which village these will be located in.	<ul style="list-style-type: none"> • Provide clear guidance on size of villages and hierarchy of service centres • Clarify criteria for location of sites for Gypsy and Travellers and Travelling Showpeople. 	<ul style="list-style-type: none"> • No guidance on Gypsy and Travellers sites – a requirement of Policy GA1 – EHDC to comment • Guidance provided on size of villages
48	Former Page 93 Village Centres Approach	The plan shows a level of masterplanning detail which is not appropriate for the CDF. The CDF should establish principles and the masterplanning work should follow. The layouts of the villages should be omitted and the plan should be revised to show the boundaries of villages and proposed location of village centres. The plan raises questions about how the new road network will connect with the existing road network and suggests that traffic will	<ul style="list-style-type: none"> • Amend Village Centres Plan • Address inconsistencies with other plans in the CDF (including access and movement) 	<ul style="list-style-type: none"> • Agreed

		be routed through Hunsdon. It also shows an additional Stort Crossing to the west but provides scant detail about this important new route which will carry considerable traffic through the proposed development; this should be better explained.		
49	Former Page 94-95 / Current page 134-135 Village Centres – retail & commercial	No information is provided about the phasing of village centre development. This will have implications for infrastructure provision. There is a concern about the viability of retail facilities in every centre and a need to establish a hierarchy of centres which will also benefit existing residents. The individual village plans are unhelpful. The main plan should be amended to show location of centres and boundaries of villages only with details of village layouts omitted.	<ul style="list-style-type: none"> • Further information on phasing of village centre development and provision of facilities • Amend plan. Remove village insets And identify existing villages. 	<ul style="list-style-type: none"> • P 134 - Would be helpful to include details of hierarchy of service centres in this section- referred to later in section. • Is there a difference between a supermarket (village 2) and a large foodstore (village 4)? Is the latter to serve the development or to attract custom from a wider area?
50	Former Page 96-97 Village Centres – Education & Leisure	The last sentence of the second para should be amended to include firm requirements: 'Secondary school provision SHOULD include sixth forms'	<ul style="list-style-type: none"> • Amend text 	<ul style="list-style-type: none"> • Reference is made elsewhere to education campus but no details are provided in this section.
51	Former Page 96-97 Village Centres – Education & Leisure Current Page 135	Greater clarity is required about the number of schools required and how these will be phased. Local schools are already under pressure and do not have capacity to accommodate new development. Additional school places are required before any development takes place. Plans to be amended to	<ul style="list-style-type: none"> • Include clear requirements on number and timescales/phasing of new schools • Amend plans 	<ul style="list-style-type: none"> • p 135- EHDC should revise and confirm details of number of schools to be provided. Whilst provision will be phased it is possible to set out requirements to meet needs arising from development

		show village boundaries and location of facilities- omit village insets		
52	Former Page 98-99 Current page 136 Village Centres – Community Facilities & Health	Greater clarity is required about the type of facilities to be provided and the timescales and phasing of new health provision. Existing facilities are inadequate. A clearer commitment is required to a phased provision of facilities to meet the demands arising from the development. Plans to be amended to show village boundaries and location of facilities- omit village insets	<ul style="list-style-type: none"> • More information required on phasing • Amend plans 	<ul style="list-style-type: none"> • EHDC – p. 136 No details provided about the level and type of facilities- what level of provision will be required to meet the needs of the proposed development? Whilst nature of provision may change over time it is possible to set out requirements based on current standards.
53	Former Page 98-99 Village Centres – Community Facilities & Health	Policy GA1 states that consideration should be given to the potential of the site to facilitate the delivery of a re-located Princess Alexandra Hospital (PAH). This is not addressed in the draft CDF. We do not consider that a major hospital of regional scale is consistent with the vision for villages. We would like to see a firm assurance that the traffic and infrastructure of a major hospital will not be located here	<ul style="list-style-type: none"> • Clarification required regarding the status of proposals for PAH • Firm guidance to prevent major regional infrastructure to be located within villages 	<ul style="list-style-type: none"> • Welcome statement regarding PAH- is this acceptable to EHDC given requirements of Policy GA1? • Plan is helpful but requires key
54	Former Page 100 / Current Page 137 Residential	The top photo shows a density and form of development which is inappropriate in a village environment.	<ul style="list-style-type: none"> • Remove photo 	<ul style="list-style-type: none"> • Photo removed • All photos are helpful to illustrate appropriate residential typologies – we note that the proposed typologies are all 2 stories with in some case a third storey as loft space only. • Typical typologies for the apartments and other 3-4 storey village homes should also be proposed
55	Former Page 100	The guidance provided on residential mix and typologies is very limited. No	<ul style="list-style-type: none"> • Add guidance on maximum densities and typology mix 	<ul style="list-style-type: none"> • p 137- EHDC to include specific reference to social and affordable

