Appendix A

Gilston Area Charter Supplementary Planning Document Consultation Statement

1. Introduction

- 1.1 The Town and Country Planning (Local Planning) (England) Regulations 2012 require a Local Planning Authority to consult the public and stakeholders before adopting a Supplementary Planning Document (SPD).
- 1.2 This statement sets out details of the consultation which has informed the preparation of the Gilston Area Charter SPD.
- 1.3 The Gilston Area Charter SPD has been produced to provide guidance to prospective applicants on the implementation of Policy DES1 "Masterplanning" of the East Herts District Plan in the context of delivering the policy aspirations for the Gilston Area site allocation (Policy GA1 of the East Herts District Plan).

2. Town and Country Planning Regulations

- 2.1 The SPD has been produced in accordance with the Town and Country Planning (Local Planning) (England) Regulations 2012. The relevant regulations relating to the consultation process are explained below.
 - Regulation 12(a) requires the Council to produce a consultation statement before adoption of the SPD, this must set out who was consulted, a summary of the issues raised, and how these issues were incorporated into the SPD.
 - Regulation 12(b) requires the Council to publish the documents for a minimum 4 week consultation, specify the date when responses should be received and identify the address to which responses should be sent.
 - Regulation 35: Regulation 12 states that when seeking representations on an SPD, documents must be available in accordance with Regulation 35. This requires the Council to make documents available by taking the following steps;

- Make the document available at the principal office and other places within the area that the Council considers appropriate;
- Publish the document on the Council's website.

3. Statement of Community Involvement (SCI)

- 3.1 The Council's current SCI was adopted in 2019 and sets out how East Herts Council will involve the community in the preparation, alteration and review of planning policy plans and guidance. It also explains how it will involve the community in planning applications.
- 3.2 Community engagement is a key part of the planning system as it ensures that the Council is able to listen to the views of stakeholders and the community to inform the outcome of planning decisions. This helps local people to become directly involved in place shaping in the district. The Council is committed to maximising publicity of its planning documents and wishes to involve all sectors of the community in the planning process, including in the production of Supplementary Planning Documents.
- 3.3 In light of the coronavirus pandemic and recent updates to government planning guidance the Council has made appropriate adjustments to its consultation and engagement processes to ensure opportunities to reach out to local people and involve them in the planning process is maximised. The Council's SCI is being updated to reflect this position.

4. Engagement and consultation undertaken

Early engagement and consultation

4.1 In October 2019 the Gilston Area Steering Group was briefed on the intention of the Local Planning Authority to commence with the production of the Gilston Area

Charter SPD. Representatives from the main parties that attend the Steering Group (Council, landowner, key stakeholder and community representatives) were invited to be part of a smaller "Charter Group" to help inform its production and content.

- 4.2 The Charter Group was subsequently established and met on several occasions to discuss and inform various elements of the draft Charter and its supporting documents.
- 4.3 Partner authorities and statutory bodies were also informally notified about the production of the Charter and given the opportunity to inform the process. These included Hertfordshire County Council, Essex County Council, the Environment Agency, Historic England and Natural England.
- 4.4 As the Gilston Area forms part of the wider Harlow and Gilston Garden Town
 (HGGT), the HGGT Board was notified of the production of the Charter in October
 2019 and HGGT officers have been party to various work streams associated with developing its content.
- 4.5 Elements of the draft Charter were also presented to HGGT Quality Review Panel (QRP) for a "Chair's Review" in November 2019. The HGGT QRP is an independent design panel made up of planning and design professionals which can review any emerging work relating to the Garden Town, including planning guidance. The Panel provides an independent critique in relation to matters presented to it and its recommendations and observations may then be considered by applicants or the Local Planning Authority.

4.6 Feedback from the QRP was generally supportive and its recommendations have informed the content of the Gilston Area Charter SPD.

Formal consultation

- 4.7 The draft Gilston Area Charter SPD was approved for public consultation at East Herts Council Executive on 11th February 2020. The consultation subsequently took place between 12th February 2020 and 12th March 2020.
- 4.8 Consultation was undertaken in accordance with the Town and Country Planning (Local Planning) (England) Regulations 2012 and the Council's Statement of Community Involvement. Consultees were consulted by email; or post where no email address was provided. A list of consultees is provided in Appendix A. The SPD consultation was also advertised via the Council's website and via social media.
- 4.9 The draft SPD and Strategic Environmental Assessment (SEA) Screening Statement were made available on the Council's website: www.eastherts.gov.uk/gilston-area-charter-supplementary-planning-document. This included Information about how to submit representations. Hard copies of the document were made available for public inspection during normal office hours at East Herts Council Offices' in Hertford and Bishop's Stortford, town council offices and in libraries across the district.
- 4.10 Representations could be made via the Council's consultation portal http://consult.eastherts.gov.uk/portal; emailed to planningpolicy@eastherts.gov.uk/

or sent to; Planning Policy, East Herts Council, Wallfields, Pegs Lane, Hertford, SG13 8EQ.

5. **Issues raised during the consultation**

- 5.1 During the consultation, 105 representations were received, made by 22 respondents. Of the representations made, 9 were general comments, 18 were objections, 4 were in support, 1 was a query and 73 were suggested points of modification.
- 5.2 Comments were wide ranging but largely focused on ensuring that the guidance in the Charter;
 - appropriately acknowledges matters approved at the outline application stage as well as existing and emerging policy/guidance relevant to the area, including the Gilston Area Neighbourhood Plan, Gilston Area Concept Framework and the Harlow and Gilston Garden Town Guidance;
 - delivers masterplans which enable comprehensive and sustainable development that draws on best practice; and
 - sets out appropriate guidance on how best to engage the community and statutory bodies in the masterplanning process.
- 5.3 A summary of the consultation responses is set out in the schedule below. This table outlines the comments received in response to each section of the Charter, the Council's response to those comments and any consequential changes to the SPD.

No.	Representation	Comment	Issue	Officer Response	Proposed modification
		type			
	General feedback	on the princip	e of the SPD		
1.	M. Ripsher	Object	Opposition to development taking place in the Gilston Area which is protected Green Belt. Development will have negative impacts on natural environment, highway network and character of existing villages, cause pollution and compound existing public transport pressures.	The principle of development on land in the Gilston Area was determined when it was allocated for development in the East Herts District Plan (Policy GA1) adopted in 2018. The decision to de-designate the site as part of the Green Belt and release it for development as specified in Policy GA1, was robustly assessed and examined by an independent Planning Inspector following a statutory process of public consultation. The purpose of the Gilston Area Charter is not to create new policy, it is to support the delivery of existing Policy GA1 and DES1 in setting out guidance to ensure that meaningful masterplanning is undertaken as part of the planning process. The guidance within the Charter	None.
				seeks to help embed high quality design solutions into the evolving	
				plans for the Gilston Area and	
				enable the delivery of comprehensive and sustainable	

				development with appropriate supporting infrastructure.	
2.	A. Taylor	Object	Existing roads cannot sustain the additional traffic that would generated by the amount of development.	Covered above in response to respondent 1.	None.
3.	F. J. Lloyd	Object	Development in the Gilston Area only serves to benefit developers and will add to existing traffic problems in the area.	Covered above in response to respondent 1.	None.
4.	T. Elmer	Object	Development in the Gilston Area will have a devastating impact upon quality of life of existing residents, wildlife and the environment, and will fail to provide the necessary supporting infrastructure.	Covered above in response to respondent 1.	None.
5.	S. McNamee	Object	The level of housing is too much for a semi-rural area and fails to consider climate change and the need for green space for food production. People move villages for peace and quiet, not everyone wants to live in a town or city.	Covered above in response to respondent 1.	None.
6.	J. McGill	Object	There is so much large scale development in the area, are the	Covered above in response to respondent 1.	None.

			houses really needed? Existing infrastructure (transport, schools and health specifically referenced) will not be able to cope with the amount of development. Will there be enough jobs for people? Visuals of the development do not look like a village.		
7.	S. Vyvyan	Comment	The green space in the Gilston Area should include woodland planting. This could support businesses, create areas for recreation and could provide wood for fuel.	The purpose of the Gilston Area Charter is to support the delivery existing Local Plan Policy GA1 and DES1 in setting out guidance to ensure that meaningful masterplanning is undertaken as part of the planning process. Existing and new areas of woodland will be identified through the production of the Strategic Landscape Masterplan. The Charter identifies this requirement.	None.
No.	Representation	Comment type	Issue	Officer Response	Proposed modification
	Comments on the		SPD – Section 1 (Introduction)		
8.	Hunsdon,	Modification	Suggest paragraph 1.1 is amended	Agree insertion of word "rural."	Amend paragraph 1.1 as follows;
	Eastwick and		to make clear that the objective is		
	Gilston		to integrate the development into	The villages will also be set within	This development will be delivered
	Neighbourhood		the existing landscape and not	managed open space and parkland	as several separate and distinct
	Plan Group		create a formal parkland setting.	as stipulated in policy GA1. This will	villages set with substantive <u>rural</u>
			Suggest inclusion of "set within a	be an important asset to the Gilston	landscaping, managed open space

			rural landscape" rather than set within substantive landscaping and parkland.	Area and as such should be referenced in the Charter.	and parklands.
No.	Representation	Comment type	Issue	Officer Response	Proposed modification
	Comments on the		SPD – Section 2 (Planning policy and g	guidance relevant to this document)	
9.	Hunsdon, Eastwick and Gilston Neighbourhood Plan Group	Modification	Suggests modifications to paragraph 2.3 to better clarify the role of the Concept Framework.	Noted and agree suggested modifications.	A Concept Framework was produced in parallel to the District Plan by landowners Places for People and City and Provincial Properties in collaboration with East Herts District Council and following intensive collective input by the local communities. The framework identifies potential design principles, land uses, infrastructure requirements and phasing and used surveys, assessments, conceptual Masterplans and consultation input from key stakeholders and the community to support and demonstrate the deliverability of Policy GA1 as seven distinct villages separated by meaningful landscape with shared infrastructure and a clear collective identity. It also established key principles to underpin and shape the content of any future Masterplanning work

