

## Settlement Appraisal

### Gilston Area

#### 1. History

- 1.1 The Supporting Document records the various stages of assessment that were undertaken to inform the Preferred Options District Plan. It therefore provides an essential background to this Settlement Appraisal. In particular, Chapters 4 to 6 of the Supporting Document explained the process of shortlisting or 'sieving' options or 'Areas of Search'.
- 1.2 On the basis of the assessments contained within the Supporting Document, and the rest of the evidence base that was available at that time, land to the north of Harlow, known as 'the Gilston Area' was identified as a preferred location for development. However, given the size and complexity of the site, and the need for the Council to gather further evidence regarding deliverability, the Gilston Area was not proposed for allocation at that stage. Instead, the Preferred Options District Plan identified it as a 'Broad Location for Development' for the delivery of between 5,000 and 10,000 new homes, both within this plan period and beyond, along with a range of supporting infrastructure such as new roads, primary and secondary schools, health centres and public open space.
- 1.3 Given the uncertainty of delivery at that time, and the need to undertake comprehensive masterplanning work, it was proposed that a separate Development Plan Document (DPD) be prepared following adoption of the District Plan in order to allocate the site. The DPD approach would set out the Council's intention to deliver development during the latter part of the Plan period, and would enable further consideration of site boundaries, Green Belt boundaries and infrastructure requirements. At that stage, the Preferred Options District Plan envisaged that the Gilston Area could provide approximately 3,000 new homes prior to the end of the Plan period, with the remainder coming forward beyond 2031 in order to help meet future housing needs.
- 1.4 This document now continues the narrative beyond Chapters 4 to 6 of the Supporting Document by detailing information and evidence which has emerged since the Preferred Options consultation. The Settlement Appraisal should be read in conjunction with the Gilston Area Concept Framework which provides further detail on design principles, land uses, infrastructure and phasing.



Figure 1: Preferred Options District Plan, Gilston Area Key Diagram

## 2. Consultation Responses

2.1 The Preferred Options consultation elicited a significant response from members of the local community. While these representations covered a variety of topics, the main areas of concern were:

- that the Council had previously opposed development in this location through the now abolished East of England Regional Plan;
- development on Green Belt land;
- harm to the landscape;
- loss of agricultural land;
- impact on sites of environmental importance;
- capacity of services and facilities in the local area, particularly schools and health centres;
- capacity of the local and strategic road network, in particular around Harlow, Sawbridgeworth and Bishop's Stortford as well as the M11 and A414;
- impact on existing settlements including Eastwick, Gilston, High Wych, Sawbridgeworth, Hunsdon, Widford and the Hadhams;
- impact on heritage assets; and

- lack of joint working between the Council and neighbouring authorities, particularly Harlow Council.

2.2 In addition to the various concerns raised, a small number of positive comments were received, notably from residents who indicated support for a development strategy that reduces pressure on existing settlements in the District.

2.3 A full summary of the issues that were raised in respect of the Gilston Area and the Officer proposed responses to them were considered by Members at the District Planning Executive Panel meeting on 21st July 2016. These can be viewed via the following link:  
<http://democracy.eastherts.gov.uk/documents/s34901/Chapter%2012%20Gilston%20-%20ERP%20B%20Issue%20Report.pdf>

### **3 The Emerging Strategy**

3.1 Following the consultation, further work has been undertaken on the District Plan, which has led to the reconsideration of some elements of the proposed strategy.

3.2 In January 2016, the Council held an informal meeting with a representative of the Planning Inspectorate who advised that the Council needed to provide more certainty over the delivery of its emerging strategy. This was in the context of the approach to Broad Locations and the use of Development Plan Documents. The Inspector suggested that where the emerging strategy included very large strategic sites which made up a large proportion of the overall housing supply, these locations should become allocations in the District Plan if possible. Allocating these sites through the District Plan would provide greater certainty of delivery and assist with infrastructure planning.

3.3 Following the Preferred Options consultation, a number of technical studies have been prepared in order to inform ongoing work on the District Plan. These technical studies are discussed in Section 6 below. Following this work, it is now considered that there is sufficient evidence in place in order to identify the Gilston Area as an allocation within the Pre-Submission version of the District Plan, for the delivery of 10,000 homes, both within this Plan period and beyond.

3.4 Given the complexity and size of this site, it is recognised that further work is still required. The Advisory Team for Large Applications (ATLAS), which is part of the Homes and Communities Agency, has provided advice throughout the plan making process, particularly with regards to the deliverability of proposed strategic sites such as the Gilston Area. ATLAS

has suggested the preparation of a 'Concept Framework' document, prepared jointly by the Council and the site promoters. The rationale behind the Concept Framework approach, which has been successfully used elsewhere in the country, is to provide greater certainty prior to the Examination of the District Plan by identifying general development principles and potential land uses.

- 3.5 A first draft version of the Concept Framework has been prepared. The Council and site promoters will undertake further work, including with the relevant Parish Councils and local communities, in order to finalise the document prior to submission of the District Plan to the Planning Inspectorate in March 2017. In addition to helping demonstrate deliverability of the site at Examination, the Concept Framework will also shape the content of any future masterplanning work undertaken in relation to the Gilston Area.

#### **4 Developer Meetings / Information**

- 4.1 A number of meetings have been undertaken with the site promoters and other stakeholders following the Preferred Options consultation in order to discuss a range of issues. The minutes from these meetings are available to view on the Councils website: <http://www.eastherts.gov.uk/ga1>.