	Residential	reference is made to social and affordable housing to meet local needs.	<ul style="list-style-type: none"> Add reference to affordable housing 	<p>housing requirement (as %, location, size and typology mix)</p> <ul style="list-style-type: none"> Add reference to tenure blind housing as a key policy objective
56	Former Page 101 / Current 138-139 Residential	The village insets should be removed for reasons previously stated. Plan should be amended to show boundary of villages only.	<ul style="list-style-type: none"> Amend plan 	<ul style="list-style-type: none"> Village insets amended. The summary of community facilities provision is helpful but needs to relate back to text. It may be helpful to put this summary page at the start of this section It would be better to indicate the number of schools and health centres expected to be required and the number or % of expected affordable homes – EHDC to provide
57	Former Page 102-103 / Current pages 140-141 Approach to Governance	Inadequate information/ guidance on requirements is provided and further clarification is required regarding future governance arrangements and how/ when these will be implemented. Detailed comments are set out in our Interim Response. We are particularly concerned about the management of community assets and the need to ensure that existing communities (including Hunsdon and High Wych will have a role in this). The protection of undeveloped land (eg: Hunsdon Airfield) needs to be much stronger. It is imperative that the shared green/ recreational spaces remain in the control of and accessible to all residents not just residents of new villages (we have requested details on this for several months but have yet to receive anything).	<ul style="list-style-type: none"> Precise guidance and requirements to be provided on Governance Approach (see also Interim Response). 	<ul style="list-style-type: none"> EHDC should review this section and ensure that the proposed approach is appropriate, legally sound and will not result in charges to future residents which should normally be paid for as a development expense and so not a service charge. EHDC should ensure the proposals comply with the revised wording of Policy GA1 EHDC should also set out clearly what part of the Governance Strategy will be public and submitted as part of the Outline Planning Application and what will remain confidential and agreed in the S106 negotiation. The text should more clearly explain the governance bodies and the land ownership / responsibilities. Is the 'Community Body' the same as the

				<p>'Community Trust'? Or will there be a body who own and a separate management body?</p> <ul style="list-style-type: none"> • The text should clearly identify the role of the existing communities and how they will be participating in the future structures • Village 7 has a different colour – will it have a different Governance Structure? How will it work? • The conceptual diagram of Page 140 is not reflected on the diagram of page 141: What is the Village Body domain? What is the Community Body domain? • Need to make clear that the requirements will apply to any subsequent promoters of the development as well as to the current principal landowners • Key milestones for governance need further explanation- first reference to Shadow Community Board/ Community Board
58	Former Page 104-105 Current Page 142-143	<p>The transport vision is supported in principle, although we do not believe that people with cars will choose walking cycling or buses instead.</p> <p>The Illustration of page 105 shows a wide road, a large articulated bus (unsuitable to a village) and very narrow walking space</p>	<ul style="list-style-type: none"> • Replace image with one that is more in the spirit of a people orientated village street 	<ul style="list-style-type: none"> • A separate transport Vision is inappropriate, as the development has an overall vision, objectives and spatial principles that should be carried through. • Image updated – but top image (p.143) shows a A class road equivalent to the A414, unsuitable elsewhere within the development.