10.	Hunsdon, Eastwick and Gilston Neighbourhood Plan Group	Modification	Suggests modifications to paragraph 2.6 to better clarify the role of the Neighbourhood Plan.	Agree suggested modifications which have informed the proposed amendments adjacent.	undertaken, including 'strong vision, leadership and community engagement in accordance with Garden City principles. Replace paragraph 2.6 as follows; The Gilston Area Neighbourhood Plan (GANP) is currently being produced by the Hunsdon, Eastwick and Gilston Neighbourhood Plan Group and is expected to be in place later in 2020. The GANP is being prepared in close collaboration with the HGGT and with the landowners. It includes policies to guide landscape development, village structure and design, infrastructure delivery and the relationship of new development with the existing villages. On adoption, the Neighbourhood Plan will form part
No.	Representation	Response	Issue	Officer Response	Neighbourhood Plan will form part of the statutory Development Plan against which relevant planning applications will be determined, including the Gilston Area masterplans. Proposed modification
		type			
	Comments on the	content of the	SPD – Section 3 (The role of this Chart	ter)	
			,	,	

11.	Hunsdon, Eastwick and Gilston Neighbourhood Plan Group	Modification	Paragraph 3.5 should be clearer that emerging policy includes the Gilston Area Neighbourhood Plan.	The role of the Gilston Area Neighbourhood Plan is set out in paragraph 2.6 and also in Figure 4 that accompanies Section 3. It is not considered necessary to repeat it in paragraph 3.5, particularly as no other policy or guidance documents are specifically referenced in this paragraph.	None.
12.	Vision Planning (on behalf of Hunsdon House)	Modification	Paragraph 3.3 should be clear that the masterplans need to respond to and consider impacts on heritage assets outside of the site.	The focus of paragraph 3.3 is about the need for masterplans to consider how development in the Gilston Area will respond to its setting. This includes heritage assets within the site and the wider landscape, and relationship with existing settlements.	None.
No.	Representation	Response	Issue	Officer Response	Proposed modification
		type			
	Comments on the	content of the	SPD – Section 4		
13.	Places for People	Modification	Suggests amendment to paragraph 4.6 – delete "the strategic elements of the development."	The Strategic Landscape Masterplan will look to address the strategic elements of the development. Further clarity on this point is covered in response to points 41 and 86 below. See also amendments to paragraph 4.6 in response to point 84.	None.

14.	Places for People	Modification	Suggests reference is made in paragraph 4.10 to the "landscape areas between the villages."	A description of what will be included in the Strategic Landscape Masterplan is set out in paragraph 4.11.	None.
15.	Places for People	Modification	Suggests deletions to para 4.11 regarding reference to detailed proposals for landscaping and reference to how movement will be accommodated.	The role of the Strategic Landscape Masterplan is to ensure that the site works successfully as one comprehensive development that also integrates seamlessly into its wider context. A broad understanding of the key routes between the villages, i.e. where they cross areas of landscaping and the points of access to individual villages and connectivity to wider routes beyond the site boundary will be is essential for successful place making, wider integration and achieving Garden Town mode share aspirations.	None.
			Suggests inclusion of "as far as it relates to the landscape areas between the villages."	The first sentence in paragraph 4.11 sets out what the Strategic Landscape Masterplan will cover. Whilst it will primarily focus on the landscape areas and green infrastructure between the villages, it will also need to have due regard to nodal and access points that influence movement which may lie	None.

				outside of those areas.	
16.	Places for People	Modification	Paragraphs 4.12, 4.14, 4.15 should make reference for the need to build on the parameters and commitments secured at the outline stage.	Paragraph 4.7 is clear that all masterplans must build on the parameters and commitments secured at the outline stage. Repetition of this point throughout Section 4 is not required.	None.
17.	Places for People	Modification	Paragraphs 4.14 and 4.18 – suggests reference to Masterplans and Design Codes being submitted pursuant to relevant conditions imposed at the outline stage.	This is already set out in paragraph 4.7, in Figure 6 and in Section 7.	None.
18.	Places for People	Modification	Paragraph 4.19 should include "This may necessitate amendments to the details approved under condition."	Agree.	Amend paragraph 4.19 as follows (note this paragraph has also been amended as per below to address other points raised through the consultation); The Compliance Checklist should also make provision for applicants to acknowledge where a code may no longer be fit for purpose and provide design justification for any proposed deviations. This may (depending on the extent of the changes proposed) necessitate amendments to Design Code details approved through the discharge of condition and would require the approval of the Local Planning

					Authority following consultation
					with the local community.
19.	Places for People	Modification	Paragraph 4.16 should delete reference to development plots.	The Regulatory Plan will establish where Design Codes are relevant and this may include development plots.	None.
20.	Briggens Estate 1 Limited	Modification	The Strategic Landscape Masterplan is intended to cover some matters not related to landscape or green infrastructure, such as those related to transport mode share. We do not consider this is an appropriate plan for the provision of this information, or any that is not related to landscape or green infrastructure matters. Response makes ref to suggested changes to paragraphs 4.6-4.14.	Agree some suggested changes (see amendments adjacent). The suggested deletions to paragraphs 4.11 and 4.13 are not agreed. The role of the Strategic Landscape Masterplan is to ensure that the site works successfully as one comprehensive development that also integrates seamlessly into its wider context. A broad understanding of the key routes between the villages, i.e. where they cross areas of landscaping and the points of access to individual villages and connectivity to wider routes beyond the site boundary will be is essential for successful place making, wider integration and achieving Garden Town mode share aspirations. Similarly it is important the Village Masterplans consider through place	Amend para 4.8 as follows; Once approved the Masterplans and their associated Design Codes will form a framework to guide Reserved Matters applications (and any relevant detailed planning applications) for development plots or buildings that follow. A summary of how the Masterplans fit into the planning process for the Gilston Area is provided in Figure 6. Delete the word "Local" form para 4.9.

				shaping, opportunities for tackling climate change and successful flood risk mitigation.	
21.	Briggens Estate 1 Limited	Object	We do not consider there is a need for a Design Code to accompany the Strategic Landscape Masterplan as stated at paragraph 4.15 of the Consultation Draft.	Existing policy and guidance sets out an aspiration for the Gilston Area to be delivered as distinct and separate villages but also identifiable as one new settlement. The establishment of Design Codes will play a key role in helping to achieve this aspiration. A Design Code that supports the Strategic Landscape Masterplan provides a particular opportunity to help facilitate cohesion and a collective character/identity across the site.	None.
22.	Briggens Estate 1 Limited	Object	The adoption of a 'testing' process, as proposed at paragraph 4.17 of the Consultation Draft, suggests an unduly onerous and timeconsuming approach in which the local planning authority would assess the adequacy of information as part of a condition discharge process.	The testing of design codes will be essential in terms of demonstrating to the LPA that when applied in practice they will deliver quality outcomes and more importantly are robust enough to ensure poor quality outcomes are avoided. Testing is likely to occur organically through the collaborative process of producing them. Design Code testing is not considered to be an onerous exercise, is recognised good practice	None.

				and was recommended as step that should be taken by the Garden Town Quality Review Panel.	
23.	Hunsdon, Eastwick and Gilston Neighbourhood Plan Group	Modification	More emphasis should be given to the principle of delivering the comprehensive development of seven distinct villages and three existing villages, particularly when referring the Strategic Landscape Masterplan. Amendments are suggested.	Agree that the principle for delivering comprehensive development could be emphasised more strongly in places.	Amend paragraph 4.1 as follows; They are particularly useful for large multi-phased developments such as that coming forward in the Gilston Area, acting as a mechanism to assist in the delivery of comprehensive and coordinated development and high quality design outcomes. Amend paragraph 4.10 as follows; This will establish a spatial strategy for comprehensive development of the entire Gilston Area site allocation in one overarching plan that draws together and expands upon the principles established in the parameter plans approved at the outline application stage, and the work already undertaken in the Gilston Area Concept Framework.
24.	Hunsdon, Eastwick and Gilston Neighbourhood	Modification	Paragraph 4.9 should be clear that the Local Development Framework includes the Gilston Area Neighbourhood Plan.	Rather than referring to the Local Development Plan, the paragraph will be amended to refer to the statutory Development Plan	Amend paragraph 4.9 as follows: The content of each Masterplan must align with any parameters

	Plan Group			documents. This aligns with Figure 4 which clarifies that the Gilston Area Neighbourhood Plan will form part of this.	established through the outline applications, the <u>statutory</u> Development Plan <u>documents</u>
25.	Hunsdon, Eastwick and Gilston Neighbourhood Plan Group	Modification	Figure 6 should be amended to ensure the masterplanning process includes community engagement as an integrated and on-going part of the masterplanning process.	Agree. The text in the figure 6 will be revised as set out adjacent.	Amend box two (Masterplans and associated Design Codes) as follows; Replace bullet point 5 with; Production is developer led with key stakeholder and community engagement as an integrated and ongoing part of the process.
26.	Hunsdon, Eastwick and Gilston Neighbourhood Plan Group	Modification	Amend paragraph 4.10 to state that the Strategic Landscape Masterplan will be produced and approved before the village masterplans.	Agree. This amendment would not preclude Village Masterplans being prepared in parallel or from being approved shortly after. The important point is that the village masterplans take account of, and can demonstrate how they will successfully integrate with the Strategic Landscape Masterplan. This is clarified in Step 1 of the process steps that must be followed in their production but shall also be reiterated in paragraph 4.13 (see amendments set out under point 47).	Amend paragraph 4.10 as follows: A Strategic Landscape Masterplan will be produced and approved before or in parallel with the approval of the first Village Masterplan.

