

Summary of Responses to the Gilston Neighbourhood Development Plan (Regulation 16 Consultation)

Summary Document of Representations:

This Document provides a summary of representations received during the Regulation 16 consultation on the Gilston Neighbourhood Development Plan. This summary does not contain an exhaustive list of every representation and detail received. All comments received during the consultation were sent to the Independent Examiner in their entirety.

Organisation	Summary of Comments
Individual GA-001	<p>Support:</p> <p>The neighbourhood plan submission is a very good and well produced document and shows evidence of a great deal of careful work and reflection of the community's wishes. A few points come across as having been expressed rather cautiously: they are highly important and need to be reiterated forcefully: e.g. penultimate bullet point on page 12: "The development will lead to complete transformation of the Gilston area...." Only too likely; and therefore "must be accompanied..." rather than "should". The "development impacts" must be scrutinised and noted at all levels, not merely mitigated. And the final bullet point: "The importance of upholding the provisions in the District Plan to preserve and protect from development the open spaces in the northern section... to transfer them to the community..." It is of "vital importance and the developer and East Herts Council must ensure that excellent legal advice is obtained which is watertight in perpetuity. It is very good to note the importance of public transport, walking and cycling which is highlighted all through the submission document. The stress on public transport needs to be increased, however, as the document was finished before the coming of coronavirus. The concern of the government during the last seven months that people should not use public transport will have a damaging effect on public perception of the importance of good public transport links. Much work will be needed by the developers and East Herts Council to redress this damage, particularly by ensuring that public awareness of the impact on the environment by private-car use is raised significantly, and as a result, that public transport infrastructure is put in place as a priority, even though it is likely that its use will be comparatively small until the coronavirus situation is eased. See in particular the last bullet point on page 40. Bullet point under objective 6 on page 41: third one down, starting "All streets and connecting roads..." "Street</p>

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	<p>lighting must be minimal...”, rather than “should”. Gilston contains a variety of bat and owl species all of which have prospered over the years because there has been no street lighting. I appreciate this will have to be included, but in such a way that minimal disturbance is caused to these and other wildlife. We are also fortunate in having a good dark sky, for observing stars, the moon, planets and occasional meteor showers. The southern sky is light polluted because of Harlow, the A414 and the M11, as to a lesser extent the north-eastern sky because of Stansted Airport; but consideration needs to be given to preserve what remains of our dark sky. This is another reason for forbidding floodlighting, as cited in the fifth bullet point under Objective 5.</p> <p>Also on page 41, last bullet point: “Convenient crossing facilities (will be provided) across the A414...” This is vital because since the A414 was upgraded during the last five years of the 1980s, Eastwick has been, as far as cycling and walking are concerned, effectively cut off from Harlow, particularly in winter, when there are fewer hours of daylight, because it is virtually impossible to cross the A414 safely, even when wearing high visibility clothing. Traffic is still moving quite fast when approaching and leaving Eastwick Lodge roundabout, and only a very few drivers are considerate enough to slow down or stop to help cyclists and walkers to cross.</p> <p>Section entitled Accommodating Growth: in particular page 52 para. 130; “To manage storm water and avoid downstream flooding, the development should incorporate sustainable drainage systems...” Another instance where “must” replaces “should”. It is mandatory that this is undertaken with due seriousness. For many years the area suffers small-scale flooding at least once a year after periods of heavy rain. Much of this is due to the poor maintenance of storm drains and insufficient clearance of gullies, etc. but with the weather becoming increasingly unstable due to climate change, those responsible for the development in the area must “have maintenance arrangements in place to ensure an acceptable standard of operation for the lifetime of the development...” Over the years, a few residents have taken it upon themselves to attempt to maintain soakaway channels to take surplus water away from Gilston Lane in its upper reaches; but this needs expert attention rather than amateur effort. Para. 129 recognise that “the area is classified as being under serious water stress...” and it should not be impossible with skill and expertise to make use of surplus storm water through recycling to mitigate this stress to some degree. It is good to see that members of the Neighbourhood Planning Group have noted the problems associated with flooding throughout this submission draft, as they have also done with the</p>