59	Former Page 106-107 / Current Page 144-145 Strategic connections	<p>The title is inappropriate as it suggests that there are no strategic transport issues off-site.</p> <p>We are concerned that the focus on Harlow as the only destination and the rail link to London is misleading as it underplays other destinations in Hertfordshire that attract traffic through the villages, especially when the development is set within the London Cambridge corridor with Stansted being some 9 miles distant with its planes approaching landing overflying the development c.35% of the time.</p>	<ul style="list-style-type: none"> • Replace Title with 'Strategic Connections' • Include firm requirements to manage additional traffic in off-site congested hot spots • Include specific reference to all main destinations • Identify routes that are at risk of attracting traffic through villages (Hunsdon & High Wych in particular) • Amend plans accordingly 	<ul style="list-style-type: none"> • The text appears to justify the allocation, while it should refer to key destinations instead. • This section or part of this section would better belong to the 'Strategic Context' pages 24-25 • Would be helpful to have a plan showing all planned infrastructure improvements (Harlow Sustainable Transport Corridors and Junction 7a) to accompany new text • P 144 - Reference is made to two new Stort Crossings- clarification required. One improved crossing and one new crossing (east or west of existing)? • p 145- plan should show all planned infrastructure improvements (Harlow Sustainable Transport Corridors and Junction 7a), the A414, the new crossing and Eastwick road, the access to the villages, cycle routes and bus services (including planned provision) • The eastern crossing and Pye Corner / Eastwick Road are not included in either internal nor strategic roads. Currently these are 30mph local "C" category distributor roads with weight restriction and attract too much traffic already. They should be slower and safer. A specific description of what it is appropriate at this location should be
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				<p>made. It will be especially important to ensure that Terlings Park is not cut off and that safe access to properties is guaranteed. The principal of running a new A road from the Eastwick roundabout to the M11 J 7A through the existing community is unsatisfactory</p> <ul style="list-style-type: none"> • The text does not provide comfort to local residents about impact of traffic on roads off-site (particularly to Hunsdon and Harlow)- further details of what a monitor and manage regime will comprise are required .
60	Former Page 108-109 / Current Page 146-147 Road Hierarchy	<p>The section is not presented as guidance or requirements.</p> <p>No reference is made to the requirements to minimise impacts on existing communities and local roads.</p> <p>There are grave concerns about:</p> <ul style="list-style-type: none"> ➤ The scale of the Primary Road – presented as a 4 lane segregated road with side access roads: completely out of character with the aspiration for villages and slow community setting ➤ The eastern access proposed fails to respect the setting and children’s play space of Terlings Park ➤ The expectation that the wide Primary Road will feed into 	<ul style="list-style-type: none"> • Give clear indication of requirements and commitment to good access infrastructure at Gilston Roundabout. • Set out clear criteria to protect Terlings Park from the impact of the Eastern Access. • Set out clear requirements to prevent additional traffic through Hunsdon. • Set out clear requirements for low impact integration (no through traffic, but good access) for the existing villages, smaller pockets of houses and Terlings Park. • Refer to requirements for adoption and maintenance. • Set out a clear commitment to slow speed, human scale roads, including a maximum 	<ul style="list-style-type: none"> • EHDC and HCC need to review and represent this section as guidelines and requirements- not as ‘anticipated’ arrangements. • The text should clearly set out expectations for the character and typologies of streets (including maximum design speed and sustainable transport provision for at least Primary and Secondary Streets) • Need for much greater clarity about when the details of the street design will be determined- the CDF must set out clear principles and requirements to ensure appropriate form of development. ‘In due course’ is not satisfactory given the concerns expressed by local community. • The community does not think that 4 lanes are compatible with the village concept and the revised text does not