27.	Hunsdon, Eastwick and Gilston Neighbourhood Plan Group	Modification	Reference to key buildings, features and nodal points in paragraph 4.14 should be amended as this could be interpreted as built gateways and landmark buildings which are not characteristic of Hertfordshire villages.	The Charter is clear that when establishing Masterplans (including Character Areas), consideration must be given to adopted policy and guidance. The PPA Project Team and the community through engagement will inform how policy and guidance is interpreted and translated into the Masterplans as they are worked up, to ensure they come forward as envisaged by those documents.	None.
28.	Hunsdon, Eastwick and Gilston Neighbourhood Plan Group	Modification	Guidance within the Charter on Design Codes should make ref to how they will; -take inspiration from patterns of local built form, relationship with the landscape, whilst adopting contemporary forms/features Prompt development of diverse architecture/irregular layouts within a consistent cohesive setting Recognise the Gilston Area will be built out over a long time and be able to react to change.	It's important that the Charter does not generalise about what the Design Codes should reference. Their production will form part of the masterplanning process as set out in Section 5. This will ensure they are appropriate and tailored to each masterplan which will have its own unique context/setting to respond to.	None.
29.	Vision Planning (on behalf of Hunsdon House)	Modification	Paragraph 4.7 needs to go further and set out the elements to be included in the Design Code.	See response to point 28 above.	None.

30.	Hunsdon, Eastwick and Gilston Neighbourhood Plan Group	Object	Allowing for deviation/derogation will invalidate the principle and usefulness of the Design Codes.	The Charter (Section 4) sets out that Design Codes will be expected to cover mandatory requirements but also allow for flexible design solutions where these are most appropriate. It also includes a requirement for Design Code testing to ensure they are sufficiently robust. It's important the Design Codes can adapt over time if necessary and the Charter allows for this, subject only to adequate justification and LPA approval first. In order to provide further reassurance, paragraph 4.19 will be amended to include a requirement to consult the community of any changes to the approved Design Codes.	See amendments to paragraph 4.19 set out at point 18 above.
31.	Hunsdon, Eastwick and Gilston Neighbourhood Plan Group	Modification	The compliance checklist is helpful but the example in figure 5 should be more relevant to Gilston.	Figure 5 is used to help explain what a compliance checklist is and the format it could take. The examples cited within it could be relevant to the Gilston Area.	None.

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32.	Canal and Rivers	Support/	Support the proposal for a	Agree.	Amend paragraph 4.11 as follows
	Trust	Modification	Strategic Landscape Masterplan to		(note amendments in this
			be produced alongside the first		paragraph also address other
			Village Masterplan and the issues		points raised through the
			to be addressed within it as set out		consultation);
			in para 4.11. Suggest that		
			delivering net gains for biodiversity		It will focus on establishing the key
			should also be included in		components and Character Areas
			paragraph 4.11.		that will form the comprehensive
					green infrastructure network across
					the site that will surround and sit
					alongside the new villages, existing
					settlements <u>and the wider</u>
					landscape. In establishing this, the
					<u>Masterplan will look to address and</u>
					plan for strategic matters including:
					<u>how movement will be</u>
					accommodated to prioritise active
					and sustainable modes of travel
					and the achievement of the 60%
					mode share target; how the
					development will successfully
					integrate with adjacent settlements
					and landscaping including the Stort
					<u>Valley; how the new villages</u> <u>will</u>
					have sufficient landscape buffers
					but will function successfully
					together as one new settlement and
					make efficient use of the land
					through coordinating measures
					such as the approach to drainage
					and flood risk and any potential net
					gains for biodiversity; and how the

					community open space land allocated in the Gilston Area will be planned and landscaped to help facilitate its long term maintenance.
33.	Essex County Council	Modification	The connection between place making and how it can influence movement is not set out explicitly enough within the SPD. Recommends that the wording in paragraph 4.11 about achieving the 60% mode share target is strengthened.	Commitments will be secured at the outline application stage to deliver certain measures and mitigation to assist in achieving the 60% mode share target. The masterplanning stage will allow for movement to be planned through place shaping and applicants will be required to submit a sustainability statement as part of the masterplan submission to demonstrate how it responds to the HGGT Design Questions, this includes a number of considerations around sustainable modes of travel. Paragraph 4.11 and Point 7 in paragraph 6.1 will be amended to clarify this requirement more clearly.	See new drafting of paragraph 4.11 as set out in point 32 above. Amend point 7 in paragraph 6.1 as follows: Sustainability Statement: this should demonstrate how the Masterplan and associated Design Code have sought to achieve quality outcomes responding to the relevant check markers in response to the HGGT Design Quality Questions and the check markers as set out in Section 9 of the Charter.
34.	Vision Planning (on behalf of Hunsdon House)	Modification	The Strategic Landscape Masterplan goes beyond matters that just relate to landscaping and so should be referred to as the Strategic Masterplan to avoid ambiguity.	The Strategic Landscape Masterplan is primarily focused on the network of green spaces that will surround the villages. The role of landscaping will be critical in ensuring that the villages are sustainable and function as a comprehensive collective, whilst also maintain appropriate separation distances from each	None.

				other and existing settlements to be district in their own right. It will also ensure that the Gilston Area is developed in a way that respects and responds to its landscape setting. It is therefore considered important to maintain "Landscaping" in the title given its integral role in achieving the policy aspirations of the Gilston Area.	
35.	Vision Planning (on behalf of Hunsdon House)	Modification	In response to paragraph 4.19 - Design Codes and masterplans will need to explain why various elements are included; otherwise they run the risk of being incrementally diluted over time.	Paragraphs 4.18 and 4.19 set out a process by which design codes can be adapted overtime if required. This would however be subject to adequate justification and approval of the Local Planning Authority following consultation with the community. Any proposed changes would need to be considered in the context of existing policy. It is therefore considered that the process is robust enough to ensure that original design principles will not be diluted over time.	None.
36.	Hertfordshire County Council	Modification	From a movement and transportation perspective the Village and the Strategic Landscape Masterplans need to; - enshrine the LTP4 hierarchy of	Paragraphs 4.11 and 4.13 have been amended to draw on these points and those of other consultees. See officer response to point 33 above.	Amendments made. See point 33.

			movement and 60% mode share - ensure walking and cycling routes are more commodious than vehicle routes; - deliver of transport/community hubs; - (Strategic Landscape Masterplan) show how villages link together to achieve points 1 and 2 above; - provide a corridor for the A414/MRT; - ensure key vehicular routes reference links with sustainable transport routes; - make ref to 'existing natural features and water catchments.'		
	Representation	Support or Object	Issue	Officer Response	Proposed modification
	Comments on the	content of the	SPD – Section 5		
37.	Places for People	Modification	Suggests amend Step 1 (Strategic Landscape Masterplan) to confirm its focus on the landscape areas around and between the villages. Suggests amend Step 1 (Village	See officer response to point 15.	

38.	Places for People	Modification	The Charter refers at Step 2 (Strategic Landscape Masterplan and Village Masterplan) a requirement to agree a brief for the Masterplan and its objectives – we need to be clear that this means building on the principles/parameters committed as part of the outline application parameters (i.e. Development Specification, Parameter Plans, Strategic Design Guide etc) which provide the starting point.	LPA agrees that the starting point for establishing a brief or vision for the masterplan requires consideration of what has been established at the outline stage and/or any discharge of condition details that follow. This is clearly set out as part of the masterplanning process in Step 1 and so does not need to be repeated again in Step 2.	None.
39.	Places for People	Modification	Suggests Step 3 (Strategic Landscape Masterplan and Village Masterplan) makes reference to acknowledging decisions made at the outline application stage.	This is clearly set out as part of the masterplanning process in Step 1 and so does not need to be repeated again in Step 3.	None.
40.	Places for People	Modification	The masterplan process suggests at Step 4 (Strategic Landscape Masterplan and Village Masterplan) that there might be a need to refine the masterplan boundaries. The Parameter Plans submitted for approval as part of the outline application fix the village developable areas, and conversely the green space elements. As a result these boundaries will not be refined at the Masterplan stage. Instead the masterplan process will determine	The intention of Step 4 (Strategic Landscape Masterplan) is not to deviate from the elements fixed at the outline application stage but to ensure that due consideration is given to how the Strategic Landscape Masterplan interfaces with the Gilston Area villages and the wider landscaping beyond the site allocation boundary. The intention of Step 4 (Village Masterplans) is not to deviate from the matters approved in the	Replace Step 4 as follows: For Strategic Landscape Masterplan: Establish the extent of the Strategic Landscape Masterplan having regard to how it will interface and respond to the Gilson Area Villages and the wider landscaping/ development beyond the site allocation boundary. For the Village Masterplans:

			what occurs within each boundary. This step should therefore be rephrased on this basis.	parameter plans but instead to ensure that the masterplanning stage allows for more detailed consideration of how the villages will appropriately respond to the landscape that will surround them and ensure appropriate landscape buffers are established. Agree this requires clarification see amendment adjacent.	Establish the extent of the Village Masterplan having regard to how it will interface and respond to its immediate surrounding landscape in the context of the approved Strategic Landscape Masterplan.
41.	Places for People	Modification	Suggests Step 5 (Strategic Landscape Masterplan and Village Masterplan) makes reference to acknowledging decisions made at the outline application stage.	This is clearly set out as part of the masterplanning process in Step 1 and so does not need to be repeated again in Step 5.	None.
			Suggests Step 5 (Strategic Landscape Masterplan) clarifies that the location and extent of key features should relate only to those within the areas of landscaping around and between villages.	See officer response to point 15.	None.
			Also suggests deletion of transport hubs as a key feature and complete deletion of the last paragraph related to consideration of strategic nodal points within villages.	The need to consider locating a sustainable transport hub(s) outside of the village developable areas within the green infrastructure should not be precluded. The primary role of the Strategic	None. Replace last paragraph under

				Landscape Masterplan is to help facilitate comprehensive and integrated development that meets the policy and guidance aspirations for the site allocation, including targets around mode share. Key to this will be an understanding of the strategic nodal points within the villages and beyond the site allocation boundary that will influence movement. Agree this should be better articulated. See amendment adjacent.	Step 5 (Strategic Landscape Masterplan) as follows; When establishing the above, the broad location of strategic infrastructure that will influence movement both within the Gilston Area Villages and beyond the masterplan boundary, such as sustainable transport hubs, village centres, schools, public spaces and access points should also be considered and inform the Strategic Landscape Masterplan.
42.	Places for People	Modification	At Step 6 suggest insert "in the landscape areas around and between the villages" (Strategic Landscape Masterplan) and "within the developable area of the relevant village (Village Masterplan)	The requisites for how Character Areas should be defined and established are set out in paragraphs 4.11 and 4.14.	None.
43.	Places for People	Modification	Step 8 (both Strategic Landscape Masterplan and Village Masterplan) refers to determining the logical order for phasing development. Given that the outline planning application will fix infrastructure triggers and sequencing principles, we are keen	Matters associated with the phasing of development/infrastructure secured at the outline application stage is indicative only and could be subject to change for a variety of reasons, such as securing external funding for infrastructure.	Delete Step 8. Amend Step 3 as per below. Drawing on conversant technical and supporting information, assess considerations and opportunities for development taking account of

44.	Hunsdon,	Modification	to understand what additional phasing details are anticipated here. Further paragraph should be	It will be important at each masterplanning stage to have an up to date picture of when development/ infrastructure is likely to come forward as this will influence placeshaping decisions. For example there may be instances where it is necessary to build in flexibility to accommodate temporary measures (such as access points and roads) until permanent solutions are delivered. Agree Step 8 is unclear on this point. Amendments suggested adjacent. Step 1 of Section 5 identifies the	the setting of heritage assets, key views, geographical/topographical features, ecological habitats (including trees/hedgerows), utilities infrastructure (retained and future provision), relationship to existing/emerging settlements/development; and any influences arising from the phasing and timing of infrastructure delivery. None.
	Eastwick and Gilston Neighbourhood Plan Group		added under para 5.1 specifically referencing the Concept Framework and emerging Gilston Area Neighbourhood Plan specifying where they would influence the masterplanning process.	need to consider relevant policy and guidance at the first stage of the masterplan process.	
45.	Hunsdon, Eastwick and Gilston Neighbourhood Plan Group	Modification	The Charter should require the selection of appropriate designers, with a track record of masterplanning suitable to the countryside and able to work collaboratively with the community. This should be set out in Step 2 in Section 5.	Agree this could be stipulated in the document.	Amend paragraph 5.1 as follows; It shall be led by an applicant team of professionals with suitable experience of collaborative landscape led masterplanning who will work together with the Council, key stakeholders and the

					community.
46.	Hunsdon, Eastwick and Gilston Neighbourhood Plan Group	Modification	Step 4 (Village Masterplans) should be re-phrased to confirmation of village boundaries ensuring that a meaningful separation between distinct built areas and continuous landscape is achieved.	The requirement to consider meaningful separation between the village developable areas, and the green spaces that surround them will be established (within limits of deviation) in the parameter plans approved at the outline planning stage. Step 4 the Charter sets out how this will be addressed in more detail at the masterplanning stage. Each step of the masterplanning process will need to be undertaken in the context of adopted policy and guidance; this will include the Concept Framework and the Neighbourhood Plan (Step 1), both of which make reference for the need for appropriate village buffers.	Proposed amendments to Step 4 are set out under point 40 above.
47.	Hunsdon, Eastwick and Gilston Neighbourhood Plan Group	Modification	Step 5 (Village Masterplans) should also include a requirement to identify views over countryside, landscape enclosed within the village, soft edges, informality etc taking account of policies in the Neighbourhood Plan.	Step 5 lists the requirement to determine the location and extent of key features within the Village masterplan boundary. The key design considerations that should inform the villages (drawing on policy, including the Neighbourhood Plan), are addressed	Amend paragraph 4.13 as follows note amendments in this paragraph also address other points raised through the consultation); Each Village Masterplan will establish a spatial strategy for the key components that will comprise

in Section 4.	the village, such as the village
	centre, access points and key
Notwithstanding this paragraph 4.13	routes, residential development
has been amended to ensure it picks	plots, recreation and open spaces,
up more clearly on the matters	and key supporting infrastructure
identified in the Neighbourhood	such as education and health
Plan.	facilities. In establishing this, each
	masterplan will be required to
	compliment the Strategic
	Landscape Masterplan and plan for
	a village that: has distinct
	character; integrates sensitively
	with its surrounding landscape
	setting taking account of existing
	ecological and heritage assets;
	ensures movement is
	accommodated to prioritise active
	and sustainable modes of travel
	and the achievement of the 60%
	mode share target; delivers
	sustainable homes and places that
	commit to tackling climate change;
	connects successfully into the wider
	sustainable drainage network and
	reduces flood risk; will be a place to
	live that is safe and secure,
	promotes healthy lifestyles and
	fosters a strong sense of
	community. Finally it shall
	demonstrate how the village can
	adapt over time to meet the
	changing needs of the community.
 •	

48.	Hunsdon, Eastwick and Gilston Neighbourhood Plan Group	Modification	Step 6 and 7 (Village Masterplans) should clearly state Village Character and also require clarification of phasing, including delivery of infrastructure.	Agree with point RE: insertion of word "Village." The need to consider phasing as part of the masterplanning process is confirmed is Step 3. See officer response to point 43 above.	Amend Step 6 as follows; Step 6 Identify Village Character Areas.
49.	D. Glass	Modification	There are a number of Public Rights of Way (PRoW) that either will be affected by the proximity of the development or will be routed through the development. These PRoWs are used regularly by individuals and walking groups. Section 5.1, Strategic Landscape Masterplan, Step 5 mentions "Establish and determine the location and extent ofpublic rights of way" I cannot see anything about protection of PRoWs.	The Charter looks to support the implementation of policy GA1. This policy notes that development is expected to take account enhancing existing bridleways and footpaths throughout the site and into Harlow. This would include public rights of way. The Charter then goes further (Section 5) to state that that the location and extent of public rights of way must be considered at the masterplanning stage. This could be protection, realignment or a combination depending on what best supports good place shaping, connectivity within the site and beyond the site boundaries, and supporting sustainable transport initiatives. Any proposed deviations or removals would also be subject to other approval processes outside of	None.

				the planning processes.	
50.	Essex County Council	Modification	Steps in Section 5 should be clearer that sustainable movement is the main priority within the design (place making) process. In addition, Step 5 of the Village Masterplan process does not set out a requirement to show how employment provision and access to this will be addressed. This is necessary in order to meet Garden City principles and to enable internalisation of trips within the overall development as far possible.	Modifications were made to reinforce the need to prioritise sustainable travel when considering place shaping (see officer response to Point 33 above). Employment provision will be added as a bullet point under Step 5.	Amend Step 5 (Village Masterplans) to include additional bullet. Step 5 Establish and determine the location and extent of key features; building in flexibility where required. As a minimum this should include; Community buildings such as schools and health care facilities; Provision of commercial and retail floorspace;
51.	Vision Planning (on behalf of Hunsdon House)	Modification	Step 2 should explain who agrees the brief and set out the process for the community to agree this.	Engagement in the production of masterplans (including Step 2) is set out in Section 7 and 8 of the Charter. See also officer response to point 45 above.	None.
52.	Vision Planning (on behalf of Hunsdon House)	Comment	Step 4 suggests that the masterplan boundary would extend into third party land. If that is the case how will the Council control what happens on that land?	Step 4 has been amended to better describe its purpose, see officer response to point 40 above.	See amendment in response to point 40 above.
53.	Vision Planning	Modification	The starting point for Step 1 of the	Step 1 (and Step 7) does reference	None.

