



HEGNPG

Supporting our Community

Hunsdon Eastwick and Gilston Neighbourhood Plan Group

Channoeks Farm

Gilston

CM202RL

<https://hegnp.org.uk/>

Planning Policy
East Herts Council
Wallfields
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12th January 2023

FAO Ms Jenny Pierce by email

at Jenny.Pierce@eastherts.gov.uk

(cc. Mr Kevin Steptoe by email at Kevin.Steptoe@eastherts.gov.uk)

Dear Sir/Madam,

**Gilston Area Applications – Outline Planning Application for Villages 1-6 ref:
3/19/1045/OUT**

This letter of representation constitutes the response of the Hunsdon, Eastwick and Gilston Neighbourhood Plan Group (HEGNPG) on behalf of the Hunsdon and Eastwick & Gilston Parish Councils and the local community. It should be read in conjunction with the previous representations submitted by the HEGNPG in January 2021 (general OPA), February 2022 (Stort Crossings) and September 2022 (Viability Appraisal).

It is divided into three parts:

- Part 1: recent expectations set out by Rt Hon Michael Gove on behalf of DLUCH
- Part 2: the reasons why the OPA should not be approved as presented
- Part 3: recommended essential conditions which should be included in any approval.
- Part 4. Response on the Gilston Area Stewardship and Governance Strategy

PART 1

The expectations set out by Rt Hon Michael Gove MP, Secretary of State for Levelling Up, Housing and Communities in his letters to Council Leaders and MPs (1st and 5th December 2022)

In early December 2022, the Secretary of State set out very clear expectations for future development and housing:

- Planning should be about delivering “enough of the right homes in the right places and will do that by promoting development that is beautiful, that comes with the right infrastructure, that is done democratically with local communities rather than to them, that protects and improves our environment, and that leaves us with better neighbourhoods than before”.
- Local and Neighbourhood Plans will have more power with future legislation and should be considered the best form of community action – and protection.
- Council Leaders should ensure strong design leadership within their council and, working with their communities, turn visions for beautiful towns, cities and neighbourhoods into standards all new development should meet.
- Councils should also refuse planning permissions for development that is not well-designed and housing targets should not be used as justification to grant permission.
- The Planning Inspectorate should no longer override local decision making which is sensitive to and reflects local concerns.
- Local authorities will not be expected to build at densities wholly out of character with existing areas or which would lead to a significant change of character. The new Office for Place will support the Council and its community in achieving this goal.

The HEGNPG is well attuned to, and probably ahead of this Ministerial call to action:

- In its representations to the Local Plan (2018) and Villages 1-6 OPA (2019), it has consistently called for development of ‘exceptional quality’ – with very specific recommendations for what this means in the local area.
- In 2021, we completed the Gilston Area Neighbourhood Plan (GANP) for the development area including tailored policies and guidance to define appropriate development in the Gilston Area and, very importantly, provide clear definitions of local character and what is to be considered ‘well-designed’ in the local context. The GANP won two national planning awards and a Landscape Institute award in recognition of its constructive approach in the promotion of quality development.
- Throughout 2020-2022, the HEGNPG continued to engage constructively with the Council and developers in the interest of better development. By doing so, it has abundantly and consistently demonstrated vision and design ambition for the Gilston Area.

It is therefore regrettable that our “community action” through the appropriate and democratic use of planning tools, as advocated so strongly by Secretary of State Gove, is yet to produce any assurance that future development in the Gilston Area will be ‘beautiful’, supported by the

necessary infrastructure and democratically delivered “with the local community”, rather than against it.

This is the time for the Council to show the strong vision and leadership that the Secretary of State expects. This includes a clear, transparent and honest response to the concerns that the local community, through the HEGNPG, has raised time and again.

We would expect the officer’s report to the DMC to reflect the Government’s guidance that sensitivity to local concerns, local character and beauty should be overriding factors guiding the planning process. The officer’s report should, therefore, include:

- 1. A detailed assessment of the OPA against Local Plan Policies and GANP Policies, recognising that the applicant has not explicitly addressed the GANP Policies in their application. This is necessary as the GANP provides a stronger, locally informed planning policy framework for the Gilston Area and clearly sets out how to address community concerns.**
- 2. A statement of the Council’s interpretation of ‘beauty’ and local character in line with GANP Policies and GANP Appendix 3.**
- 3. A renewed commitment to the Council’s own Gilston Area Charter SPD (2020) that identifies the Strategic Landscape Master Plan as a comprehensive priority plan to be approved ahead of the approval of the first village masterplan.**
- 4. A clear position and commitment to the development of Design Codes for the Gilston Area, so clearly identified by the Secretary of State’s letter as a duty of all planning authorities to guide development and not a developers’ supporting document.**
- 5. Detailed response to the community concerns and expectations set out in this letter and previous representations.**

PART 2

Why the OPA should not be approved as currently submitted

1. The priorities that led to the site allocation in the Local Plan and discussed extensively at the Examination in Public five years ago have fundamentally changed. There would now be a presumption against the release of land from the Green Belt and housing targets would be required to take into account local constraints and concerns. There would be far greater consideration of the impact of the new Eastern Crossing on the floodplain of the Stort Valley and sustainable transport targets would require stronger evidence of deliverability. This is a long term project which will extend well beyond the current Local Plan timeframe and It is therefore imperative that the OPA is considered within the framework of future acceptability and policy compliance to ensure that development at Gilston does not become outdated before it even commences.

2. The changes introduced by the applicant's Viability Assessment (VA), even after the commendable efforts in renegotiation, result in a such a poor outcome that the current development concept should be rejected and rethought:
 - a. A massive tract of Green Belt will be built upon to deliver a very low proportion of affordable housing which falls far short of policy requirements, thereby undermining the very argument played out at the time of the Local Plan allocation that building on greenfield land and at scale was the best way to deliver the affordable housing required to meet identified local needs.
 - b. Social infrastructure (education, healthcare, open space, community facilities) will be delivered considerably later than required, contrary to the Garden City principles and the principle of land value capture enshrined in Policy GA1 and the requirement of GANP Policy AG9, putting further pressure on existing communities and already overstretched infrastructure.
 - c. Road building, both in Gilston and in Harlow, has taken priority in the allocation of funding and is being secured through S106 negotiations, while sustainable transport measures are insufficiently robust and therefore unlikely to be successful. This will eventually result in the Gilston Area being entirely car dependent to the point that even the new roads will be congested.
3. The VA confirms that the delivery of the Eastern Stort Crossing (ESC) and the additional requirements of the revised Central Stort Crossing (CSC), such as the Superarch and the double junction to access Village 1, result in a chronic diversion of land value capture to the delivery of new road infrastructure, draining funding and diluting the ambitions set out in the Local Plan of which EH could have been rightfully proud. The ESC was promoted as needed by the Gilston Area development, so much so that it was granted full and detailed approval a year before the outline planning application even comes before the DMC. In February 2022 we warned that approving the crossings was premature and would have a serious impact on the overall quality of the development. We also demonstrated that the road was over scaled and poor value for money, as well as not needed. Now the applicants say exactly that: that the ESC has consequences on viability and is not required for 10 years or more, and that the CSC will only be delivered by 1,500 units – approximately 5 years after it is needed. The Council a year ago stated that the harm caused by the Eastern Crossing was outweighed by the benefits of the GA and the affordable housing and social infrastructure it would bring. This was clearly a misplaced assessment and the Council should not now compound previous mistakes and make the situation worse: it should show the leadership and ambition expected by the Government and rethink the delivery of the Gilston Area on different grounds.
4. As well as the colossal cost of the ESC, the VA negotiations have introduced many more road schemes; these all seem to involve or be for the benefit of Harlow, where other development funding sources are also available. By contrast, there are little or no contributions or infrastructure offsets for the existing settlements in East Herts, not even the ones directly adjoining and affected by the GA: Hunsdon, Eastwick or Gilston outside the red lines. The scale of the development will have a significant impact on these settlements in terms of accessibility, community services, amenity, privacy and disturbance. The Terlings Park playground will be affected, Pye Corner will be forever

transformed and no interim or permanent measures to deal with safety and placemaking have even been considered. The existing communities will suffer competition for access to education, social services and healthcare for 5-10 years at least and will be cut off from any bus service which may be provided. The current proposals fail to address this and totally ignore GANP Policy EX1 which requires the mitigation of impacts of the development on existing communities to ensure a comprehensive and integrated development. The applicants have failed to respond to community concerns (as detailed in previous representations and at meetings) about local impacts and have not demonstrated where and how impacts on existing settlements and residents will be mitigated as part of an overall and comprehensive scheme. EH appear to have allowed the applicants to do this and have ignored our very legitimate requests for clarification, thereby failing to act in the best interests of the area and its communities.

5. In January 2021, the HEGNPG provided a formal representation to the OPA (see main letter plus Addenda H and I), to which a response has still not been received. We are concerned that Parameter Plans (PP) 2, 3, 5 and 6 once approved and combined, will encourage a type of development that is far removed from the 'gentle density' and respect for local character advocated by DLUCH and the Office for Place.
 - a. The Village Developable Areas (VDAs) as shown in PP2 and PP5 are such that the villages are not separated by meaningful green corridors (as required by GANP Policy AG4). This had been previously raised by the HEGNPG (January 2021 Addendum G), the HGGT Design Review Panel and by the Council's own Landscape Officer around the same time. PP3 Green Infrastructure and Open Space clearly shows how the villages merge into one another with only two Strategic Landscape Corridors. The Development Specifications (DS) refer to a minimum width of corridor of 10-40m, i.e. the typical length of a private garden and not much more than a usual street width. This is clearly inadequate and should not be approved. The landscape and countryside should not be treated as the 'left-over space' of the VDAs but as a structural element clearly intended to create individual villages set in the landscape as required by policy and the HGGT documents.
 - b. Revised PP6 (Building Heights) is of particular concern and demonstrates very clearly that the level of flexibility proposed by the applicant is inappropriate and would not constitute any form of control. This makes PP6 dangerously over-generous. The majority of the area is marked at 14+/-2m – so on average 3-4 floors, whereas the Development Specification (Para 4.7.7) identifies a further 10-15% at a height up to 18m (5-6 floors). In addition, all buildings along the edges of the limited Strategic Green Corridors (for example along the Golden Brook) have a proposed height to the ridge of +14m plus 5m 'Limit of Deviation' – i.e. potentially 19m tall, or 5-6 floors. How compact development with very limited landscape and building heights between 4 and 6 floors could possibly constitute locally appropriate 'village character' is not explained. This is clearly in direct conflict with GANP Policy AG6 and Appendix 3 and also at odds with the aspirations of the Government and the Office for Place.

- c. The height and urban wall created by the development proposed in the Parameter Plans is evident in the verified views (Part 8 and 9 of Environmental Statement Addendum) from the south: View 8 from Gilston, View 12 from Pardon Lock, View 14 from Plume of Feathers car park, View 16 from Burnt Mill Lock, View 18 from Harlow Town Park and even View 21 from Hunsdon Mead all indicate that a wall of development will dominate the skyline and views, removing all sense of 'villages set within the countryside'. This is the result of deliberate choices such as lack of adequate landscape buffers and buildings 14-18m tall.
 - d. The applicants have also produced a Strategic Design Guide (as a supporting document), updated in July 2022, i.e. a full year after the GANP was adopted and became part of the statutory Development Plan. The applicant chose to ignore the GANP policy requirements in terms of strategic landscape design and design of the built form. They have not used this guide to explain how they intend to create soft edges, a balance between landscape and built form or even to explain what a village built in 2023 could look like. It only includes reference to local materials as a token gesture towards 'local character'.
6. Although expansion of acute healthcare has so far been the responsibility of the Government and the NHS and not funded through development, it must be acknowledged that the NHS Clinical Commissioning Groups for the area have made it clear that there will be a lack of hospital care for the growing population in the area without further investment and that they will struggle to staff the primary care centres within the development. They have identified a funding gap of £39M, for which the applicants have successfully contested responsibility. The shortfall will obviously impact upon the existing population as a consequence. It will be highly irresponsible to allow the occupation of new homes unless a viable solution can be found and appropriate investment in acute and primary care and general healthcare secured. This is a major development and the numbers of people it will attract cannot simply be absorbed by existing facilities. Ignoring the issue will put lives at risk.

The Council should not forget that this site was part of the Green Belt until a few years ago, and that it is unlikely that the Government today would have allowed its release and development. It should also reaffirm its commitment to why the Green Belt was lost: to deliver affordable homes, a development of exceptional quality and the timely delivery of a range of social and transport infrastructure through the development of villages of appropriate local character. Mr Gove and Office for Place are very clear that quality of design and local acceptability should take priority over targets.

We have been disappointed that whilst we have attended many meetings with the applicants and the Council to make our views known and to receive information about the progress of the development, most of our requests for clarification and suggestions have been disregarded and the GANP policies ignored even where clearly applicable or helpful. This is not Localism- how it should be or what the Government aspires to in its championing of Neighbourhood Planning.

We expect the officers' report to address openly and clearly the six points above and fully assess compliance with the GANP Policies as part of its policy review of the proposals.

PART 3

Proposed additional conditions in the event that officer' report recommend approval of the OPA

As we have made clear above, the HEGNPG and the local community recommends that the OPA should be revisited to improve viability, deliver a higher proportion of affordable housing and that Parameter Plans, Development Specifications and Strategic Design Guide are provided that are more closely aligned with adopted policy (Local Plan and GANP). We believe that this is what the Government would expect to see and that a more appropriate set of proposals will provide a more robust development framework and eventually save time when considering Reserved Matters.

If these documents are not to be provided prior to the determination of the OPA by DMC, additional conditions should be applied to ensure that future details and reserved matters applications will be "the right type of development in the right place" as advocated by the Government through Mr Gove.

A summary of the key additional conditions we would advocate is presented below:

- 1. Strategic Landscape Masterplan: A Strategic Landscape Master Plan should be prepared in collaboration with the local community for the whole area of the Gilston allocation (Local Plan Policy GA1) and submitted and approved before the commencement of development or the approval of the first Village Master Plan (whichever is the earlier) in accordance with the Gilston Area Charter SPD.** The Strategic Landscape Master Plan should respond to the requirements for a landscape-led approach in accordance with GANP Policy AG1 and the recommendations of the HGGT Quality Review Panel. Development and work on the Village Master Plans should not start until a convincing landscape-led approach is presented to define the extent of meaningful separation and green corridors between villages in accordance with GANP Policy AG4.1. The extent of green corridors should be approved as part of the Strategic Landscape Master Plan and should not be limited to the land outside the Village Developable Areas. Meaningful separation should be defined as the extent required to avoid coalescence between villages, ensure that the villages remain distinct, establish visual separation and distance between different village settlements and support biodiversity and wildlife.
- 2. Parameter Plans: Parameter Plans 2, 3, 5 and 6 are for illustrative purposes only and will inform detailed design work and the development of the Strategic Landscape Masterplan, Design Codes and Village Master Plans.** The Parameter Plans are not based on detailed assessment and there is a danger that as currently

presented they could result in an inappropriate form of development which is not in compliance with Local Plan or Neighbourhood Plan policies.

3. **Advance planting: Planting of green corridors and buffers should take place in the first planting season immediately following the approval of the Strategic Landscape Master Plan to maximise the opportunities for screening, visual separation and wildlife protection in accordance with GANP Policy EX1.** This will allow the establishment of new tree planting and landscaping in advance of development and assist with the integration of the development within its landscape setting.
4. **Active travel: An active travel network of walking and cycling routes connecting key destinations and extending to existing settlements should be agreed as part of the Strategic Landscape Master Plan and developed in advance of the occupation of the first houses to support sustainable travel modes from the outset of the development.** This is in accordance with the sustainable transport strategy for the Gilston Area and GANP Policy TRA1.
6. **Design Codes: An overarching Design Code should be submitted and approved prior to the commencement of development and approval of individual Village Master Plans. The Design Code should be prepared in consultation with the local community and should clarify village character taking into account the character of typical East Hertfordshire villages, individual village identity, appropriate scale and massing, relationship between built form and landscape, etc in accordance with GANP Policy AG6.** GANP Appendix 3 provides an adopted definition of local and village character which has the support of the local community. GANP Policy BU1 also makes specific reference to appropriate heights and densities.
The Design Code should provide the controls and details that qualify appropriate heights and scale, which are expected to be well below the 'maximum heights' identified in PP6, which should not be interpreted as consented typical heights.
The HEGNPG suggests that a Strategic Design Code is also prepared by the Local Authority and adopted as SPD, as envisaged by the Secretary of State's letter to all Council leaders. Only a public planning document will guarantee extensive and open consultation with the community. A Strategic Design Code should cover village character, landscape edges, massing, heights and density.
7. **Mitigation of Traffic Impacts: Development and first occupation of the residential or commercial units will not be permitted until a detailed assessment of the cumulative impacts of traffic (including development and construction traffic) on existing communities has been undertaken and adequate mitigation measures are put in place. This will include assessment of delays, road safety, pedestrian and cycle accessibility, air quality, noise and place-making at Pye Corner, Gilston Lane, Church Lane, Fifth Avenue during construction (say at 5 years intervals or following agreed development milestones) and at completion.** The requirement for mitigation is in accordance with GANP Policy EX1.

8. Provision of other necessary Infrastructure: Prior to the commencement of development, details of the following infrastructure provision should be submitted to and approved by the local planning authority:

- a. **Burial grounds** in accordance with Policy GA 1 and considering that local cemeteries will not have the capacity to serve any significant increase in population..
- b. **Flood mitigation**, including, but not exclusively, the following areas:
 - i. The Airfield and Hunsdon Village via Drury Lane
 - ii. Along the southern section of Gilston Lane – from fields to the east of Gilston Lane with over flow of Fiddlers Brook
 - iii. Length of road approx. 500 metres east of Church Cottages
 - iv. Length of road running between Church Cottages & Great Penny's (near Game Keepers Cottage)
 - v. Eastwick Hall Lane
 - vi. Cockrobin Lane
- c. **Community facilities including cultural facilities and facilities for children and young people.**

In addition, provision should be included in the S106 for the following:

- d. **Sport and play facilities in Hunsdon and Eastwick** where a Multi Purpose Games Area and accessible open space and play space for children are already needed.
- e. **Support for local communities to deliver the Priority Projects identified in Appendix 4 of the GANP**

PART 4

Gilston Area Stewardship and Governance Strategy

We broadly welcome this Framework document and support the concept of a single Community Body incorporated as a registered charity in perpetuity for the Gilston Area Development. The Stewardship and Governance of the Gilston Area is a massive subject in itself and will require expertise, commitment and leadership from the developers, the planners and the people who live here now and in the future.

We have commented on a previous draft though were disappointed that a number of our suggestions were not included in this version. Some were, which we were pleased to see. We have made our views known to PfP and to the planners at EHC.

One of our principal objections was that though it attempts to set the approach to place management, and to define the community assets and the structures to achieve their transfer and funding, it leaves far too much detail to the S106 agreement which the Council is negotiating with the developers. That is not a public document, so we have no clear indication of the extent of the developers' financial commitments and legal obligations, nor will we until after the Outline Planning Application is heard when it will be presented as a "done deal". We have been told that heads of terms will be published soon to give some idea of what will be agreed but they will not be specific or exhaustive enough.

Secondly, the document is lacking in the following respects:

1. It is ambiguous and vague about the area and people it is intended to benefit- in our opinion, it should at this early stage be ready to make it clear that the Charitable Body will be for the general public benefit of the people who now or in the future live or work in the geographical area at present comprised within the boundaries of the Civil Parishes of Hunsdon, Eastwick and Gilston as this is where the development is intended to take place and the Charity should be accountable to those people. There should be no suggestion that a wider population outside this area or in Harlow should be beneficiaries of the Charity. We consider this a key point and if it is not agreed we see little prospect of being able to support the proposed structure.
2. The proposed participation in membership and on the Board of Trustees of the Charity will be an important element to ensure proper representation and accountability but we consider that the proposals in the document will leave the local parish councils under-represented which will prove to be undemocratic and lead to difficulties in the future. The Parish Council structures in the Area will need a wide scale review in due course so that they continue to fully represent the electors who live or come to live in the area and they can fulfil their role, both financially and democratically. The Framework Document makes certain suggestions on this but is in danger of seeking to impose a developers' solution rather than seeking a well thought out review which has regard to the views of local people.
3. We are pleased that the Document acknowledges the GANP policy D2 about Stewardship but it fails to recognise the Policy AG7 which stipulates the early delivery of community ownership and the long-term stewardship, protection and maintenance of the Community Trust Open Space Land identified for special protection in the District Plan. The Neighbourhood Plan is an important Planning document which neither the developers nor the planners can cherry-pick from and ignore what does not suit them- a point we have made elsewhere a number of times and will continue to make.
4. It seems unfair that new residents will have to pay service charges for some services that the District Council refuse to adopt, yet EHC will still impose full council tax charges on them and declines to rebate part to the community.

In Conclusion:

We are aware that the S106 negotiations have been complex but the effectiveness of the S106 agreements and delivery mechanisms will be of critical importance and we would expect to see full details of the S106 including phasing, funding and relevant triggers detailed in the officers' report. This is essential to ensure the timely delivery of necessary infrastructure and members will not be able to determine the OPA without clear details being available to the DMC.

The HEGNPG are firmly committed to securing a high quality development appropriate to the local area, as initially identified in the Concept Development Framework which formed the basis of a statement of common ground between the developers and the Council (November 2017), and as subsequently enshrined in the adopted Gilston Area Neighbourhood Plan which has the widespread support of the local community and is now a

formal part of the statutory development plan. We are not seeking to delay or impede progress of the project, only trying to preserve the original concepts advanced by the developers and supported by East Herts and the local community and to ensure the development is in accordance with adopted policies in the Local Plan and Neighbourhood Plan. Unless the necessary controls are in place in the outline planning approval, we are very fearful of the outcomes and the irreversible damage which will be done to our shared vision for the Gilston Area.

We believe that the Gilston Area has the potential to become an exemplar development of outstanding quality provided the issues set out in our representations are directly and openly addressed prior to determination of the outline planning application.

We look forward to further discussions with you.

Best regards,

-Anthony Bickmore
Chair HEGNPG



HEGNPG

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16 September 2022

By email only

Jenny Pierce, Jenny.Pierce@eastherts.gov.uk
Kevin Steptoe, Kevin.Steptoe@eastherts.gov.uk

Dear Sir/Madam,

Gilston Area Applications – Revised Outline Planning Application for Villages 1-6 ref 19/1045/OUT: Viability Assessment

The Hunsdon, Eastwick and Gilston Neighbourhood Plan Group (HEGNPG), on behalf of the Parish Councils of Hunsdon and Eastwick & Gilston have reviewed the Financial Viability Assessment (July 2022, ref. 96V) submitted by Places for People and would like to express our **serious concerns about the far-reaching implications** of this document for the Gilston Area and the delivery of the high quality development embedded in Garden City principles which the District Plan promised when it passed Examination.