#### **5 Duty to Co-operate**

- 5.1 The Co-operation for Sustainable Development Member Board (Co-op Board) was set up in 2014, following the Preferred Options consultation on the District Plan. This group comprises the four core authorities that form the West Essex/East Herts housing market area (East Herts, Harlow, Uttlesford and Epping Forest), along with Hertfordshire and Essex County Councils and other local authorities in the wider area. The main function of the Co-op Board is to address strategic cross boundary issues within the wider Harlow area.
- 5.2 A number of joint working initiatives have been undertaken by the Co-op Board, including a Strategic Housing Market Assessment. Joint work has also taken place in relation to transport modelling and an assessment of strategic site options around Harlow. More information is provided on this work in the context of the Gilston Area in Sections 6 and 8 of this appraisal.
- 5.3 As part of discussions undertaken through the Co-op Board, it has been agreed that three Memoranda of Understanding (MOU's) will be prepared and signed. The MOU's require the relevant authorities to work collaboratively in order to:

- agree the distribution of development across the housing market area;
- identify and deliver strategic transport schemes in order to mitigate the impacts of development on the highway network; and
- mitigate and monitor the impacts of development on Epping Forest Special Area of Conservation (SAC).

5.4 The principle of development within the Gilston Area has also been considered through this forum. The development will be located within East Herts, and will make a significant contribution to the District's housing needs. However, there is a clear relationship between development in this location and Harlow, particularly with regards to transport and employment. Harlow Council is broadly supportive of development in the Gilston Area, largely because it has the potential to assist in the regeneration of the town by helping to re-balance the housing stock in the wider Harlow area.

5.5 Co-operation among the constituent authorities of the Co-op Board will continue beyond plan adoption in order to address ongoing cross boundary issues.

## **6 Technical Assessments**

6.1 This section summarises the relevant technical studies that have been prepared following the Preferred Options consultation.

### **Green Belt Review 2015**

6.2 The Green Belt Review 2015 assessed various parcels of Green Belt to the north of Harlow, within the area identified by the Preferred Options District Plan as the Gilston Area Broad Location. All of the parcels in this area were concluded to have 'very low' suitability for development. The findings are discussed in more detail below, based on the four purposes of Green Belt that formed the assessment criteria within the study. The full Green Belt Review document can be viewed via the following link: <http://www.eastherts.gov.uk/greenbeltreview2015>.

6.3 Parcel 49, which covers a wide geographical area stretching from Stanstead Abbots & St. Margaret's to Eastwick, was assessed as being of 'moderate' importance with regards to checking unrestricted sprawl of large built up areas, in this case Harlow. In particular, it was noted that this area of Green Belt has prevented further development from 'leap-frogging' the floodplain of the River Stort. It was concluded that the parcel performs no role in terms of preventing neighbouring towns from merging into one another, or preserving

the setting and special character of historic towns. However, the study also concluded that Parcel 49 is of 'paramount' importance in terms of safeguarding the countryside from encroachment, and indeed that any development would represent a very apparent encroachment into open countryside where there are few features to provide containment.

6.4 Parcel 51 covers a smaller section of Green Belt between Eastwick and Gilston villages. Again, for the reasons noted above, this parcel was concluded to play a 'moderate' role in checking the unrestricted sprawl of large built up areas, a 'paramount' role in safeguarding the countryside from encroachment, and no role in preserving the setting and special character of historic towns. However, in contrast to Parcel 49, it was adjudged to perform a 'moderate' role in preventing neighbouring towns from merging into one another.

6.5 Parcel 52 lies further east, between the villages of Gilston and High Wych. When considered against the four purposes of Green Belt, the parcel was considered to perform the same important role as Parcel 49.

6.6 A fourth area of land, Parcel 53, was also assessed. This area lies partially within the Stort Valley floodplain, immediately to the north of Harlow. This area of land was adjudged to perform a 'major' role in checking the unrestricted sprawl of large built up areas, and a 'paramount' role in preventing neighbouring towns from merging into one another. This was largely on the basis that this Parcel of Green Belt, and in particular the eastern side of it, prevents the coalescence of Harlow and Sawbridgeworth. Again, it was concluded that the Parcel performs no role in preserving the setting and special character of historic towns.

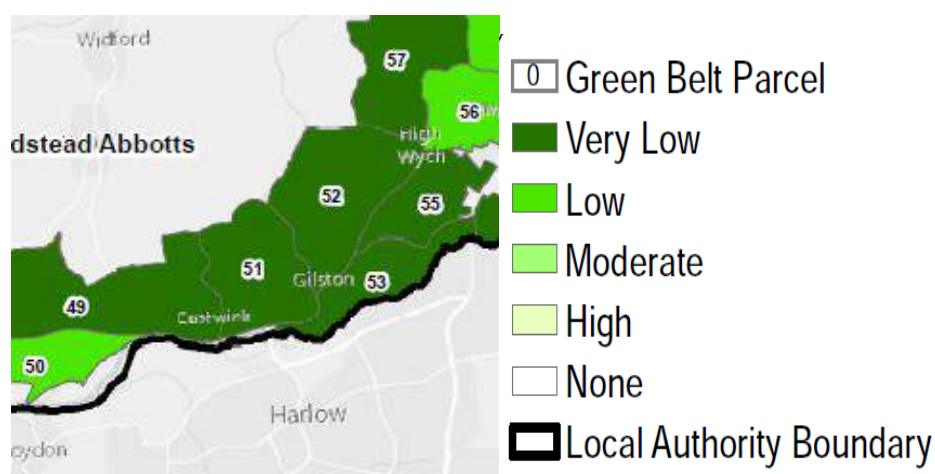


Figure 2: Conclusions of Green Belt Review 2015 for the area north of Harlow.

