

Issue Number	Issues raised through consultation	Officer Response
General Issues		
12.0	Sawbridgeworth Town Council, High Wych Town Council, Hunsdon Parish Council, Much Hadham Parish Council and Eastwick and Gilston Parish Council, along with a number of individuals, support the STOP Harlow North campaign and the submission made which details a number of objections to development in the Gilston Area as set out in the draft District Plan.	Officer responses to the issues raised in the STOP Harlow North submission are addressed within this document below.
12.01	STOP Harlow North states that East Herts Council has changed its mind about development in this location, having opposed it previously through the East of England Plan.	<p>No amendment to Plan in response to this issue</p> <p>The area to the north of Harlow was previously identified under a very different planning context as part of the East of England Regional Plan. At that time the site was identified in order to help meet the housing needs of the wider region. Following the abolition of the East of England Plan, it became the responsibility of local planning authorities to identify, and plan for, their full objectively assessed housing needs. The Strategic Housing Market Assessment identifies that East Herts housing need is for 16,390 homes up to 2033. Having undertaken a thorough assessment of all options, the Gilston Area is considered to be a sustainable location for development which will help meet a significant proportion of East Herts' housing needs, both within the current plan period and beyond.</p>
12.02	STOP Harlow North and others state that the Green Belt is of special significance as identified by the Green Belt Review 2013. In addition, exceptional circumstances do not exist to enable Green Belt release in this location.	<p>No amendment to Plan in response to this issue</p> <p>It is acknowledged that the Green Belt Review 2015, which has replaced the document produced in 2013, identifies that land in that location performs an important role in Green Belt terms. However, in formulating the development strategy for the District, the Council has to have regard to the evidence base as a whole. Having done so, it is considered that the Gilston Area represents a sustainable location for development. Housing need does represent the exceptional circumstances required to review the Green Belt. This</p>

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		was confirmed by a Planning Inspector during an advisory visit to the Council in early 2016.
12.03	STOP Harlow North states that the Council should consider not meeting its full housing needs due to the environmental constraints that exist.	<p>No amendment to Plan in response to this issue</p> <p>Should the Council submit a Plan which does not meet the full objectively assessed needs of the District, it is highly unlikely that it would be found 'sound' at Examination. Only the lower third of the District is within the Green Belt. The Council could adopt a strategy whereby no Green Belt land is released, however this would result in having to provide significantly more development within the more rural area to the north of the District which is not considered to be a sustainable approach.</p>
12.04	STOP Harlow North states that the URS Sustainability Appraisal is flawed as it is too general and does not fully pick up adverse effects.	<p>No amendment to Plan in response to this issue</p> <p>The Sustainability Appraisal is a high level, strategic document which assesses the sustainability of sites against the reasonable alternatives, taking into account a range of objectives.</p>
12.05	STOP Harlow North states that, while the landscape is not designated, it does have intrinsic quality. The Harlow Development Corporation report from 1974 acknowledged that the 'Hertfordshire Hills' to the north of the town should not be breached.	<p>No amendment to Plan in response to this issue</p> <p>While not designated, the quality of the landscape in this location is recognised. The Council is working with the site promoters in order to prepare a 'Concept Framework Document' which will identify, in broad terms, what the development will look like. A key aspect of this document will be to ensure that the development integrates well with the landscape and that any negative impacts are mitigated as much as possible.</p>
12.06	STOP Harlow North indicates that the land is Grade 2 and 3a agricultural land and the Paragraph 112 of the NPPF states that LPA's should seek to use poorer quality land in preference to higher quality land.	<p>No amendment to Plan in response to this issue</p> <p>The NPPF does encourage local planning authorities to avoid development of good quality agricultural land wherever possible. However, much of the agricultural land in East Hertfordshire is regarded as being of high quality. It would therefore not be possible for the District to meet its substantial level of housing need without some carefully planned development on higher quality land.</p>

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12.07	STOP Harlow North states that development would lead to a negative environmental impact, largely due to increased surface water run off which would particularly affect the Stort Valley and Hunsdon Mead SSSI.	<p>No amendment to Plan in response to this issue</p> <p>The Council is working with the site promoters in order to prepare a 'Concept Framework Document' which will identify, in broad terms, what the development will look like and how it will be delivered. In part, the Framework will seek to ensure that areas of environmental and historical importance are protected and enhanced. Sustainable drainage techniques will be utilised in order to ensure that surface water run off does not increase.</p>
12.08	STOP Harlow North states that a full Habitats Regulations Assessment is required due to impacts on the nearby Special Protection Area and Ramsar Site. There are also numerous wildlife sites, Scheduled Monuments, Areas of Archaeological Significance and historic gardens, most notably the Gilston Estate.	<p>No amendment to Plan in response to this issue</p> <p>A Habitats Regulation Assessment was undertaken in support of the Preferred Options District Plan. This is now being updated with our neighbouring authorities and will be presented to Members alongside the final version of the District Plan in September 2016. However, the evidence so far suggests this would not provide a constraint to development in the Gilston Area.</p> <p>The Council is working with the site promoters in order to prepare a 'Concept Framework Document' which will identify, in broad terms, what the development will look like. In part, the Framework will seek to ensure that areas of environmental and historical importance are protected and enhanced wherever possible.</p>
12.09	STOP Harlow North states that the development would be located under the flight path for Stansted Airport.	<p>No amendment to Plan in response to this issue</p> <p>The Gilston Area lies outside the area of concern as defined by noise contour maps. The area is also outside flight safety zones. Recent changes to flightpath navigation systems have greatly reduced the area of land overflown during take-off and landing.</p>
12.10	STOP Harlow North states that development would impact negatively on air quality and would increase traffic levels through Sawbridgeworth and Bishop's Stortford where there are existing air quality issues.	<p>No amendment to Plan in response to this issue</p> <p>District Plan policy EQ4, which is located within Chapter 24 (Environmental Quality), prescribes how issues of air quality should be considered as part of specific development proposals.</p>