- We are disappointed that Places for People appear no longer to be committed to the delivery of a scheme that is compliant with the expectations clearly set out in policy GA1 and other key policies in the District Plan and the Gilston Area Neighbourhood Plan and their own Concept Development Framework.
- We deplore the substantial shift away from Garden City Principles and the key tenet of Land Value Capture for the benefit of present and future communities for what appears to be unjustifiable developer profits; this has been exacerbated by the direction taken to prioritise the delivery of costly strategic highways infrastructure over other community benefits.

- We expect East Herts to assess the merits of the proposed revisions robustly and to use the planning instruments at its disposal to ensure the scheme is policy compliant and will deliver the high-quality sustainable development that has justified the release of the Green Belt. In doing so, we expect the Council to pay full regard to the advice set out in the Independent Viability Review undertaken by BPS.
- We fear that this ‘revision’ may not be the last and that we could find ourselves on a slippery slope of falling quality of development and quality of life for future generations. This is not the shared vision which the community has supported and underpins the Neighbourhood Plan.

There is a substantial difference between the baseline costs and of the level of reasonable profits in the Turner Morum (TM) report prepared by PfP and the BPS report prepared on behalf of the Council. While we fully appreciate that viability appraisals are based on a number of assumptions, the discrepancy is so great that **the TM report cannot be used as the basis for planning decision making**. We expect to see the matters raised by BPS to be fully addressed by PfP and a revised appraisal submitted and subject to consultation before any further progress is made in determination of the outline planning application.

In the interest of achieving appropriate and sustainable development, in line with Garden City Principles, it is now **incumbent on the Council to re-establish the credibility of the entire process** and make sure that any subsequent planning approval is clearly associated with:

- A transparent assessment of viability, with reliable assumptions for baseline costs and fair but not excessive rates of return for the developers.
- Reaffirmed commitment to Land Value Capture to deliver the social and physical infrastructure for the benefit of the community; , so publicly made by the Council and the developers in 2018 and written into the District Plan: this could be done by agreeing a realistic baseline land value (BLV) in the Viability Appraisal **before** applying any uplift due to the allocation. The Council has always promoted the principle of Land Value Capture to deliver the social and physical infrastructure for the benefit of the community and must reinforce this with the applicant.
- An approach to scaling back the development if this would ensure viability (as suggested in the East Hertfordshire Strategic Sites Delivery Study prepared by PBA in 2015) that is driven by sustainability and material priorities, rather than the expediency of ambiguous interpretations of planning requirements. The Gilston Area Development Forum should be given the opportunity to assess options and make recommendations.
- A new review by the HGGT Quality Review Panel should be undertaken to ensure that the proposals are still in line with policy expectations and the adopted Vision for the HGGT.
- The resulting recommended changes should subject to full public consultation to ensure transparency of the whole process.

The HEGNPG and the Parish Councils urge East Herts Council to treat the very significant and controversial proposals put forward by Places for People

as a call to reassess the scheme as a whole and ensure a fair and transparent process which will deliver the development and meet the identified housing needs of the District, safeguard quality of life commitments made to current and future residents and ensure just and reasonable profits for the investors taking into account Garden City Principles and the key tenet of Land Value Capture.

Specific Concerns

1. Low level of affordable housing / higher Private Rent provision

We are not convinced that the proposed new housing mix will meet East Herts identified housing needs or result in mixed and balanced communities and provide homes for local people and key workers.

East Herts is an expensive place to live: key workers, younger generations and many local residents need access to a range of affordable units. The District Plan acknowledges that there is a significant need for affordable housing. The West Essex and East Hertfordshire SHMA which informed the District Plan confirmed that in numerical terms East Hertfordshire had the highest level of affordable housing need in the Housing Market Area- equating to 32% of overall housing need.

The Council's stated aim is to maximise affordable housing provision and the target of 40% applied to larger sites in Policy HOU3 was informed by viability assessments. EHC had previously assessed the need for 4,000 affordable units to be delivered in the Gilston Area - that is 3,400 in V1-6 and this has now been cut to 1800 : if these much needed affordable homes are no longer to be delivered as part of the Gilston development, where will they provided and what will the implications be for local households and meeting identified local needs?

One of the key benefits of building at scale should be to maximise affordable housing provision- a figure of 21% (which could in practice be further reduced over time) is totally unacceptable for a development of this size and on a site which has been released from the Green Belt on the premise of the planning benefits that would be secured.

It is argued by the developers that the provision of private rented homes will go some way towards compensating for this but in practice, in this location, private rent will attract a range of employment related accommodation (airline staff, hospital staff, company workers) resulting in inflated rental prices and stiffer competition for housing. It will not meet local needs.

We note that BPS consider the scheme to be in surplus and capable of contributing further towards affordable housing. Para 5.5 of the BPS report states that if a benchmark profit of 15% on cost is assumed, this surplus would represent c.£109 million. We would urge the Council to ensure that the level of affordable housing provision is maximised in accordance with policy.

PfP should also be required to provide, and EHC to publish a well-documented and benchmarked assessment of their proposed housing mix and how it will contribute to the formation of stable and prosperous local communities in accordance with Policy GA1 and the shared vision for the Gilston area.

2. The lead weight of the Eastern Crossing

The HEGNPG argued forcefully, but to no avail, in its representations to the Development Management Committee that the costs of the CSC and ESC could put the rest of the Gilston Area development at risk and that the planning applications for the crossings should not be approved before understanding the full viability position of the scheme, an issue already then raised by the developers). Sadly, our fears have proved to be well founded.

The VA report has confirmed that the massive (and increasing) costs of the two crossings (including additional junctions and pedestrian bridges) have played a significant part in the cuts to affordable housing and other contributions now proposed by PfP. It also confirms our earlier contention that the ESC will not be needed, and will not be built in any case, before 10 years at least and that there would be the opportunity to reconsider the road schemes.

These over-scaled and over-engineered infrastructure projects are a lead weight on the wider development. Though already, prematurely, approved, they should be reconsidered, and efforts made to minimise costs and impacts: smaller footprint, reduced earthworks, revision of unnecessary junctions. EHC should support the preparation of revised proposals to reduce the crippling costs of the crossings as part of trying to find a fairer and more balanced solution.

3. The funding implications for Harlow's Sustainable Transport Corridors

The VA and PfP note that they will expect the HGGT and the authorities to secure substantial funding contributions for the ESC from other developers (as identified in the HGGT IDP) and guarantee that part of the funding in case of shortfall.

This could potentially result in a very significant loss of funding for Harlow's Sustainable Transport Corridors. This could potentially make the 60% share of Sustainable Travel within the Gilston Area unattainable if buses, cycle routes and other active travel measures are cut back or delayed in the surrounding area. This will in turn invalidate all the baseline assumptions made in the Transport Assessment which has been submitted in support of the outline planning application.

Alternatively, if PfP were required to increase their own contribution to deliver the crossings, this could result in a further reduction in affordable housing, other infrastructure provision and community benefits.

Before any revised proposals are approved, the HGGT and Transport Authorities should provide a clear and deliverable framework to secure the necessary funding to complete the STCs. PfP should supplement their TA with further 'sensitivity testing' / scenarios in which the STCs in Harlow are delayed or not delivered.

4. Lack of clarity regarding Pye Corner

The revised proposals do not make clear what would be the impact on Pye Corner (already a difficult junction and challenging fast road in the middle of a village area) and on Terlings if development in Village 1, Village 2 and maybe other areas comes forward in advance of the planned date for completion of the ESC. Eastwick Road at this location is a C road with weight restrictions that cannot take construction traffic and is unlikely to be suitable to serve the first 3,500 homes. The acceptability of the interim proposals for this area should be made clear and capable of scrutiny, as it will be a cause of considerable concern for residents.

A full transport, safety and noise study should be provided as part of the planning application submission, as specific impacts will result from the proposal to defer the ESC which is included in the VA.

5. Cutbacks on investments in the Stort Valley

Although outside the red line application boundary, the Stort Valley will clearly be significantly impacted by the proposals:

- Water and drainage patterns will be affected.
- Cycle routes will be required to link new residents to key destinations in Harlow
- There will be considerable pressure for additional leisure use as c. 35,000 people move into the area.

We fully endorse HMWT's representations already submitted on the VA and invite EHC to identify how the costs of the inevitable impacts will be covered, if they are not to be funded through development.

6. The lack of provision for Health Services

If it is the case that development in the HGGT is only required to contribute towards the provision of primary care facilities, such as a new health centre or GP surgeries, it cannot be acceptable to approve a development which will potentially house 35,000 new residents without any certainty about funding or medical staff to deliver the necessary health provision to meet their needs.

The area already experiences shortages and lack of doctors and nurses. It's not enough to provide land and buildings if there will be no-one to staff them.

The IDP identifies a shortfall of £330 million for the relocation or redevelopment of the Princess Alexandra Hospital with potential funding sources identified as the Department for Health and Social Care, NHS England, the Hospital Trust, CCG and private financing. No funding has been identified for extra care or nursing/residential care provision across the HGGT.

The pressures on the NHS, and central Government funding in 2022 are massively greater than they were in 2018 when the District Plan allocated the GA site. The Clinical Commissioning Groups and the Ambulance Service are warning that it is not within their capacity to provide GPs or ambulances for the new residents; furthermore, the delivery of the proposed new hospital in place of Princess Alexandra is looking uncertain.

This is a growing and now a very real problem for the whole Garden Town and must be addressed and the necessary commitments and funding secured before a development of the scale proposed can be approved by EHC or accepted by HGGT.

7. Status of the Draft Strategic Landscape Masterplan

The Strategic Landscape Masterplan is recognised as a critical document which must be in place prior to the preparation of Village Masterplans. We have become increasingly frustrated by the lack of progress made to date and the suggestion that this should follow the grant of outline planning consent. We are therefore extremely concerned that the VA states that landscaping costs have been based on the Draft

Strategic Landscape Masterplan when this document does not form part of the outline planning application submission and limited consultation has taken place.

If such a document has been prepared and is being relied on for the purposes of the VA, it should be made available as part of the planning application and subject to full consultation. We would welcome the Council's clarification on the status of this document.

Conclusion

The HEGNPG is of the view that the **amended scheme is no longer policy compliant and cannot be considered acceptable in planning terms**. Given the gravity of the current situation, we would request an early meeting with you to discuss the implications of the VA and the OPA going forward and reserve our right to make further comments as additional information becomes available and dialogue with various parties is undertaken. We would also urge the Council to place significant weight on the independent review undertaken by BPS and to ensure that all of the matters raised in that report are fully addressed.

Whilst our community remain committed to continue to engage with all parties to ensure an exceptional development of the highest quality in accordance, we believe the vision and objectives in the District Plan and Neighbourhood Plan are in serious jeopardy. **We regret we cannot support the proposals as currently presented given the grave uncertainty regarding the funding and delivery of essential social and community infrastructure and other benefits and the substantial reduction in affordable housing provision now proposed.**

Yours faithfully

D A Bickmore, Chairman

CC Cllr Linda Haysey, EHC Leader

Cllr Eric Buckmaster EHC and HCC



HEGNPG

Supporting our Community

Hunsdon Eastwick and Gilston Neighbourhood Plan Group
Channoeks Farm
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Nr Harlow
CM202RL
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Dear Jenny,

Re - Revised Environmental Statement Village 1 -6 application

Thank you for your email of 23rd April notifying us of the further information and evidence relating to the Environmental Statement submitted in support of Gilston Area Villages 1-6 Applications.

May I refer you to Addendum K (extract below) of our response to the revised outline application regarding the proposed provision for Gypsy and Travellers and Travelling Show People.

The proposals have been added to the outline planning application in response to a request from East Herts Council. There is no evidence that an informed assessment has been undertaken. No design or location criteria are offered in the Development Specification or SDG.

An analysis of options does not appear to have been submitted, and the Landscape and Visual Impact Assessment has not been updated to address the identified sites. This analysis is required to demonstrate the relative merits of each option and ensure that they will not result in any unacceptable harm to landscape character and visual amenity

The development of serviced sites for gypsies and travellers outside of Village boundaries is contrary to the objective of a green infrastructure network, retained in perpetuity, around villages. Development of serviced sites should be contained within the Village Developable Areas and should not be considered a suitable use within the landscape buffers or green corridors.

There is concern for the potential adverse landscape and visual effects of each site. The site to the south of V6 is located within a green corridor, which was identified to provide an important buffer between V6 and the A414, and laterally between Eastwick and Village 7, overlooking and visible from the Stort Valley; and the site to the north of V3 goes beyond the site boundary and the logical development limit of Golden Grove into currently open countryside.

Without prejudice to our fundamental objection to the proposals as set out in Addendum K we have reviewed the further information updating the EIA (which we considered a necessity) and have the following concerns: -

- There is still no overall Environmental assessment for the GA1 allocation; it seems to be 'cut' into sections by the splits in site ownership and we fear that doing that will result in a lower overall outcome so more unacceptable environmental loss. This is perfectly illustrated by having 2 separate applications each with a G&T site a few hundred metres from each other, viz Villages 6 & 7.
- The site proposed between villages 6 & 7 is in an area designed as an important landscape buffer between the proposed villages. The GA1 Allocation was put forward to the Inspector on the basis of 7 villages set in a countryside setting and the buffers, narrow as they are, are a fundamental concept and the loss of them through this proposal is unacceptable as it clashes with the basis upon which the Green Belt was released.
- It is unclear whether the provision of these sites is subject to the requirement for sustainable transport mode shift or whether this allocation will use the 40% non sustainable transport capacity – oddly the environmental assessment does not consider this?
- It is proposed that the pitches located to the south of Village 6 are protected from A414 traffic noise by an acoustic screen and/or commercial buildings. The land rises around 10m from the A414 to Village 6. The pitches are therefore going to be on terraces (cut and fill) and higher than the acoustic screen. The result is that temporary dwellings such as caravans will suffer significant noise levels as acknowledged in the further assessment study.
- Although drivers on the A414 may only catch a glimpse, other people, particularly those using the Stort Valley whether on foot, cycle or on the water, will be unable to avoid seeing such overbearing features such as mobile homes and commercial buildings looking down on them from the Eastwick slopes. This is a substantial harm and loss of amenity in what is supposed to be a recreational area which the applications say elsewhere will be enhanced and improved - in fact exactly the contrary is now proposed. No assessment has been made of this in the amendments to the EIA and it should have been.
- Accordingly, the landscape and visual impacts both during construction and on completion have not been fully or properly assessed when viewed from the Stort Valley
- Similarly, we do not accept that the visual impact of the proposed G&T/TSP pitches to north of Village 3 that abuts High Wych, has been thoroughly investigated. Again, there is very little in the document except for this below, which is the same for both construction and operational phases: -

13.7.25 Apart from possibly introducing commercial use or a G&T/TSP site into its northernmost part, the Development would not have any direct physical effects on the landscape of this area LLCA to the east of the site. However, the perception of the landscape would alter within this area (up to the western edge of High Wych) as the urban influence of Villages 2, 3 and 4 would be apparent.

This assessment is not clear as it implies that the amended proposals would actually have a direct physical effect on the landscape. In this case the landscape and visual impacts need to be assessed.

In summary the HEGNPG consider that: -

- The further work on landscape and visual assessments in the revised Environmental Assessment has not been properly assessed.
- The application correctly describes the land between Villages as buffers but then seems to suggest that buffers should not be buffer and can be developed – this must be wrong as it was not what was presented to the Inspector when the the GA1 allocation was made.
- Our original comments have not been addressed so remain.

Yours sincerely,

Anthony Bickmore, Chairman HENPG

CC Bob Toll, Chairman, Hunsdon PC
Mark Orson, Chairman, Eastwick and Gilston PC
Cllr. Eric Buckmaster, EHC



HEGNPG

Supporting our Community

Hunsdon Eastwick and Gilston Neighbourhood Plan Group

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Planning Policy
East Herts Council
Wallfields
Pegs Lane
Hertford SG13 8EQ

21st January 2021

FAO Ms Jenny Pierce by email at Jenny.Pierce@eastherts.gov.uk
(cc. Mr Kevin Steptoe by email at Kevin.Steptoe@eastherts.gov.uk)

Dear Sir/Madam,

Gilston Area Applications – Outline Planning Application for Villages 1-6 and Detailed Applications for Central and Eastern Stort Crossings refs 19/1045/OUT, 19/1045/FUL and 19/1051/FUL

The Hunsdon, Eastwick and Gilston Neighbourhood Plan Group (HEGNPG), after consultation with the community and the Parish Councils of Hunsdon and Eastwick & Gilston, has concluded that the proposals included in **the revised planning application submissions for the Gilston Area cannot be supported and should not be approved without further integrations and modifications**. These are necessary to demonstrate a clear commitment to the delivery of development in the form of distinct villages, enhancing the natural environment and supporting infrastructure that addresses the needs of future and existing communities, as required by Policy GA1, the submission Gilston Area Neighbourhood Plan, the Gilston Area Charter SPD and other relevant guidance including the Gilston Area Concept Framework and the HGGT Vision and Design Guide. In addition, the mitigation of impacts on the existing communities is not adequately addressed. Far too many of these measures are left vague and unspecific to be defined and secured through the s106 agreement and governance arrangements. We maintain that

greater clarity and certainty on these critical matters is required before the current planning applications can, properly, be determined.

We acknowledge that the applicants have made some welcome additions and clarifications, while retaining strong commitment to quality building design and 40% affordable housing. Other welcome improvements are on public transport provision, heritage protection and increase of employment space within the village centres. However, we remain concerned that if East Herts Council (EHC) approves the applications in their current form, they will fail to achieve the agreed vision and objectives for development in the Gilston Area and fail to fulfil the Garden City principles set out in the District Plan itself

We outline below the key areas of concern of the local community. These are explained in further detail in the Addenda attached to this letter.

Summary of our Main Concerns (Relating to the Development Proposals as a whole)

Status of the Application Documents submitted for approval – The Parameter Plans (PP) and Development Specification (DS) are presented as the documents that will fix the boundaries of the built area, maximum heights and green spaces. This interpretation is confirmed in the DS (Section 6.2), which states that the role of the Strategic Landscape Masterplan (SLMP) and Village Masterplans (VMPs) is to apply the boundaries, parameters and principles identified in the OPA. This approach fails to present adequate reasoning and justification for the parameter proposed and invalidates the role of later master planning stages. It also shows unacceptable parameters (no meaningful separation, no integrated green infrastructure, unacceptable height parameters, etc.). It should be made clear in the Development Specification that subsequent design stages (SLMP and VMPs) will be the key documents where the boundaries of the Green Infrastructure and Buffers and the built-up area will be fixed, and that heights and density can only be set on the basis of a VMP which has the full engagement of the community. This is essential to ensure the Parameter Plans and Development Specification are not applied in a way which will constrain the masterplanning process and prejudice the overall vision and objectives for the Gilston Area (see Addenda G and I).

Development Contributions (s106) and Land Value Capture for the benefit of the whole community – We have raised these matters with EHC multiple times, but we are still informed that the Heads of Terms for the Section 106 agreements are far from settled and that most of the commitments required of the applicants remain to be negotiated. We understand that even the basis on which they will be formulated is not yet agreed, with the applicant's rejection of the HGGT Infrastructure Development Plan and reversion to its own draft heads of agreement submitted with the original application which are not accepted by EHC or the community. It is impossible to see if the full mitigation of impacts on existing communities and off-site enhancements for the benefit of existing and future residents will be secured. The extent and timing of the provision of services and community facilities in line with Garden City Principles are also obscure and uncertain.

This is a requirement of EHC's Policy GA1 that is unresolved and demands the clarity of unambiguous and detailed Heads of Terms, open for all to see and upon which to base the wide and far-reaching decisions now required of the Councillors of EHC (see Addendum A).

Community Trust Land and Stewardship – Despite engaging with EHC and the Developers for 18 months on this matter, there is still no detail of what land will be transferred to the community, when the transfer will take place to meet the Policy GA1 requirement and how the long-term stewardship will be secured and funded; this is an unresolved requirement of EHC’s Policy GA1 (see details in Addendum B).

Main Access Highways – The route from the Eastern Crossing to the entrance to Village 6 (and Village 7) is proposed as a sequence of isolated junctions and local access roads. At the same time, it is described as a strategic connection required to support the Garden Town as a whole, and relieve traffic from Harlow town centre (i.e. a road fulfilling the role of a by-pass). The lack of transparency about the real objectives of the proposals raises doubts that the benefits and impacts have been properly evaluated to justify the heavily engineered design and land take, which appears to be contrary to the objectives of containing vehicular traffic in favour of the promotion of sustainable transport and has massive impact on the existing community. The detailed highways applications fail to properly address the consequential impacts of their proposals; should they be consented (see Addenda C,D,E).

Comprehensive Development and Integration with Village 7 – Despite assurances, this has not been adequately addressed. A holistic approach is needed given that GA1 is a single allocation of 7 villages not 6 +1. A properly phased and clear delivery framework that knits all development together in a logical sequence (so including Village 7 and existing settlements) is not provided. We believe this should detail community facilities, green spaces network, footpaths and cycle routes and the promotion of social cohesion. The developers of Village 7 seem to be proposing a different design approach on many aspects; this is at odds with Policy GA1 and EHC’s stated ambitions to have a strong masterplan led approach to major projects. To make decisions on villages 1-6 without the incorporation of the village 7 development will lead to disconnection and harm to the community.

Green Infrastructure Network and Adequate Separation between Villages – Meaningful separation between the 7 villages and the creation of a backbone of a continuous green infrastructure network surrounding the villages is not clearly set out. This could compromise the establishment of an appropriate balance between built areas and landscape, with implications for the Strategic Landscape Masterplan and Village Masterplans. The proposals for the areas north of the high tension power lines are not sufficiently developed and we are concerned that the proposals are not informed by a robust landscape framework (work on the Strategic Landscape Masterplan does not appear to us to have meaningfully started) – see Addendum G. (**NOTE** we have read the Hertfordshire County Council’s (HCC) Landscape Officer’s report and note that their concerns with the applications in many cases echo our concerns).

Treatment of Sensitive Sites (fields in front of St Mary’s, to the west of Home Wood, south of Gilston Park House and around Hunsdon House) – There is insufficient clarity about the extent of the controls put in place to safeguard the setting of heritage assets and very exposed and prominent locations (see more details in Addendum H).

Development Heights and Built Form – Inadequate control measures are provided to ensure village quality and requests for potentially inappropriate flexibility in heights, location and development quantities without justification, establishing development parameters that could constrain the design-led approach of the

Strategic Landscape Master Plan and Village Master Plan processes (see Addendum I).

Other Concerns (Relating to specific issues)

Other Transport Issues – Inadequate or no commitments to improved access to the stations by cycling and walking and to creating an efficient, connected network of essential routes for walking and cycling accessible to the new and existing communities (see Addendum J).

Industrial Uses / Business Park – Poorly integrated and prominently located employment uses, undermining the concept of ‘villages’ as set out in the Concept Framework. To achieve the objective of sustainable development and encourage local employment which reduces the need to travel, the village centres should be the focus of employment provision for the community rather than promoting the concept of a road orientated Business Park at the edges of the site which also reduces the green infrastructure at a key location and seems in conflict with EHC’s sustainability ambitions.