## Transport Modelling

- 6.7 The need to undertake further transport modelling was a significant factor with regards to identifying the Gilston Area as a Broad Location rather than an allocation within the Preferred Options District Plan.
- 6.8 Following the Preferred Options consultation in 2014, the Council has engaged closely with Essex County Council and our housing market area partners (Harlow, Epping Forest and Uttlesford Councils) through the Co-op Board in order to undertake strategic transport modelling. This modelling, known as VISUM, takes account of all planned growth proposed by the four local planning authorities. Transport modelling is an iterative process, and it is likely that the VISUM modelling will continue to evolve over the coming months as neighbouring authorities continue to prepare their respective local plans. However, modelling undertaken so far indicates that the strategic road network is able to cope with the provision of approximately 14,000 – 17,000 new homes in the wider Harlow area, providing that certain mitigation measures are implemented. This range of homes represents the amount of planned development that is likely to be provided within the Plan period up to 2033. It comprises an approximate figure of 3,000 homes within the Gilston Area, as well as development within Harlow itself, and on the edge of the town within Epping Forest District.
- 6.9 In order to deliver this level of growth within the Plan period, the following schemes will be required:
- Provision of a new Junction 7a on the M11;
  - Upgrade works to increase the capacity of Junctions 7 and 8 on the M11;
  - Widening of the existing River Stort road crossing;
  - Provision of a second River Stort road crossing; and
  - Upgrades to a number of existing junctions within Harlow.
- 6.10 In particular, the modelling demonstrates that early delivery of both a new Junction 7a and a second River Stort crossing will provide significant benefits in terms of increasing road capacity in the wider Harlow area. Creating capacity on existing roads through Harlow could facilitate the delivery of a ‘multi-modal sustainable transport corridor’ running from the Gilston Area, through Harlow town centre, to potential new development on the southern edge of the town, within Epping Forest District. The purpose of this corridor would be to make provision for sustainable forms of travel including buses, walking and cycling.



- 6.11 In order to provide in excess of 14,000 – 17,000 homes in the wider Harlow area, including a further 7,000 homes within the Gilston Area (beyond the initial 3,000 homes in the Plan period) , further strategic mitigation measures will be required. One possible solution is the provision of a ‘Harlow northern bypass’ running between the second River Stort crossing and Junction 7a. However, further transport modelling will be required in order to identify the full impacts of such a scheme, in particular the potential for higher volumes of traffic travelling westbound on the A414 towards the A10.
- 6.12 As noted in paragraph 5.3, it is intended that a Memorandum of Understanding be signed by the four core authorities of the Co-op Board, as well as Hertfordshire and Essex County Councils and Highways England. The MOU commits the authorities to working together in order to identify and deliver strategic highways schemes, including those identified within paragraph 6.9.

### **Delivery Study**

- 6.13 The Delivery Study is a technical document which assessed the financial viability and deliverability of the proposals contained within the Preferred Options District Plan. With regards to the Gilston Area, the study assessed the potential to bring forward a development of either 2,500 or 10,000 homes.
- 6.14 Having identified all known infrastructure requirements, and other costs arising from emerging District Plan policies and Building Regulations, it was concluded that a development of either size would be financially viable. In addition, the scheme for 2,500 homes was considered to be ‘developable’ in that there was a realistic prospect that development could commence within the Plan period. A larger scheme for 10,000 homes was considered ‘developable’ subject to securing solutions for sewage treatment and provision of a second River Stort crossing.
- 6.15 Following completion of the Delivery Study, the Council has continued to work with Thames Water regarding the capacity of Rye Meads Sewage Treatment Works. As a result of these discussions, Thames Water has advised that Rye Meads now has sufficient capacity to cater for all planned growth in the wider sub-region, within this Plan period and beyond. With regards to the second River Stort crossing, the site promoters are continuing to liaise with the relevant landowners in order to secure the land that is required to deliver the scheme. While no agreement has yet been reached, there is a realistic prospect that this can be achieved. While a scheme to the east of the existing crossing is considered to be the preferred option due to its proximity to the M11, the draft Concept Framework identifies that an



alternative scheme to the west of the existing crossing can be provided if necessary.

6.16 The Delivery Study also provided information with regards to likely build out rates for the strategic sites. For the Gilston Area, it was concluded that the likely completion rate would be 200 – 250 homes per year, based on having three to four sales outlets across the site at any particular point in time.

6.17 The Delivery Study is available to view on the Council's website: <http://www.eastherts.gov.uk/deliverystudy>

### **Harlow Strategic Sites Assessment**

6.18 As part of ongoing joint working, the Co-op Board has commissioned work in order to assess potential development options on the periphery of Harlow. This work has informed the consideration of site boundaries for the Gilston Area. More information is provided within Section 8 of this appraisal.

### **Gypsies and Travellers and Travelling Showpeople**

6.19 In 2014 the Council commissioned a Gypsies and Travellers and Travelling Showpeople Accommodation Needs Assessment to identify the needs of Gypsies and Travellers and Travelling Showpeople. The Council further commissioned an Identification of Potential Sites Study in 2014 with the aim of identifying locations where such need could potentially be met.

6.20 Subsequent to the publication of revised 'Planning policy for traveller sites' guidance, published by the Government in August 2015, the Council commissioned an update to the Accommodation Needs Assessment, which was finalised in May 2016. The Assessment concluded that five Gypsies and Travellers pitches and nine Travelling Showpeople's plots were needed over the course of the Plan period.

6.21 Given the strategic nature of the Gilston Area proposal, and the fact that it will provide development beyond the current Plan period, it is considered that it should provide for the longer term needs of the Gypsy and Traveller and Travelling Showperson community.