		<p>Church Lane and Hunsdon is wrong</p> <ul style="list-style-type: none"> ➤ The requirements for slow speed and liveability on the Primary Spine are needed. <p>The road sections are inappropriate, as are the images which show an urban boulevard in Rotterdam.</p>	<p>road width consistent with village concept.</p> <ul style="list-style-type: none"> • Replace/ amend images and sections accordingly. 	<p>offer any comfort that this is not typically needed.</p> <ul style="list-style-type: none"> • It is still suggested that primary road will be 4 lanes in some places- need to illustrate on plan where this will occur, how slow speed and sustainable transport will be integrated and how pedestrians will safely and casually cross the roads. Concern that large sections will be designed to this standard and no controls provided in CDF. • p146- This statement in its current context implies that no traffic from the development will impact the existing road infrastructure, which is clearly untrue. There needs to be greater clarity on how the existing infrastructure will be expanded / improved. Similar comment applies to other transport infrastructure.
61	Former Page 110-111 Sust. Transport Strategy	<p>The community does not believe that a strategy of walking and cycling is a credible foundation: people have cars and will use them. If the Council and Developers are planning to encourage cycling then they must put forward measures to do this and explain how that will work.</p> <p>However, this section should set out clear commitments to maximise</p>	<ul style="list-style-type: none"> • Plans – integrate the existing villages and paths into walking and cycle network. • Reinforce requirements and commitments to the promotion of walking and cycling – including marketing and promotion. • Add requirements for integration with Harlow’s sustainable transport initiatives. 	<ul style="list-style-type: none"> • Promotion of sustainable transport is critical to achieving vision for Gilston Area- the provision of facilities as an integral part of the development must be set out as ESSENTIAL REQUIREMENTS not proposals or possible interventions. EHDC and HCC should revise and propose clear targets. • Table of key destinations is too small and perhaps belongs to the strategic section

		sustainable travel, including but not limited to physical provision.		<ul style="list-style-type: none"> • P. 149 existing communities are not linked to the pedestrian and cycle networks
62	Former Page 112-113 / current page 150-151 Bus Strategy	<p>The vague language of the text is inappropriate and is not supported. It should be changed to clear requirements for quality bus service in the area.</p> <p>There is no clarity of how the existing villages (especially but not only Hunsdon) will benefit from the additional provision.</p> <p>We disagree with the identification of the key destinations.</p>	<ul style="list-style-type: none"> • Indicate requirements for minimum quality bus services. • Identify likely passenger levels and requirement for services. • Integrate all existing villages. • Consider bus services to Hertford, Welwyn and Bishop Stortford. 	<ul style="list-style-type: none"> • The plan on p. 151 still shows that the current residents are outside the catchment of bus stops and there is no pedestrian link shown on p. 149 • The text is vague and makes no commitment except to the possibility of market provision of services - bus service improvements and new provision must be presented as an ESSENTIAL requirement of development, and funded by the developer in advance of full occupancy of the site. • If this has not yet been developed, a Public Transport Strategy must be set out as a requirement of any planning application submission.
63	Former Page 114-115 Current p152 Rail	<p>The text paints a rosy picture of the rail service, with vague reference to forthcoming improvements. The community does not believe that capacity on the trains, in the station and in the car park will be available to serve the development.</p> <p>There are no 'transport requirements' but only 'possibilities' in this section.</p>	<ul style="list-style-type: none"> • Identify likely passenger levels generated by the development and requirement for additional services and relative timeframe. • Express firm requirements for access to the station, for development in line with additional capacity at station and railway. • Express firm travel planning and management expectations. 	<ul style="list-style-type: none"> • Text amendments do not provide any greater detail about proposed improvements. • Reference is made to engagement with TOC and Network Rail to secure delivery of the northern access to Harlow Town Station: EHDC should make this a REQUIREMENT of development