Provision for Travellers and Showpeople – Inadequate assessment has been undertaken of this sensitive land use, and the two safeguarded areas appear to have been included as an afterthought at the margin of the sites and, of even greater concern, within landscape areas outside development boundaries that are identified for green corridors, wildlife and biodiversity to be retained in perpetuity. Design criteria for the successful integration of this requirement should be set out in the Development Specification and EHC’s requirement to accommodate such uses post 2033 should be considered in the next Local Plan review on a cross District basis, not now. The insistence on making provision earlier has distorted what the District Plan requires. This and the developers’ refusal to allocate potential sites within their developable areas means that the Council and the applicants have lost the support and trust of the community on this matter and the proposal put forward is fundamentally unacceptable.

Biodiversity Net Gain – Lack of clarity about the strategy for achieving biodiversity net gain or any commitment as to when / or as part of which work proposals it will be made. A clearer commitment to this requirement should be added to the Development Specification.

Infrastructure Delivery Plan - Social Infrastructure – there appears to be no progress on our concerns on the timely delivery of local social infrastructure such as Schools, Health Care and other social needs. The proposed Infrastructure Delivery Plans left key items to be delivered too late in the development planning so making for unbalanced communities. ***IDP -Transport*** – A number of sustainable transport improvements have also been suggested too late. Early delivery of these will be critical to people changing their patterns such as public transport, cycling and walking, equally importantly who will deliver these and by when?

Further Considerations

Many matters have developed or changed over the last 15 months and should be reflected in the revisions, these include further elaboration of how the developer is intending to respond to:

1. The Covid pandemic, leading to an economic shift, different lifestyles and development requirements.

2. Phasing of development and infrastructure provision and changes to the housing trajectory.
3. The additional urgency to address the climate emergency, including more stringent targets for carbon neutral development including EHC's consultation on its own Sustainability Strategy and greater recognition of the importance of achieving a biodiversity net gain of a minimum of 10%. The recently published Future Homes Standard also needs consideration.
4. The Charter SPD and Community Engagement SPD have been approved since the submission of the planning applications. Clarity is required with respect to the full planning strategy for the development, including a matrix of what will be approved as part of which application in accordance with the Charter SPD, the scope of the masterplans and how the community will be meaningfully engaged at each stage in accordance with the Community Engagement Strategy SPD.
5. The emerging Gilston Area Neighbourhood Plan (GANP)

Proposed Way Forward

The HEGNPG advocates that the following main integrations and revisions are made before the proposals are in a condition to be decided or, we suggest capable of being recommended by Officers for approval:

1. **Fixing Development Parameters**; It will be necessary to establish a clearer development process and schedule of what it is fixed and what remains to be determined as part of this application. The extent of development, green corridors, heights and densities indicated in the Parameter Plans and Development Specification cannot be fixed at this stage without further justification. There is a real danger that development will be built to the maximum extent leaving no separation, that the top range of the height envelope (4-5 stories) will be the norm and that minimum width of the green corridors will be 'filled up' with other requirements (as already happening in the application). It must be agreed that the Parameter Plans and Development Specification only set out high-level development principles which must be further developed at the masterplanning stage. It is premature for critical elements of Parameter Plans to be fixed at this stage when the Landscape Masterplanning work has not yet started and further necessary assessment work has not been undertaken. The Parameter Plans submitted for approval can only be agreed as 'indicative' and not to be applied as a set of 'control documents'. Boundaries of the green corridors and built-up areas, heights, density etc. will be fixed through the Strategic Landscape Master Plan and Village Masterplans in full consultation with the community.
2. **Confirmation of the Heads of Terms and content of the S106**. More transparency and clear detailed proposals are required to understand how impacts on the existing community will be addressed and off-site enhancements to manage the development's impacts delivered. The Developers are pushing back on their responsibilities for transport and other infrastructure (VDAR Appendix 9) and it is not clear how or if the development impacts at Gilston will be mitigated or the promised enhancements delivered. There is a fundamental disagreement between the Council and the HGGT on the one hand and the applicants on the other as to Delivery of Infrastructure and the appropriate Plan for its delivery which has to be resolved with clarity and transparency before this

application can proceed. Furthermore, the infrastructure triggers are 'indicative' and we are disappointed that so little progress appears to have been made on agreeing the subject matter headings, let alone detail heads of terms. In the absence of the above, councillors will be delegating matters to officers which they themselves should be deciding and/or will be making decisions without the necessary and appropriate facts before them. This will be a breach of the legal and democratic process and to proceed in this fashion will leave them open to serious and inevitable challenge.

6. **Stewardship**; the Community have participated in discussions with the developers but there has been no effective progress. The timing and nature of community ownership, and the essential funding mechanisms all remain outstanding. There have been some modest 'early win' proposals but almost none of these have progressed over the last 18 months. The planning applications should not be agreed without clarity about transfer of land, its timing and the stewardship arrangement, as this is contrary to Garden City Principles, Policy GA1 (VII) and the Concept Framework and the emerging Neighbourhood Plan.
7. **Highway justification**; A highway strategy document is required explaining the options considered and how the proposals maximise opportunities for sustainable transport and minimise impacts on the environment and local communities. Without a robust framework, design solutions that cause significant severance, landscape loss, involve massive land take for vehicular traffic and will likely require CPO of private property cannot be justified. In addition, the proposals leave many areas unfinished as a consequence of the proposed highway changes and that seems to be a critical omission for a detailed planning application. Suggestions for better connections to Harlow Town Station are made but lack any substance or commitment on the part of the Developers or other bodies. Approval of proposals relating to the corridor between Temple Fields and Church Lane (V7) (detailed applications and general arrangement plans) should be suspended pending the publication and consultation of a detailed A414 Strategy for Segment 14 in the context of overall priority being given to sustainable and convenient active transport between the Gilston Area and Harlow.

Conclusion

EHC has achieved the largest release of Green Belt land in England in recognition of the exceptional circumstances made in its Local Plan. The Community have been assured by the Council before, during and after the Local Plan Examination that the Gilston project would be delivered to meet exceptionally good standards in reflection of the exceptional circumstances advanced at the Examination. The developers championed this aspiration at the time but have yet to show precisely and clearly how they will achieve and deliver it. As a community we have worked tirelessly to help shape the development to achieve the undertakings made to us, we have prepared a Neighbourhood Plan that sets out how we see the Gilston allocation being delivered to achieve this objective. We have consulted extensively with the Council and applicants on this.

We regret that these three applications still require much further work before they can be supported. Indeed there are major omissions, which we feel means the applications are not capable of being determined without considerable further work. Our community remain ready to continue to engage with all parties to see this development emerge as an exceptional development of quality.

Yours faithfully

D A Bickmore, Chairman

CC Cllr Linda Haysey, EHC Leader

Cllr Eric Buckmaster EHC and HCC

Development Contributions (S106) and Land Value Capture for the benefit of the whole community

Issue:

The terms of the S106 agreements are unknown and it is not possible to see if full mitigation of impacts on existing communities and off site enhancements for the benefit of existing and future communities will be included and the extent and timing of provision of services and community facilities in line with Garden City Principles. The application merely proposes that the uplift in land value will be used to pay for the 'minimum' infrastructure requirements rather than meet the policy ambitions of GA1 and the HGGT; this is a substantial dilution of the Council's original vision as a Garden City. It is regrettable that the applicants show reluctance to provide more than the minimum that their narrow and legalistic interpretation of the legislation would permit. This is in direct conflict with the provisions of the District Plan Policy GA.III. If that is incapable of implementation, then the policy is predicated on a false and impossible premise. If that is the case, the District Plan will have to be revised and resubmitted for Examination and approval. This is something which EHC have to address before they go any further with the application.

The Development Specification state that a Strategic Delivery Plan will be submitted to and approved by the local planning authority before development commences on site and that this will accord with broad Delivery Principles proposed. This does not provide us with the necessary confidence that infrastructure will be delivered in a proper and timely manner to meet the needs of the whole community in accordance with planning policy and Garden City Principles. It is also unclear how the necessary triggers and contributions will be captured in the S106 agreement and how these will apportioned across Villages 1-6 and Village 7.

Related to Planning Documents:

Supporting information – informing S106 negotiations:

Village Development Addendum Report (VDAR):

- Delivery Statement (Appendix 8)_
- IDP Response Table (Appendix 9)
- Draft Infrastructure Triggers (Appendix 11)

Development Aspirations:

District Plan Policy GA1 states that development will be based on the principle of land value capture to deliver the social and physical infrastructure for the benefit of the community.

HGGT IDP sets out the infrastructure required to accommodate development based on assessment of existing capacity to meet the comprehensive needs of new and existing communities.

Submission Gilston Area Neighbourhood Plan Policies AG9 and D2 requires

infrastructure capacity to be phased to meet the comprehensive needs of new and existing communities and to ensure necessary physical and social infrastructure is provided at time of need.

Concerns:

- The Delivery Statement does not provide confidence that the necessary infrastructure required to accommodate the development will be provided at the time of need or that contributions will be secured to deliver the full range of infrastructure identified in the HGGT Infrastructure Delivery Plan and mitigate impacts on the existing community. The applicant states that this may affect the viability of the scheme and that only infrastructure considered 'appropriate' to mitigate the impacts of development will be funded through the development. This is a cause of great concern to the community, especially as the applicants decline to provide information on viability. It is difficult, if not impossible, to see how viability will be a factor in what is said to be a £2.8 billion pound development.
 - The approach adopted by the applicant is not in accordance with Garden City Principles and it appears that the concept of Land Value Capture is being abandoned.
 - We have asked to see the S106 HoT's covering the development and have been told by EHC that no HoT's for this exist in any meaningful form. This is of critical importance given the short timescale set by EHC for determination of the application. The application cannot be determined without full and detailed HoT's and it is impossible for the community to form a view on the adequacy of these measures based on the information submitted. The VDAR (para 4.9) states that these matters will be resolved with the local planning authorities as part of the continued determination of the applications, *'the outcome of which may have a material bearing on project viability'*. Far too many commitments are left unspecified and uncosted with only a proposal to examine their feasibility within S106 negotiations. In too many instances the applicants have not yet entered into meaningful discussions with other third party landowners or stakeholders to bring forward realistic proposals that are capable of delivery and which they are prepared to be obliged to pay for. This leaves us to seriously doubt whether the necessary infrastructure will be delivered at the appropriate time and we strongly contend that the application is not ready for determination in its current form.
 - Without the opportunity to see the S106 HoT, it is impossible to understand the phasing of infrastructure. We are concerned that the draft triggers proposed will allow for the development of a substantial number of new homes without the necessary infrastructure being secured. This highlights again the importance of a coordinated approach to the Infrastructure Delivery Plans and planning obligations for Villages 1-6 and Village 7 as the Council and its partners at HGGT are well aware. But this is not something which the applicants are prepared to commit to.
 - The draft infrastructure triggers are not evidenced by an assessment of impacts on existing infrastructure capacity and would not deliver the necessary mitigation to manage the impacts of development on existing communities in
-

the early stages of development. The triggers for the completion of parkland and landscaping works are considered to be too late in the development programme. Development will almost be completed before completion of the parkland and necessary landscaping/ woodland restoration. Needs should be identified and closely integrated with development programme.

- The application states that 40% of all housing will be affordable. However, the applicant's previous commitment to retaining the affordable housing has not been reconfirmed and it is unclear how this will be delivered. We are concerned that if this commitment is now in question, their position on other important matters such as Stewardship may also be open to review.

Proposal:

1. Further details of the S106 HoTs and proposed infrastructure triggers and a more comprehensive delivery strategy are required before the application can properly be determined. The community and other consultees should be afforded the opportunity to comment on these before the application is reported to planning committee.
2. HoTs should also include mitigation measures for impacts on existing local communities and off-site enhancements for the benefit of existing and future communities in accord with the land value capture principles in the District Plan, the Concept Framework Document and the emerging GANP.
3. The report to planning committee must include detailed unambiguous HoTs as these will be material to determination of the planning application, and a necessary pre-requisite without which the Councillors cannot make an informed and balanced decision. The applicants claim the total S106 contribution is over £600m; such a sum cannot be left not detailed.

Community Trust Land and Stewardship

Issue:

The applicant has provided an outline framework for the future governance of the area but to date the Parish Councils have not been given the opportunity to have real input. It will be very important that the Parish Councils and the community have time to adequately reflect on alternative possible governance structures and what role they will take.

Despite requests for further information, there is still a lack of detail of:-

- What land will be transferred to the community
- When the land will be transferred and
- How long term stewardship will be secured and funded.

Related to Planning Documents:

Supporting information – informing S106 negotiations:
Village Development Addendum Report (VDAR)

Development Aspirations:

District Plan Policy GA1 (11.3.7) and the Concept Framework states that the transfer of the Community Trust Open Space Land should take place **early** in the overall development programme to deliver local ownership and management of these assets.

Submission GANP Policy AG7 states that funding and design support should be secured through a legal agreement prior to the transfer of land and made available at the **early** stages of development. Policy D2 states that arrangements for future governance and stewardship will be secured as part of the planning process.

Concerns:

- Agreement on stewardship of community assets has not meaningfully advanced since the first submission of the outline planning application (May 2019). However, it is a key requirement of Policy GA1. Whilst we welcome the commitment to form a local working group, the timing for the 'early transfer' of the land by the applicant is still not set out in the application. In fact it is now stated that the transfer of the land will be "at the end of the development" (Development Specification- Governance Commitments p 67)
 - Discussions have been held but we are no closer to having an agreed basis for taking this forward. The information submitted in November 2020 indicates that the Community Trust Land will be *delivered* at the end of the delivery programme: Work on Hunsdon Airfield parkland is to be completed on the occupation of 5000 homes and Eastwick Wood on the occupation of 7500 homes. This could be in several decades' time. No trigger for the transfer of the land has been indicated. On the contrary the Development Specification states
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it will not be until the end of the development which might be in 25-30 years time, if ever. The countryside parks are integral to the development and represent important mitigation measures and must take place early in the development programme with clear obligations for the funding of the necessary work promised and a future endowment for the maintenance of it within the Community Trust.

- We are no closer to understanding the nature of community ownership and how the communal areas and buffers will be managed. Without a clear programme for the transfer of ownership and the establishment of a community land trust or similar mechanism, the proposed triggers and promises of triple locks are meaningless. We warmly welcome the concept of early wins and hope some can be delivered through the s106.
- Under Policy GA1 a large amount of land is due to be transferred to the local community and in granting planning permission, there must be greater clarity about how this land will be protected and funded and how future stewardship arrangements will work.

Proposal:

1. Clearer commitments regarding future governance arrangements and community ownership need to be secured as part of the outline planning application.
2. Commitments to working with the parish councils and the community must be secured in the S106 agreements.
3. The proposed triggers for the delivery of the Airfield and Eastwick Wood parkland are unacceptable and contrary to Policy GA1. Early transfer **and** delivery of the Community Trust Open Space Land and the necessary funding for this must be secured in the S106.

Main Access Highways – Approach to the Whole Route from Temple Fields to Village 7**Issue:**

The route from the proposed Eastern Crossing to the entrance to V6 (and V7) is applied for as a sequence of isolated junctions and local access roads. At the same time, it is described as a strategic connection required to support the Garden Town as a whole, and relieve traffic from Harlow town centre (i.e. a road fulfilling the role of a by-pass).

The lack of transparency about the real objectives of the proposals raises doubts that the benefits and impacts are properly evaluated to justify the heavily engineered design and the massive road land take, which appears to be contrary to the objectives of containing vehicular traffic in favour of sustainable transport.

Related to Planning Documents:

For Approval

General Arrangement Plans for access to V1, V2, V6

PP4

Detailed Application Drawings – Highway design and Landscape design

Supporting Documents

CSC and ESC Options Report

Development Aspirations:

Eastwick Roundabout is a major constraint to movement in the area: for vehicles and for cyclists. Pedestrian provision is particularly poor. Traffic along Eastwick Road towards High Wych is too fast and causes problems at Pye Corner. Lorry restrictions, however, ensure that volumes, noise and pollution are generally contained.

The local community is determined to ensure that the Gilston Area is to be planned and delivered in accordance with Garden City Principles and Policy GA1 / GA2, including being designed such that walking, cycling and public transport are the most attractive forms of local transport. There is support through the emerging GANP and the HGGT Transport Strategy for upgraded infrastructure that does not create severance within the community (GANP Policy AG8) and promotes sustainable travel choices. We are open to consider proposals in their own merit, as well as in relation to the existing communities.

The community would like to be able to explore the options behind the proposals and be satisfied that the proposed arrangements and layout have been optimised for their purpose.

Concerns:

The route from Edinburgh Way to Church Lane / V7 is approximately 4.6km long and will be designed to accommodate 9 junctions (one every 3-500m) at 40mph

speed. This route is openly referred to as reflecting the ‘aspirations’ of the two highways authorities (ECC and HCC) to deliver an improved strategic road corridor linking the A414 to Edinburgh Way to offer relief to Fifth Avenue (ESC Options Report - Exec Summary 1.1.3). This approach is also reflected in other aspects of the application:

- PfP pushing back on their responsibility to pay for the road upgrades and the ESC because of its strategic road (VDAR – Addendum 8).
- PfP indicating that triggers for its construction are dependent on delivery of houses elsewhere in Harlow (Appendix 11)
- Reference to proactive encouragement (in the form of reduced turning lanes) for traffic coming from the west along the A414 to use the ESC to reach Harlow, the Enterprise Zone and Junction 7a.

This has introduced the creation of a by-pass to Harlow (i.e. a strategic road with wider benefits) disguised as an access road to development.

The NPG (via Markides Associates) have questioned whether the proposed corridor represented the best infrastructure solution to enable the development and a response in May 2020 by the HGGT/ ECC and HCC confirmed that the proposals represent the preferred strategic solution.

The benefits and specifications of a new Harlow by-pass / strategic route via Terlings have never been openly presented as strategic options. The approved A414 Corridor Strategy (HCC, Nov. 2019) is very conceptual and does not constitute a proper assessment. In addition, in its Technical Report (Segment 14, pg. 248) it states: *The immediate priority for the Harlow and Gilston area is to ensure that the proposed Garden Communities including Gilston are well connected to the existing town, and that there are sufficient opportunities to facilitate sustainable travel on foot, by bike and by public transport. A new direct east-west route from the M11 at J7a to the A414 at Eastwick could work against local priorities and therefore has not been considered further as an immediate priority for investigation in the A414 Corridor Strategy.*

The HGGT Sustainable Transport Strategy echoes the same message, arguing that it is futile to build more road capacity to accommodate future growth and that a change in travel behaviour should be the key option.

The ambiguity about the role of the corridor is leading to potentially poor decisions:

- The corridor has 9 junctions, of which 6 (with 3 signalled crossings) between Edinburgh Way and the replacement junction of Eastwick Roundabout instead of the current 5 roundabouts. It is not therefore efficient.
 - It will create severance within the existing communities, splitting the Gilston community in two (Terlings Park and the rest).
 - It will increase through traffic in High Wych directed to the M11.
 - It will bring increased noise and pollution to a tranquil area.
 - It will potentially undermine efforts to promote sustainable and active travel between the future Gilston communities and key destinations within Harlow.
 - It may relieve traffic on Edinburgh Way, a commercial / industrial district, to put
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traffic across a residential community.

- Design road speeds have resulted into a sweeping alignment across the landscape with significant embankments and terrain alterations: *The extent of cut required to achieve an appropriate highway gradient, has resulted in a substantial area land of take, and feels disproportionate to the scale of the highways infrastructure* (HCC Landscape Report on the Planning Applications, Section 2.6). This is very pronounced on the ESC and the entrance to V6.

The NPG assumes that CPO will be required to deliver the ESC, given the complexity of ownerships and Terlings' residents' entitlement to the land. Without a clear and transparent narrative about the whole corridor and justifiable benefits, we cannot see how a CPO can be successfully advanced.

Finally, the provision for pedestrians and cyclists connecting to Harlow town centre and rail stations (Roydon and Harlow Town) is not given the same level of information and attention: for example flooding in Burnt Mill Lane and in the Stort Valley are not addressed, access along Station Road remains too narrow and no firm commitment is made to the station's northern access. There is no evidence that meaningful discussions have taken place between the applicants and third party owners and stakeholders. Yet pedestrian and cycle movement is a fundamental requirement of the development on which the road design also depend.

Proposal:

1. Reject or suspend approval for all proposals relating to the corridor between Temple Fields and Church Lane (V7) pending the publication and consultation of a detailed A414 Strategy for Segment 14 in the context of overall priority being given to sustainable and convenient active transport between the Gilston Area and Harlow.
2. Revise all access junctions to demonstrate a landscape-led approach which optimises land take, pedestrian and cycle permeability, respect for existing vegetation (as also advocated in HCC Landscape Report on the Planning Application).
3. Comprehensive and detailed design of a reliable pedestrian and cycle network as part of the detailed planning applications for the ESC and CSC extending to the two stations and Harlow town centre.
4. Ensure that the 'consequences' of the applications are evaluated and addressed (the quality of the spaces in Pye Corner and under the proposed new bridge, if it is to be built; Burnt Mill Lane, Eastwick road etc).

Central Stort Crossing (CSC) and new Village 1 access road**Issue:**

There is insufficient information to evaluate the design choices informing the CSC, the main access junction and V1 access road, which results into very significant land take, impact on the Stort Valley and confines pedestrian and cyclists on an inconvenient bridge over the roads. This is in addition to the issues related to the overall corridor (see Addendum C).

Related to Planning Documents:

For Approval:

Detailed Application Drawings: Engineering drawings, Construction access drawings

Development Aspirations:

The community supports the HGGT Vision and its Transport Strategy, which promote the creation of Sustainable Transport Corridors linking all parts of the Garden Town and constituting a backbone of pedestrian friendly connections prioritising active movement over vehicular one.

Concerns:

The design proposals are heavily engineered and clearly not guided by principles of place-making or landscape (see also Addendum C). This results in strong priority and visual dominance given to vehicular movement – contrary to Garden City principles and to the HGGT stated aspirations:

- Dedicating the direct access to V1 to buses only (promoted as a way to assert the prominence of public transport) appears a token gesture that massively increases road land-take to provide a vehicular access to V1 300m east.
 - The eastern arm of the junction has a carriageway width approximately 5 times the current road width – around double the size of any of the avenues within Harlow.
 - Pedestrians and cyclists are confined to a bridge nearly 400m long, which creates opportunities for anti-social behaviour, putting the likes of pedestrians with prams, young people and other vulnerable users at risk.
 - Pedestrian and cycle access to the station has not been properly secured: there is no commitment to delivering the northern access to the station (only unspecified financial contributions and the concept is not supported by any feasibility studies) and no proposals to improve the current access routes, which has narrow pavement and no cycle route.
 - How pedestrian and cycle access to Harlow town centre is to be upgraded is not presented / addressed. The critical transport infrastructure to meet the 60% sustainable movement targets stops before it reaches Harlow Station, a key issue still not addressed.
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Proposal:

1. Reject or suspend approval of the CSC Detailed Application pending the publication and consultation of a detailed A414 Strategy for Segment 14 in the context of the design of Sustainable Transport Corridors across Harlow.
2. Revise all junctions to demonstrate a landscape-led approach which optimises land take, pedestrian and cycle permeability, respect for existing vegetation (as also advocated in HCC Landscape Report on the Planning Application).