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12.11	STOP Harlow North states that there are issues with water supply and the capacity of Rye Meads Sewage Treatment Works.	<p>No amendment to Plan in response to this issue</p> <p>The Council has liaised with Thames Water throughout the plan making process. Thames Water has advised that Rye Meads STW has capacity to cater for all known growth in the wider sub-region up to, and beyond the end of plan period in 2033. In addition, the Council has also engaged with the relevant water providers in order to ensure that the proposed level and location of growth can be provided for.</p>
12.12	STOP Harlow North and others state that the development would lead to severe transport issues, particularly as there is no prospect of delivering a new Junction 7a or A414 bypass to the M11.	<p>No amendment to Plan in response to this issue</p> <p>Essex County Council has undertaken transport modelling on behalf of the four authorities who make up the East Herts/West Essex housing market area. The modelling demonstrates that the road network can cater for the planned level of growth providing that key mitigation schemes are delivered. These include improvements to Junctions 7 and 8 of the M11 and the provision of a new Junction 7a within the plan period. More local improvements will also be required, including dualling of the existing crossing from the A414 into Harlow and the provision of a second crossing.</p> <p>A Memorandum of Understanding (MoU) is being prepared, which will be signed by Highways England, Essex and Hertfordshire County Councils and the four local authorities that comprise the housing market area (including East Herts). The MoU will confirm that the respective authorities will work collaboratively to identify, develop and deliver highway infrastructure schemes in order to support housing growth.</p>
12.13	STOP Harlow North states that there is insufficient public transport to cope with the development.	<p>No amendment to Plan in response to this issue</p> <p>Discussions have taken place during the plan making process with the relevant Train Operating Companies and Network Rail and are ongoing. Hertfordshire County Council is currently in the process of updating its Rail Strategy which will also influence how train services can adapt to growing demand.</p>

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		<p>The need for additional capacity on the Liverpool Street line has been highlighted through several mechanisms and the four-tracking of the line between the Tottenham Hale and Broxbourne areas has been included in Network Rail's recently published Anglia Route Study, March 2016. This currently anticipates potential commencement within Control Period 6 (i.e. between 2019-2024).</p> <p>In addition, new or extended bus services will be provided in order to serve the new development.</p>
12.14	STOP Harlow North states that there is already a strain on community facilities including schools and Princess Alexandra Hospital.	<p>No amendment to Plan in response to this issue</p> <p>As part of the Gilston Area development, five new primary schools (a total of 15FE) and two new secondary schools (a total of 12FE) will be provided. The Council has worked closely with Hertfordshire County Council, as education authority, throughout the plan making process. HCC has undertaken modelling in order to forecast the level of provision for both primary and secondary education that would be required over the course of the plan period. The modelling shows that the proposed level of provision would be sufficient.</p> <p>The Co-operation for Sustainable Development Member Board, of which East Herts is part, has engaged with representatives from Princess Alexandra Hospital. Given the constraints associated with the existing site, the hospital Trust is keen to explore the possibility of relocating the facility to an alternative location. Discussions are currently at an early stage, and a preferred location in the Harlow area has not yet been identified. In addition, the Government will not be making a decision on whether to fund a new hospital until Autumn 2016. However, it is considered that the Gilston Area could provide a suitable location for a relocated hospital, and as such, the District Plan will include this possibility as an option to be further explored.</p>
12.15	STOP Harlow North states that development would compete with Harlow rather than assist with regeneration.	<p>No amendment to Plan in response to this issue</p> <p>The Gilston Area will provide new homes, services and facilities for</p>

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		<p>the benefit of existing and future residents. However, development may also have a beneficial impact on the regeneration of Harlow by re-balancing the housing offer in that area and attracting skilled workers to the town.</p> <p>The Gilston Area will provide local retail facilities and employment opportunities in order to serve the new community. However, these units would not be of a scale where they would have a significant negative impact on existing town centres.</p>
12.16	STOP Harlow North states that development would result in the potential coalescence of Harlow with Eastwick, Gilston, High Wych and Sawbridgeworth, and would also impact upon Widford, the Hadhams and Hunsdon.	<p>No amendment to Plan in response to this issue</p> <p>It is acknowledged that development in this location would have a direct impact on the villages of Eastwick and Gilston, although this would be mitigated as far as possible through the use of appropriate buffers and landscaping.</p> <p>The Council is working with the site promoters in order to prepare a 'Concept Framework Document' which will identify, in broad terms, what the development will look like. A key principle of this emerging document is that development should be confined to the lower part of the site thereby ensuring that there are no coalescence issues with Hunsdon, Widford and the Hadhams. The northern part of the site, which comprises plateaus of higher ground including Hunsdon Airfield will not be developed. These areas will provide new green spaces for the benefit of new and existing residents. Appropriate landscaping buffers will also ensure that any impact on High Wych and Sawbridgeworth can be mitigated.</p>
12.17	STOP Harlow North states that development would impact on the viability of town centre shops and services in Sawbridgeworth, Bishop's Stortford, Hertford and Ware.	<p>No amendment to Plan in response to this issue</p> <p>The Gilston Area will provide local retail facilities and employment opportunities in order to serve the new community. However, these units would not be of a scale where they would have a significantly negative impact on existing town centres.</p>
12.18	STOP Harlow North states that consideration should be given to development proposals around Harlow as a whole as there is a strong	<p>No amendment to Plan in response to this issue</p>