## **7 Deliverability Assessment, Land Uses and Infrastructure**

7.1 The majority of information relating to delivery, land uses and infrastructure is contained in the draft Concept Framework, referred to in Section 3. A full list of strategic infrastructure needed to support development in the Gilston

Area is contained in the Infrastructure Delivery Plan (IDP) that accompanies the District Plan.

- 7.2 Given the complexity of the site, it is unlikely that development will commence within the first five years of the Plan period (2017-2022). As identified in paragraph 6.16, the Delivery Study advised that a realistic build out rate for the Gilston Area would be the completion of 200 to 250 homes per year. Prior to the Preferred Options consultation on the District Plan, the Council asked the Advisory Team for Large Applications (ATLAS) to prepare a technical note on potential build out rates for strategic sites based on experience from other sites around the country. ATLAS advised that, for the Gilston Area, 300 to 500 completions per year could be possible, although the upper end of this range represented an optimistic scenario. The ATLAS technical note forms Appendix E to the Interim Development Strategy Report and can be viewed on the Council's website:  
<http://www.eastherts.gov.uk/strategyreport>
- 7.3 Based on the outcomes of the Delivery Study and the advice from ATLAS, it is the view of the Council that delivery of 300 homes per year is a realistic build out rate for the Gilston Area, with development likely to start in 2022/23. Development in the first two years is also likely to be less than 300 homes per year given the need to undertake significant on-site preparatory works. It is therefore expected that approximately 3,000 homes will be delivered within the Plan period up to 2033, with the remainder coming forward after that date.

## **8 Site Allocation Boundaries**

- 8.1 As identified by paragraph 1.1, the Supporting Document assessed a number of Areas of Search prior to the Preferred Options consultation. This work included an assessment of alternative options for strategic scale development or new settlements in other areas of the District. The principle of development within the Gilston Area was therefore established through that process.
- 8.2 In order to progress the Gilston Area from a Broad Location to an allocation, a site boundary and a revised Green Belt boundary need to be identified. As part of ongoing joint work, the Co-op Board commissioned consultants in order to assess the potential suitability of different site options around the periphery of Harlow. With regards to East Herts, the options were based on sites that were submitted to the Council through the 'Call for Sites' exercise which took place in the early stages of plan making. The assessment criteria included a number of different topic areas ranging from potential impacts on environmental and heritage assets to transport and access issues. The results of the assessment are presented in Figure 3.

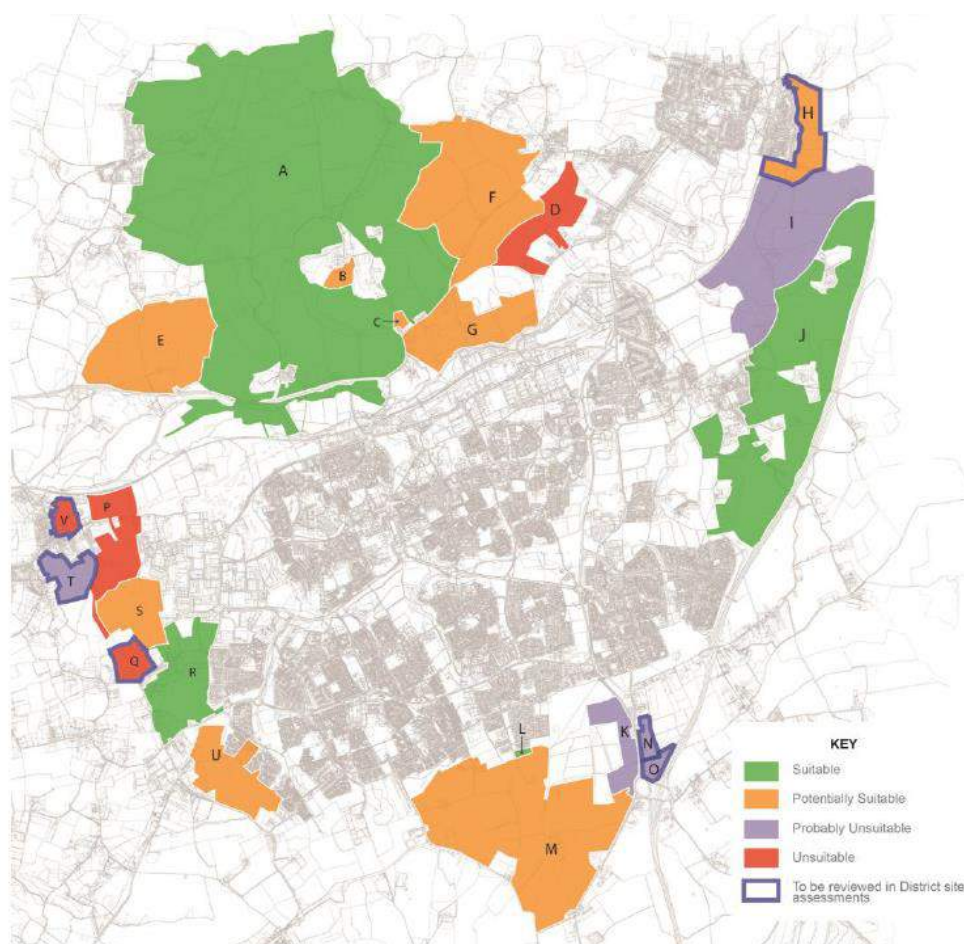


Figure 3: Harlow Strategic Sites Assessment: Conclusions

- 8.3 As illustrated above, Site A was concluded to be a 'suitable' site within the assessment. While it was noted that development in this location would have a significant impact on Green Belt, the ability to deliver a substantial amount of new development and supporting infrastructure weighed in its favour. In addition, the assessment indicated that development of Site A could make a significant contribution to the regeneration of Harlow.
- 8.4 Site B forms a small parcel of land, adjoining Site A. It incorporates Gilston Park, a locally important Historic Park or Garden. Given the size of the site, the assessment concluded that any impact on the Green Belt and wider landscape would not be significant. However, it was recognised that careful design would be required in order to maintain the setting of adjacent listed buildings. It was concluded that the site is 'potentially suitable' if viewed as part of a wider development in conjunction with Site A.
- 8.5 Site C is another small site that lies immediately adjacent to Gilston village. As with Site B, the assessment identified that development would not result