	(on behalf of Hunsdon House)		village masterplans should be consideration of what has been determined in the Strategic Landscape Masterplan.	the need to have regard to the Strategic Landscape Masterplan. See also amendments to Step 4 in response to point 40.	
54.	Vision Planning (on behalf of Hunsdon House)	Modification	Step 5 sets out matters agreed in the Strategic Landscape Masterplan and should focus instead on establishing finer grained elements.	The Strategic Landscape Masterplan will establish the broad location of the elements described under Step 5, having regard to the design considerations set out in Section 4. Finer grained elements will be established through the associated Design Codes and at the Reserved Matters stage.	None.
55.	Hertfordshire County Council	Modification	Step 5 (Strategic Landscape Masterplan and Village Masterplans) would be improved if it identifies the following additional points. · Areas where ecology and biodiversity take precedence · Areas where people can recreate · Movement corridors (especially in relation to the Stort Valley	Agree that Step 5 would be improved by suggested changes.	Amend Point 5 as per below; (Strategic Landscape Masterplan) Delete first bullet point and replace with: - Defined areas for recreation such as community parks and fields; - Key habitat areas (both natural/semi natural) such as woodland areas, ongoing agricultural uses and green corridors including identification of where public access is allowed and where it is restricted to prioritise, protect and support ecology and biodiversity;

					-Sustainable transport/movement corridors including the broad location of transport hubs, Public Rights of Way, bridleways, cycle paths and footpaths that permeate the green infrastructure;
56.	The Countryside Charity Hertfordshire	Modification	Design Codes should be design driven with the aim of quality place making and distinctiveness as well as support local services and tighter knit compact communities. Steps 1 and 2 (Section 5) should refer to the creation of a visual framework or high level design code showing key elements of the new place and how it all connects.	The Strategic Landscape Masterplan will comprise the overarching spatial strategy for the Gilston Area. Paragraph 4.11 sets out the key elements it will comprise and how it will connect the new villages, existing settlements and wider destinations. A Design Code will support this masterplan and will also be produced for each of the villages. The Design Codes will establish the key elements that are considered to contribute to the creation of high quality places from strategic to more focused detailed elements. This will help to deliver villages that are distinct in character but also work collectively as an identifiable new settlement. This is set out in paragraphs 4.15 to 4.20 of the Charter.	None.
	Representation	Comment	Issue	Officer Response	Proposed modification
		type			

	Comments on the content of the SPD – Section 6					
57.	Briggens Estate 1 Limited Places for People	Objection	Disagree with the need for various technical documents to support the masterplan submission as a comprehensive range of environmental and technical information will have already informed the decision-making process at outline stage and the approved parameters of the Outline Planning Permissions.	Point 9 is not stating that technical work needs to be undertaken again at the masterplanning stage. The masterplan submissions should make reference in the appendix (or include in full where helpful for ease of reference) any technical information/assessments that informed/supported the parameters approved at the outline planning stage or have been approved subsequently through the discharge of conditions. It may also be necessary for new and further supplementary or updated technical work to be undertaken to support a masterplan, particularly given the duration of the project and likely changes to relevant policy and guidance. This will become evident once the masterplanning work has started and should not be precluded.	Amend point 9 in Section 6 as follows; 9. Appendix, this should comprise any supporting documents or technical studies used to inform and/or support the masterplan process covering matters such as heritage, ecology and floodrisk for example. This may draw on existing technical information such as that used to support the site allocation and outline applications, or approved through the discharge of conditions; and/or new technical information where updated or supplementary information is required given the duration of the project and likely changes to relevant Policy/guidance.	
58.	Hertfordshire Gardens Trust	Modification	Masterplans (Point 9) should include as an Appendix, a Heritage Impact Assessment including the impact on heritage assets outside of the boundary which could be affected.	See officer response to point 57.	See amendments in response to point 57.	

59.	Historic England	Modification	Support paragraph 9 which lists the technical evidence expected to accompany and inform the contents of a Masterplan, including heritage assessments and archaeological surveys, but request that reference is made here back to the Gilston Area Heritage Impact Assessment (October 2017) (HIA) that was prepared in support of the Gilston Area GA1 allocation. Policy GA1 outlines the requirement that the HIA will inform the design and layout of the site, so it is very important that the SPD makes it clear to developers that they will be expected to respond to the issues and recommendations set out in this report when preparing their Masterplans and design codes.	See officer response to point 57.	See amendments in response to point 57.
60.	Essex County Council	Modification	This section does not include a requirement for addressing health and wellbeing considerations, which is best done as early as possible in the development process. This may be addressed by a proportionate Health Impact Assessment (HIA) at the masterplanning stage. This would be important at this early design	Impacts on human health are considered at the outline stage as part of the Environmental Statement. Paragraph 9 in Section 6 enables further/supplementary technical information to be provided to inform and support the masterplanning stage where required. This could	See amendments as set out under point 47.

	Hertfordshire County Council		stage to ensure that this informs subsequent planning applications. Hertfordshire County Council (HCC) has produced a range of guidance to support health in planning, which the SPD could usefully signpost as a guide to good practice. Recommends adding to Section 6, paragraph 9, to include health and wellbeing impact assessments, including application of active design principles (as mentioned previously) as part of the technical and other associated documents to be submitted.	include a proportionate Health Impact Assessment. Drawing on best practice and consideration of measurable outcomes is also covered in Section 9 of the Charter. Paragraph 4.13 has also been amended to make specific reference to consideration of healthy lifestyles as part of the village masterplan design process.	
61.	Vision Planning (on behalf of Hunsdon House)	Query	Paragraph 6.1 refers to a Statement of Engagement. Does this exist yet and how does it relate to Policy GA1 and the Concept Framework?	A Statement of Engagement is required as part of the masterplan submission to confirm the engagement that was undertaken when producing the masterplan. It will need to confirm that engagement was undertaken in accordance with the Gilston Area Community Strategy as required by Policy GA1 (to be produced and published alongside the Charter). This is clarified further in Sections 7 and 8 of the Charter.	None.

62.	Vision Planning (on behalf of Hunsdon House)	Comment	The Eastwick and Gilston Neighbourhood Plan Group should be included in the PPA and the Core Project Group.	A working group of community representatives will be established to inform the production of masterplans (see para 7.8); this could include representatives from the Eastwick and Gilston Neighbourhood Plan Group. Furthermore, the working group will need to be established in accordance with the Gilston Area Community Strategy, this sets out a requirement for any engagement plans to be agreed by the Gilston Area Steering group. This group already exists and comprises representatives from the community including the Neighbourhood Plan Group.	None.
63.	Hertfordshire County Council	Modification	Section 6 (paragraph 9) would be improved by the addition of the words; - Transport Assessment with particular emphasis on how the approach to the development will promote delivery of an LTP4 hierarchy of movement and encourage attainment of the sustainable mode share which HGGT expects and targets. - Travel Plan including residential, commercial and for education - Heritage Assessment including	Paragraph 9 of Section 6 sets out what technical and supporting information should be considered when producing the masterplans. This has been updated (see officer response to Point 57 above) and paragraph 4.9 will also be amended to explain this requirement in more detail. It should be noted that Travel Plan and archaeological survey details will be required through conditions	Amend paragraph 4.9 to include; The current relevant policy and guidance documents are summarised in Appendix 1. They will also be supported and informed by up to date technical work such as topographical and habitat surveys, and transport, heritage and flood risk assessments. This could include existing technical information used to support the outline planning applications, but also new and

			archaeological survey which should include further evaluation of the site via geophysical survey and trial trenching should be carried out prior to, and should inform, the finalisation of detailed Village Masterplans.	secured at the outline stage.	supplementary information where required, given the duration of the project and likely changes to policy/guidance.
	Representation	Comment	Issue	Officer Response	Proposed modification
		type			
	Comments on the	content of the	SPD – Section 7		
64.	Briggens Estate 1 Limited Places for People	Modification	Do not agree that a PPA is necessarily the most appropriate tool for collaborative working on the Gilston Area Masterplans. The focus of the section would more usefully then be on the outcome being sought rather than the mechanism.	Planning performance Agreements (PPAs) are currently the only method of jointly project managing planning submissions to an agreed programme with the necessary resources provided to support it, which is recognised in government guidance. Imbedding the requirement for a PPA is seen as essential in enabling effective and meaningful masterplanning that is truly collaborative and which also provides the appropriate level of resources and expertise support their timely production.	None.
			Referring to project governance rather than simply a PPA might also allow mention of the Steering Group to be included in this	The role of Gilston Area Steering Group is identified in the Gilston Area Community Engagement Strategy and the Charter requires	

			section.	engagement of masterplans to be undertaken in accordance with this document. The Steering Group is identified in the strategy as playing a key role in planning matters, including the production of masterplans. It is important not to reference particular groups in the SPD as these may cease to exist over time. The Gilston Area Engagement Strategy (unlike the SPD) is a live document that can evolve and adapt overtime to changing circumstances and therefore it is preferable to reference adherence with this document rather than a particular group mentioned within it.	
65.	Places for People	Modification	Clarity required on the role and function of the Core Project Group	The Core Project Group is intended to comprise key representatives from the signatory parties to the Planning Performance Agreement. They are the individuals that will collectively lead on project managing the Masterplan process. Agree this should be made clearer through re-naming the group to "PPA Project Lead Group" and amendments to the supporting text.	Delete paragraph 7.5 and replace with: A PPA Project Lead Group will be established comprising key representative(s) from of each of the parties that are signatory to the PPA. The group will lead on project managing the masterplanning process and any associated decision making.