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	case for land allocations both to the east and west of Harlow.	Agreed. Following the District Plan Preferred Options consultation, the Council has worked closely with its neighbouring authorities within the housing market area as part of the Co-operation for Sustainable Development Board. As part of this ongoing joint working, the authorities have commissioned consultants to undertake a sustainability assessment of all potential development options on the periphery of Harlow. It is likely that, in order to meet their own housing needs, Harlow and Epping Forest Councils will need to allocate sites on the existing edge of Harlow. The Gilston Area has been identified by this Council as a sustainable location to meet a significant proportion of the Districts housing needs in this plan period and beyond.
12.19	Object to the name "Gilston Area" – implies a small development in a village location, rather than an urban extension.	<p>No amendment to Plan in response to this issue</p> <p>The name 'Gilston Area' was chosen to help communicate the fact that, while assisting with the regeneration of Harlow, the development is proposed by this Council in order to help meet the housing needs of East Herts. In addition, given that the Gilston Area is separated from Harlow by the Stort Valley, it would be inaccurate to simply describe it as an urban extension.</p>
12.20	Development would result in the destruction of the north bank of the Stort Valley.	<p>No amendment to Plan in response to this issue</p> <p>The vast majority of development in this location would take place north of the A414. The only works that would be required in the immediate vicinity of the Stort Valley would involve the dualling of the existing Stort crossing and the provision of a second crossing further east. The plans include proposals to protect and enhance the environment of the Stort Valley.</p>
12.21	Object to the assumption that unmet need from elsewhere in the District should be directed to Gilston	<p>No amendment to Plan in response to this issue</p> <p>Work on housing need at the local level was undertaken in order to inform the Preferred Options document. This suggested that the level of need arising from certain locations in the District could not be met in those areas, and therefore, this need could be met by the</p>

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		<p>Gilston Area.</p> <p>The Districts objectively assessed housing need is for 16,390 homes by 2033. The Gilston Area has been identified as a sustainable location to meet a significant proportion of this need, both within this plan period and beyond. The quantum of development to be provided within this plan period will be considered through the Settlement Appraisal for the Gilston Area. This will be presented to Members in August.</p>
12.22	<p>The South East is one of the most densely populated areas in the world. Any more development will lower quality of life.</p>	<p>No amendment to Plan in response to this issue</p> <p>National planning policy requires that local planning authorities should seek to meet their objectively assessed housing needs. In the case of East Herts, the level of need has been identified as 16,390 new homes by 2033.</p>
12.23	<p>Parishes in this area should be amongst the first to be invited to prepare neighbourhood plans.</p>	<p>No amendment to Plan in response to this issue</p> <p>Many Parish and Town Councils across the District are now preparing Neighbourhood Plans for their areas, including Eastwick and Gilston and Hunsdon Parish Councils.</p>
12.24	<p>The development is to appease Harlow, it is not for East Herts needs.</p>	<p>No amendment to Plan in response to this issue</p> <p>All development that takes place in the Gilston Area, within the plan period and beyond, will help meet East Herts housing needs.</p>
12.25	<p>This is an landowner-led proposal and but for the resource and persistence of the owner would be most unlikely to have emerged.</p>	<p>No amendment to Plan in response to this issue</p> <p>Where landowners have undertaken significant work to promote a site it is important to carefully test the evidence to ensure that Local Planning Authorities can reach a sound conclusion and reduce the risk of a successful challenge. Having undertaken this work, the Gilston Area has been identified as a sustainable location for development. The Council is working with the site promoters in order to prepare a 'Concept Framework Document' which will identify, in broad terms, what the development will look like.</p>

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12.26	The Bishop's Stortford Civic Federation objects to the adverse traffic impacts of development in this area on Bishop's Stortford, since much of the traffic will head north on the A1184 to reach the M11.	<p>No amendment to Plan in response to this issue</p> <p>Essex County Council has undertaken transport modelling on behalf of the four authorities who make up the East Herts/West Essex housing market area. The modelling demonstrates that the road network can cater for the planned level of growth providing that key mitigation schemes are delivered. These include improvements to Junctions 7 and 8 of the M11 as well as the provision of a new Junction 7a within the plan period which will reduce the amount of traffic using the A1184. More local improvements will also be required, including dualling of the existing crossing from the A414 into Harlow and the provision of a second crossing.</p> <p>A Memorandum of Understanding (MoU) is being prepared, which will be signed by Highways England, Essex and Hertfordshire County Councils and the four local authorities that comprise the housing market area (including East Herts). The MoU will confirm that the respective authorities will work collaboratively to identify, develop and deliver highway infrastructure schemes in order to support housing growth.</p>
12.27	Doubts about deliverability: until the full capacity of the broad locations has been tested along with the viability testing and consideration of infrastructure requirements, there remains considerable doubt about the 5,250 dwellings (Gilston and Ware) allocated in this manner. The NPPG states that "where sites are proposed for allocation, sufficient detail should be given to provide clarity to developers, local communities and other interests about the nature and scale of development (addressing the 'what, where, when, how' questions)" – Paragraph 10 ID12-10-20140306	<p>No amendment to Plan in response to this issue</p> <p>Following the Preferred Options consultation, the Council commissioned consultants to undertake a technical piece of evidence called the Delivery Study. This study assessed the deliverability and financial viability of development in the Gilston Area. In addition, The Council is working with the site promoters in order to prepare a 'Concept Framework Document' which will identify, in broad terms, what the development will look like and how it will be delivered. As a whole, it is considered that the evidence base provides a robust case for allocation of the Gilston Area within the District Plan.</p>
12.28	No sustainability assessment has taken place to justify development in this location	<p>No amendment to Plan in response to this issue</p> <p>In combination, the Supporting Document and Sustainability</p>

