



our ref: **PM/Q10058**

your ref:

email: [REDACTED]

date: 23 July 2015

Isabelle Haddow
Planning Policy Team
East Herts Council
Wallsfields
Pegs Lane
Hertford
SG13 8EQ

Dear Isabelle

NEIGHBOURHOOD AREA DESIGNATION APPLICATION
EASTWICK & GILSTON, AND HUNSDON PARISH COUNCILS

I write on behalf of Places for People in respect of an application that has been made by Eastwick & Gilston, and Hunsdon Parish Councils to form a joint Neighbourhood Area.

As East Herts District Council ("EHDC") are aware, Places for People are the freehold owners of over 1,000 hectares of land referred to as the Gilston Park Estate which falls entirely within the proposed Neighbourhood Area.

Places for People have been engaging with EHDC planning officers for a number of years regarding the identification of the Gilston Area for a residential led development that would address the significant evidenced local housing need, whilst also materially contributing to the urgent economic regeneration of Harlow. The preparation of detailed evidence by EHDC and Places for People has led to the identification of the site within the Gilston Area Broad Location as set out in the District Plan Preferred Options. Based on the detailed evidence prepared, the Preferred Options states that the Gilston Area is a strategic scale location where the "*Council accepts the principle of development*" although there are certain aspects that require additional testing (paragraph 3.3.10).

Our client is therefore concerned to ensure that the Neighbourhood Area designation recognises EHDC's development plan approach for the area and as a result we request that the Council carefully considers this application prior to making any decision, and in particular has regard to the following matters. We have discussed the application with my client's joint promoters of the Gilston Area, City & Provincial Properties, and we're aware they are submitting similar representations.

a) Development Plan Status

A Neighbourhood Plan is required to be in general conformity with the strategic policies of the development plan in force. The Guidance advises that it is important to minimise any conflicts between policies in the neighbourhood plan and those in the emerging Local Plan, and that where any conflict occurs weight will be afforded to the last document to become part of the development plan.

If the District Plan continues to support the development of the Gilston Area and is adopted post the adoption of a Neighbourhood Plan, depending on the content, the former could be immediately be out of date and require review. This is a factor that can be taken into account when considering the application for a Neighbourhood Area.

b) Neighbourhood Area Boundary

The emerging District Plan, which has been in gestation for some time following the preparation of detailed technical evidence, has identified the Gilston Area as part of the strategic policies for development during the plan period. The National Planning Practice Guidance notes at paragraph 36 that where a proposed Neighbourhood Area includes a strategic site, the local planning authority will consider the particular planning context and circumstances in concluding the extent/area to be designated, and paragraph 35 explains that a LPA can use its powers to designate all or some of a Neighbourhood Area applied for.

In this instance, given the significant amount of work currently ongoing in the preparation of the emerging District Plan and as the Gilston Area covers a substantial part of the two parishes, it would seem premature to create a Neighbourhood Area when a large part of it is covered by a strategic site defined as part of the emerging District Plan.

A similar case was recently considered by Epping Forest District Council ("EFDC") in respect of an application by North Weald Parish Council which included land immediately to the south east of Harlow that has been identified as a potential location to accommodate some of the forecast housing need. EFDC decided to approve the Neighbourhood Area designation but excluded the land adjacent to Harlow on the basis that it would be premature to include the land in the Neighbourhood Area whilst wider strategic decisions about the direction for growth were yet to be concluded.

In summary, the Gilston Area is a critical element of the EHDC's emerging District Plan (as supported by up to date evidence) and is fundamental to the successful economic regeneration of Harlow. As a result it is important for EHDC to ensure that the Neighbourhood Area designation does not impact on the planned growth for the area.

Yours sincerely,