in a significant impact on the Green Belt or the wider landscape. The proximity of the site to listed buildings and a Scheduled Monument was noted although it was considered that any impacts could be mitigated. Again, it was concluded that the site is 'potentially suitable' if viewed as part of a wider development in conjunction with Site A.

- 8.6 Site D is a relatively large site that lies between High Wych Road and Redricks Lane. The assessment noted that development in this location would have a significant impact on the Green Belt, particularly in terms of the potential to cause coalescence between Harlow and High Wych. On this basis, the site was considered to be 'unsuitable' for development.
- 8.7 Site E, which is being promoted in conjunction with Site A, lies immediately to the north of the A414. It was recognised that the site lies within relative proximity to European designated sites within the Lee Valley Regional Park and that the potential to impact on these sites would need to be considered. In addition, it was noted that development would have a significant impact upon Green Belt. However, overall it was concluded that the site is 'potentially suitable' if viewed as part of a wider development in conjunction with Site A.
- 8.8 Site F is located between Site A and the village of High Wych. The assessment noted the potential for development to impact negatively on High Wych. In addition, there would be a significant impact on Green Belt and the wider landscape. The potential to contribute towards the regeneration of Harlow was noted. Overall, it was again concluded that the site is 'potentially suitable' if viewed as part of a wider development in conjunction with Site A.
- 8.9 The final site, Site G, is located immediately to the north of Harlow. The assessment notes that much of the site is located within Environment Agency Flood Zones, including the functional floodplain (Zone 3b). In addition, consideration would need to be given to the conservation of wetland habitats. However, it was concluded that the impact on the openness of the Green Belt would be limited, and that development would be well located in respect of employment opportunities. As with Sites B, C, E and F, it was concluded that the site is 'potentially suitable' if viewed as part of a wider development in conjunction with Site A.
- 8.10 The study provides a useful high level assessment of potential options around Harlow. Having considered these options in relation to the Gilston Area, it is the view of the Council that Sites A and E should be allocated for development. While recognising the significant impact that development in this location will have on the openness of the Green Belt and the wider landscape, these sites provide an opportunity to make a significant

contribution towards identified housing needs, both within this Plan period and beyond. It is recognised that the northern part of Site A is more sensitive in landscape terms than the rest of the site, given its higher elevation. It is therefore considered that this area should not be developed but should be used for the provision of substantial new public open space. This is reflected within the Harlow Strategic Sites Assessment, as shown in Figure 4 below. As is the case with Figure 3, the green areas are those that are considered to be 'suitable' for development, while the orange areas are those that are considered to be 'potentially suitable'.

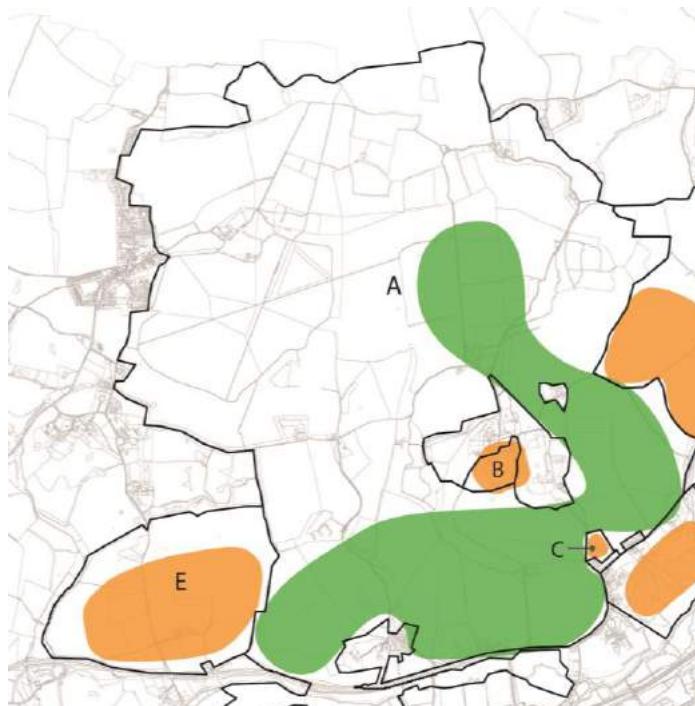


Figure 4: Harlow Strategic Sites Assessment.

- 8.11 In addition, while there are constraints associated with both Site A and E, including a number of heritage and environmental assets, it is considered that any impacts can be mitigated to a large extent through careful design and the use of appropriate landscape buffers. Development of this scale would also help facilitate the provision of strategic infrastructure schemes such as a Second Stort crossing. All of these issues are considered in more detail within the draft Concept Framework.
- 8.12 In relation to Site B, it is considered that development would have an unacceptable impact on the locally important Historic Park or Garden of Gilston Park, and as such should be avoided. While development of Site A would also impact on the character of this heritage asset, appropriate landscaping can help to mitigate this.