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		Appraisal provide a robust and thorough analysis of all development options across the District. Through this work, the Gilston Area has been identified as a sustainable location to meet a significant proportion of the Districts housing needs, both in this plan period and beyond.
12.29	The principle of development in this location is supported however it is unclear whether development could come forward within the plan period given reliance on Junction 7a.	<p>No amendment to Plan in response to this issue</p> <p>The transport modelling that has taken place to date identifies that a new Junction 7a on the M11 is needed in order to deliver the identified level of housing need across the wider sub-region. Essex County Council has recently undertaken a public consultation on the scheme, and should funding be secured, the new junction could be open by 2021.</p>
12.30	The Herts and Middlesex Wildlife Trust comments that significantly more detail is needed on the nature and layout of the development north of Harlow, how it will relate and impact upon the natural environment. A comprehensive, integrated and adequately resourced plan to maintain, restore and enhance habitat and Green Infrastructure networks across the area in the long-term should be secured. This should build on existing plans including the Stort Catchment Management Plan and the Lee Catchment NIA. Contributions to the management and enhancement of nearby important habitats and landscape features, such as the River Stort, Harlow Marsh Local Nature Reserve and Hunsdon Mead SSSI may be appropriate.	<p>No amendment to Plan in response to this issue</p> <p>Having undertaken further evidence based work following the Preferred Options consultation, it is the view of Officers that the Gilston Area should be allocated within the Publication version of the District Plan. The Policies Map, which accompanies the District Plan, will identify the proposed site boundary. In addition the Council is working with the site promoters in order to prepare a 'Concept Framework Document' which will identify, in broad terms, what the development will look like and how it will be delivered. A key aspect of this document will be to present a strategy which will protect and enhance environmental assets such as the Stort Valley.</p> <p>Following liaison with the site promoters in early 2016, the Herts and Middlesex Wildlife Trust has advised that the emerging proposals for the Gilston Area could provide significant opportunities to achieve a net gain in biodiversity through the creation of new habitats.</p>
12.31	As the area is not adjoining an existing town (separated by the Stort Valley from Harlow), it is not clear how the new communities would be able to sustainably access the necessary facilities, services and jobs.	<p>No amendment to Plan in response to this issue</p> <p>While the Gilston Area will be separated from Harlow by the River Stort, sustainable transport measures will be provided as part of the</p>

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		development which will allow residents to access the jobs and facilities that are available in Harlow. These measures include new and extended bus services and provision for walking and cycling.
12.32	Hertfordshire County Council comments that there is potential for mineral sterilisation in this area. The area is designated by the British Geological Survey as an almost continuous spreads of mineral beneath overburden. The broad location is close to mineral resource block numbers 1 and 7. Further investigation is required to establish the extent of mineral reserves and detailed studies for individual sites and they come forward for development.	<p>No amendment to Plan in response to this issue</p> <p>Following the Preferred Options consultation, discussions have been ongoing with Hertfordshire County Council. As a result, it has been concluded that any substantial mineral working on this area would not prove beneficial. However, it should still be considered that some material could be used within the construction of the development itself.</p>
12.33	Hertfordshire County Council comments that the tests with 10,000 new homes have shown that despite the proposed scale of mitigation measures there are still significant delay and stress issues to resolve in the Harlow and Sawbridgeworth areas. There are also operational issues around the second Stort Crossing which have implications for the effectiveness of the scheme and its deliverability and there is need for further investigation on the scheme design and level of demand it may support.	<p>No amendment to Plan in response to this issue</p> <p>Following the Preferred Options consultation, Essex County Council has undertaken transport modelling on behalf of the four authorities who make up the East Herts/West Essex housing market area. The modelling demonstrates that the road network can cater for the planned level of growth providing that key mitigation schemes are delivered. These include improvements to Junctions 7 and 8 of the M11 as well as the provision of a new Junction 7a within the plan period which will reduce existing pressures on the A1184 and routes through Harlow. More local improvements will also be required, including dualling of the existing crossing from the A414 into Harlow and the provision of a second crossing. Further work is currently ongoing in order to understand when the second Stort crossing will be required. The design of the scheme will be addressed through the planning application process.</p> <p>A Memorandum of Understanding (MoU) is being prepared, which will be signed by Highways England, Essex and Hertfordshire County Councils and the four local authorities that comprise the housing market area (including East Herts). The MoU will confirm that the respective authorities will work collaboratively to identify, develop and deliver highway infrastructure schemes in order to</p>

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		support housing growth.
12.34	Hertfordshire County Council comments that if sustainable transport connections are not sufficient quality, the impact on the road network would be greater than forecast in the modelling, and would require more significant highway mitigation measures.	<p>No amendment to Plan in response to this issue</p> <p>Noted. This will need to be kept under review as part of ongoing modelling work.</p>
12.35	Natural England comments that the area north of Harlow is one of the main concerns with the draft Plan. The most significant issues with development north of Harlow: this would need to cross the Stort Valley with potential for significant environmental effects. However, in the absence of such a link road, there is a risk that traffic from the development would come into London via the B1393 and the A104, with resultant impacts on Epping Forest SAC.	<p>No amendment to Plan in response to this issue</p> <p>The vast majority of development in this location would take place north of the A414. The only works that would be required in the immediate vicinity of the Stort Valley would involve the dualling of the existing Stort crossing and the provision of a second crossing further east. The plans include proposals to protect and enhance the environment of the Stort Valley.</p> <p>A Habitats Regulation Assessment was undertaken in support of the Preferred Options District Plan. This is now being updated with our neighbouring authorities and will be presented to Members alongside the final version of the District Plan in September 2016. This work assesses the potential impacts of development on Epping Forest and other designated sites. However, the evidence so far suggests this would not provide a constraint to development in the Gilston Area.</p> <p>A Memorandum of Understanding (MoU) is also being prepared, which will be signed by Natural England, the City of London Corporation, Essex and Hertfordshire County Councils and the four local authorities that comprise the housing market area (including East Herts). The MoU seeks to ensure that growth within the housing market area is managed in a way that avoids adverse effects on the integrity of Epping Forest Special Area of Conservation (SAC), particularly through deteriorating air quality.</p>
12.36	Historic England and Hertfordshire County Council (Historic Environment Unit) states that the Gilston Area contains three Scheduled Monuments, and may have many more currently unknown, undesignated heritage	<p>No amendment to Plan in response to this issue</p> <p>The Council is working with the site promoters in order to prepare a 'Concept Framework Document' which will identify, in broad terms,</p>