66.	Places for People	Modification	The draft states that the application to discharge the planning condition will be taken to East Herts Full Council – presumably this should be East Herts Planning Committee.	The decision to discharge the condition/approve the masterplan could be taken by the Council's Planning Committee. However, East Herts has published guidance on the approval process for Masterplans which was endorsed by full Council in 2017 and has already informed the approval process for a number of recent Masterplans produced in the district. It is acknowledged that the process will be slightly different for the Gilston Area masterplans as they will be submitted as a Discharge of Condition application; however it's important that the Council is consistent in its approach to decision making. Like the other masterplans produced in the district, it is also important the Gilston Area masterplans are endorsed by full Council so they have status as a document with material weight in decision making.	None.
67.	7. Briggens Estate 1 Limited	Object	Do not agree that a multi-stage approach to engaging with the Garden Town Quality Review Panel during the masterplanning process is necessary given their prior	The masterplans will add a further layer of detail to the evolving plans for the Gilston Area and will include Design Codes. The focus of any critical review at this stage will be	Amend paragraph 7.9 as follows; Each Masterplan and respective Design Code shall be reviewed by the Harlow and Gilston Town

			involvement throughout the design evolution of the Gilston Area, including approval of the Parameter Plans that will inform the masterplans that follow.	Review of Masterplans and their associated Design Codes by the Quality Review Panel is considered to be an important step to enable confidence in their robustness and the avoidance of design compromises at the detailed application stage. The decision about how to most effectively engage with the QRP and how often will be taken by the Core Project Group (or "PPA Project Lead Group", as per response to point 65). However, it is considered that as a minimum there should be engagement as currently set out in the Charter.	Quality Review Panel (QRP) at various stages of their production, including at the options testing phase and during the drafting phase (pre-submission) as agreed by the Core Project Group as agreed necessary by the PPA Project Lead Group. As a minimum this will include a QRP review at the options testing/drafting phase presubmission.
68.	Briggens Estate 1 Limited	Modification	As a discharge of condition submission, it is questionable whether it is appropriate procedurally for the masterplans to obtain full Council approval when the outline applications do not. Suggest amendments to address this.	The Masterplans will be processed as a discharge of condition application and once approved will provide a framework for the detailed reserved matters applications that follow. By taking the masterplans to EDHC full Council for determination, they will also have the added status of having material weight in planning decision making. This is important as	None.

				it means they can inform the assessment of any standalone planning applications that might materialise. This process is also consistent with how all Masterplans are considered and determined at East Herts Council, as endorsed by full Council in 2019 (see officer response to Point 66).	
69.	Places for People	Modification	The Garden Town Quality Review Panel requirements are too prescriptive. We are keen that at the masterplanning stage we use the QRP in a different way. Whilst we may have 1 or 2 formal reviews before a masterplan is submitted, we'd like the opportunity to engage with key QPR representatives on a more frequent and informal basis to assist and shape thinking.	Section 7 paragraph 7.9 sets out the role of the Garden Town Quality Review Panel. This section states that masterplans shall be reviewed by the QRP. Review could mean all manner of things, i.e. not necessarily a formal full review but something less formal/rigorous such as Chairs Review. The drafting doesn't preclude discussion on how to best to engage with the QRP and use it most effectively to inform the masterplanning process.	None.
70.	Hunsdon, Eastwick and Gilston Neighbourhood Plan Group	Modification	Financial support should be provided to enable the community to properly review and respond to masterplan material.	Engagement will be a necessary part of the masterplanning process and will need to align with the principles set out in the Gilston Area Community Engagement Strategy	None.

				(GACES). The GACES will set out how applicants should support community representatives so they can effectively inform the masterplanning process.	
71.	Hunsdon, Eastwick and Gilston Neighbourhood Plan Group	Modification	In reference to Paragraph 7.8, the community through the Parish Council's should be should establish the terms of reference for the working group including selection of its members. Further articulation of this and on how the community group will engage with PPA lead group should be set out in the Charter.	The Gilston Area Community Engagement Strategy will require that any engagement plans related to planning applications, including the production of Masterplans, are informed and agreed first by the Gilston Area Steering Group. This group comprises representatives from the community and local councillors. This is considered to be the appropriate method for establishing how and who from the community should be engaged and involved in the process. It's also important that the Charter isn't overly prescriptive in regards to how engagement should be undertaken given the duration of the development; see officer response to Point 75 below.	None.
72.	Harlow District	Modification	Suggests that paragraph 7.2 be	Agree. See adjacent amendment to	Amend paragraph 7.2 as follows:

	Council		amended to make reference to HGGT partners as opposed to individual bodies. The change would add clarity and context; it would highlight the existing crossborder partnerships which seek to deliver effective, robust and integrated land-use planning and delivery across the Harlow and Gilston Garden Town as a whole.	paragraph 7.2	A Planning Performance Agreement (PPA) will be prepared and agreed between the applicant and East Herts together with other relevant bodies such as HGGT partners; Harlow Council, Hertfordshire County Council and Essex County Council before work of any significant extent on the Masterplan is undertaken.
73.	Hertfordshire County Council	Support	Section 7 relating to the use of Planning Performance Agreements associated with both the production of Masterplans is fully endorsed. This approach will enable HCC and other public authority partners to recover reasonable costs associated with engagement in the Masterplan process which will be necessary to achieve the comprehensive development, and quality outcomes, anticipated by Policy GA1.	Noted.	None.
	Representation	Support or Object	Summary of Issue	Officer Response	Proposed modification
	Comments on the	content of the	SPD – Section 8		
74.	Places for People	Modification	The role and status of the Engagement Plan is not clear.	Agree that further clarification should be incorporated.	Amend last sentence in paragraph 8.1 as follows;

					This will establish who will be involved in the production process, how and when, and will inform the Statement of Engagement included within the formal masterplan submission as set out in Section 6.
75.	Hunsdon, Eastwick and Gilston Neighbourhood Plan Group	Modification	The Charter makes ref in Section 8 to engagement being undertaken in accordance with the Gilston Area Engagement Strategy which is still in draft. In the interests of clarity the Charter should set out how the community should be engaged in the preparation of masterplans; suggestions are provided.	It's important that the Charter is not overly prescriptive in regards to how engagement should be undertaken in relation to the Masterplans. Their production is likely to take place over several years and how to most appropriately engage will change overtime as the new community grows and existing groups evolve and change. The Gilston Area Community Engagement Strategy is live working document that will able to adapt over time to take account of those changes. The first version will be ready for publication by the time the Charter is adopted. The content of the strategy will be informed by the Gilston Area Steering Group (members include representatives from the Gilston Area Neighbourhood Plan Group) to ensure it includes the most effective	None.

				and up-to-date methods for engaging the local community.	
76.	Canal and Rivers Trust	Support	Welcome the proposal that an Engagement Plan will be prepared for each Masterplan, suggest that the Canal & River Trust should be seen as an important consultee for the Strategic Landscape Masterplan and any plans that involve crossings of the River Stort Navigation.	Noted. The Canal and Rivers Trust would be included as one of the "other bodies" engaged in the process of a producing the Strategic Landscape Masterplan.	None.
77.	Hertfordshire County Council	Modification	Step 8 would be improved if the words "in the opinion of the LPA in consultation with other stakeholders and the developers" were to be introduced.	Step 8 has been removed (see comment 43 above).	None.
	Representation	Support or Object	Summary of issue	Officer Response	Proposed modification
	Comments on the	content of the			
78.	Hunsdon, Eastwick and Gilston Neighbourhood Plan Group	Support	Support the commitment to high quality design solutions and the intention to keep the public informed. The monitoring framework will also assist in monitoring the Neighbourhood Plan.	Noted.	None.
	Representation	Support or Object	Summary of issue	Officer Response	Proposed modification

	Comments on the	content of the	SPD - Appendix		
79.	Hunsdon, Eastwick and Gilston Neighbourhood Plan Group	Modification	The structure, headline policies and ambitions of the latest draft of the Gilston Area Neighbourhood Plan should be referenced and clarified in the appendix and the document should be referenced higher in the table to reflect its emerging Development Plan policy status.	Agree. Appendix needs to be updated to reflect the current status of the Gilston Area Neighbourhood Plan.	Update the summary paragraph and move reference to the Neighbourhood Plan higher in the table.
80.	Hunsdon, Eastwick and Gilston Neighbourhood Plan Group	Object	The case study examples of design documents in Appendix 2 are not relevant to the Gilston Area and should make ref to South Cambridgeshire Village Design Guide.	The Charter is a guidance/process document. The purpose of the case study workshop was to review a wide variety of design codes/design documents, looking at the approach and format they took, the level of detail included and their effectiveness as a tool for professionals to use and the public to understand. Its good practice to review a wide variety of examples, and all those chosen had learning points that could be applied to the Gilston Area context. The South Cambridgeshire Village Design Guide was not reviewed as part of the workshop and so cannot be included. The case studies did however review the Cambridgeshire	None.