- 8.13 Similarly, it is considered that development of Site C would have an unacceptable impact on the character of Gilston village. Again, while development of Site A will also have an impact, the Concept Framework includes measures to ensure a landscape buffer is provided in order to maintain the integrity of Gilston village as a separate settlement. This is also the case with Eastwick village.
- 8.14 The Council agrees that Site D is unsuitable for development given that it would clearly lead to coalescence issues with both High Wych and Sawbridgeworth. In addition, while development of the western section of Site F would not directly lead to coalescence issues, it is considered important to maintain a significant Green Belt gap between the Gilston Area and High Wych and Sawbridgeworth. As such, Site F is also considered to be unsuitable.
- 8.15 Finally, while reasonably well related to the existing urban area of Harlow, Site G is considered to be unsuitable for development. Much of the site is within Flood Zones 2 and 3 which reduces the developable area to two small parcels of land. The two parcels are shown in Figure 5 below.



Figure 5: Harlow Strategic Sites Assessment.

- 8.16 Similar to Site C, it is considered that the western parcel would result in an unacceptable impact on the character of Gilston village. In addition, development of this site could fetter the ability to deliver a second road crossing of the River Stort. The eastern parcel would represent a slightly isolated pocket of development which would reduce the already narrow strategic gap between Harlow and the south western tip of Sawbridgeworth. Development in this location may also prevent the delivery of a Harlow Northern Bypass, should this be considered necessary following further

transport modelling work. Finally, much of Site G was previously used for quarrying, and subsequently, for landfilling. At present, the Council is investigating the extent of gas emissions associated with this use. It is therefore not possible to determine whether the site would be developable at this stage.

- 8.17 Having given consideration to alternative sites, the proposed site boundary is detailed in Figure 6 below.

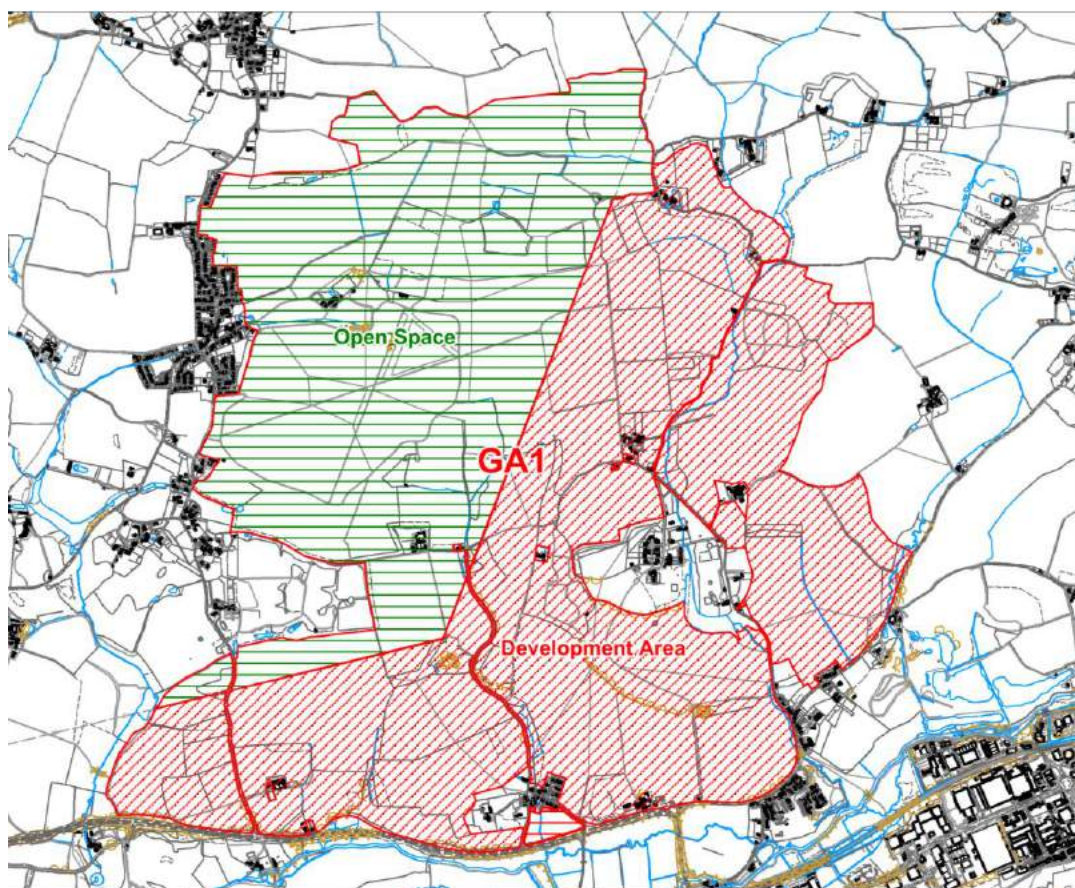


Figure 6: Site Allocation boundary

- 8.18 In responding to landscape form in the local area, it is considered that development should be limited to the area south and east of the electrical pylons. The northern section of the site, which is at a higher elevation, should remain undeveloped. As such it is proposed that significant new open space and parklands be provided. In line with Garden City principles, ownership and management of this land should be transferred to a community trust.

## 9. Green Belt Boundaries

- 9.1 Having established that Sites A and E should form the site allocation for the Gilston Area, consideration needs to be given to revised Green Belt boundaries. In general, the Council's approach through the District Plan is to



only release those areas from Green Belt that are directly required in order to deliver growth. With regards to the Gilston Area, the proposed approach to Green Belt is identified in Figure 6 below.