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	assets. The presence of such remains would be a constraint upon development in some parts of the area.	what the development will look like. In part, the Framework will seek to ensure that areas of environmental and historical importance are protected and enhanced.
12.37	Essex County Council comments that given the Phase 4 Greater Essex Demographic Forecast Study, which highlights the need for an additional 7,500 dwellings in Harlow (375 per year), and given the tight administrative boundaries for Harlow, it is recommended that consideration be given to meeting the existing and future needs of Harlow's local community.	<p>No amendment to Plan in response to this issue</p> <p>A Strategic Housing Market Assessment has been undertaken in order to assess the level of housing need across the housing market area.</p> <p>A Memorandum of Understanding (MoU) is being prepared, which will be signed by the four local authorities that comprise the housing market area, including East Herts. The MoU will identify the way in which identified housing needs will be distributed across the housing market area. In particular it will confirm that all four local authorities are committed to meeting their respective needs within their own administrative areas.</p>
12.38	Roydon Parish Council comments that development on this scale will require infrastructure in place either before or as development takes place.	<p>No amendment to Plan in response to this issue</p> <p>The Infrastructure Delivery Plan, to be presented to Members alongside the final District Plan in September, will provide a significant level of information with regards to infrastructure requirements and phasing. For the Gilston Area, information is also provided within the Delivery Study.</p>
12.39	Hertfordshire LEP, Places for People and City and Provincial Properties state that the Council should do more to bring forward development in this location and should not rely on a separate DPD.	<p>Proposed amendment to Plan in response to this issue</p> <p>The Gilston Area was identified within the Preferred Options version of the District Plan in 2014 as a 'Broad Location for Growth' for the delivery of 5,000 to 10,000 new homes along with supporting infrastructure such as schools, roads and healthcare facilities.</p> <p>Since undertaking the Preferred Options consultation, the Council has continued to gather a significant amount of technical evidence. The SHMA confirms that the District's objectively assessed housing</p>

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		<p>need is for nearly 16,390 new homes during the period to 2033. Meanwhile, the Delivery Study concluded that development within the Gilston Area is financially viable, and that a scheme of 10,000 dwellings has the potential to become 'developable' subject to the successful resolution of certain key issues.</p> <p>Given the evidence that is now in place, Officers consider that the Gilston Area should be identified as a location for 10,000 new homes, to be delivered in this plan period and beyond, within the forthcoming 'Publication' stage of the District Plan.</p>
12.40	<p>Harlow Infrastructure Study Stage 2 (March 2010) identified an infrastructure deficit of £753 million. Hertfordshire Infrastructure and Investment Strategy concluded that CIL would be unable to fill the gap and that major public funding would be required.</p>	<p>No amendment to Plan in response to this issue</p> <p>The Infrastructure Delivery Plan, to be presented to Members alongside the final District Plan in September, will provide a significant level of information with regards to infrastructure requirements and phasing. The Gilston Area will provide a range of infrastructure on site including schools, roads and healthcare facilities.</p> <p>Development across the wider sub-region is dependent on the delivery of strategic transport infrastructure schemes such as a new Junction 7a on the M11. A Memorandum of Understanding (MoU) is being prepared, which will be signed by Highways England, Essex and Hertfordshire County Councils and the four local authorities that comprise the housing market area (including East Herts). The MoU will confirm that the respective authorities will work collaboratively to identify, develop and deliver highway infrastructure schemes in order to support housing growth.</p>
12.41	<p>Water supply company likely to struggle to meet demand resulting from 10,000 additional dwellings, despite policies WAT3, 4, and 5. Of little comfort to state that the utilities company are under a statutory obligation to provide their services.</p>	<p>No amendment to Plan in response to this issue</p> <p>Throughout the Plan making process, the Council has engaged with the relevant water providers in order to ensure that the proposed level and location of growth can be provided for. The water companies have not objected to the proposed scale or location of development in East Herts.</p>

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12.42	Hospital in Harlow could not cope with increase in patients. There is inadequate health related infrastructure generally.	<p>No amendment to Plan in response to this issue</p> <p>The Gilston Area will provide new healthcare facilities on site in order to serve the development.</p> <p>The Co-operation for Sustainable Development Member Board, of which East Herts is part, has engaged with representatives from Princess Alexandra Hospital. Given the constraints associated with the existing site, the hospital Trust is keen to explore the possibility of relocating the facility to an alternative location. Discussions are currently at an early stage, and a preferred location in the Harlow area has not yet been identified. In addition, the Government will not be making a decision on whether to fund a new hospital until Autumn 2016. However, it is considered that the Gilston Area could provide a suitable location for a relocated hospital, and as such, the District Plan will include this possibility as an option to be further explored.</p>
12.43	Proposals consist mainly of housing, with very little related employment, and high-levels of out-commuting. Too much reliance on Harlow for employment opportunities, which would exacerbate traffic and transport problems.	<p>No amendment to Plan in response to this issue</p> <p>The Gilston Area would provide local employment opportunities within the neighbourhood centres as well as schools and healthcare facilities. However, the proximity to Harlow means that there are more significant opportunities for employment nearby including the Enterprise Zone. These will be able to be accessed by residents of Harlow using sustainable modes of transport including buses as well as walking and cycling.</p>
12.44	Alternative option for a new settlement elsewhere in the District should be rigorously tested.	<p>No amendment to Plan in response to this issue</p> <p>The Supporting Document, which is available to view on the Councils website, did assess a number of potential locations for a new settlement in East Herts. However, these options were ruled out, either due to sustainability issues, or the fact that they would not be deliverable within the plan period.</p>
12.45	Epping Forest District Council notes the longer-term proposals for the Gilston area, and to encourage continued Member and senior officer co-	<p>No amendment to Plan in response to this issue</p>