				guidance note on the preparation of Design Codes and the Wing Masterplan (Cambridge).	
81.	Vision Planning (on behalf of Hunsdon House)	Modification	The Concept Framework entry should make reference to the fact it is referred to in Policy GA1.	Agree.	Amend Status column as follows: Produced and approved as a material consideration in July 2018 and referenced in Policy GA1 of the East Herts District Plan.
82.	Hertfordshire County Council	Modification	Appendix 10 would be improved if it can also cross referenced the relevance of; Local Transport Plan 4 – Hertfordshire's Local Transport Plan, 2018 – 2031 (adopted May 2018).	Agree.	Add Hertfordshire's Local Transport Plan, 2018 – 2031 to appendix table with specific reference to Local Transport Plan 4.
	Representation	Support or Object	Summary of issue	Officer Response	Proposed modification
	Comments on the	content of the	SPD – General comments or commer	nts that relate to more than one section	of the draft SPD
83.	Briggens Estate 1 Limited	Object	The masterplanning process should not revisit those key matters of principle and development parameters that have been established through the Outline Planning Application process and it is important that the Charter	The masterplans will establish a further layer of detail to the evolving plans for the Gilston Area. The LPA agrees that each masterplan produced must align with the parameters established at the outline stage. This is set out in	Amend paragraph 4.7 as follows: Each Gilston Area Masterplan will be supported by a Design Code and together they will provide an added layer of detail to the evolving plans for the Gilston area, building on the parameters and commitments
			acknowledges this. A number of statements contained within the	paragraph 4.7, Step 1 of the masterplanning process in Section 5,	secured at the outline <u>planning</u> application stage and the work

			draft should therefore be deleted to ensure there is no unnecessary confusion over the role of the masterplanning stages. This includes paragraph 3.3; Step 3, Step 4 and Step 8 in relation to the Strategic Landscape Masterplan (as listed under paragraph 5.1); Step 8 in relation to Village Masterplans (as listed under paragraph 5.1) as shown below. In addition, parts of paragraph 4.11 and 4.13 as shown within the following section of these representations should also be deleted.	and confirmed in Figure 6. On this basis the LPA does not agree that the amendments and deletions to the paragraphs suggested are required, or that reference to this requirement needs to be repeated further throughout the document. However paragraph 4.7 will be amended to further emphasise this point this, taking account also of comments made further in the response letter in relation to this paragraph.	already undertaken in the Gilston Area Concept Framework which underpins these applications. The requirement for their production will be secured by this Charter and a planning condition secured at the outline planning application stage in accordance with District Plan Policy DES1.
84.	Briggens Estate 1 Limited	Modification	Throughout the document, there needs to be a consistent use of terminology around the two types of masterplans that are to be produced and the respective processes to ensure there is clarity. Therefore recommend that the word "Village" is inserted before the word "Masterplan" where referring to the plan that is to be prepared in relation to each of the seven villages, as set out below. In turn, "Strategic Landscape" should be inserted before the word "Masterplan" where referring to	Much of the guidance in the draft Charter relates to all masterplans required for the Gilston Area, whether they are "Village" masterplans or the "Strategic Landscape" masterplan. The term "Masterplan" when used on its own is used generically for points related to both. When points relate only to a specific type of masterplan, the type of masterplan is clarified. It is recognised that the distinction between the two types of masterplan needs to be clarified more clearly in paragraph 4.6 as	Amend paragraph 4.6 as follows; As set out earlier in this document, Village Masterplans will be required for each of the Gilston Area villages, together with an overarching Strategic Landscape Masterplan that will address the appropriate strategic elements of the development and the important network of green spaces that will play a key role in knitting the development together and integrating it into the wider context.

			the masterplan that is to be prepared across the Gilston Area (Villages 1-7) to guide the green infrastructure that will be brought forward as part of the respective proposals.	suggested.	
85.	Places for People	Modification	The Charter would benefit from identifying via a plan the anticipated boundaries of each masterplan.	Step 4 of the Strategic Landscape Masterplan (as amended to address point 40 above) will establish the extent of the masterplan having regard to how it will interface with and respond to the Gilson Area Villages. This will need to factor in what has been secured and fixed through the parameter plans approved at the outline planning stage. Clarity over boundaries will therefore be established through the production of the Strategic Landscape Masterplan.	None.
86.	Places for People	Modification	The word 'Strategic' should be deleted from the Landscape Masterplan title. We agree that the reference to Landscape should be included in the title, but given that the intention is for the Landscape Masterplan to cover the whole of the Gilston Area, the word 'Strategic' is not needed. Changes are suggested to the	The word <i>Strategic</i> needs to remain. The Landscape Masterplan will be a strategic masterplan in that it covers the entire site allocation and considers its connections beyond the site boundary. Furthermore, effective masterplanning of the landscaping cannot be undertaken without having a broad understanding of movement across	None.

			1. 6 1	at to tall the C	
			wording of paragraphs within	the site and the drivers for	
			Section 4.	movement – i.e. where key nodal/	
				destination points are and where key	
				routes will be within and beyond the	
				site boundary. These elements do	
				not have to be determined at the	
				Landscape Masterplan Stage (agree	
				this is most appropriately	
				established at the VMP stage) but	
				they should be identified in the	
				Strategic Landscape Masterplan,	
				even if only in broad terms.	
				even in only in stoda terms.	
				Finally as the Strategic Landscape	
				Masterplan will influence the content	
				of the Village Masterplans, the word	
				Strategic also emphasises its	
				importance and hierarchy in the	
				•	
				masterplaninng of the Gilston Area.	
87.	Places for People	Object	Reference is made to role of the	The Masterplans will be processed	None.
07.	Traces for reopic	Object	masterplans being a material	as a discharge of condition	None.
			consideration, which in our view is	application and once approved will	
			not technically correct. The	provide a framework for the detailed	
				·	
			approved masterplan sets the	Reserved Matters applications that	
			framework for detailed Reserved	follow.	
			Matters applications - RMAs must		
			accord with the masterplan - and	By taking the masterplans to EDHC	
			'material consideration' suggests	full Council for determination, they	
			divergence is possible which it is	will also have the added status of	
			not.	having material weight in planning	
				decision making. This is important as	
				it means they can inform the	

88.	Places for People	Modification	The Charter should be clear that the masterplans will be prepared by developers (this is shown in the process diagram but could usefully	assessment of any standalone applications that might materialise. The requirement for the preparation of masterplans to be developer led is stipulated in para 5.1 and in figure 6.	None
89.	Hertfordshire Gardens Trust	Object	be pulled into the text too). Disappointed not to have been engaged as part of developing a draft.	Engagement on the draft Charter SPD, both formal and informal has been undertaken in accordance with the Council's Statement of Community Involvement and the Town and Country Planning (Local Planning) (England) Regulations 2012.	None.
				This formal consultation provides the opportunity for the Hertfordshire Garden Trust to comment and inform the document.	
90.	Hertfordshire Gardens Trust	Object	No consideration has been given in the Charter to the impact of development on heritage assets such as listed buildings and parks on the periphery of the development as required by National Planning Policy Framework.	The role of the Charter is to support the implementation of District Plan Policy GA1 (The Gilston Area) and DES1 (Masterplanning); not to produce new policy. Both these policies make reference to the importance of considering the impacts of development on heritage assets, this will include at the Masterplanning stage.	None.

				The need to consider heritage impacts is also referenced in the process steps that should be taken in the production of masterplans (see Step 3 in Section 5).	
91.	Hertfordshire Gardens Trust	Object	Impact of new population on trains via Roydon Station has not been addressed.	Any mitigation required to alleviate impacts on the existing public transport system will be considered and secured at the outline planning application stage.	None.
92.	Hertfordshire Gardens Trust	Comment	Key to sustainable transport is the phasing of the development. The roads/cycleways and schools and other infrastructure needs to be put in place before the first residents move in.	Matters of phasing and when infrastructure should come forward to support development will be considered and secured at the outline planning application stage. It will also be considered as part of place shaping when the masterplans are produced, as set out in Section 5 (Step 3).	None.
93.	Hertfordshire Gardens Trust	Modification	Consideration of Garden City Principles should be included in the various Masterplans.	The need for masterplans to acknowledge the Garden City Principles is confirmed in the Charter (See Sections 1 and 2). This is also a requirement of Local Plan Policy GA1 which all masterplans will need to accord with.	None.

0.4	Hortfordshire	Modification	Consideration of Conurs by Design	Agrae Cuggest that this is most	Con amondments as set out
94.	Hertfordshire	Modification	Consideration of Secure by Design	Agree. Suggest that this is most	See amendments as set out
	Constabulary		should be included in the Charter	appropriately incorporated into	under point 47.
			suggestions are made for where	paragraph 4.13 which sets out the	
			this could be incorporated. Also	role of the Village masterplans.	
			that the Hertfordshire		
			Constabulary should be consulted	Engagement point agreed and	
			as part of the stakeholder	noted.	
			engagement.		
95.	Historic England	Comment	Guidance contained within this	Comments noted.	None.
			document establishes a clear and		
			consistent approach to the		
			production of Masterplans and		
			Design Codes in the Gilston Area.		
			Particularly pleased to see		
			numerous references to the		
			historic environment within the		
			SPD, including acknowledgement		
			of the important role that the		
			historic environment plays in		
			place-making (for example		
			paragraph 4.14). The importance		
			of distinctive placemaking is		
			emphasised in both Government		
			and Historic England guidance. We		
			reiterate our advice that		
			development should draw on local		
			vernacular/building materials and		
			village forms, allowing a		
			development to have a clear and		
			distinctive character.		
			districtive character.		
96.	Essex County	Modification	Recommends inclusion of the	Section 9 of the Charter sets out the	Replace paragraph 9.2 as follows;
50.	Council	Modification	Sport England and Public Health	requirement for high quality	1. The place paragraph 3.2 as 10110W3,
	Courien		Sport England and Lablic Health	requirement for might quality	