64	Former Page 116-117 Current Page 154-155 Highway Improvement Strategy and summary	<p>The text of this section places no obligation on the developers to address transport requirements generated by the development and improve on current deficiencies.</p> <p>This section should set out clear parameters for strategic connections. There should be requirements to demonstrate good standards of service across the wider network and for minimal environmental impacts (noise and pollution).</p> <p>Our experience is that current roads are already congested and there is significant rat running already.</p>	<ul style="list-style-type: none"> • Firm requirements for transport infrastructure improvements off site. • Clear guidance for good standards of service. • Commitment to fund all necessary infrastructure in line with arising additional needs. • The summary should indicate quite clearly the transport service offered to the existing communities. 	<ul style="list-style-type: none"> • Given that an early planning application is considered, the CDF should provide further details of the proposed second Stort Crossing. This is a major concern to residents of Pye Corner and Terlings Park. • Text changes have not addressed Community's concerns and do not reflect EHDC's Leaders written assurances or Landowners statements on quality of development
65	Former Page 116 Current p154 Highway Improvement Strategy	<p>The statement that the second Stort crossing is not enabling works and will be required with or without the Gilston Area development gives rise to doubt upon its funding viability. Without this link the A414 will become more congested making rat runs through Widford, Hunsdon and Much Hadham all the more attractive.</p> <p>We question the statement made in column 3 that the development will not result in increased traffic in Hunsdon and High Wych given that the new highway network feeds into local roads. The route through Hunsdon is used as a short-cut to Bishops Stortford which is the areas natural shopping destination.</p>	<ul style="list-style-type: none"> • Further clarification required of traffic assessment and how impacts on existing communities will be mitigated. • Further information required regarding funding and phasing of highways infrastructure. 	<ul style="list-style-type: none"> • This section needs to set out clear requirements for transport infrastructure improvements and to confirm which will be funded by developer and which will require funding from other sources. • Text changes have not addressed communities concerns • Strategy needs to be set out as requirement of development- not the developer's proposals. • EHDC and HCC should revise this section to confirm the developers' commitments and add a text box with highway conditions and upgrades that need to be satisfied before the development can proceed.

				<ul style="list-style-type: none"> • p 155- summary of transport strategy should be set out as a summary of REQUIREMENTS to be delivered by development. This will need to be demonstrated as part of Outline Planning Application • p 155- issues of air quality must be addressed as part of the Environmental Assessment undertaken to support the OUTLINE planning application not at detailed masterplanning stage- this will be too late. • EHDC and HCC/ECC inputs required
66	Former Page 130-131 Current p163 Delivery and Implementation	The text does not set out any commitment or requirement (not even the delivery of the District Plan assumptions).	<ul style="list-style-type: none"> • Clear commitments for housing delivery in line with District Plan. • Clear commitments to infrastructure first. • Clear commitment to managed construction to protect residents. • Clear requirements for community engagement in all future design and approval stages. 	<ul style="list-style-type: none"> • Policy GA1 requires issues of phasing to be addressed in Concept Framework – EHDC to confirm what is required • The section raises a lot of uncertainty about timing, funding and delivery of key infrastructure. If these matters are not addressed in CDF there must be a very clear requirement that they will be addressed as part of the Outline Planning Application. Also need for acknowledgement that development will not proceed without commitment to infrastructure delivery- to be secured through s106. • New text on Delivery and Implementation is welcomed but is very general and does not provide sufficient detail. • The plan does not indicate any phasing. It is necessary to provide at

				<p>least indication of when development is expected to commence and the first phases (including access upgrades and community facilities).</p> <ul style="list-style-type: none"> • Need firmer commitment to phasing of infrastructure provision in line with development. Is it possible to provide an indicative programme? • Reference to additional work- who will undertake this and when?
67	Revised Draft p 172 Next Steps			<ul style="list-style-type: none"> • This section is still worded as a document which is intended to support the allocation rather than provide guidance on future development. • The text must make clearer that the outline planning application will be required to comply with the guidelines set out in the CDF- not merely to 'have regard to'. This weakens the status of the CDF. • EHDC need to expand on what will be required to be submitted with the outline planning application- Infrastructure Delivery Plan, Transport Strategy, Governance Strategy, illustrative masterplan (including location of key infrastructure such as schools) etc. Design Guidelines should include primary road and other strategic infrastructure • A much stronger commitment should be made to community ENGAGEMENT at each stage of the

				<p>process. Does the Shadow Community Board have a role in this?</p> <ul style="list-style-type: none">• References to further technical assessments has been removed- this should be reinstated as it is a requirement to advance to Outline Planning Application Stage• EHDC should set out how they will work with other authorities and alignment with Garden Town Initiative. This will be important in respect of infrastructure funding and delivery• EHDC need to add to this section as the planning authority responsible for delivery• The CDF should set out the approach to land value capture. This information has been requested for 18 months
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