Eastern Crossing**Issue:**

There is insufficient information to evaluate the design choices informing the ESC, which results into very significant land take, impact on the Stort Valley and severance of Terlings Park from the rest of the Gilston community. The proposals also do not address the treatment of the downgraded Eastwick Road and improvements to Burnt Mill Lane and provide insufficient detail about the proposed Terlings Park acoustic barrier.

This is in addition to the issues related to the overall corridor (see Addendum C).

Related to Planning Documents:

For Approval:

Detailed Application Drawings: Engineering drawings, Construction access drawings

Landscape drawings

Development Aspirations:

The community supports the HGGT Vision and its Transport Strategy, and the overall objectives for pedestrian friendly and healthy communities. The emerging GANP (Policy AG8) states that new infrastructure should have minimal impact on existing communities and avoid creating severance. It also states (Policy EX1) that the impacts on existing communities should be adequately mitigated.

Concerns:

There is no strategy for the land acquisition required to secure the ESC and demonstrate it is deliverable. The NPG are not satisfied that the proposals are solely justified by the access needs of the development and that the proposed scheme and consequently the CPO is the best approach in the public interest to deliver social, environment and economic well-being.

The design proposals are heavily engineered and clearly not guided by principles of place-making or landscape (see also Addendum C). This results in a series of concerns and unanswered questions:

- The width, speed (40-50mph) and engineering make of the ESC are not fully explained and justified. Roundabouts are sized for major traffic loads, central ghost reservations intended to make travel at speed safe. The width of the bridge at Fiddlers Brook (26.7m wide bridge with a 20.8m carriageway) corresponds to a two lane carriageway width even if shown as a single lane.
 - The impact on existing communities (including High Wych) of the removal of the Heavy Load restrictions is not fully explored.
 - The overall arrangement results in Terlings Park being hidden behind the sound barriers and severed from the rest of Pye Corner and Gilston. The playground at Terlings will no longer be easily accessible for other residents of Gilston.
 - The layout requires land take from Local Open Space (including felling a c.100-year old oak) at Terlings Park and destruction of the designated Local Wildlife
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Area (both designations by the District Plan). Adequate mitigation for this loss has not been proposed.

- The proposals have great impact on the landscape of the Stort Valley and are great generators of noise. There is no confidence on the landscape, wildlife and pollution mitigation strategy associated with the proposals.
- The space of 'gravel and shade loving plants' under the Fiddlers Brook bridge (Landscape Drawing DR-L-5221) is approximately 30x60m, the size of a junior football pitch. The headroom under the bridge ranges from 2.5m to 3.5m: the height of a typical room. The resulting space is clearly unattractive and we believe is likely to become prone to antisocial behaviour. It will require artificial lighting 24/7 and cameras for surveillance; it seems irresponsible for the applicants to be creating such spaces.
- There are no proposals for the downgrade of Eastwick Road (so becoming a road to serve only Terlings as a result of the development): the road should be redesigned as a permeable surface. Given the likely low levels of traffic it is unlikely that segregated cycle routes (adding a further 5m of tarmac) would be necessary. A clear approach should be presented to ensure that the road does not become a parking place for the station. A 20 MPH home zone might be considered?
- There are no proposals for the downgrade of Pye Corner Eastwick Road (becoming a cul-de-sac as a result of the development): the road should be redesigned as a permeable surface, removing redundant engineering features and including it into the landscape proposals. The war memorial should be reset into the new context created by the development. Pedestrian and cycle provision should be made as part of the detailed application. A clear approach should be presented to ensure that the road does not become a target for informal parking.
- Terlings and Burnt Mill Lane provide an important cycle connection to the station. Upgrade of the routes and prevention of flooding should be included in the detailed application boundary because they are an essential component of access to the area. Commitment to delivery of the upgrades at first occupation of houses in V1 and V2 should be made.
- There is no clarity about the maintenance and adoption of the willow wall (sound barrier) and the almond shape space between Road 1 and downgraded Eastwick Road.
- There is no clarity of the construction impacts (site access, construction sites etc.)
- There seems no consideration of the consequential impacts car parking spilling over from the station into Pye Corner and Terlings given the planned improvements offering free and easy access to Harlow Town Station.
- Assessment of noise and air impacts have not been fully considered, particularly around moving the private vehicle main access to the development of 10,000 homes next to the Social Housing in Terlings Park. During the public consultation, it was clear that P4P and EHC have not considered this impact alongside the impacts of the ESC.

Proposal:

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1. Reject, or suspend approval of, the ESC Detailed Application pending the publication and consultation of a detailed A414 Strategy for Segment 14 in the context of the design of Sustainable Transport Corridors across Harlow.
 2. Demonstrate deliverability by confirming the funding allocation across the Garden Town and providing demonstration that the proposals are the best solution in the public interest to deliver social, environment and economic well-being – sufficient to justify CPO.
 3. Revise and extend the proposals to include design mitigation on Eastwick Road and upgrade of Burnt Mill Lane to demonstrate a landscape-led approach which optimises land take, pedestrian and cycle permeability, respect for existing vegetation and minimization of pollution (as also advocated in HCC's Landscape Report on the Planning Application).

Comprehensive Development and Integration with Village 7**Issue:**

A holistic approach is needed given that GA1 is a single allocation requiring a comprehensive, phased development across the whole of the site allocation. A clear framework that knits all development together (including Village 7 and existing settlements) is not provided for community facilities, social and cultural cohesion, green spaces network, footpaths and cycle routes and connectivity within the site and the outside world around it. The applicant states in the Village Addendum Document that there has been *continuous engagement* with Briggens Estate 1 Ltd to ensure the integration of Villages 1-6 with Village 7 but this is not reflected in the Parameter Plans or the other documents which have been submitted for approval. Limited evidence is provided as to how the two developers are working together to provide a comprehensive framework for development and infrastructure provision and how this is to be addressed in a consistent and integrated manner in the respective s106 agreements

Related to Planning Documents:

For approval:

PP4 shows a Sustainable Transport Corridor and green corridor between Villages 6 and 7 but no connections between the villages in terms of green infrastructure network, footpaths or cycle routes, inter-dependency and shared cultural or social facilities planned from the outset. Village 7 is outlined on the Parameter Plans and illustrative material but is not shown as part of a comprehensive development.

Supporting documents:

VDAR Appendix 5 provides a Technical Report prepared by Grimshaw Architects to address the issues. This is limited to an overlay of parameter plans submitted in support of each application to show physical interactions.

Development Aspirations:

Policy GA1 requires future development to be planned as a single allocation informed by local character and distinctiveness. A comprehensive plan for the whole Gilston Area is seen as key to preventing piecemeal development and controlling the form and character of new development.

GA1 is single allocation - not a development of 6 + 1 separate areas.

Concerns:

- The application does not provide the necessary clarity or confidence that the development of Villages 1-6 and Village 7 will be brought forward as a comprehensive properly and logically phased development.
- The Parameter Plans do not demonstrate how the relationship between Village 6 and 7 will be controlled.

The community does not have confidence that the overall area will be managed

effectively, coherently and in the interests of all current and future residents. Unless the two applications are considered together there is a real risk that decisions on villages 1-6 without the incorporation of the village 7 development will lead to disconnection and harm to the community.

Proposal:

1. The Parameter Plans should be amended to incorporate the details shown in Appendix 5 of the Village Development Addendum to show the integration of Villages 1-6 with Village 7 in respect of pedestrian and cycle routes and green infrastructure network.
2. Further clarification to be provided of how the developers will work together to ensure an integrated development and delivery of necessary infrastructure and mitigation. This should be referenced in the Governance documents and reflected in the s106 in terms of planning obligations. The Governance Strategy should relate to all 7 villages and not to the 6 covered by the outline planning application.
3. The requirement for a comprehensive and integrated approach to masterplanning and delivery of the GA1 allocation must be secured through the application of appropriate conditions and planning obligations. These must be applied consistently in the determination of the outline planning applications for both Villages 1-6 and Village 7.

Green Infrastructure Network and Adequate Separation between Villages

Issue:

Meaningful separation between villages and the backbone of a continuous green infrastructure network surrounding the villages is not identified in the Parameter Plans or Development Specification. The green corridors between villages (new and existing) are critical in providing a landscape setting, protecting and promoting biodiversity, accommodating pedestrian and cycle routes and a range of other functions. The case for a substantial release of Green Belt land has been made for a development of exceptional quality yet there seems to be little attempt to mitigate the Green Belt loss.

The Development Specification states that village corridors will be approximately 10-40m width. In some cases the VDA is shown right up to the boundaries of an existing settlement. It is unclear how far this has been tested to demonstrate that all the necessary functions can be achieved. The community believes these corridors will need to be wider than shown on the Parameter Plans to deliver the vision and objectives for the Gilston Area.

Related to Planning Documents:

For Approval
PP2 and PP3
Development Specification (DS)
Strategic Design Guide (SDG)

Supporting Documents:
Landscape and Green Infrastructure Report (Addendum)

Development Aspirations:

Policy GA1 clearly states that development in the Gilston Area should take the form of a series of distinct villages.

The Concept Framework sets a principle of buffers and 'meaningful separation' and the HGGT Vision clearly describes the villages as set within a continuous landscape.

Submission GANP (Policy AG2 and AG4) requires that a robust and permanent Green Infrastructure network is established and that the individuality and separation of villages in the Gilston Area is maintained.

Concerns:

- We remain concerned about the lack of clear landscape objectives, which are clearly set out within the Concept Framework, the HGGT Vision and Strategic Design Guide and the Charter SPD which contain landscape aims and objectives that should be taken into account even at this stage.
 - The VDAR indicates that all areas and zones shown on the Parameter Plans
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are to be intended as fixed. This is in contradiction with the DS which states that the Village Development Area (VDA) is submitted in outline to provide the *necessary flexibility* for the detailed design of the scheme through the preparation of Village Masterplans and a Strategic Masterplan and the subsequent submission of Reserved Matters Applications. The Development Specification (para 4.3.4) recognises that the corridors cannot be fixed at this outline stage stating- 'There is a commitment to providing a Village Corridor *in the general location* shown on the Parameter Plan'. This is contradicted in the DS itself where it states that the Parameter Plans provide a framework of control for the masterplanning process. The Parameter Plans do not provide sufficient justification for the proposals and it is inappropriate for details of the Green Infrastructure Network and corridors between villages to be fixed without further landscape and visual analysis at the masterplanning stage. HCC Landscape Officers are of the same opinion (Landscape Report, Section 2.3.2).

- The PPs and Strategic Design Guide (SDG) do not comply with the requirement of Policy GA1 and the Concept Framework (requiring distinct villages separated by meaningful landscape) and the Charter SPD. Section 1.4 of the SDG describes the Strategic Landscape Master Plan as following the Village Masterplans and applying to the 'spaces around and in between each village' implying that the village boundaries take precedence over the landscape. This is wrong. The detailed configuration of green corridors and green infrastructure cannot be defined as the 'resulting land' after village development. This is contrary to the requirement for a landscape led approach.
- The Strategic Green Corridors (PP3) are incidental, rather than strategic. In places they are equivalent to the width of an existing lane (for example along Gilston Lane), without any landscape buffers and therefore no certainty that the minimal width will be maintained if the lane carriageway needs widening as a result of the development.
- The connectivity east-west from the Airfield through Home Wood to Gilston Park and beyond is severed; continuous and uninterrupted development areas are proposed from V5 to V4 (PP3, PP5) – this is clearly contrary to the requirement of District Plan Policy GA1 and emerging NP AG2. This also creates a continuous linear frontage in a very open and prominent location.
- Development areas extend right to the edges of private properties in Eastwick and Gilston without any buffers, effectively relying on third parties to provide green buffer and separation.
- Strategic Green Corridors, already insufficient, are indicated to be also the location of allotments, G&T safeguarded development land and other uses (VDAR Land Use Budget Section). This will further limit their ability to accommodate strategic landscape and biodiversity functions.
- Community Parks are discontinuous as they include fenced off developed areas like the schools playing fields and Play Areas inside Ancient Woodland and the Local Green Spaces identified in the GANP.

Proposal:

1. The Strategic Design Guide and Development Specification should be modified prior to approval to:

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- a. Ensure that meaningful and continuous Green Infrastructure and Strategic Green Corridors and separation between villages is established as part of the Strategic Landscape Master Plan and that the boundary of the built area is only agreed once sufficient corridors, buffers and green spaces have been identified.
 - b. Avoid fixing the Village Developable Areas in the Parameter Plans in advance of a more detailed SLMP.
 - c. Make a clear commitment to meaningful minimum buffer widths that demonstrate settlements are clearly separated.
 - d. Confirm which types of activities are acceptable in each type of landscape and especially in the Strategic Green Corridors based on their visual impacts and requirement for fencing, lighting, biodiversity and access to the public.
 - e. Exclude inclusion of play spaces and allotments within the existing woodlands (for example within Home Wood in PP3 and Village 5 Land Use Budget in VDAR)
2. Flexibility along the 'village developable area' edge is vital to ensure that at the Masterplanning stages, the developable area boundary can be adjusted to reflect site conditions and tested as part of an iterative design process to ensure that the village development sits comfortably within its landscape and visual setting. This approach to flexibility is in line with Policy GA1, the Concept Framework, the HGGT Vision, the Charter SPD and the submission Gilston Area Neighbourhood Plan which promotes a landscape led approach to development.
 3. Parameter Plans should be amended to state: "Configuration of developable areas and green corridors subject to detailed design". Other proposals e.g.: removal of existing trees and hedgerows should also be 'indicative and subject to detailed design'.
 4. The Development Specification wording should be amended to state that the village developable area is flexible in order that its exact location and the configuration of the green corridors separating the villages can be determined at the masterplanning stages.
 5. The expanded narrative in the Development Specification should take precedence over the Parameter Plans.
 6. Alternatively, PP2 and PP3 should be amended to indicate clear separation between each village and between the future villages and the current communities as well as continuous green infrastructure in accordance with the Concept Framework and the key diagram agreed with the developers at the Examination of the GANP.

Treatment of Sensitive Sites (fields in front of St Mary's, to the west of Home Wood and south of Gilston Park House)**Issue:**

Some positive changes have been made to address heritage concerns and we are pleased to note the revised sensitive development areas around the scheduled monuments and St Mary's Church. However, there remains insufficient clarity about the extent of the controls put in place to safeguard heritage settings or very exposed and prominent locations. The OPA should make direct and enforceable commitment to the protection of these sensitive areas. The application is strangely silent about the effect of development on Hunsdon House, a Grade 1 listed building. While that is more directly affected by the Village 7 application it borders the part of the site owned by Places for People and this illustrates the risk of harm in considering the two applications separately.

Related to Planning Documents:

For Approval:

PP2, PP5, PP6

DS Sections 4.3, 4.6, 4.7 and Appendix 5

SDG Village 4 and Village 5 Principles

Supporting Documents:

Land Use Budget and Density Report (VADR) – illustrative

Development Aspirations:

These three sites are very important to the community: one provides the important heritage setting to Listed St. Mary's Church, while Home Wood is visible for miles across the open plateau of the Hunsdon Airfield and the setting of Gilston Park House is also sensitive. It would be preferable for these sites not to be developed, but if development should take place, it is essential that it is discrete and 'lost in the landscape'. It is also important that views from Hunsdon Airfield do not present a continuous built form spanning across several villages. The role of the site in between V5 and V4 is essential in breaking this frontage by creating a different, primarily unbuilt frontage.

- The District Plan does not enter into this detailed topic, but clearly requires that villages are separate and distinct (Policy GA1) and that heritage and its setting are protected.
- The CF clearly indicates that these are sensitive sites to be treated differently from the rest of the development.

The emerging GANP clearly indicates that these are very sensitive locations where development should be restricted and where Cherished Views are to be protected

Concerns:

The area referred to as Gilston Fields (V4, opposite St Mary's Church):

- PP5 identifies the whole area as Sensitive Development Area (SDA) and indicates that half of it is allocated for residential development. PP6 indicates that the 'Maximum Height' at this location could be 20m towards Home Wood. The VDAR Illustrative Density indicates an average of 26.4 dph (the lowest across the VD, but without any differentiation across V4 – so there is no guarantee of lower density at this location).
- Appendix 5 of the DS intends to specify the limitations of development implied by the SDA designation. However, the language is vague and does not represent adequate control. For example, it states that 'height restrictions *may* help to protect the heritage setting'; or that buildings *close* to the church should be restricted – this does not give any certainty as there is no definition of 'close' or of 'near' or what commitment the applicant is making when stating that controls 'may' or 'should' be in place. What is clear is that there is no firm implication for the SDA definition, and this could open up to the application of the PP 'maximum' allowed height and development extent, which are completely inappropriate.
- The SDG for V4 indicate a building line that is well north of St Mary's and does not encroach on Gilston Fields. This, if approved, is in conflict with the PP and DS.
- Para 3.8.2, main bullet 9 of the DS refers to *A cricket club will be provided within **Gilston Fields** and this will include a minimum of two senior community grass pitches provided with **club house** and ancillary facilities;* This, if approved, is incompatible with the commitment to the protection of these sensitive areas.

Area to the west of Home Wood, identified as an Education and Mixed Use Area and located in the open landscape of the Hunsdon Plateau:

- This area has always been described as a very low-density education (Secondary School) and sport facility, where the proportion of build form over open land was limited. No controls of any kind are in place to secure this outcome.
- In PP5 it is identified as part of V5 and as an Education and Mixed Use Zone: no different from the other village centres. DS Section 4.6.3 makes no differentiation and allows retail, leisure, office space and the full range of community facilities.
- Furthermore, homes appear to be proposed on its western frontage close to the power line (Land Use Budget section of VDAR) creating a linear built frontage, a barrier and continuous development linking V4 and V5.
- PP6, if approved, would allow 15-20m tall buildings in the majority of the area.
- Para 3.8.2, 1st bullet point of the DC states:
A leisure centre will be provided within the Education and Mixed Use Zone of Village 5.

This section includes 4-lane swimming pool, sports hall, etc. which will cause a **massive impact** on open green space and could generate considerable traffic. This, if approved, is incompatible with the commitment to the protection of these sensitive areas.

- Para 3.8.2, Main bullet point 5 states: *The Village 1 and Village 5 Education and*
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Mixed Use Zones will each accommodate one floodlit artificial grass pitch This, if approved, is incompatible with the commitment to the protection of these sensitive areas.

- It is noted that Historic England has raised concerns on heritage grounds, particularly about the road arrangement at Eastwick Hall Lane and the potential loss of non-designated heritage assets. We agree with Historic England that greater consideration should be given to the setting of the Sensitive Development Areas and recognition given that the definition on the Parameter Plans is not a hard and fast line.

Proposal:

The nature of these locations requires careful study, which can only be undertaken through a masterplan proposal where actual built form, heights and views can be determined. It will be therefore necessary, prior to approval, that:

- PP5 is modified to clearly identify a different nature of development at these two locations and differentiate between the sensitive area west of Home Wood and the other village centres (all currently Education and Mixed Use Areas).
- PP6 is rejected as inadequate to provide controls (see also Addendum I) and these sensitive sites should be clearly marked as locations where stricter controls are applied. The potential loss of non-designated heritage assets should not be shown on the Parameter Plans for approval and any decision regarding their loss should be made at the masterplanning stage.
- DS Section 4.7 and Appendix 5 is modified to clarify the commitment to develop buildings that have low density, low height, and are discrete individual elements within the landscape.

Development Heights and Built Form**Issue:**

The proposals are inadequate to provide control measures to ensure village quality and include requests for potentially inappropriate flexibility in heights, location and development quantities without justification, establishing development parameters which could undermine the role of the Strategic Landscape Master Plan and Village Master Plan processes. There is a real risk that these unjustified and generous maximum heights, density and boundaries will become the default 'built-to' parameters.

The appropriate distribution of heights needs to be tested through the masterplanning process based on a more detailed and rigorous process of landscape and visual analysis to ensure that the development sits comfortably with its landscape setting. There is an underlying assumption that a similar approach is suitable for each village but the ability of each village to accommodate heights is likely to be more varied dependent on topography and landscape character.

Related to Planning Documents:

For Approval:

PP5 Land Use and PP 6 Heights
Development Specification (Section 4.7)
Strategic Design Guide

Supporting Documents:

Land Use Budget and Density Report (VADR) – illustrative

Development Aspirations:

- District Plan Policy GA1 requires development to take the form of distinct villages of individual character. In other places, it also clearly refers to the requirement of designing in context.
 - The CF (pg. 102) establishes the principle of village character, drawing from the local character of Gilston, Eastwick and Hunsdon and other surrounding villages. It also indicates an average density of 33dph.
 - The HGGT Vision states that the characteristics of nearby villages should be used as design cues and a broad range of 25-55dph should be appropriate.
 - The emerging GANP gives a clear indication of what should be considered part of village character in Policy AG6 and in a supporting Appendix and proposes that this is defined as part of Village Masterplans.
-

Concerns:

The Parameter Plans and supporting information do not provide adequate controls to deliver development in the form of villages (Policy GA1 of Local Plan, Policy AG6 of the emerging GANP, HGGT Vision and Design Guide):

- Parameter Plan 6 (Heights) proposes to limit heights within the visual envelope of buildings placed in the most prominent location. The rationale is shown the VDAR: if GF+3 (i.e. 4 stories) are proposed in the most prominent location (top of the hill), all the buildings on lower ground remain roughly within that envelope even if in some cases 6 floors high. This approach is predicated on the acceptance that 4 floors are acceptable on higher ground, which is not explained nor justified. It also means that from the lower ground (from Harlow) a sea of roofs extending all the way up the hill is presented. This parametric approach may secure maximum development but it has nothing to do with good placemaking or village design and should be rejected.
- The Maximum Height Zone allows a 10-15% of all buildings to reach 5 floors. This parameter is not transparent nor justified. It is not explained by development requirements (necessary to deliver the required number of units) nor is it conducive to the creation of beautifully designed villages. Taller buildings should be exceptional and justified on their merit as part of a master plan.
- The Density Note of the VDAR Land Budget Section indicates average density across the villages of 39.1 dph, and a range of 70-130dph within the village centres. This density is in contradiction with all policy and guidance and it does not correspond to the delivery of villages or to village character (Policy GA1, principles of the CF and GANP). The Illustrative Residential Density image in the same section clearly identify urban built form (Cambridge, Basildon, London). No indicative design in which high density suitable to villages has been proposed.
- The Strategic Design Guide does not define 'Village Character' for the development. It only proposes in Principle 4 building with materials and openings (fenestration) taking inspiration from East Hertfordshire and Harlow. This is a major shortcoming, which does not help understand and justify why the height, density and built form proposed is in accordance with Policy.