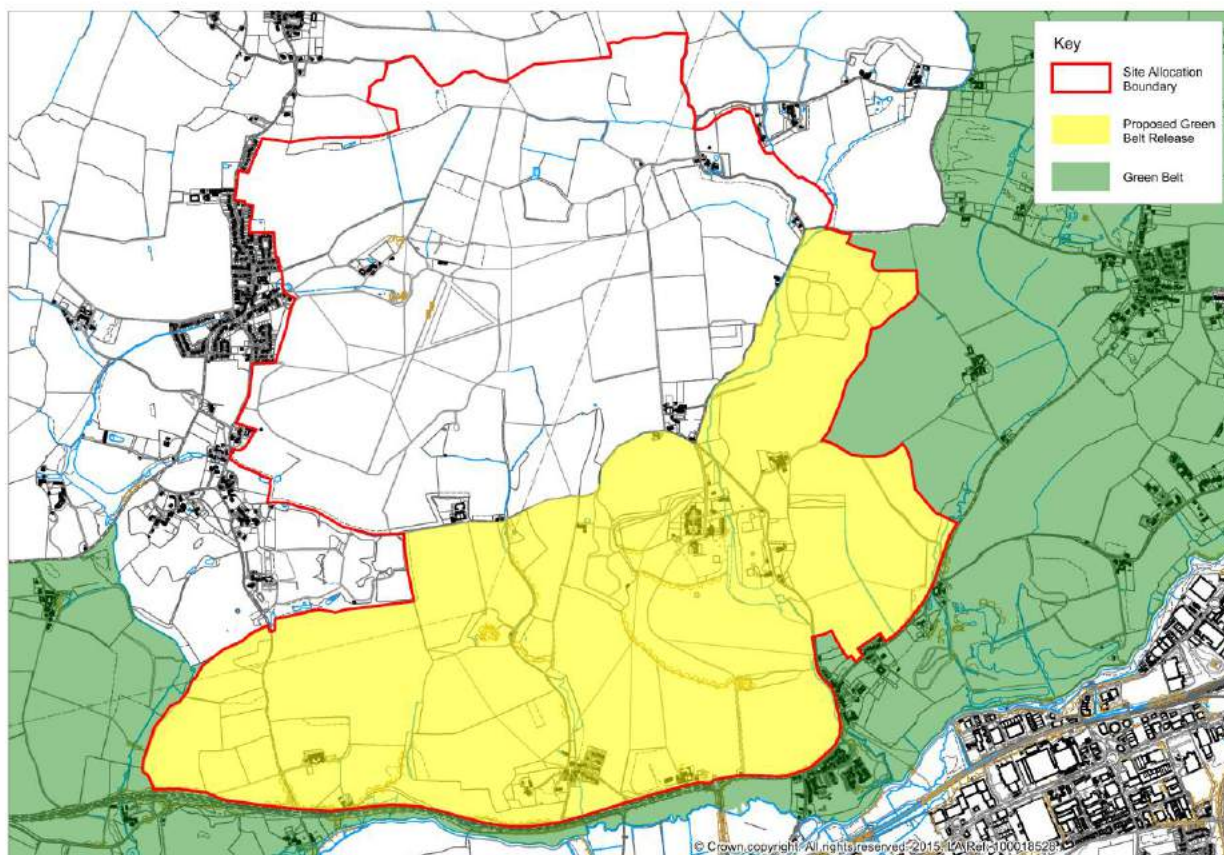


Figure 7: Proposed Green Belt release

9.2 Given anticipated build out rates, as identified in Section 6 of this Settlement Appraisal, it is expected that approximately 3,000 homes could be delivered in the Plan period, with the remainder coming forward after that date. However, paragraph 85 of the NPPF requires that local planning authorities 'satisfy themselves that Green Belt boundaries will not need to be altered at the end of the development plan period'. It is therefore necessary for the District Plan to remove the area of Green Belt required to deliver the full scheme of 10,000 homes, thereby ensuring that boundaries do not need to be reviewed again in this location within the next Plan period.

9.3 It is recognised that this approach leaves a narrow strip of Green Belt between Harlow and the Gilston Area (although Figure 6 does not show the extent of the Green Belt to the south of the River Stort, within the administrative area of Harlow). However, this situation is not unusual when considering the extent of the Metropolitan Green Belt as a whole. This approach does mean that the land required to deliver a widened existing Stort

crossing, and to deliver a second crossing to the east, remains within Green Belt. However, the Council considers that such works are considered to be compatible with paragraph 90 of the NPPF which allows for the provision of local transport infrastructure, where doing so would not harm the openness of the Green Belt.

- 9.4 The revised boundaries follow distinct features on the ground wherever possible, such as roads, treelines and field boundaries. The development will be expected to strengthen these boundaries through careful design and landscaping.
- 9.5 The Council is not proposing to introduce new Green Belt to the north of the Gilston Area. This is because 'Rural Area Beyond the Green Belt' policy, which covers those areas of the District that are not within Green Belt, seeks to achieve similar aims.

## **10 Neighbourhood Planning**

- 10.1 Hunsdon and Eastwick & Gilston Parish Councils had an Area Designation approved in September 2015 in order to undertake a joint Neighbourhood Plan. It is understood that the Plan remains in the early stages of preparation, subject to the finalisation of the District Plan.

## **11 SA Objectives**

- 11.1 The Sustainability Appraisal is an integral part of Plan-making. This Settlement Appraisal forms part of the Sustainability Appraisal process as it considers the impacts arising from development, and a consideration of alternative options. To assist the broader District-Wide Sustainability Appraisal, each of the urban extension options and the proposed development strategy for each East Herts town has been assessed against the Sustainability Appraisal Framework as updated by the Strategic Housing Market Area Spatial Options Distribution work. The appraisal, below, of proposed development in the Gilston Area describes how the sites will meet the objectives as set out in the Sustainability Appraisal Framework.