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	operation and joint working, also involving Harlow Council, to monitor development progress in relation to other strategic planning and infrastructure issues in that general area.	All three authorities are part of the Co-operation for Sustainable Development Group which was set up in order to address cross boundary issues within the housing market area.
12.46	Harlow Council considers that the draft Plan misses an opportunity to take the necessary long-term view to meet the compelling development needs across the Harlow and M11 Corridor Housing Market Area. The draft plan establishes a preferred approach to development across the East Herts area in advance of the outcome of co-operation with neighbouring Councils currently underway in seeking to fulfil the mandatory Duty to Co-Operate.	<p>No amendment to Plan in response to this issue</p> <p>A Strategic Housing Market Assessment has been undertaken in order to assess the level of housing need across the housing market area.</p> <p>A Memorandum of Understanding (MoU) is being prepared, which will be signed by the four local authorities that comprise the housing market area, including East Herts. The MoU will identify the way in which identified housing needs will be distributed across the housing market area. In particular it will confirm that all four local authorities are committed to meeting their respective needs within their own administrative areas.</p>
12.47	Harlow Council considers that the Draft Plan does not provide sufficient reasoning for why only housing needs arising from forecast population changes are being met and why an upward adjustment to these figures has not been made to reflect other considerations (such as affordability pressures across the EHDC area) and the need to drive forward long term national growth as set out in Government policy.	<p>No amendment to Plan in response to this issue</p> <p>These points have been addressed through the joint Strategic Housing Market Assessment which has been prepared by expert consultants and follows guidance contained in national policy. The SHMA includes a significant uplift to reflect affordability issues.</p>
12.48	Harlow Council is concerned that co-ordinated Councillor engagement in the process has not been demonstrated by EHDC. Effective co-operation is likely to require sustained joint working and there should be clear outcomes, one way or another. This will include joint Committees, memoranda of understanding and joint plans or policies for the issues in question.	<p>No amendment to Plan in response to this issue</p> <p>Both East Herts and Harlow Councils are part of the Co-operation for Sustainable Development Group which was set up in order to address cross boundary issues within the housing market area. Three separate Memoranda of Understanding are currently being prepared which will demonstrate that all relevant authorities, including East Herts and Harlow, are in agreement on strategic issues including the distribution of housing need across the housing market area, the provision of strategic transport infrastructure, and the protection of Epping Forest Special Area of Conservation.</p>

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12.49	Lack of clarity over the scale of development to the north of Harlow. Harlow Council's Emerging Strategy and Further Options (April 2014) suggests (example 5) 20,000 dwellings, where paragraph 10.6 of the same document refers to "10,000 dwellings to north of Harlow split equally between Harlow and East Hertfordshire District Council's needs."	<p>No amendment to Plan in response to this issue</p> <p>A Strategic Housing Market Assessment has been undertaken in order to assess the level of housing need across the housing market area. Both East Herts and Harlow Councils are committed to meeting their respective identified needs within their own administrative areas and are preparing Local Plans on this basis.</p> <p>The Gilston Area has been identified as a sustainable location for 10,000 homes, to be delivered within this plan period and beyond.</p>
12.50	Stort valley landownerships between the Gilston Area and Harlow are critical to securing connection of the proposed development area with Harlow.	<p>No amendment to Plan in response to this issue</p> <p>Noted and agreed.</p>
12.51	The Ramblers' Association objects to the proposals because of the impact on open countryside.	<p>No amendment to Plan in response to this issue</p> <p>The Council has tried to utilise brownfield land as far as possible but only a small proportion of the housing need can be met in this way. Greenfield development is therefore necessary in order to meet identified housing needs.</p> <p>While not designated, the quality of the landscape in the location of the Gilston Area is recognised. The Council is working with the site promoters in order to prepare a 'Concept Framework Document' which will identify, in broad terms, what the development will look like. A key aspect of this document will be to ensure that the development integrates well with the landscape and that any negative impacts are mitigated as much as possible.</p>
12.52	The Hertfordshire Gardens Trust objects to the proposals and the impacts on the nearby historic parks, including Briggens (on the English Heritage register), Pishiobury, Hunsdonbury, Sayes, and Hunsdon Old and Hunsdon New Parks.	<p>No amendment to Plan in response to this issue</p> <p>The Council is working with the site promoters in order to prepare a 'Concept Framework Document' which will identify, in broad terms, what the development will look like. In part, the Framework will seek to ensure that areas of environmental and historical importance are protected and enhanced wherever possible.</p>

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12.53	Object to the failure to take account of the needs and separate identity of Gilston village. Gilston has already agreed to double its size by taking over 200 homes at Terlings Park.	<p>No amendment to Plan in response to this issue</p> <p>It is acknowledged that development in this location would have a direct impact on the villages of Eastwick and Gilston, although this would be mitigated as far as possible through the use of appropriate buffers and landscaping.</p> <p>The Terlings Park scheme involved the re-development of a vacant brownfield site and the completions in that location have counted towards the Districts housing requirement. However, in order for East Herts to meet this requirement, significant development on greenfield land is needed. As such, the Gilston Area has been identified as a sustainable location for development.</p>
12.54	Unable to comment on an incomplete plan – for example there are no suggested Gypsy and Traveller sites in the document and the level of development at the Gilston Area is unconfirmed.	<p>No amendment to Plan in response to this issue</p> <p>The Gilston Area will help provide for identified needs for Gypsy and Traveller accommodation. The total level of provision to be made across the District will be identified within the Housing chapter in the final version of the District Plan.</p>
12.55	No solution to the problem of rat-running on the minor roads around the development.	<p>No amendment to Plan in response to this issue</p> <p>Essex County Council has undertaken transport modelling on behalf of the four authorities who make up the East Herts/West Essex housing market area. The modelling demonstrates that the road network can cater for the planned level of growth providing that key mitigation schemes are delivered. These include improvements to Junctions 7 and 8 of the M11 and the provision of a new Junction 7a within the plan period. More local improvements will also be required, including dualling of the existing crossing from the A414 into Harlow and the provision of a second crossing.</p> <p>More detailed Paramics transport modelling is also ongoing which looks at the impact of development on the local road network. Mitigation measures to reduce rat-running will be identified through this process.</p>