Proposal:

The Outline Planning Application should not be approved in its current form without amendment or rejection of the Parameter Plans and Development Specification which pre-empt the study of the villages through a transparent masterplanning process.

Approving the proposed Parameter Plans and Development Specification would create a dangerous precedent and a drive towards building 'to the upper limit'.

The emerging GANP potentially offers a constructive way forward with Policy AG6, where the best possible balance between density, height and built boundaries is defined in the Village Masterplans in consultation with the local community.

It will be therefore important to consider the following:

1. It is premature to fix height parameters at the outline planning application stage. PP 6 should not be approved, and the principles and content of Development Specification Section 4.6 should be redrafted.
2. A commitment should be included in the Development Specification to investigate options and best balance between height, density and built-up areas in collaboration with the community as part of Village Masterplans (Policy AG6 of the submission GANP)
3. The Strategic Design Guide should be modified to reflect the applicant's understanding and commitment to village character and village development taking into account Policy GA1 and the principles set out in the Concept Framework and HGGT Vision and Design Guide.
4. Height and built form should be determined as part of the village masterplanning process following further detailed assessment.

Other Transport Issues**Issue:**

While the proposals for bus priority and bus accessibility for the existing and future communities has been improved, the community is not satisfied that adequate provision is made to ensure a 60% sustainable transport modal share.

Related to Planning Documents:

For Approval:

PP4, PP5

DS

SDG

Supporting Documents

TA Addendum

Development Aspirations:

The community supports District Plan Policy GA1's emphasis on sustainable transport, LTP4 and the HGGT Transport Strategy, which requires 60% of all movement to be made by sustainable modes. The emerging GANP (Policy TRA1) makes specific reference to sustainable and convenient access to Harlow town centre, Harlow Town station and Roydon Station. It also states (Policy TRA2) that a full network of PROW will be required, with consideration of the need for tranquillity of the Green Infrastructure network and the privacy / amenity of existing residents where PROW pass very close to existing homes.

Concerns:

We have been reassured by the Developers that they fully appreciate the requirements of a 60% shift to sustainable transport modes for the design of the villages and infrastructure. Many on and off site measures will be required and we are unconvinced that these are a guaranteed part of the proposal.

Off site measures not fully addressed (see also Addenda C, D, E):

- Access to Harlow Town Station by additional buses: 15 additional buses per hour are proposed to serve the development at peak. It is not clear how these will be accommodated in the station interchange and town centre bus station.
- There will be high numbers of pedestrians and cyclists commuting via the rail station. There is only commitment to a financial contribution towards upgrades at Harlow Town Stations and no firm plan for delivery of a northern entrance, increased cycle parking or pedestrian and cycle routes to the current entrance.
- There is no commitment to the upgrade of Burnt Mill Lane and to the Stort Valley routes, which are subject to flooding and are in a delicate environment, where lighting, safety and pressure of pedestrian footfall is a concern.

On site measures:

- The Sustainable Transport Corridor (STC) will be the only vehicular route

connecting across villages and beyond; it will also provide the only bus network across the sites and prioritise cycling and pedestrian movement. This approach of concentrating all modes of transport and all movements onto a single road will probably require large carriageways and engineering-led design rather than a landscape and place-led approach. The NPG raised the issue at the time of the Concept Framework and again in our representation to the first OPA. The issue has yet to be addressed.

- There is no comprehensive plan of PROW and cycle routes integrated with the Green Infrastructure Network. No adequate proposal for lighting that protects the quiet nature of the Green Infrastructure (see also HCC landscape Report for the Planning Application).
- There is no integrated plan for essential sustainable transport networks (PP4 only refers to 'leisure routes') linked to the destinations identified in PP5 and extending to destinations in V7.
- PP4 indicates existing leisure PROW weaving through the private properties of Gilston Park. These now serve a very small and local community and do not affect the privacy and amenity of residents. It is essential that the nature of these paths is retained as existing and alternative routes are provided.

Proposal:

1. Approval of PP4 and the detailed application for CSC should be made conditional to improved access to the stations (including off site) and upgrade of pedestrian and cycle links up to the two stations and the centre of Harlow.
2. The alignment and design of the STC remains indicative on PP4 and stronger commitment to pedestrian and cycle priority and suitable village character is made in DS (Section 4.5) and in the SDG (Principle 9).
3. Delivery of the north access to the station (rather than financial contribution to it) should be included. Alternatively, a clear demonstration that the north access is not required should be provided. (NOTE There is not even an indicative concept design showing how a new northern station entrance would be configured, even after all these years of work).
4. PP4 should be amended to ensure that a key network of essential pedestrian and cycle routes is identified (besides leisure routes) and that the amenity of existing private properties is protected from increased use in path use in close proximity. The DS should have a clear approach to limit lighting intrusion within the Green Infrastructure Network (see also HCC Landscape Report).

Industrial Uses / Business Park**Issue:**

The provision of employment space within the Gilston Area is an essential component of providing sustainable and mixed communities, provided the employment uses are designed and integrated in a way that makes a contribution to the character and life of the villages. Proposed amendments suggest a poorly integrated and prominently located employment area at the edge of Village 6 which would undermine the principle of villages in the landscape. The proposed location would encourage car use contrary to the ambition of promoting sustainable transport modes and the creation of sustainable communities.

Related to Planning Documents:

For Approval:

PP5

Development Specification

Development Aspirations:

District Plan Policy GA1 V(q) states that development in the Gilston Area is expected to deliver employment areas of around 5ha within visible and accessible locations which provide opportunities to promote self-containment and sustainability. The supporting text states that this will take the form of a business park or distributed across the village centres having regard to Garden City Principles. The inclusion of reference to a business park was added as a late modification to Policy GA1 and is not reflected in the Concept Framework or HGGT Vision which anticipates provision for employment uses in village centres. Policy ED1 states that the provision of new employment uses will be supported in principle where they are in a suitable location and access can be achieved by a choice of sustainable transport and do not conflict with other policies.

The focus of the HGGT is primarily on growth and investment in the Harlow Enterprise Zones at London Road and Temple Fields. In the Gilston Area, the Garden Town Vision identifies the village centres as the locations for investment and innovation with the potential for new employment typologies. The District Plan recognises that residents will be able to access more substantial employment opportunities within Harlow, including the Enterprise Zone.

The Draft Harlow and Gilston Garden Town Employment Commission gives consideration to employment land and premises in the Gilston Area as part of a comprehensive economic and employment strategy for the Garden Town. It suggests employment development should be primarily focussed around village centres and in locations with better access to the sustainable transport network.

Submission GANP Policy BU3 encourages employment uses in village centres as part of mixed-use areas. Proposals for employment development outside village centres will be required to demonstrate compliance with a range of criteria relating to location, landscape setting, access by walking, cycling and public transport and

consistency with the overall employment strategy for the Garden Town.

Concerns:

- No justification is provided for the selection of the area to the south of Village 6 for employment use and no guidance is provided on how this will be brought forward as a mixed use development. We are concerned this would be brought forward as a large free-standing business park or distribution facilities and that this would create a virtually self-contained employment space, car dependent and adjoining but not integrated with the villages.
- We do not consider the proposed V6 employment area accords with the vision and objectives for the Gilston Area as set out in the Concept Framework and HGGT Vision. This type and scale of development would have better synergies as part of the Harlow Enterprise Zones which are a focus for regeneration and investment by the HGGT. This is evidenced in the Employment Land Review prepared by Savills in support of the outline planning application for Village 7.
- A conventional business park at the fringes of Village 6 served by the A414 will inevitably be a car-based development which would undermine the ambition to reduce the need to travel and promote sustainable travel modes. It would also present an urban fringe type of frontage to Village 6 and make limited contributions to community life. This approach is contrary to good practice set out in the TCPA publication Understanding Garden Villages (January 2018).
- The suggested allocation on a green space on the Eastwick Slopes, separating Village 6 from the A414, and an important lateral buffer between Eastwick and Village 7 also immediately overlooks, and is visible from, the Stort Valley. For these reasons it is environmentally unacceptable and contrary to other policies within the Gilston area.
- The additional signalised junction on the A414 will affect all traffic and the access road requires very extensive land cutting that seriously compromise the setting of the development and views from the Stort Valley immediately to the south. .
- Employment development should be planned as an integral part of the Village Masterplans to enrich the life of village centres and provide a range of employment spaces targeting the local community and reducing the need to travel.

Proposal:

1. The VDAR (para 2.5) acknowledges that the final decision on the precise quantum and distribution of employment floorspace will be determined at a later stage following completion of a Needs Assessment. The identification of a residential/employment/residential area on the edge of Village 6 in Parameter Plan 5 is therefore considered to be premature and we are concerned that it will be treated as a fix and will constrain the masterplanning process following completion of the Needs Assessment.

2. The employment notation should be removed from PP5. The key on Parameter Plan 5 does not include Village Centres. This should be added and should include reference to employment, retail and community uses in the Village Centres.

3. The Development Specification (para 3.3.5) should be amended to exclude reference to the zone to the south of Village 6 on PP5. The text should reflect the agreed vision and objectives for the Gilston Area and state that employment uses will be encouraged in the Village Centres or may be considered in suitable locations with good access to the sustainable transport network. Exact distribution will be determined as part of the masterplanning process following completion of the Needs Assessment and further technical analysis.

Provision for Travellers**Issue:**

The allocation of land for gypsies and travellers is a very sensitive matter. This has been introduced at a very late stage of the outline planning application process and has not allowed for adequate consideration to be given to how this will be successfully integrated into the wider Gilston Area. It appears that the safeguarded sites have been included as an afterthought. Therefore, the identified sites do not appear to have been the subject of detailed assessment or scrutiny: one is located on the margin of the sites and the second within part of the green infrastructure network designed to be retained, in perpetuity, as green space. We are concerned that the proposals will be treated as fixed and this will reduce the possibility to address the matter sensitively and with coherence.

Related to Planning Documents:

For Approval:

PP5

Development Specification

Development Aspirations:

District Plan Policy GA1 identifies the requirement for the provision of two serviced sites to meet longer term needs beyond the plan period comprising a site which should deliver 15 plots for gypsies and travellers and a site with 8 plots for Travelling Showpeople.

This requirement should take account of Submission GANP Policy AG2 and Policy AG3 aiming at establishing a permanent green infrastructure network and providing an attractive countryside setting for the new and existing villages.

Concerns:

- The proposals have been added to the outline planning application in response to a request from East Herts Council. There is no evidence that an informed assessment has been undertaken. No design or location criteria are offered in the Development Specification or SDG.

An analysis of options does not appear to have been submitted, and the Landscape and Visual Impact Assessment has not been updated to address the identified sites. This analysis is required to demonstrate the relative merits of each option and ensure that they will not result in any unacceptable harm to landscape character and visual amenity

- The development of serviced sites for gypsies and travellers outside of Village boundaries is contrary to the objective of a green infrastructure network, retained in perpetuity, around villages. Development of serviced sites should be contained within the Village Developable Areas and should not be considered a suitable use within the landscape buffers or green corridors.

There is concern for the potential adverse landscape and visual effects of each site. The site to the south of V6 is located within a green corridor, which was identified to provide an important buffer between V6 and the A414, and laterally

between Eastwick and Village 7, overlooking and visible from the Stort Valley; and the site to the north of V3 goes beyond the site boundary and the logical development limit of Golden Grove into currently open countryside.

- We are very concerned about the implications of safeguarding land without a more detailed assessment particularly given that the sites are required to meet longer-term needs beyond the plan period. Any longer-term needs should properly be assessed on a District wide basis and consider a range of site options; such an analysis has not been undertaken by EHC. Provision of this nature needs to be carefully planned and the exact location of the proposed pitches should be determined at the village masterplanning stage.
- Insufficient assessment has been undertaken to justify the safeguarding of sites at the outline planning stage.

Proposal:

1. PP5 should be amended and the proposed safeguarding zones for gypsies and travellers sites should be removed.
2. The Development Specification (para 3.3.5) should be revised to reflect the changes to PP5. A statement should be included in para 3.3.6 to reiterate that the location of the sites will be identified at the masterplan stage and to include design criteria for safeguarded sites. This should include a requirement to minimise impact on the landscape character and setting of villages and the loss of green space outside Village Developable Areas.
3. The location and size of safeguarded sites should be defined as part of the masterplanning process, assuming any analysis across the District shows there to be a need post 2033.

Biodiversity Net Gain**Issue:**

The development will impact on areas of ecological importance through the loss of vegetation and habitat as a result of construction activities and during the operational phase through recreation or urban disturbance effects such as noise or increased lighting. The Environmental Statement states that measures outlined in the Biodiversity Strategy and other planning documents will help ensure that the development delivers the applicant's commitment to deliver a minimum of 10% net biodiversity gain. However, there continues to be a lack of clarity about when / as part of which work stage proposals will be agreed and implemented.

Related to Planning Documents:

For Approval:

Development Specification (3.16 Biodiversity Principles and Appendix 6 Sustainability Strategy commitments)
Strategic Design Guide (Strategic Principle 6iii)

Supporting information

Environmental Statement (Outline Ecological Management Plan)

Village Development Addendum Report (VDAR):

- Delivery Statement (Appendix 8)
- Draft Infrastructure Triggers (Appendix 11)

Development Aspirations:

District Plan Policy GA1 (III) states that development will be required to enhance the natural landscape providing a comprehensive green infrastructure network and net biodiversity gains.

Submission GANP Policy AG2 Creating a Connected Green Infrastructure Network seeks to ensure development retains and where possible enhances areas of ecological importance.

Concerns:

- It will be important to protect existing wildlife sites and biodiversity and retain wildlife connectivity across the wider area as the sites are developed. The government is to introduce a mandatory requirement for development to deliver biodiversity net gain of 10% at least and the development offers potential to achieve this in a number of ways for example, through the creation of biodiversity corridors between villages, species rich planted areas and woodland, and the restoration and enhancement of rivers and their corridors.
- Based on the information provided in support of the outline planning application, we simply do not know how the biodiversity benefits will be achieved. This is of significant concern given the extent of green belt land to be lost to development.
- There is concern that the applicant's Environmental studies are out of date, e.g. in the Stort Valley and fail to reflect current habitats and wildlife, e.g. presence of water voles and otters.

-
- The draft infrastructure triggers give rise to concerns regarding the timing of essential landscape works. We are particularly concerned about the late delivery of the key strategic parklands Hunsdon Airfield Park and Eastwick Wood Park so late in the delivery programme. These areas are vital for the delivery of important landscape and visual mitigation measures such as offsetting the impacts of increased recreational pressure upon the character, quality, and visual amenity and biodiversity of the Stort Valley.

We would wish to see the timescale for landscape enhancement to be brought forward including a requirement for 'early wins' in the form of advance planting and woodland management. The requirement for biodiversity net gain should be stipulated in the planning obligations and appropriate planning conditions.

If specimen mature trees are to be felled to facilitate this development there needs to be a proper assessment of their qualities and ways of addressing such a loss. There is no evidence of this approach, for example, the detailed road application requires a c.100 year old oak tree to be acquired under CPO powers and felled without a proper case being made for such a loss.

Proposal:

1. The strategy commitments listed in the Development Specification Appendix 6, should be amended to include reference to habitat 'creation' in addition to habitat enhancement to mitigate adverse effects on biodiversity, landscape character and views. For example, it is proposed to create significant new woodland in Eastwick Wood Park, as confirmed within the Landscape and Visual Impact Assessment.
 2. The wording of Section 3.16 of the Development Specification should be strengthened to include a clear commitment to the delivery of net biodiversity gain and details of how this will be delivered. The requirements for the masterplanning process need to be clearly specified.
 3. The Biodiversity Principles need to be translated into a clear strategy for the delivery of net biodiversity gains and this should be reflected in the planning conditions and planning obligations.
 4. The proposed Infrastructure Triggers must be reviewed prior to finalisation of the HoTs of the s106 agreement to ensure funding and delivery is secured for the early implementation of landscaping, woodland management and habitat enhancement and creation to secure net biodiversity gains and to mitigate the impacts of development.
 5. Reference to the Biodiversity Net Gain Target in the Strategic Design Guide (Strategic Principle 6.iii Landscape and Green Infrastructure) requires amplification and should be cross referenced to the Biodiversity Principles in the Development Specification.
 6. A new approach to managing the village buffer areas and land not to be developed needs to be put in place now working with the community, as anticipated within Policy GA1, to secure biodiversity net gains. This should not be put on the 'back burner' until the majority of the housing has been built as the developers seek.
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LIST OF ABBREVIATIONS

CF	Concept Framework
CSC	Central Stort Crossing
DS	Development Specification
EHC	East Herts District Council
ESC	Eastern Stort Crossing
GANP	Gilston Area Neighbourhood Plan
GI	Green Infrastructure
GT&TSP	Gypsy, Traveller & Travelling Showpeople
PP	Parameter Plan
PROW	Public Rights of Way
SDG	Strategic Design Guide
SLMP	Strategic Landscape Masterplan
STC	Sustainable Transport Corridor
V	Village
VDA	Village Developable Area
VDAR	Village Development Addendum Report
VMP	Village Masterplan

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East Herts Council
Wallfields,
Pegs Lane
Hertford SG13 8EQ

SENT BY EMAIL
FOR THE ATTENTION OF ADAM HALFORD

1 November 2019

Dear Sir,

Formal objection to highway proposals for Gilston Estate OPA and detailed highway applications made by Places for People - modification to original representation by the Hunsdon Eastwick and Gilston Neighbourhood Plan Group (HEGNPG)

We refer to our letters of representations dated 9th August 2019 covering all three planning applications made by Places for People in respect of their Gilston proposals.

Since we made our representations we have commissioned independent professional highways advice. We have already recorded our strong objections to the proposal to realign the A414 through the middle of the existing Pye Corner residential neighbourhood from its existing route, one through a commercial area.

We attach our consultants summary presentation. Their work, we believe demonstrates; -

1. The realignment of the A414 through the residential areas of Pye Corner and into Harlow, via a new 'Eastern Crossing', is not merited by the Gilston scheme proposals. Both HCC and ECC, as the strategic highway authorities, have told us that this proposal is a 'developer led proposal' and that they have not made any assessments of the options or needs for a proposal diverting traffic from the A414 existing alignment. On this basis that the proposal is not being promoted by the highway authorities and is not needed by the scheme

we believe it is without merit, so should be rejected especially given the harm it causes to Pye Corner residents. HCC have consulted on the strategy for the A414 but not published the outcomes of that work; it is not for the Gilston project address any emerging needs for this road. Even if there was such a HCC led proposal that would need to be supported by a balanced option analysis and environmental assessment; we assume starting with an assessment of improvements to the A414's existing alignment? The reality is that HCC have assured us that they have done no such work so we believe the developers should be directed to manage the impacts of their proposals and not creating division of an existing residential community by driving a major road through the middle of it.

2. The design of the roads within the detailed road applications appear to be designed to cope with traffic generated on the assumption that existing levels of car usage will be maintained. The transport policy obligation we understand the developers are expected to achieve is to deliver a sustainable transport modal shift to 60% of journeys being by sustainable means of transport (so to walking/cycling/bus). In our view the roads proposed fail as they appear to favour car users and offer limited priority to sustainable modes as evidenced by: -

- The lack of a meaningful option appraisals, despite our requests over many years. The attached presentation, we commissioned demonstrates a range of options which we believe have not been considered before.
- The lack of clarity from the developers on what sustainable transport provision they will make to serve the new communities, from the outset of the development, as without the provision of sustainable transport alternatives from the start new residents will expect private cars to be the dominant means of transport.
- The proposal for a pedestrian and cyclist bridge at the Eastwick Roundabout seems only to be needed because of the unnecessary diversion of the A414 traffic to the Eastern crossing; if the existing traffic flow was maintained then a high quality at grade crossing can be achieved. This would support, and encourage, the shift of sustainable modes of transport; we do not believe a elevated cyclist and pedestrian bridge link does that.
- The lack of proposals for cycle and walkways connecting to Harlow Town Station with sufficient capacity and attractiveness to make it a desirable route to the station as a core public transport interface, including the bus interchange. These are needed by the proposals and their absence seems a fundamental flaw which must be addressed.
- The lack of any detail on the proposed new northern entrance to Harlow Town Station coupled with no developer commitment to fund it, and or, support from Network Rail, after apparently years of discussion.

- The lack of any facilities at the station to cater for the anticipated increase in the number of users, especially cyclists, alongside a better functioning public transport interchange at the station.

In conclusion we believe that, if the scheme, as anticipated within the East Herts Local Plan, is to progress there needs to be a proper option review of the highway proposals put forward by the developers, as a Group we will actively engage with such work. In advance of this work being done the current applications should be withdrawn.

Yours faithfully,

Anthony Bickmore, Chairman, HEGNPG

Cc Cllr Eric Buckmaster EHC and HCC
HGGTB

Gilston Park Estate

Traffic Intervention Options



Gilston Park Estate

Site Context

60% sustainable travel mode share target

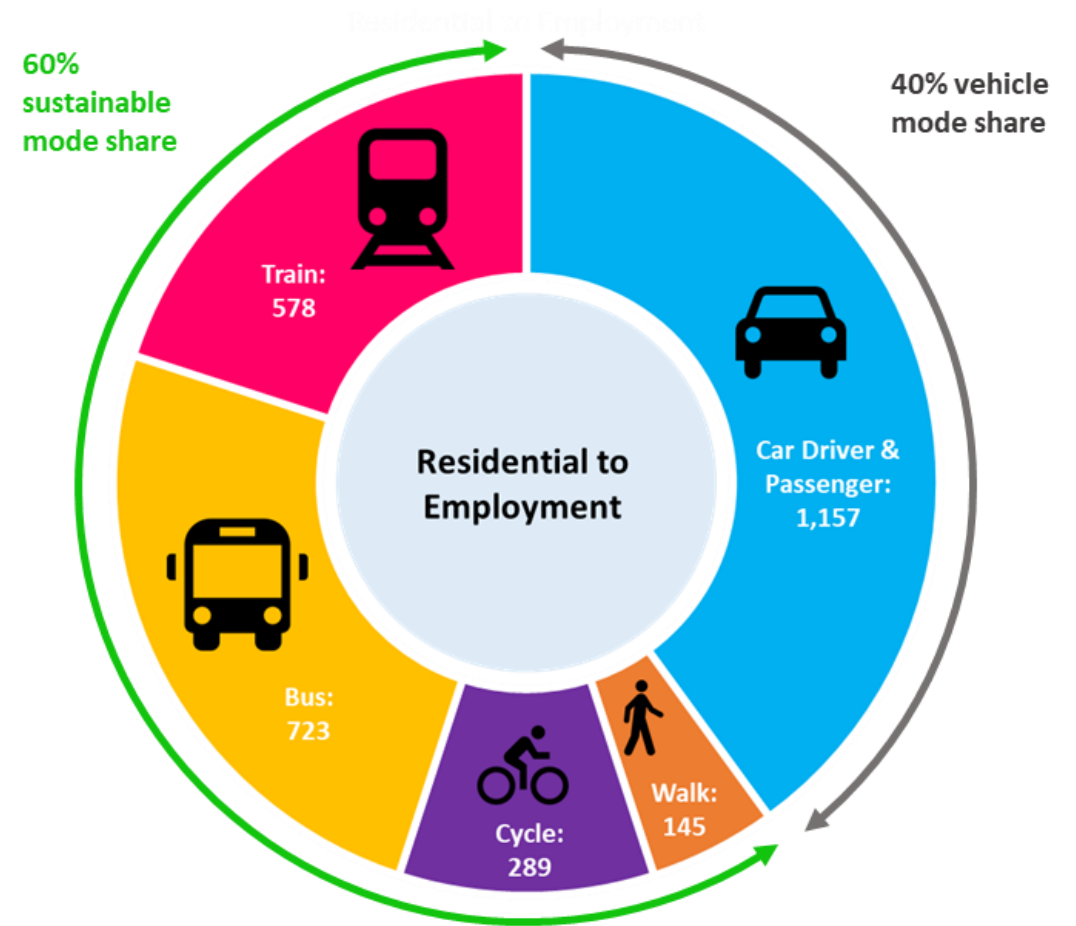
- GPE planning application is predicated on achieving a 60% sustainable travel mode share target.
- Development proposals should therefore focus as much, if not more, effort on sustainable travel as it does highways.
- This requires a switch of 1,200 car trips [based on existing Vectos forecasts base assumption] in the peak hour.