			England Active Design principles (ADP's) within the masterplans. The application of the ADP's could helpfully support the active travel, movement and modal shift ambitions raised within the SPD. The Active Design principles checklist should form part of the design compliance checklist. To support this, ECC wishes to see health frameworks/strategies developed as part of strategic developments within HGGT and included as part of masterplanning, with their application demonstrated via health impact assessments as scoped by key stakeholders and then considered as part of masterplan compliance (section 7 of SPD refers).	outcomes and makes reference to how this will be achieved. This includes the need for applicants to demonstrate how the masterplans have responded to HGGT guidance (including Design Quality questions) and emerging guidance. The above guidance sets high expectations in regards to the encouragement and take up of sustainable movement and travel and the creation of healthy places. This objective is also picked up throughout the document (e.g. paragraph 4.13). In response to ECC, the Charter will also make reference to best practice to enable consideration of guidance such as Active Design Principles.	The masterplans should also consider and respond to any guidance or checklists established by East Herts or jointly by the Garden Town Authorities, as well as other best practice that looks to embed high quality sustainable solutions through the planning process and build in consideration of measurable outcomes.
97.	Natural England	Comment	Does not wish to provide specific comments but advises consideration of the following issues: - Make provision for green infrastructure within the development - Opportunities for biodiversity enhancement - Opportunities for Landscape enhancement	These points are picked up in Sections 4 and 5 of the Charter. Natural England was consulted separately on the Gilston Area SPD Draft Strategic Environmental Assessment Screening Opinion which concluded that an assessment would not be required. They concluded that the SPD poses a	None.

			- NPPF guidance such as para 180 which looks at impacts of lighting on natural environment - Ensure that consideration has been given to whether a Strategic Environmental Assessment/Habitats Regulations Assessment is necessary.	low risk in terms of impact on the natural environment.	
98.	Vision Planning (on behalf of Hunsdon House)	Modification	Too much detail is being approved at the outline application stage which would prejudice meaningful masterplanning. The Strategic Landscape Masterplan should be submitted for approval before any outline applications are submitted to ensure that development of the area suitably responds to existing features within and outside of the site such as landscape and heritage assets, and that the Gilston Area is developed comprehensively (particularly now that two separate outline applications have been submitted for the area). (These points are made in response to various sections in the Charter).	The role of the Charter is to assist the implementation of policies GA1 (the Gilston Area) and DES1 (Masterplanning). Neither of these policies precludes outline applications being submitted before the production and approval of masterplans. Two outline applications have been submitted to EHC. The Local Planning Authority has a statutory obligation to determine the applications or there is a real risk of the applicants appealing on the grounds of non- determination; this could compromise the quality and appropriateness of what is approved if an appeal was successful. The level of detail approved at the outline stage will need to accord with existing policy and guidance and build in the flexibility to allow for	None.

				meaningful masterplanning to be undertaken at the next stage (note neither of the current applications have been approved yet). The Charter provides an opportunity to supplement Policy DES1 to ensure it enables meaningful masterplanning that is nuanced to the Gilston Area. This includes a two tiered approach to masterplanning, whereby an overarching Strategic Landscape Masterplan must be approved first, followed by individual village masterplans. This not only ensures that the site can be considered comprehensively with a strong emphasis on landscape setting, but also that each village will have its own distinct character surrounded by suitable buffers as set out in the Concept Framework.	
99.	Vision Planning (on behalf of Hunsdon House)	Modification	Rather than a discharge of condition application, it would be more appropriate for the masterplans to be produced as SPDs or DPD in consultation with the community.	The masterplans for the Gilston Area will add a further layer of detail to the evolving plans for the Gilston Area. Although they will not be SPDs or DPDs, they will go through an approval process (see Section 7) that gives them material weight in all decision making for any detailed applications that follow.	None.

100.	Vision Planning (on behalf of Hunsdon House)	Modification	The Charter provides an opportunity to place more emphasis on the Concept Framework and avoid the role of this document being diluted (reference is made to various paragraphs where this could be emphasised).	Section 2 of the Charter (and Figure 4) is very clear about the policy and guidance that is relevant to the guidance in the SPD and the later stages of the planning process. This includes the role of the Concept Framework. This is also reconfirmed at various points throughout the document.	None.
101.	Vision Planning (on behalf of Hunsdon House)	Modification	The Charter SPD should emphasise the importance of engaging with stakeholders and the community at every stage of the Gilston development (reference is made to various paragraphs where this could be emphasised).	The need for engagement to be undertaken as part of the masterplanning process is covered in Sections 7 and 8 of the Charter and referenced elsewhere in the document. It will also be set out more fully in the Gilston Area Community Engagement Strategy, a separate document that will be published alongside the Charter SPD.	None.
102.	The Countryside Charity Hertfordshire	Comment	Density needs to be applied skilfully to support place making and the role of sustainable transport. This helps limit loss and encroachment of open countryside.	Noted.	None.
103.	The Countryside Charity	Comment	Sustainability Statement: It is recommended that the Statement	Paragraph 9.2 requires the masterplans to consider and	None.

	Hertfordshire		be carried out in accordance with the 17 UN Sustainable Development Goals and tested against objectives that align with a declared Climate Emergency and a path to Zero Carbon emissions.	respond to relevant best practice /guidance and measurable sustainability outcomes.	
104.	The Countryside Charity Hertfordshire	Comment	Concerned about adequacy of the mechanisms in place to achieve land value capture for communities in accordance with Garden City principles.	Matters associated with land value capture are considered and negotiated at the outline application stage and secured as part of the associated s106 legal agreement. This is not a matter for the masterplanning stage.	None.
105.	A. Rowe	Objection	The Gilston Area Charter Supplementary Planning Document (SPD) should be subject to a Strategic Environmental Assessment (SEA) in accordance with the European Union Directive 2001/42/EC (SEA Directive) and the Environmental Assessment of Plans and Programmes Regulations 2004 (SEA Regulations).	Under the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004, the Council was required to consult the Natural England, Historic England and the Environment Agency to seek their opinion as to whether the Charter will have significant environmental effects and as such requires a Strategic Environmental Assessment to be undertaken. All statutory bodies agreed with the conclusions of the screening process that a Strategic Environmental Assessment was not required. The Strategic Environmental Assessment	None.

		Screening Statement can be viewed	
		on the Council's website as one of	
		the supporting documents to the	
		Charter.	

Appendix A: Consultees

The following organisations were directly notified of the draft Gilston Area Charter SPD in accordance with the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended). It should be noted that individuals on the planning policy consultation database were also consulted, but are not listed.

Affinity Water	Hertfordshire Building Preservation		
	Trust		
Anglian Water	Hertfordshire Chamber of Commerce		
	& Industry		
Bat Conservation Trust	Hertfordshire Community Health		
	Services		
Beds and Herts Local Medical	Hertfordshire Local Neighbour		
Committee	Partnership		
British Horse Society	Hertfordshire Police Authority		
British Telecommunications plc	Herts & North Middlesex Area of the		
	Ramblers		
British Waterways	Herts Sports Partnership		
Broxbourne Borough Council	Hertfordshire Gardens Trust		
Briggens Estate 1 Limited (Landowner)	High Wych Parish Council		
Building Research Establishment	Highways England		
CABE	Historic England		
Canal & River Trust	Home Farm Trust Herts & Essex		
Carers in Hertfordshire	Homes and Communities Agency		
CDA for Herts	Homes England		
Civil Aviation Authority	Hunsdon Parish Council		
Clinical Commissioning Group	Hutchinson 3G UK Limited		
Community Safety & Crime Reduction	Labour Party		
Department, Herts Constabulary			
Communication Operators	Mobile Operators Association		
Countryside Management Service	National Express East Anglia		
East of England Ambulance Service	National Grid		
NHS Trust			
Eastwick and Gilston Parish Council	National Farmers Union		
EDF Energy Networks	National Federation of Gypsy Liaison		
	Groups		
Environment Agency	Natural England		
Epping forest District Council	Network Rail		
Essex County Council	NHS East and North Hertfordshire CCG		

Fields In Trust	NHS West Essex
Freight Transport Association	North East Herts Labour Party
Friends, Families and Travellers and	Office of Rail Regulation
Traveller Law Reform Project	
Garden History Society	North Hertfordshire District Council
Garden Town Developer Forum	Openreach Newsites
Gilston Area Steering Group	Orange Personal Communications Services
Gilston Area Charter Working Group	Places for People (Landowner)
Gilston Neighbourhood Plan Steering Group	Police and Crime Commissioner
Greater Anglia	The Princess Alexandra Hospital NHS Trust
Harlow and Gilston Garden Town Board	The Traveller Law Reform Project
Harlow District Council	Roydon Parish Council
Hertford Disability Support Group	RSPB
Hertford Heath Primary School	Sport England
Hertfordshire Action on Disability	Stanstead Airport
Hertfordshire Association of Parish and Town Councils	Stevenage Borough Council
Hertfordshire Constabulary	STOP Harlow North
Hertfordshire County Council	Thames Water
Hertfordshire Local Enterprise Partnership	Uttlesford District Council
Hertingfordbury Conservation Society	Veolia Water
Herts & Middlesex Badger Group	
Herts & Middlesex Wildlife Trust	