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12.56	Once identified as a Broad Location there will be no defence against any future planning application.	<p>No amendment to Plan in response to this issue</p> <p>Officers are now of the view that the Gilston Area should be allocated within the Publication stage of the District Plan. The area will remain within the Green Belt until the District Plan is adopted in late 2017.</p>
12.57	Proposals are developer-led.	<p>No amendment to Plan in response to this issue</p> <p>The Council's 'stepped approach' to options formulation ensured that developers were only engaged directly after the preferred options were identified. Developer engagement is necessary at this latter stage in order to test the proposals and meet requirements for deliverability.</p>
12.58	Support the proposals because development here would help to ease the burden on Ware and other surrounding towns.	<p>No amendment to Plan in response to this issue</p> <p>The level of housing need in the District is significant – 16,390 new homes by 2033. In order to meet this requirement, a number of sites are proposed for allocation across the District including a site to the North and East of Ware.</p>
12.59	London and Harlow should densify rather than encourage sprawl.	<p>No amendment to Plan in response to this issue</p> <p>Development in the Gilston Area will help meet the housing needs of East Herts as identified by the Strategic Housing Market Assessment.</p>
12.60	Spare capacity at Harlow Town station should be used to serve development to the east of Harlow	<p>No amendment to Plan in response to this issue</p> <p>Following the District Plan Preferred Options consultation, the Council has worked closely with its neighbouring authorities within the housing market area as part of the Co-operation for Sustainable Development Board. As part of this ongoing joint working, the authorities have commissioned consultants to undertake a sustainability assessment of all potential development options on the periphery of Harlow. It is likely that, in order to meet their own housing needs, Harlow and Epping Forest Councils will need to allocate sites on the existing edge of Harlow. The Gilston Area has</p>

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		been identified by this Council as a sustainable location to meet a significant proportion of the Districts housing needs in this plan period and beyond.
12.61	A414 road bridge into Harlow already subject to severe congestion at peak hours.	<p>No amendment to Plan in response to this issue</p> <p>The development scheme includes proposals to upgrade the existing crossing to a dual carriageway while also providing a second eastern crossing into Harlow.</p>
12.62	The Harlow West Consortium supports the principle of development in this location. However there is a disparity between Harlow's ambitious aspirations to the north of Harlow and these proposals.	<p>No amendment to Plan in response to this issue</p> <p>The Gilston Area has been identified by this Council as a sustainable location to meet a significant proportion of the Districts housing needs in this plan period and beyond. Harlow Council is broadly supportive of the proposals for the Gilston Area, and in particular the way in which it may contribute to the regeneration of the town by helping to re-balance the housing offer and attract skilled workers.</p>
12.63	The Stort Landowners consortium states that it is far too early to reject land to the north of the Stort and south of Gilston village. In part, the land is suitable for development and insufficient justification has been given for not supporting development in this location. The Council must assess all 'reasonable alternatives' in order to meet the requirements of the NPPF and PPG. In addition, development would help meet the aspirations of Harlow and as such, by not supporting the site, the Council is at risk of failing the Duty to Co-operate.	<p>No amendment to Plan in response to this issue</p> <p>Following the District Plan Preferred Options consultation, the Council has worked closely with its neighbouring authorities within the housing market area as part of the Co-operation for Sustainable Development Board. As part of this ongoing joint working, the authorities have commissioned consultants to undertake a sustainability assessment of all potential development options on the periphery of Harlow.</p>
12.64	The Roydon Society objects to the proposals because Roydon already suffers from East Herts residents using the village as a 'rat run' to access work in Harlow.	<p>No amendment to Plan in response to this issue</p> <p>Residents of the Gilston Area would not need to travel via Roydon to access Harlow. The development is therefore highly unlikely to exacerbate any existing issues in this regard.</p>
12.65	It maybe separated from Harlow initially but the next Plan will probably fill in the land in between.	<p>No amendment to Plan in response to this issue</p> <p>The development proposals include measures to protect and</p>

Issue Number	Issues raised through consultation	Officer Response
		enhance the environmental quality of the Stort Valley.
12.66	This implies a degree of certainty that is unwarranted given all the provisos and uncertainties. Change to ‘development in this location <u>may</u> contribute to East Herts’ development needs...’	<p>No amendment to Plan in response to this issue</p> <p>It is the view of Officers that the Gilston Area should now be identified as an allocation within the forthcoming Publication version of the District Plan. Therefore the Plan will need to provide certainty with regards to delivery.</p>
12.67	The wording should be stronger to ensure that development would meet East Herts housing needs rather than Harlow’s.	<p>No amendment to Plan in response to this issue</p> <p>Noted. The revised chapter will make this clear.</p>
12.68	There are other ways to regenerate Harlow, not just to make it bigger. The STOP Harlow North proposals for Gilston Great Park would help achieve this.	<p>No amendment to Plan in response to this issue</p> <p>The Gilston Great Park proposals seek to provide substantial new open space for the benefit of East Herts residents. The Gilston Area will provide substantial new green space while also providing for a significant proportion of the Districts housing need, within this plan period and beyond.</p>
12.69	Change to “land in the Gilston Area may be required for development but only after current infrastructure deficiencies are thoroughly explored through a specific Development Plan Document”.	<p>No amendment to Plan in response to this issue</p> <p>The Infrastructure Delivery Plan, to be presented to Members alongside the final District Plan in September, will provide a significant level of information with regards to infrastructure requirements and phasing. For the Gilston Area, information is also provided within the Delivery Study.</p>
12.70	East Herts are sacrificing this part of the District to save other areas from incremental development. Incremental development isn’t always negative, particularly limited development in villages.	<p>No amendment to Plan in response to this issue</p> <p>The level of housing need in the District is significant – 16,390 new homes by 2033. In order to meet this requirement, a number of sites are proposed for allocation across the District. In addition, the Plan seeks to deliver a limited amount of development in village locations, to be delivered primarily through the preparation of Neighbourhood Plans.</p>