Ambitious but not entirely unachievable.....

How is this done.....

1. Prioritise sustainable travel choices (walking, cycling and public transport) both within the village and to the outside.
2. Discourage the use of the car through design and operation.
3. Agree a strategy for what happens should then 60% sustainable mode share not be achieved.

AM Peak Hour – 60% Sustainable Travel Mode Share (based on Vectos trip generation forecasts)

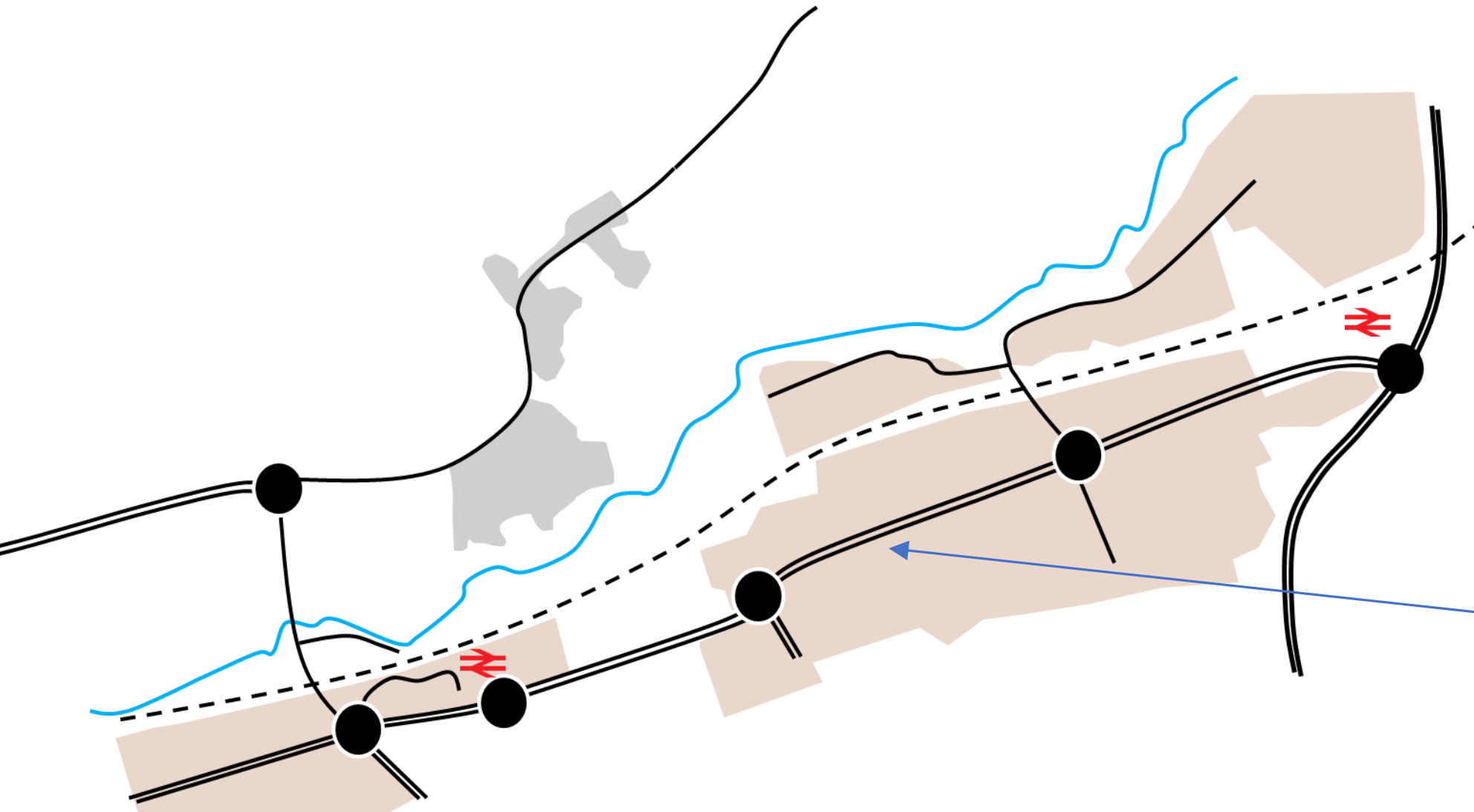


Gilston Park Estate

Existing Road Network

Eastwick Road currently provides a link between the A414 (Eastwick Road) to the northwest of Harlow and Sawbridgeworth via Terling's Park, Pye Corner and High Wych.

Traffic travelling through Harlow do so along Edinburgh Way which runs to the north of the town centre on a similar alignment to the railway.

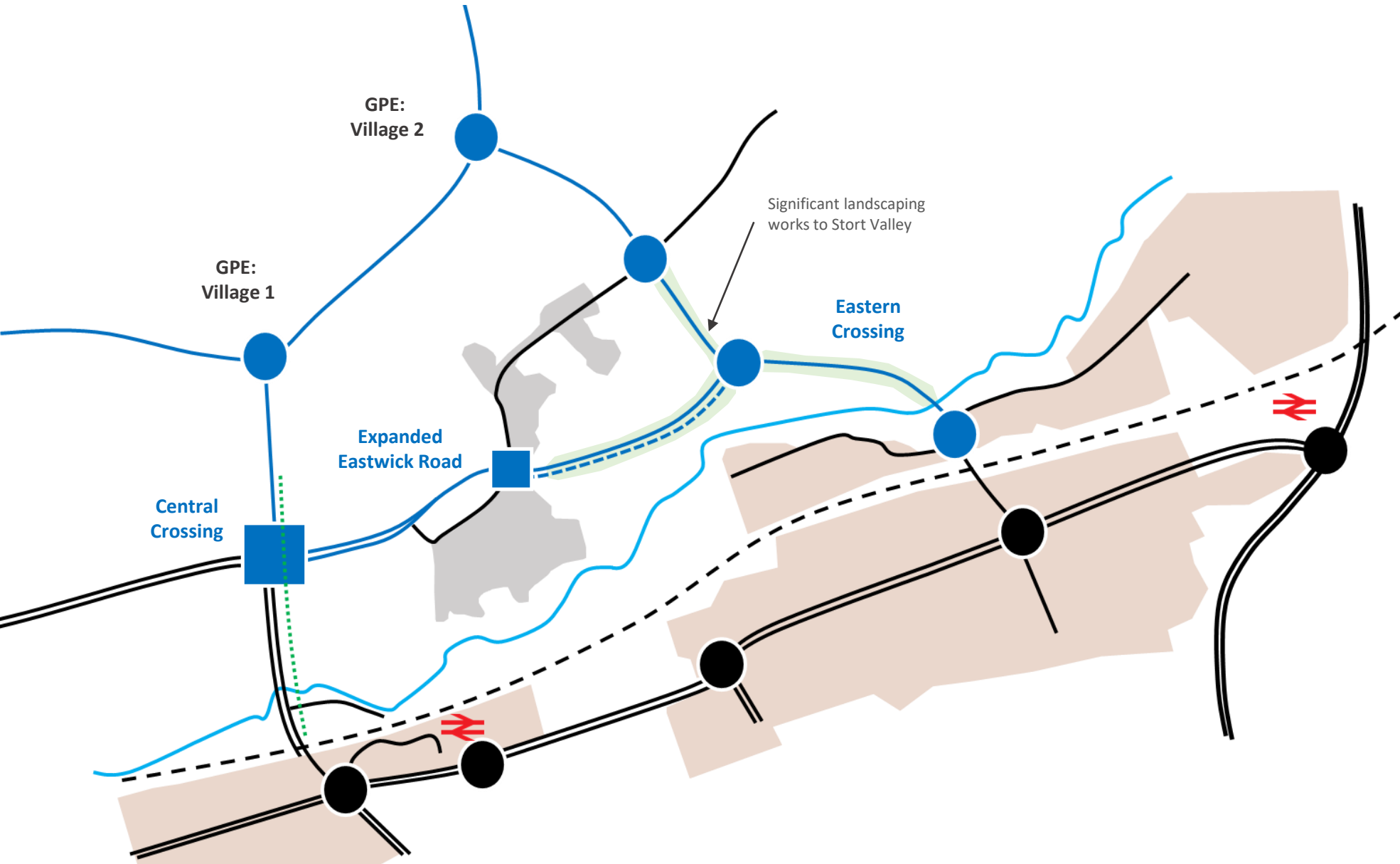


Edinburgh Way 'dualling' scheme currently under construction between Cambridge Road and River Way junctions.

https://www.essexhighways.org/uploads/Highway-Schemes/Major-Schemes/Edinburgh-Way-Harlow/A414_Notice%20Board_June19.pdf

Gilston Park Estate

Detailed Application Proposals (Hybrid Approach)



Detailed GPE application proposes the following highway infrastructure:

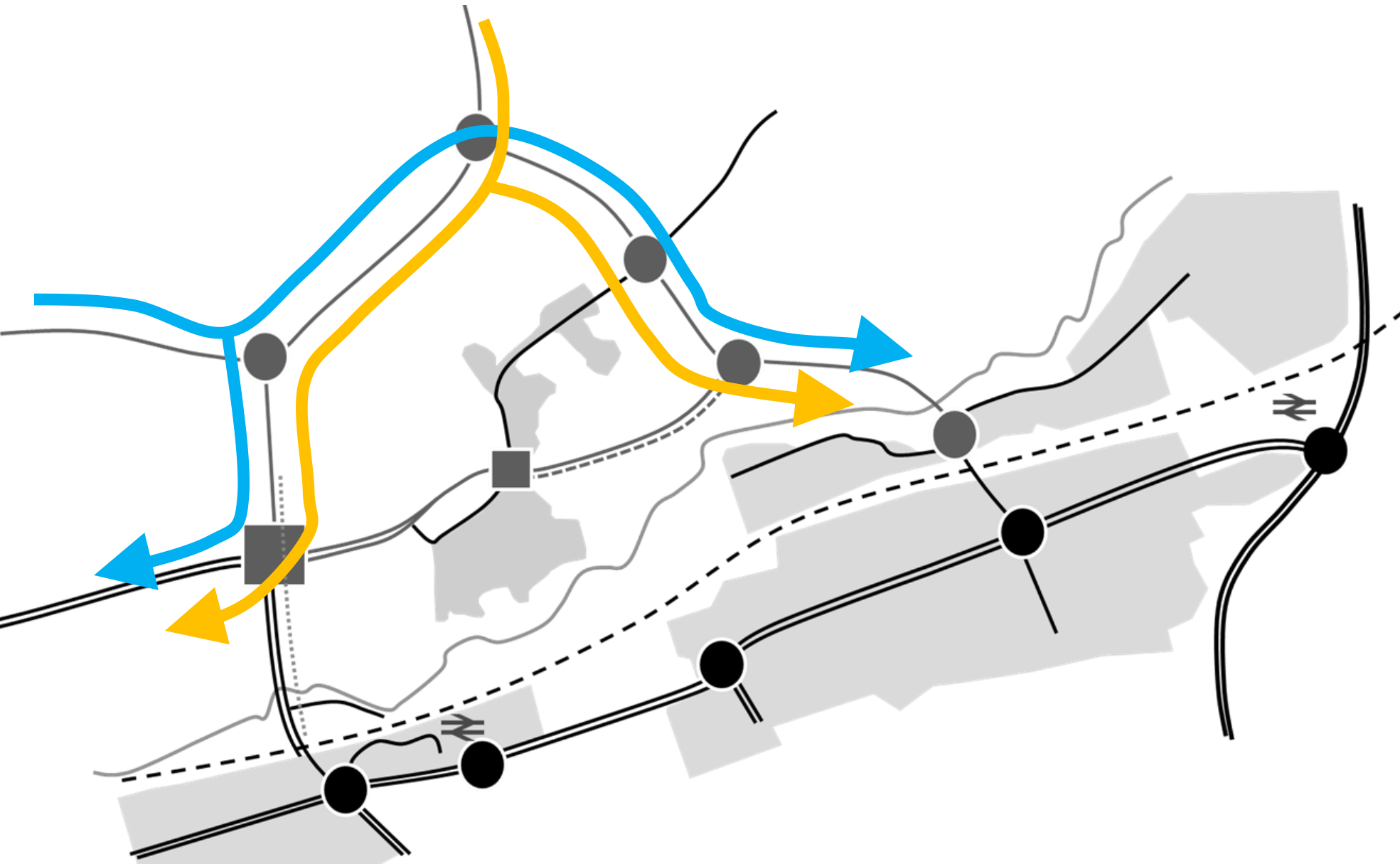
- **Central Crossing:** upgrades to Fifth Avenue with a new large signalised junction with the Eastwick Road providing access to Village 1.
- **Eastern Crossing:** a new junction on River Way providing access to Village.
- **Expanded Eastwick Road:** linking the Eastern and Central Crossing with safeguarded areas for future dualling to increase capacity further.

Key:

- Existing Road
- Proposed Road
- Roundabout
- Signalised Junction
- Cycle Route

Gilston Park Estate

Detailed Application Proposals



Expanded Eastwick Road fulfils few functions for residents of the GPE site.

Any new resident within GPA will be able to reasonably access the wider road network to either the east or west of Harlow via the road network provided within the GPE site without the use of the Expanded Eastwick Road.

Key:

Existing Road

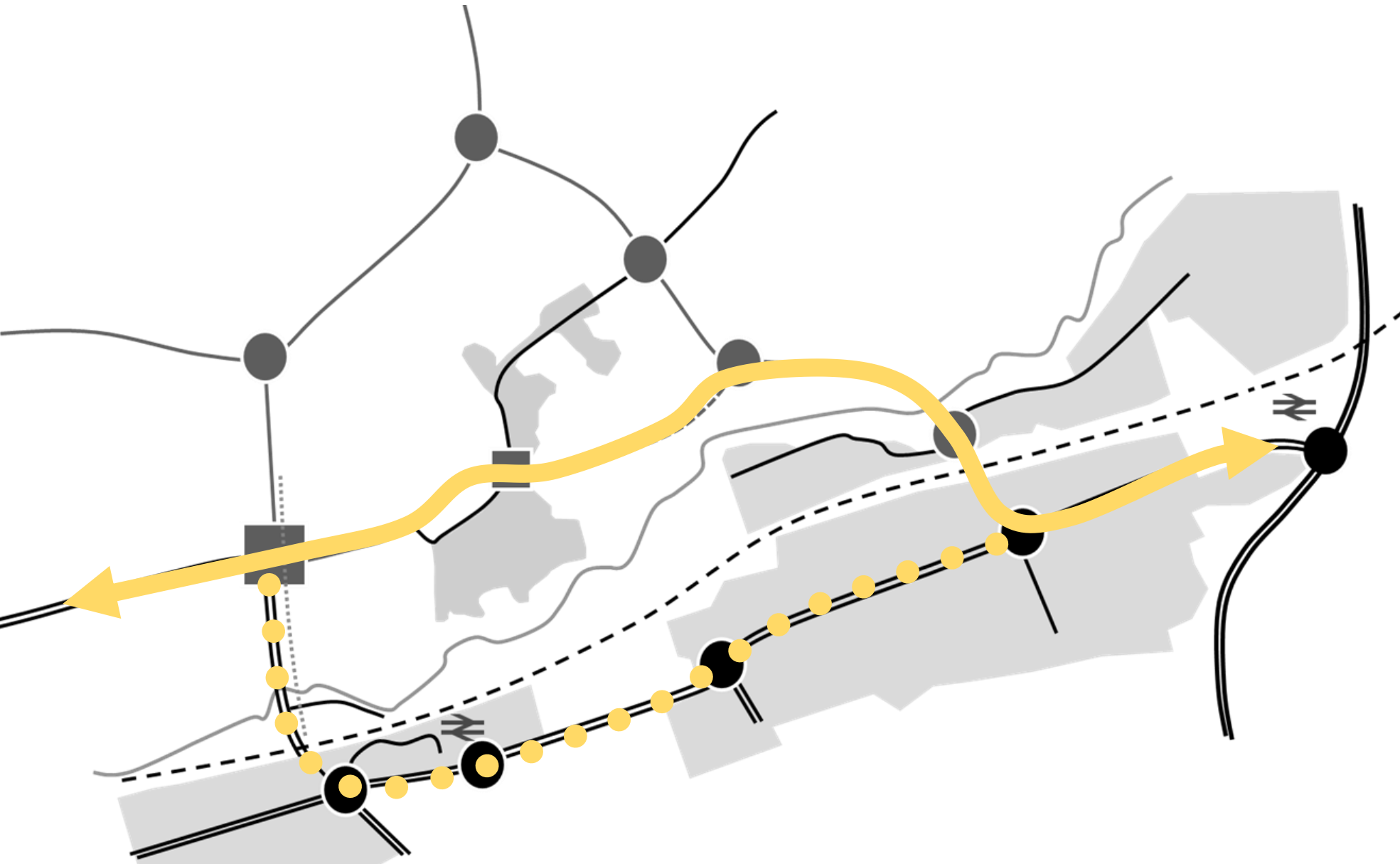
Proposed Road

● Roundabout

■ Signalised Junction

Gilston Park Estate

Detailed Application Proposals



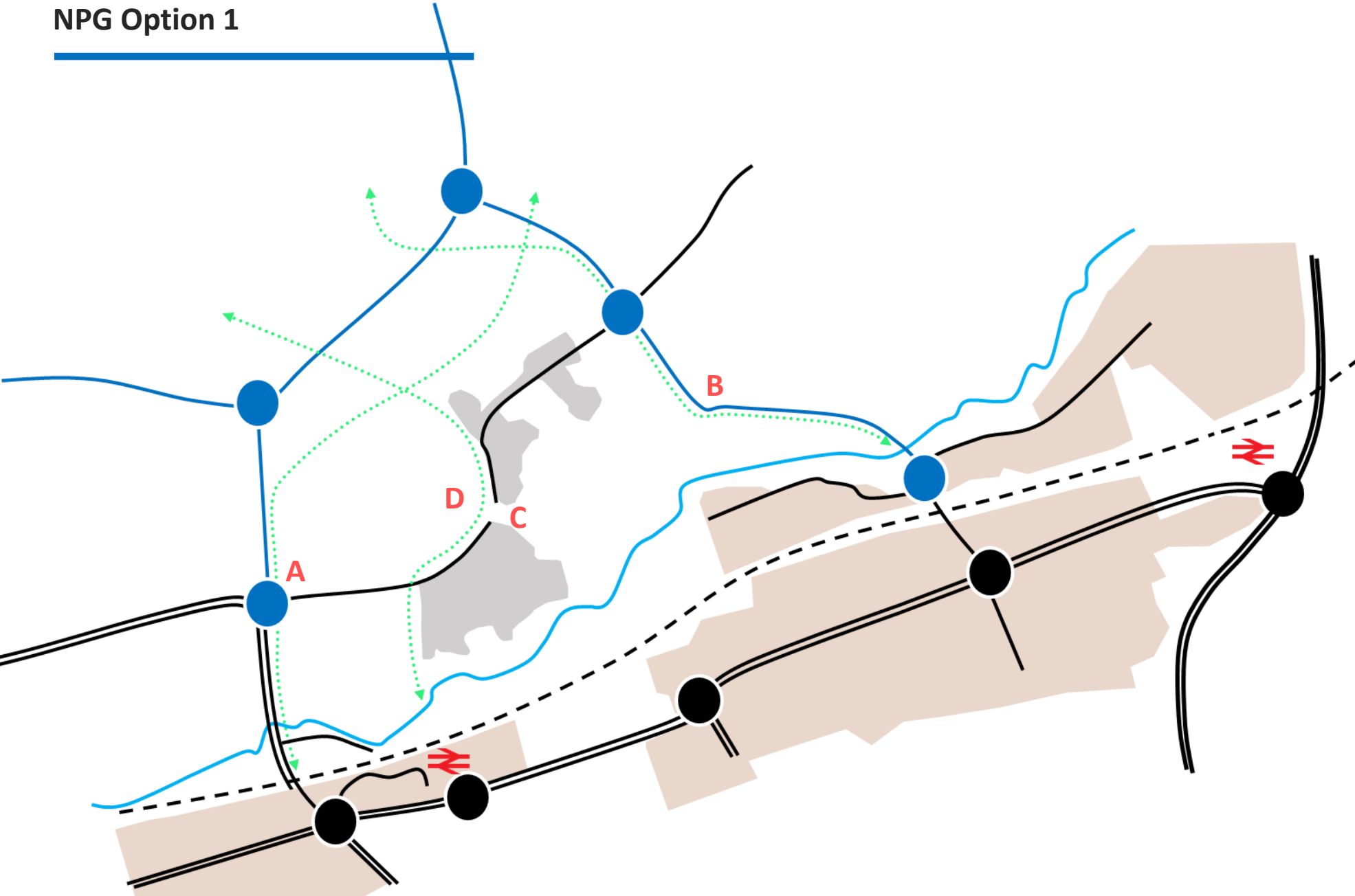
The Expanded Eastwick Road is therefore believed to primarily become a 'relief' road for existing trips travelling through Harlow with few localised functions.

The NPG therefore does not believe that the Expanded Eastwick Road is an absolute requirement of the GPE development.

We have therefore explored how the existing Eastwick Road could be treated differently to reduce the impact of the scheme on Terling's Park and Pye Corner.

Gilston Park Estate

NPG Option 1



Option 1 assumes that the existing Eastwick Road through Pye Corner and Terlings Park is dissected at Fiddlers Brook.