### *Air Quality*

- 11.2 There are no Air Quality Management Areas (AQMA's) within the immediate vicinity of the Gilston Area. However, large scale development in this location, in conjunction with other development proposals, is likely to increase the amount of traffic using the A1184 through Sawbridgeworth and Bishop's Stortford where AQMA's are present. Air quality issues must therefore be monitored and managed in accordance with Policy EQ4 of the District Plan. A

Memorandum of Understanding (MOU) has been signed by the four core authorities of the Co-op Board, Hertfordshire and Essex County Councils, Natural England and the Conservators of Epping Forest. The MOU requires the development of a joint strategy in order to address potential adverse impacts on the integrity of Epping Forest Special Area of Conservation (SAC).

### *Biodiversity and Green Infrastructure*

11.3 While the Gilston Area contains a number of designated County Wildlife Sites, any impact can be mitigated to a significant degree through careful design and the use of landscape buffers. In addition, the Gilston Area will provide a significant amount of new green space in the form of parklands, which through careful management, has the potential to increase biodiversity across the site when compared to the current situation.

### *Community and Wellbeing*

11.4 The Gilston Area will deliver a significant amount of new housing, catering for all age ranges including an ageing population. The development will provide local shops and healthcare services as well as local sources of employment. Early Years, primary and secondary education will also be provided on-site. The use of Garden City principles, along with the provision of formal, informal and accessible natural green space, outdoor sports and play spaces make valuable contributions to health and wellbeing objectives.

### *Economy and Employment*

11.5 The Gilston Area is located within close proximity to Harlow. While the development will provide local sources of employment, through the creation of education, retail, community and healthcare facilities on site, more significant opportunities will be easily and sustainably accessed within Harlow, including the new Enterprise Zone. The site also benefits from its proximity to Harlow Town railway station, from where other locations can be easily reached for employment purposes, including Bishop's Stortford, Cambridge and London.

### *Historic Environment*

11.6 There are a number of Areas of Archaeological Significance on site as well as Scheduled Monuments. There are also a number of listed buildings close by and a locally important Historic Park or Garden (Gilston Park). Any impact on these sites can largely be mitigated through the use of carefully designed

landscaped buffers. In particular, the approach to maintaining the setting of Gilston Park has been established through the draft Concept Framework.

### *Housing*

11.7 The proposal will cater for a significant proportion of the District's housing needs, both within this Plan period and beyond. It will provide for a wide range of house types and mix, including an appropriate quantum and mix of affordable housing and family sized homes. The development will also provide for the longer term needs of Gypsy and Travellers and Travelling Showpeople.

### *Land*

11.8 The Gilston Area is currently a large greenfield site that is largely in agricultural use (Grades 2 and 3). Development will be at appropriate densities in order to make efficient use of land while respecting the character of existing development. The northern section of the site will be utilised for open space and will therefore remain undeveloped, with the exception of a limited number of buildings associated with leisure and recreation uses. An assessment will need to be made at the planning application stage in order to ascertain whether any material can be extracted to be used during construction.

### *Landscape*

11.9 It is acknowledged that the Gilston Area will have a significant impact on the existing landscape. However, the draft Concept Framework identifies how the development will respond to the landscape by avoiding the most sensitive areas. In addition, as noted in paragraph 11.8, the northern section of the site, which is characterised by a more open landscape with far reaching views, will be utilised for open space.

### *Low Carbon Development*

11.10 The site will incorporate footpaths and cycleways and facilitate the provision of bus routes which will enable sustainable access to Harlow and other areas. In addition, the site will comprise buildings that incorporate sustainable building features. On-site flood attenuation measures will be a fundamental element of the overall design of the site, incorporating natural drainage features and the creations of suds and swales.

### *Transport*

11.11 The development will incorporate new cycle and pedestrian links as well as bus routes connecting to Harlow and the wider area. Development in this location also has the potential to help facilitate the delivery of a multi-modal sustainable transport corridor stretching from the Gilston Area, through Harlow, to a possible new development to the south of the town, within Epping Forest District. In order to facilitate the proposed level of development in the Gilston Area, strategic transport schemes will be required. These schemes are identified within Section 6 of this Settlement Appraisal.

### *Water*

11.12 Methods to minimise water consumption through construction and occupation of the development will be utilised and appropriate connections to water supply and waste water networks are possible. The wider Rye Meads Waste Water Treatment Works has capacity to cater for planned growth beyond the Plan period.

## **12 Conclusion**

12.1 This Settlement Appraisal has sought to demonstrate that, given the evidence available, it is now appropriate to identify the Gilston Area as an allocation within the Pre-Submission version of the District Plan.

12.2 In particular, new evidence arising from the Delivery Study and ongoing transport modelling, has demonstrated that development in this location is deliverable, subject to the provision of required infrastructure including a new Junction 7a on the M11 and a second River Stort crossing. The site will therefore provide a significant proportion of the District's housing need, both within this Plan period and beyond. Allocation of the site for 10,000 homes, with approximately 3,000 to be delivered within the Plan period, will help to ensure that Green Belt boundaries will not need to be reviewed again at the end of the Plan period, in conformity with the requirements of the NPPF. In addition, the provision of approximately 7,000 homes beyond 2033 will reduce future pressure to provide for new homes on the periphery of existing settlements in the District.

12.3 The site will provide significant services and facilities including schools, libraries, community centres and health centres. A substantial amount of new public open space will also be delivered for the benefit of new and existing residents.

12.4 A draft Concept Framework has been prepared which identifies general development principles and potential land uses. The Framework will be

refined prior to submission of the District Plan in March 2017, in consultation with local communities including Parish Councils.