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12.71	The Canal and Rivers Trust states that the towpath will need significant upgrading, both in width and surfacing, if it is to be deemed suitable to cope with an increase in usage as a result of the proposal.	<p>No amendment to Plan in response to this issue</p> <p>The Gilston Area development includes proposals to maintain and enhance the environmental quality of the Stort Valley. The Council is working with the site promoters in order to prepare a 'Concept Framework Document' which will identify, in broad terms, what the development will look like and how it will be delivered. The Framework will include reference to upgrading the towpath in this location.</p>
12.72	Objection to level of housing need to be provided on an ongoing basis.	<p>No amendment to Plan in response to this issue</p> <p>National planning policy is clear that local planning authorities must seek to plan for their full objectively assessed needs. For East Herts, this amounts to 16,390 new homes by 2033.</p>
12.73	The Green Belt should be protected and brownfield sites used for development.	<p>No amendment to Plan in response to this issue</p> <p>The Council has always sought to bring forward brownfield sites wherever possible. This includes the Goods Yard in Bishop's Stortford and the Mead Lane area in Hertford which are proposed for allocation within the District Plan. However, being a predominantly rural district, there are very few brownfield sites available. Therefore development on greenfield sites is required.</p>
12.74	Consideration should be given to Pye Corner, particularly with regards to traffic.	<p>No amendment to Plan in response to this issue</p> <p>Detailed Paramics transport modelling is ongoing which looks at the impact of development on the local road network. Mitigation measures to reduce rat-running will be identified through this process.</p>
12.75	Development should be of high quality design using modern sustainable practices.	<p>No amendment to Plan in response to this issue</p> <p>Noted and agreed. Reference to this will be included, both within the District Plan and the Concept Framework document.</p>
12.76	Not appropriate for feasibility to be tested through a DPD.	<p>No amendment to Plan in response to this issue</p> <p>The deliverability and financial viability of the Gilston Area has been</p>

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		assessed through the Delivery Study which is available to view on the Councils website.
12.77	Timeframe unrealistic due to the level of infrastructure required to provide roads and schools.	<p>No amendment to Plan in response to this issue</p> <p>The Council is working with the site promoters in order to prepare a 'Concept Framework Document' which will identify, in broad terms, what the development will look like and how it will be delivered. This will include phasing of development and associated infrastructure.</p>
12.78	Sport England objects to the lack of reference in criterion (i) relating to social infrastructure due to the omission of a specific need to provide indoor and outdoor sports facilities as part of the social infrastructure required to support the development.	<p>Proposed amendment to Plan in response to this issue</p> <p>The revised chapter and Concept Framework document will refer to the provision of sports facilities.</p>
12.79	Essex County Council is concerned that during the early phases of development families will look for places in primary schools in Harlow as there is likely to be limited primary and secondary school provision in the area.	<p>No amendment to Plan in response to this issue</p> <p>As part of the Gilston Area development, five new primary schools (a total of 15FE) and two new secondary schools (a total of 12FE) will be provided. The Council has worked closely with Hertfordshire County Council, as education authority, throughout the plan making process. HCC has undertaken modelling in order to forecast the level of provision for both primary and secondary education that would be required over the course of the plan period. The modelling shows that the proposed level of provision would be sufficient. The phasing of education provision will be addressed through the Infrastructure Delivery Plan which will be presented to Members alongside the final version of the District Plan in September.</p>
12.80	It isn't sound to describe the land as Green Belt, up until the point of building on it, and then it's no longer Green Belt.	<p>No amendment to Plan in response to this issue</p> <p>At present the land is Green Belt and therefore it is correct to refer to it as such. The Green Belt designation would only be removed when the District Plan is adopted which is currently anticipated for late 2017.</p>

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12.81	Stevenage Borough Council considers that the uncertainty in the Broad Locations could leave East Herts Council exposed to challenges, and that a small scale extension of between 500 to 1,000 homes to the east of Stevenage could introduce greater flexibility and certainty to the East Herts strategy and could provide sustainability advantages over a number of the sites that have been identified.	<p>Proposed amendment to Plan in response to this issue</p> <p>The potential for an urban extension of the nature suggested here has been considered. Taking account of the shortage of available housing to meet the 5-year housing land supply, and the reduced landscape impact of a smaller scheme, it is the view of Officers that land to the east of Stevenage should be identified within the District Plan as an allocation.</p>
12.82	The Council should fund the local community to make their case at Examination.	<p>No amendment to Plan in response to this issue</p> <p>Any individual or organisation who responds to the forthcoming Publication stage consultation on the District Plan can appear at Examination if they choose to do so.</p>
12.83	Gilston and Eastwick should have been shown on the mapping.	<p>Proposed amendment to Plan in response to this issue</p> <p>Noted. Both Gilston and Eastwick will be shown on the Policies Map which accompanies the District Plan.</p>
12.84	Enhancement of the Stort Valley is supported.	<p>No amendment to Plan in response to this issue</p> <p>Support noted and welcomed.</p>
12.85	The level of need is due to the fact that East Herts is a desirable place to live. However, this will not be the case with the level of development envisaged.	<p>No amendment to Plan in response to this issue</p> <p>National planning policy is clear that local planning authorities must seek to plan for their full objectively assessed needs. For East Herts, this amounts to 16,390 new homes by 2033.</p>
12.86	The development sets a precedent, and with further landowners putting their land forward, the level of development is likely to exceed the 3,000-15,000 homes currently under consideration.	<p>No amendment to Plan in response to this issue</p> <p>The proposed development would provide 10,000 new homes in this plan period and beyond. The Council is not proposing any further development in this location.</p>

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12.87	The proposals would result in the desecration of a WW2 airfield bunker	<p>No amendment to Plan in response to this issue</p> <p>The Hunsdon Airfield area would not developed as part of these proposals. Historic features such as the WW2 bunkers will be retained.</p>
12.88	General support for development in this location	<p>No amendment to Plan in response to this issue</p> <p>Noted.</p>
12.89	Compensation should be given to homeowners in the area as the value of their homes is reducing.	<p>No amendment to Plan in response to this issue</p> <p>Blight of property prices is not an issue that the planning system can address.</p>