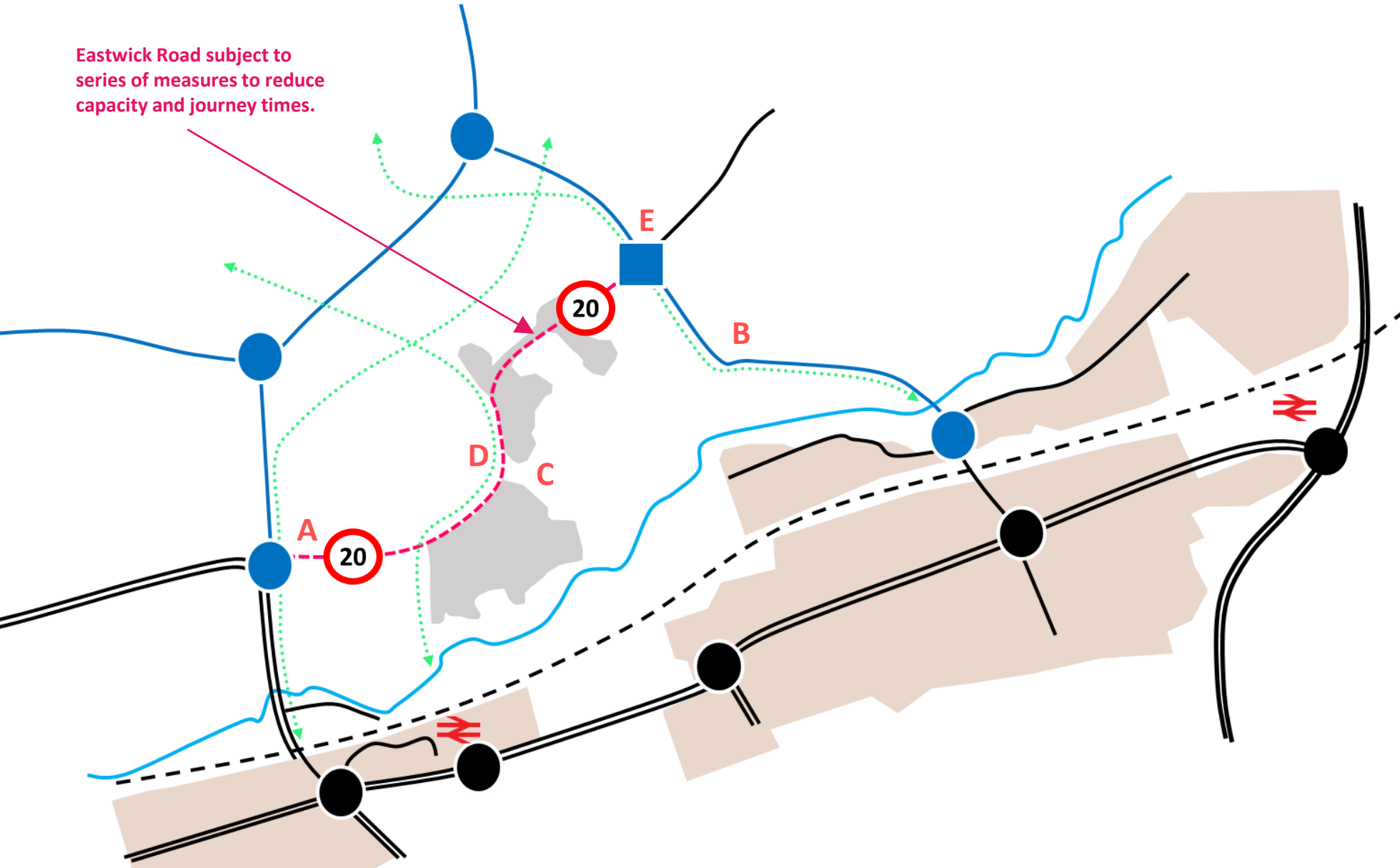
This would significantly reduce traffic on Eastwick Road re-routing existing through traffic and creating a much improved environment for pedestrians and cyclists between GPE and the Harlow Station.

- A** Reduced Eastwick Road junction enables removal of pedestrian/cycle bridge.
- B** Removal of Expanded Eastwick Road eliminates requirement for a roundabout on the Eastern Crossing.
- C** Fiddlers Brook bridge and signalised junction removed.
- D** Amendments to Eastwick Road results in lower traffic volumes creating significant opportunities for pedestrian and cycle links between GPE and Harlow.

Gilston Park Estate

NPG Option 2

Eastwick Road subject to series of measures to reduce capacity and journey times.

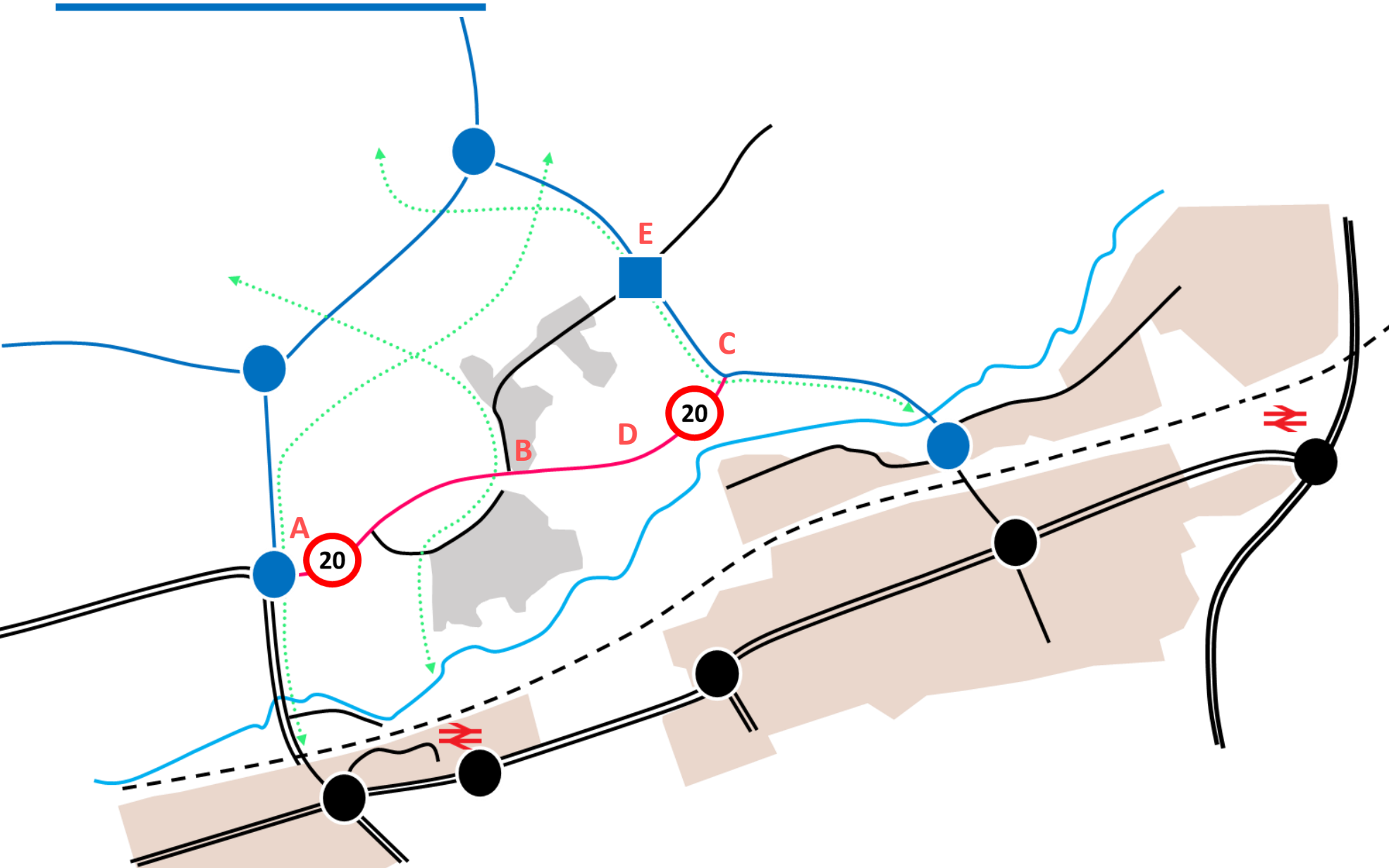


Option 2 assumes Eastwick Road exists on its current alignment but is subject to significant traffic calming to reduce traffic volume through Pye Corner and Terling's Park.

- A** Reduced Eastwick Road junction enables removal of pedestrian/cycle bridge.
- B** Removal of Expanded Eastwick Road eliminates requirement for a roundabout on the Eastern Crossing.
- C** Fiddlers Brook bridge and signalised junction removed
- D** Local traffic is still able to make through movements along Eastwick Road with traffic calming reducing the likelihood of rat-running and no requirement for a bridge.
- E** Signalised junction at to the east of Pye Corner to restrict movements into Eastwick Road.

Gilston Park Estate

NPG Option 3



Option 3 assumes Eastwick Road is diverted in a similar manner to the GPE proposals but with much reduced scale thereby reducing the overall impact on residents of Terlings Park and Pye Corner.

- A** Reduced Eastwick Road junction enables removal of pedestrian/cycle bridge.
- B** Priority Junctions on Eastwick Road remove the need for large signalised crossing and bridge at Fiddlers Brook.
- C** Priority 'left turn only' junction on to Eastern Crossing reduces likelihood of significant rat-running whilst maintaining local trips to High Wych.
- D** Reduced landscape impact in comparison to GPE Detailed Application.
- E** Signalised junction at to the east of Pye Corner to restrict movements into Eastwick Road.

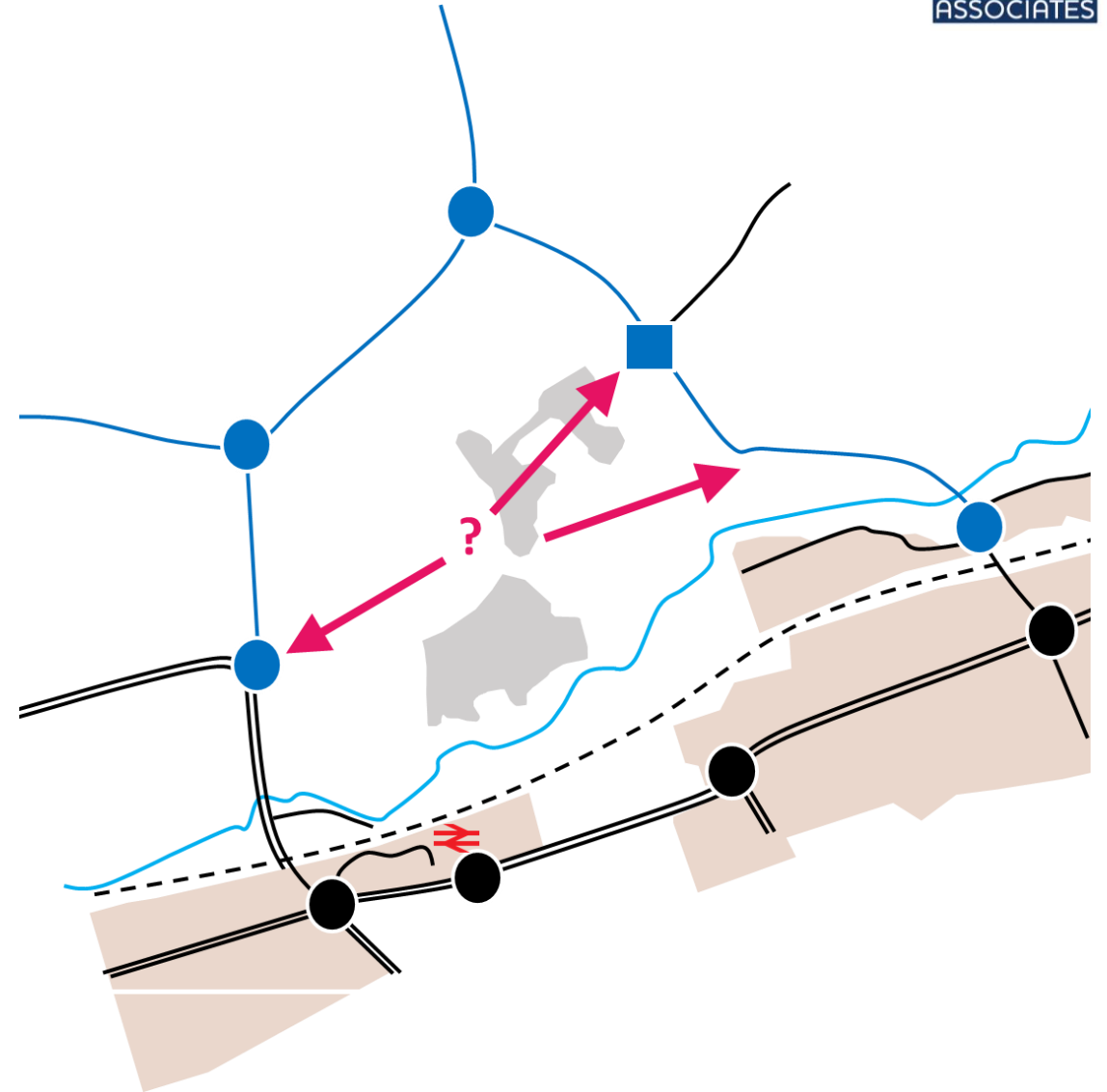
Summary

Overview

Access between the Eastern Crossing and Central Crossing's is not considered to be component driven by the need for the GPE development. By not providing the Expanded Eastwick Road the Eastern and Central Crossing junctions can in turn become smaller reducing the overall impact of the schemes in the Stort Valley.

In summary:

- HCC and ECC have confirmed that the GPE development option is not driven by any County wide improvements and that it is a 'developers proposal'
- The benefits of the realigned and Expanded Eastwick Road between the Central and Eastern Crossings are not demonstrated and risk undermining the sustainable travel target of 60%.
- The development should be capable of being served without the Expanded Eastwick Road.
- The impacts of the Expanded Eastwick Road are therefore unnecessary for delivery by the development and further impacting:
 - severance / pollution / landscape / environment / prejudice sustainable movement
- Options that provide adequate infrastructure to serve the development and good access to existing communities are needed to optimise the balance of sustainable transport and vehicle trips





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Harlow District Council – 27th January 2023

In response to the initial consultation Harlow Council advised that whilst supportive of the development of the Gilston Area there were matters that needed to be addressed before they could determine whether it was supportive of the specific application.

In summary the main matters raised related to:

- Lack of adequate detail within the parameter plans, and concern regarding potential building heights in some locations
- Lack of clarity on the Development Specification, including the amount of floorspace for each use.
- inconsistencies in the Strategic Design Guide.
- More work needed on the S106, lack of information regarding Sustainable Transport Infrastructure. A comprehensive review of requirements needs to be carried out to ensure all are captured in the S106.
- Lack of clarity on to how all the strategies and commitments in the submission will be achieved
- Green Infrastructure and open spaces need to include green wedges and fingers to help achieve a cohesive identity for the Garden Town. Separation of the villages needs to be clearer.
- -Greater commitment to job creation is required to meet the Growth and regeneration objectives of the Garden Town.
- Inclusion of Social Rented housing would be beneficial and would welcome further engagement in respect of the affordable housing mix.
- More work is needed to ensure that the work required to secure 60% sustainable travel mode share from the start as there are concerns that the goal may not be met.
- In response to the 2nd consultation the HDC made the following comments;
- The Council supports the amendments on design of the site accesses and the commitments to internal circulation principles.
- The current planning obligations, as set out, fall short of the commitments required to meet policy.
- In particular;
- Lack of clear commitment to HGGT principles
- Lack of commitment to funding for, and timely delivery of, the Stort Valley Crossings and proportional contributions to the funding of the Sustainable Transport Corridor network
- how the application will support effective use of the Housing Investment Grant (HIG)
- Inadequate details of affordable housing for Harlow residents to support social mobility; provision of adequate employment land and; energy strategy measures; and future community facility stewardship arrangements.

- No Memorandum of Understanding between the applicant and the Village 7 owners to show a shared commitment.

HDC advised that they would like to remain engaged in the application process with regard to the S106 obligations and conditions.

In response to the final consultation HDC provided the following comments:

The applicant's final viability submission, and its conclusions are generally accepted, on the basis of the independent specialist scrutiny advice EHDC has received.

HDC **supports** the proposed balance of infrastructure, affordable housing provision and associated use of the Housing Infrastructure Grant (HIG) but require the delivery of infrastructure in the timely manner. HDC accept matters relating to the Legal agreement will be secured duly but attention should be paid to the uncertainty currently at play.

HDC continue to **support** the delivery of villages 1-6 of the Gilston Garden Community development.

Policy HGT1 of the Harlow Local Development Plan sets out a series of principles which Harlow seeks to secure in all new Garden Communities including Gilston. Harlow expect the proposal to be in accordance with policy HGT1, the Garden Town documents and strategies. Importantly, this includes 60% of all journeys being by sustainable modes and the provision of all infrastructure requirements identified as needed for the development.

Comments on Highway grounds;

- The trigger point for the Central Stort Crossing (CSC) should be set at 1,500 dwellings – as proposed by the applicant.
- The trigger point for completion of Eastern Stort Crossing (ESC) should be set at 3,250 units.
- capacity improvement and sustainable transport measures are required to be delivered at A414 Edinburgh Way/River Way junction. These should be delivered by the developer in line with the agreed ESC trigger
- The delivery of the Edinburgh Way / Howard Way/ OI junction should take place when the CSC is delivered at 1,500 dwellings.
- That the applicant remains committed to working collaboratively with HGGT partners through the Transport Review Group (TRG) to achieve the 60% mode share targets for Gilston
- the application must ensure a robust monitoring framework with annual monitoring is in place in accordance with GA1 of the East Herts Development Plan.
- If the monitoring identifies a failure in mode share targets (and/or any other agreed parameters), East Hertfordshire District Council should take appropriate action.

Comments on The Planning Agreement

Concerned that there remains some uncertainty on some aspects of the planning obligations; and advise that EHDC should ensure:

- A phase related viability review mechanism and an agreement on how any future surplus payments achieved will be deployed.
- Shared HGGT wide affordable housing nomination rights and application of a formal nominations protocol and a local lettings plan
- Long term local centre land reservations and provision arrangements.
- Long term employment land reservations to meet full Development Plan requirements and provision arrangements in case of market failure.
- A robust skills and employment plan that provides benefit to the local workforce
- Community Trust led stewardship arrangements that are defined in terms of land ownership, business planning and funding sources. and provide a framework for future expansion to create a unified HGGT Community Trust.

Hertfordshire County Council 16th January 2023

HCC is satisfied the service and highways infrastructure requirements pass the tests set out in Regulation 122 (2) of the Community Infrastructure Regulations 2015 (as amended by the 2011 and 2019 Regulations), and as policy tests at paragraph 57 in the NPPF (National Planning Policy Framework). HCC's support to the application is contingent on those infrastructure requirements being satisfied.

Highways

HCC Seeks further flexibility with regard to Transport Hubs, given mobility hubs are an emerging concept in the UK and guidance for mobility hubs being developed by both HCC and ECC is still to be finalised.

From a highways and movement perspective, HCC has previously set out the infrastructure requirements and triggers for delivery required to ensure that the application proposals (and those subject of the application in neighbouring village 7), can be accommodated without unacceptable impact on the highway network. They are also necessary to ensure that the development is successful in achieving mode share targets, facilitating active travel/public transport, the hierarchy of movement set out in LTP4 and deliver on the Garden Town principles to which the applicants, EHDC, HCC and other Garden Town Partners are committed. It remains the case that, from a Highways perspective, these mitigations are required for HCC to support the application.

Access to Village 6:

With respect to the Village 6 access, the Highway Authority notes that all the access points are submitted for detailed planning. The Village 6 access should only come forward should the Village 7 access not be built. However, the site forms part of one comprehensive allocation in policy GA1 and it is therefore appropriate to consider the delivery of the whole and the interrelationship of the different applications. Furthermore, Policy DES1 of the adopted Local Plan states that "III. In order to ensure that sites are planned and delivered comprehensively, any application for development on part of the site will be assessed against its contribution to the Masterplan as a whole" – adopted policy supporting our view articulated here.

As such, the access (shown for Village 6) is a substantial construction, including bus priority provision and closely mirrors what is presently proposed for the Village 7 access from the A414 (*a development of some 1,500 homes plus significant community, neighbourhood and education facilities*).

It is noted that the proposed Village 6 general arrangement access is illustrated on drawing number VD17516-V6-100-GA Rev P02. The planning submission materials notes the following:

"Access into Village 6 – A western access to Gilston Park Estate will comprise a signal controlled vehicular, pedestrian and cycle access off the A414. The design features bus priority measures and signal controlled pedestrian crossings."

The Highway Authority also has concern with respect to the crossing opportunities for pedestrians and cyclists, as on the southern side of the A414 there is no connecting link detailed on the submitted drawing. The drawing(s) should in the first instance show a through connection to Parndon Mill. The lack of such a facility leads to doubt with respect to pedestrian/cyclist safety and sustainable travel from Village 6 to destinations towards Parndon Mill and Harlow. If approved, this would be contrary to the objectives of HCC's LTP4 which aims to support and prioritise sustainable travel (Policy 1), in addition to HGGT's Transport Strategy which sets the objective of 60% of all trips originating or ending in new communities to be made by sustainable modes.

Similarly, there is a possibility that the access would be installed and subsequently removed following installation of the Village 7 access and the associated connection of the STC between Village 7 and Village 6. There have been discussions around the situations whereby a Village 6 access could be retained to serve limited facilities such as an emergency services hub. Once it is considered the situations whereby the access might be delivered,

altered or removed, and taking into account the above policy context in addition to the fact that V6 is still due to be masterplanned, the Highway Authority has formed the view that it would not be appropriate to approve the proposed Village 6 access in detail (as per the other access points), as we have concerns regarding the form of the access, which still need to be addressed.

We suggest that it would be more appropriate to approve the Village 6 access in outline, the principle of the access being accepted in certain conditions. We consider that the detail of the appropriate access could be delayed to the point when there is greater clarity on its function. The evidence submitted to support the planning application clearly shows that a third point of access to serve the Village 1 – 6 development is only required at 3000 homes, similarly the indicative phasing does not envisage Village 6 coming forward until the end of the buildout of the site. As such we would suggest it would be far more appropriate to consider the detail of the Village 6 access as part of the masterplanning process for the village.

Given the above concerns, the Highway Authority preference is not to permit detailed permission for the Village 6 access at this point. However, should the LPA be minded to approve the access we would first require clarity on how walking and cycling provision proposed for the junction will connect to the walking and cycling network south of the A414, we need to be confident that this is deliverable to ensure policy compliance with LTP4 principles.

In summary, with respect to the Village 6 access the Highway Authority does not wish to object to the general principle of a safe and suitable access being formed at the shown point. However, in its current form (as shown in the Development Specification Part 2 document), the Highway Authority believes that there is an element of risk in approving such a substantial access which is not fit for purpose in its current form. The Highway Authority recommends that the Local Planning Authority considers the suggested condition or the removal of the access as part of the detailed planning permission. As noted, the principle of access may be acceptable, but at this present point (where there are a number of unknown variables), including with respect to Village 7 and the Village 6 Masterplanning, the Highway Authority does not presently recommend approval of the application in its current form.

The support of the Highway Authority to the application is contingent on the above matters being resolved and associated infrastructure requirements being satisfied.

Children's Services Comment

Providing the planning permission caters for the totality of potential primary (17FE primary, with 3 FE at V7 and 20 FE secondary) then the outline planning permission will comply with the requirements of Policy GA1. The role of the Education Review Group (ERG) in its overview capacity reviewing the dynamic education strategy appears to be something that is now settled between us and the applicants.

HCC welcomes the addition of an infrastructure package towards SEND education.

Archaeology

Recommends the following provisions be made should if planning approval is granted:

1. *A systematic programme of non-intrusive geophysical survey of the Village Development and ancillary areas of land (as appropriate), carried out by an appropriately qualified specialist, prior to any development commencing.*
2. *The archaeological field evaluation, via trial trenching, of the Village Development and ancillary areas of land (as appropriate), of the proposed development area, prior to any development taking place;*
3. *Such appropriate mitigation measures indicated as necessary by these evaluations. These may include:*
 - a) *the preservation of any archaeological remains in situ, if warranted, by amendment(s) to the design of the development;*
 - b) *the appropriate archaeological excavation of any remains before any development commences on the site;*
 - c) *the archaeological monitoring and recording of the ground works of the development, including foundations, services, landscaping, access, etc. (and also including a contingency for the preservation or further investigation of any remains then encountered);*
4. *The analysis of the results of the archaeological work with provision for the subsequent production of a report and an archive, and the publication of the results;*
5. *Such other provisions as may be necessary to protect the archaeological and historic interests of the site.*

The 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, and the submission of planning applications for Reserved Matters consent.

Ecology

HCC makes detailed comments in the response dated 16th January 2023.

Assuming the claims for existing / future habitats, their retention, creation and enhancement can be justified and delivered in practice, I have no fundamental reason to object to the net results of the assessments. Each distinct habitat type assessed shows a significant increase as a result of BNG, considerably above the minimum of 10%. This is welcomed but given the rather bland arable fields present, not particularly surprising. However successful delivery will critically depend on the success of compensation, enhancement and land management.

To summarise the metric, there is a clear increase in BU following development, although this is predictable given the land availability and its nature within the site. Whilst this is acknowledged, the development will generate indirect impacts the consequences of which are unknown. However, I have no reason to question the BNG figures otherwise.

Nevertheless, because the Trading Rules have yet to be adequately satisfied in respect of the loss of the specialised habitat area of colonising plants, which clearly has been confirmed as supporting considerable interest. There is sufficient room to address this through compensation and special management within the Gilston Park Estate, and this will be expected to be demonstrated at Reserved Matters.

Despite the demonstrable BNG, I also remain of the opinion that the losses of farmland ecology to development are still underestimated in the impact assessments. However, with BNG the possibility for any negative impact assessments is almost redundant as all appropriate developments will generate enhancements by default – at least in the metric. This is not wholly credible where substantive existing losses are compared with only potential / future gains. However, this does place greater emphasis on delivering the proposed habitat enhancements to ensure long term BNG is successfully achieved, and the proposals and Stewardship arrangement proposals do seek to demonstrate this.

Consequently, the application can be determined accordingly.

Fire and rescue

HCC has indicated that it would be prepared to consider a site for Fire and Rescue/ emergency services use being provided in V6, subject to the caveats regarding access and masterplanning which are set out by the Highway Authority in the Highways section 2 of this response above.

To be clear, HCC has indicated that it is prepared to forego the financial contribution set out in the IDP 2019 subject to land for the provision of fire station being made available. The reciprocal arrangements between Essex Fire and Rescue and Hertfordshire Fire and Rescue relating to small hamlets either side of the County boundary are not considered in any shape or form to be a suitable proxy for the provision of adequate service cover for a new settlement which will ultimately have a population similar to that of Hertford.

Growth & Infrastructure Unit

From a services perspective, Appendix A to the 3rd October HCC consultation response sets out the matters that need to be delivered through the Section 106 agreement required to ensure that the Gilston application(s) deliver the infrastructure required to mitigate the impacts of the development. Matters such as education contributions at primary and secondary, for temporary provision and off site school transport, Early Years provision, Youth provision, the library contribution for Recycling Centres and for Extra Care housing are set out in that response (and in previous responses or position updates on service needs) and need to be secured through appropriately worded obligations in a Section 106 legal agreement.

Insofar as this consultation and viability update is concerned, the revised viability update provides the confidence that the applicants are offering the required proportionate SEND contribution, though further discussion is required in relation to triggers.

The issue of provision of a fire station site (or a wider Emergency Services Hub if the element of police need is still being sought by the LPA) remains to be satisfactorily resolved. For the reasons outlined in section 6 above, it is required. While a site in Village 6 would potentially be acceptable, the caveats to that location from an access perspective are set out in Section 2 – the highway Authority comments above.

From HCC's perspective, it is important that the full range of service delivery community infrastructure asks are satisfactorily provided for and secured through a Section 106 legal agreement (noting that in some cases provision within the Village 1 to 6 part of the site should also be reflected in proportionate contributions from the Village 7 proposals – the subject of a separate planning application). It is the combination of the two that will ensure the comprehensive development which Policy GA1 envisages.

We remain committed to working in collaborative partnership with the LPA, the applicants and wider HGGT partners and stakeholders in seeking to deliver a quality place at Gilston. From the collaborative, but paused, work on the SLMP and V1MP, we are aware of the importance of the stewardship arrangements for the long term in multiple areas of delivery,

long term maintenance and management. As set out at 1.1 ii above, Appendix A contains the thoughts of GIU, Education, and Highways, including Countryside and Public Rights of Way – and has been influenced by contributions and thoughts made by colleagues to various Stewardship and Masterplanning meetings over the past 2/3 years.

Local Lead Flood Authority

Following our review of the above documents and additional information submitted in support of the above application, we can confirm we have **no objection** in principle on flood risk grounds and advise the LPA that the proposed development site can be adequately drained and mitigate any potential existing surface water flood risk if carried out in accordance with the overall drainage strategy.

As the proposed scheme has yet to provide the final detail and in order to secure appropriate principles of sustainable drainage systems, recommend several planning conditions should planning permission be granted.

Minerals & Waste Planning Authority

A Site Waste Management Plan and Construction Environmental Management Plan should be required by condition.

A development of this scale must ensure that sufficient consideration has been given to the waste arising and where it can be disposed of. Makes detailed comments regarding the handling of waste during construction.

Public Health

Recommend that the Strategic Design Guide is required as a condition of planning to make explicit reference, and commits to adhere to, the HGGT Healthy Towns Framework as a guiding document.

The Health and Wellbeing Strategy also sets out a commitment for further engagement with the wider health and social care system. We fully support and encourage this as this firmly meets Principle 1 of the HGGT Healthy Towns Framework.

Recommend early, system-wide, engagement in masterplanning and that the Applicant considers achieving this through direct engagement with the Hertfordshire and West Essex STP (now known as the Herts and West Essex Integrated Care System).

Recommend that further, standalone, Health Impact Assessments are undertaken to deal with the missing detail that will emerge through masterplanning and dealing with reserved

matters – and that these are required as a condition of planning as an when individual village applications are submitted.

Youth Services Hertfordshire

The requirement for access to floorspace to meet youth needs, somewhere in villages 1 to 6 (and 7) and a specification for that use was included in the HCC consultation response in August 2019. Additionally, a financial contribution of £416,887.06 was sought to support the delivery of the services.

The revised Development Specification Document (which is a document for Approval for as part of the planning permission), explicitly includes provision of facilities for young people.

This specification was shared with the service in August 2020 and the offer being made by the applicants is consistent with their requirements.

Therefore, subject to the S106 agreement securing;

- 1) the provision of the floorspace as set out above, and as described in the Spec accompanying the original HCC response, and
- 2) the financial contribution of £416,887.06

The impacts of the development and need of the service will be addressed through the planning permission.

Waste Disposal Authority

The need for contributions to mitigate against the increased demand for waste disposal capacity, (specifically Recycling Centre capacity), was set out in section 13 of the original HCC consultation response in August 2019. NB Hertfordshire's HWRCs have been rebranded as simply Recycling Centres since the original response.

Library Services

The need for contributions in order to mitigate increased demand for library services remains as expressed in section 12 of the original consultation response in August 2019. As required in the HGGT IDP, HCC is seeking a contribution of £1,913,244 towards library services.

Essex County Council – 27th January 2023

- Previous comments and recommendations set out in the 2021 response should be considered when determining the application.
- Maintain that Harlow is protected from the impacts of the development given its scale and location and taken on delivery of a Sustainable Transport Corridor (STC) into Harlow and forms a key part of the wider HGGT transport strategy and will help mitigate impacts of the development.
- The HIG agreements signed by partners including the applicant, in 2021 contractually committed the developer to deliver the ESC by 2027. This is the most desirable outcome in order to maximise its benefits in relation to the new housebuilding. Due to the nature of the ESC being a large and complex project and that the planning application for housing has taken longer to bring forward, in light of this it is expected the ESC to be delivered at the latest by 2031. The developer has emphasised that they recognise the importance of the ESC in the wider interests of the development and associated traffic network.
- Expects the sustainable transport package and transport management across the development cycle to be implemented in full and support is given on this basis.
- ECC supports the amended application subject to issues being clearly addressed in decision and provided:
 - a. the trigger point for completion of Eastern Stort Crossing should be set at 3,250 units at the latest.
 - b. that the applicant remains committed to working collaboratively with HGGT partners through the Transport Review Group (TRG) to achieve the 60% mode share targets including through exemplary design and sustainable transport measures, which should be set out in the Group's Terms of Reference.
 - c. that the application will ensure a robust monitoring framework with annual monitoring is in place.
 - d. that, if the monitoring subsequently identifies that the mode share targets (and/or any other agreed parameters) are not being met, the Local Planning Authority / East Hertfordshire District Council will take appropriate action [in conjunction with other HGGT partners].
 - e. the continued participation of ECC in the Gilston planning as appropriate to the matter under discussion, including all aspects that materially impact on the delivery of highway mitigation and the achievement of the mode share such as future S106 agreements/reviews, Master Planning and reserved matters.
- Appendix 1 Sets out detail on ECC position on key issues associate with the application and include housing delivery trigger for ESC, the operation of the TRG and management of associated funding.

Essex County Council – 22nd January 2021

- ECC remain supportive in principle of development within the Gilston Area, however subject to a number of fundamental and outstanding concerns relating to the applicant's commitments to achieving sustainable mode share targets and highway infrastructure provision, including funding and trigger points.
- Further commitment is required to secure funding and early delivery of key highway infrastructure needed to mitigate the impact of the proposed development.
- Need to strengthen the mitigation measures and reduce impact of the highway network including funding and delivery of high quality, high frequency public transport provision as well as the implementation of a comprehensive site wide travel plan.
- Further clarification required to put in place and establish a comprehensive monitoring and management regime aiming to achieve sustainable travel objectives including the need to achieve the 60% modal share target.
- GA1 allocation is being promoted by two different applicants through two separate outline planning applications. Fundamental that the two applications are coordinated in an orderly, holistic and comprehensive manner to deliver sustainable planning requirements set out in policy. Key elements include phasing of development, contributions to and delivery of key infrastructure and services, site wide strategies.
- A Memorandum of Understanding (MoU) will be agreed between the applicants to provide a clear mechanism in terms of how comprehensive development will be achieved. An MoU has not been submitted. A single s106 agreement should be used to cover both outline planning application within the Gilston Area.
- ECC considers the Garden Town IDP April 2019 represents the most up to date and comprehensive assessment of the Garden Town wide infrastructure needs, including specific requirements of the Gilston Area.
- The development should require early delivery of sustainable transport and key highway interventions in order to make sustainable travel the most attractive, efficient and best option from first occupation of the homes within the Gilston Area.
- EHDC should take account of risks associated with the applicant's highway and traffic modelling evidence and potential impacts on the highway network. To address the risks and potential highway impact. ECC is proposing that the applicant's proposed mitigation measures should be strengthened with greater clarity and commitments.
- Planning condition should be included to require the contract for the delivery of the Central Stort Crossing will be let before the commencement of construction of any dwellings. Details of this condition can be found in comments.
- Arrangements should be set out in Heads of Terms and S106 agreement to require the CSC scheme and to be fully funded and delivered.
- Developer to contribute to the wider Harlow STC network in accordance with GTIDP, including fully funding delivery of the 1st phase of the Harlow STC from Burnt Mill

junction to Harlow Town centre. Clear trigger points for financial contributions will need to be agreed through the S106.

- A range of comments made on the applicants Bus Strategy and Business case that will need to be addressed and set out in ECC comments. Further analysis is required, agreement through S106 to at least £25m gross cost contribution to be paid in phases at set trigger points.
- Detailed junction assessment for A4141 Howard Way/OI Junction, A414 Edinburgh Way/River Way junction, A1019 Velizy Ave/A1025 Second Ave junctions and the new river way/eastern stort crossing via condition.
- S106 obligations to improved and deliver road junctions in Harlow.
- Further information regarding sustainable transport hubs are required and indicated on parameter plan 4

Car parking standards

- Focus on location, level and design of parking is required to ensure 'walkable neighbourhoods'. Critical to promote modal shift and give advantage to active and sustainable travel and create quality places to live and not dominated by cars. Zonal approach should be adopted to the level of provision bases on access to service.
- Vehicle parking spaces must have electric charging facilities.
- Cycle and motorcycle parking – secure, covered and located in easy to use locations.

Village access arrangements

- Active and sustainable transport will not be given sufficient advantage when comparing door to door journey times with those for car journeys. Undermine achievement of sustainable modal shift.
- Vehicle access points – VIL 1, 2 and 6 do not appear to give sufficient advantage to sustainable door to door journey times.

Primary and Secondary Education

- Comments similar to those seen under previous response dated 2019.

SEND

- Comments similar to those seen under previous response dated 2019.

Housing Growth

- Continue to work with HCC as statutory Adult Social Care provider in progressing plans for specialist accommodation provision within village at both masterplan and reserved matter stages.

Skills and Life Long Learning

- Agreement to an Employment and Skills Plan and Strategy outlining the ambitions around apprenticeships, pre-employment and work experience, supported employment and school and college engagement. Financial contribution to support skills and employability interventions. Commitment to work with Harlow College and other Essex based training providers.

Energy and Low Carbon

- Welcome sustainability principles and commitment to minimising CO2 emissions, further improvements to the sustainability of the development by aiming for net zero GHCs to align with the national net zero target. Significant positive impact on emission reductions if ambitious standards are set.

Environment and Green Infrastructure

- No objection, however advise to improve the GI and achieve net environmental gains the following should be considered: stewardship, early collaboration and engagement with relevant stakeholders, long term management and stewardship plans, sustainable buildings through the use of green walls and/or bio solar roofs or amenity green space rooftops, waste storage areas, bus stops, soil cell systems for trees, bird boxes/bricks, designs are resilient and sustainable, considers user requirements, connects to existing network.

LLFA

- Satisfied scheme will not have a significant impact and not recommending any condition or amendment to the application at this stage.

Public Health

- Encourage further engagement with the wider health and social care system. Recommend that a condition is added to the proposals requiring a Health Impact Assessment is undertaken.

Library Service

- Increased/improved capacity and library provision would be sensible with the IDP.
- A total of £2,250,876 (of which £1,913,244 is apportioned to this site) is needed for the Gilston Area. This should be secured through S106.

Waste Disposal

- Development will generate significant needs for bulky waste disposal. The Garden Town IDP states a total of £1,622,076 (of which £1,412,757 is apportioned to this site) is

required by the Gilston Area to deliver additional household waste recycling provision and should be secured through S106.

- A detailed review of the Gilston Peak Estate Transport Assessment, Trip Generation, Modelling and triggers has been provided at Appendix 1 of ECC comments raising a number of issues and concerns.

Essex County Council – 9th August 2019

ECC Public Health

- Encourage by the significant emphasis placed on health and wellbeing by the applicant.
- ECC and HCC Public Health service will continue to work with health and care commissioners and providers, including our colleagues within the NHS and Sport England, so to ensure that this proposal considers the wider system.
- The Council's will continue to work towards identifying opportunities to optimise benefits for health are maximised for both new and existing residents as this proposal develops through the masterplanning process.
- The Councils recommend that either a condition or an informative is attached to any planning permission, to deliver on the strategy ideas set out in the Health and Wellbeing Strategy and to deliver on commitments to create a healthy place in the Strategic Design Guide and should require each individual Village Masterplan to demonstrate how village masterplanning is incorporating, planning, managing and delivering places which deliver and promote public health.
- The Councils welcome opportunities to work with the applicant using Public Health data that has been developed to support the HGGT Healthy Towns Framework to identify effectively assess health and wellbeing implications.
- The Councils assert that clarity on communities' needs will need to be included in future assessments as this will provide a greater clarity to health and care commissioners and providers for service planning.

ECC Highways

- ECC Highways Authority and Transportation service require further information and clarification on key matters as outlines above, including
 - The access strategy
 - The impact on the existing network
 - The relationship between different strategies and how the non-transportation strategies can influence sustainable transport
 - The difficulty at an outline planning stage to be able to consider how sustainable transport will be prioritised

- ECC will provide a more detailed response on developer contributions once the Council is satisfied it has received the required/adequate information on which to form a view.
- ECC welcomes the opportunity to work with both EHDC and HCC on ensuring that sustainable and active travel to school is enabled through the design and delivery of schools and housing, including by position family housing in close proximity to schools and providing high quality walking and cycling routes; and by prioritising public transport over car travel. ECC recommends the principles outline above to enable this.
- ECC advises that it is essential for ECC to be involved in shaping and informing the Section 106 agreement required for the development.

ECC Libraries

- ECC Libraries service do not raise an objection to the application, provided adequate S106 contributions and if necessary related measures are required to ensure appropriate future libraries provision to serve this development.
- ECC recommends that at this point in time, sufficient developer contributions need to be provided in line with the identified requirements set out in the HGGT IDP.
- ECC'S preferred strategy, as discussed with HCC is for new libraries provision to serve the development to be located within Harlow itself and focused on the main Harlow Town Centre library, where increased and improved provision would be made in line with the emerging Harlow Town Centre Action Area Plan and wider town centre regeneration.
- The option focussed on Harlow Town Centre Library may result in a lower level of required developer contribution, however not possible to quantify that cost with precision, since the eventual form of project to improve and expand the Harlow Town Centre library provision is still being developed. Work to conceptualise and refine the number, form and location of new community hubs is in progress.
- Future stewardship arrangements need considering for all future library provision that will serve the Gilston Area development. HGGT stewardship work is yet to reach conclusions on the scope of facilities and assets to be included under future Garden Community stewardship arrangements. Arrangements will need to reflect these decisions on scope of assets to be included but also the eventual form of those assets. It is anticipated that future library facilities will form part of wider community hubs and therefore stewardship arrangements will need to reflect the nature and form of such hubs.

ECC Education

- ECC Education service does not raise an objection to the current application. This is provided that a mutual agreement is reached on secondary school provision, adequate developer contributions and if necessary related measures required through conditions.

- Welcomes early provision of primary schools within the Gilston Area.
- Likely that four forms of entry will need to be accommodated prior to a new school being established. ECC will work with HCC and appropriate schools to establish where temporary secondary school accommodation could be added to meet anticipated demand.

ECC Special Education Needs and Disabilities (SEND)

- Further clarification on how SEND requirements would be met and the capital cost addressed over the development phase to effectively meet needs without having a detrimental impact on existing provision within West Essex which is already under significant pressure. Without such re-assurance this itself would warrant ECC withholding support for the application.
- S106 contributions need to be provided in line with identified requirements set out in the HGGT IDP and other costs such as school buildings or school transport.

ECC Early Years and Childcare (EYCC)

- No objection raised to the proposed early years approach, provided ECC can be satisfied that the proposed approach is the most appropriate taking into account further assessment of the need for EYCC facilities on the Essex/Hertfordshire borders and if necessary adequate developer contributions and related measure are required to ensure appropriately located EYCC provision to serve this development.
- ECC would like to work with HCC and the applicant to clarify the baseline provision and location of EYCC on the Essex/Hertfordshire borders and to work on the timing of delivery of EYCC on the Essex/Hertfordshire borders.
- Involvement in relevant planning obligations agreement

ECC Adult Social Care and Older Persons Housing

- Welcomes opportunity to work closely with HCC on ensuring that both main stream/general needs housing and specialist housing provision, including supported living, extra care, sheltered housing and residential/nursing care requirements are met in full across the Garden Town.

ECC Economic Growth and Skills

- Does not raise an objection to the proposals, however discussions are ongoing in terms of a Construction Skills Academy approach.
- Continued engagement with applicant and other key stakeholders in determining an appropriate cross-boundary approach.
- Involvement in relevant planning obligations agreement necessary.

ECC Environment

- No objection to the current proposals. ECC broadly supports the green infrastructure proposed and set out in Parameter Plan 3 within the Development Specification.
- Further information on the development, management and maintenance of green infrastructure across the proposed development is required.
- ECC Ecology
- No objection to ecology aspects of application, recognises that a number of Priority Habitats will be impacted by these schemes and recommends that these habitats should be references within the Ecological Management Plan and proportionately compensated.
- With reference to CIEEM's Guidance on 'On the Lifespan of ECOLOGICAL reports & Surveys' (April 2019) the majority of surveys are now considered out of date and may need updating in some cases.
- Recommends conditions that are set out in Appendix 1 of consultation response should be included if approved.

ECC -LLFA

- River Stort provides a barrier to surface water flows which means the main development will have no negative impact in relation to surface water flood risk within Essex and therefore ECC LLFA has no comments to make.

ECC - Waste Disposal Authority (WDA)

- No objection to current application provided adequate developer contributions and if necessary, related measures are required to ensure appropriate RCHW provision to serve the development. ECC will work with HCC wherever possible to refine options to support the proposed development and other growth locations with HGGT.
- With improved accessibility resulting from the new Eastern River Crossing, it can be reasonably assumed that householders will seek to use the Harlow RCHW for disposal of bulky waster in the absence of a more convenient facility within the Gilston Area itself or elsewhere within Hertfordshire. The anticipated bulky waste arising from the development would equate to a c.14% uplift on the current throughput at Harlow RCHW.
- Mitigations necessary to address infrastructure capacity shortfall is required.
- Necessary for ECC to be involved in planning obligation agreement.

ECC Minerals and Waste

- Very little supporting information with regards to minerals and waste implications of development the proposals and as such ECC in its capacity as the neighbouring Minerals and Waste Authority requests that the applicant submits evidence which

addresses these concerns to allow ECC to better understand the minerals and waste implications of this development.

ECC Culture and Heritage

- Welcomes opportunities to work with HCC, the applicant and other stakeholders to develop the concept further.
- Recommends that guidance such as the TCPA's good practice guide be referred to.