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	<p>problems associated with light-pollution.</p> <p>Section 2.9, Sustainable Mobility (Page 138) is another example of the careful work done by the group members to reflect the wishes of the new community. Para 355 should be particularly highlighted: "...new villages should be designed on active design principles...to help (create) vibrant, inclusive and healthy communities...New homes should be located within short walking distance of open space, community facilities, shops and schools ." This is vital" in fact, new homes must be located within short walking distance of open spaces etc., as the paragraph goes on to say, "it is acknowledged that this was one of Gibberd's aims for Harlow in his original New Town Masterplan and it is essential (my emphasis) that this approach is adopted in the Gilston Area..." Gibberd's rationale must also be stringently considered to avoid the perpetuation of any mistakes in town design that he might've made.</p> <p>It is also important to note (para 396, page 152) that the "Neighbourhood Plan will be kept under review by the Neighbourhood Plan Group and this will be undertaken in collaboration with East Herts Council who will be responsible for monitoring development in the Gilston Area in accordance with Policy GA1 and other policies in the District Plan..." This paragraph and para 397 which follows "reinforces this collaborative approach to monitoring", and will reassure us that we, the communities involved in this whole project, will be kept informed and updated on a regular basis, and that it has "regard to Garden City principles and incorporates high quality design solutions".</p> <p>This whole Neighbourhood Plan submission is, compared to many of a similar nature, easy to read and clearly set out. The accompanying photographs are of a high quality and enhance the document most attractively. Great credit should be given to all members of the group for the immense amount of thought and discussion that has gone into its production and, along with the points I have made, I wish to support this document wholeheartedly.</p>

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HCC GA-002	<p data-bbox="409 240 568 268">Comment:</p> <p data-bbox="409 284 613 311">Introduction</p> <p data-bbox="409 371 2072 536">This representation is made by Hertfordshire County Council's (HCC) Growth & Infrastructure Unit, in relation to the Gilston Area Neighbourhood Plan consultation (henceforth referred to NP). The comments within this representation reflect the interests of the following services that are provided by HCC, along with other relevant areas within the Environment & Infrastructure Department (excluding HCC Property):</p> <ul data-bbox="409 592 1464 667" style="list-style-type: none"><li data-bbox="409 592 1464 624">-Transport (HCC as Highways Authority and Network & Travel Planning)<li data-bbox="409 635 1245 667">- Environment Resource Planning (Historic Environment) <p data-bbox="409 722 2072 798">Comments from the above listed HCC services and other relevant areas within the Environment & Infrastructure Department are stated in the following sections throughout this representation.</p> <p data-bbox="409 853 2051 928">It is also worth noting that HCC is involved in ongoing discussion with EHDC in delivery of the GA1 allocation, in terms of the planning applications submitted by PfP and Briggens Estates.</p> <p data-bbox="409 984 568 1011">Transport</p> <p data-bbox="409 1074 595 1101">Introduction</p> <p data-bbox="409 1161 2092 1457">The Gilston Area Neighbourhood Plan (2020-2033) very much aligns with our own overarching Transport Strategy set out in our Local Transport Plan (LTP4). HCC is in the process of developing a Growth and Transport Plan (GTP), with involvement from district/ borough councils and other stakeholders, which is a supporting document to LTP4. The purpose of the GTP is to consider the key problems and opportunities which currently exist or may occur in the future on the transport network, and to identify what types of interventions are needed to improve the transport network. A GTP identifies what interventions could be required to deliver the County Council's overarching policies and priorities.</p>

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	<p>HCC would be keen to explore how we might best reference the Plan within our own GTP.</p> <p>The approach of HCC to the current Gilston applications is intended to promote the LTP4 hierarchy of movement, and achieve the modal share aspirations of the Garden Town.</p> <p>Sustainable Mobility</p> <p>Paragraph 348 – HCC would fully support developments in the Gilston Area that fully contributes to a modal shift towards sustainable transport choices and options. The approach of HCC to the Gilston applications is based on the LTP4 hierarchy and encouraging active and sustainable modes.</p> <p>Paragraph 352 – As set out, the key objective of the Concept Framework is to promote sustainable transport choices, anticipate foreseeable changes in transport technology, and mitigate the traffic impact of the development on existing communities and the wider transport network across the locality. This would need to be supported by an extensive network of safe and convenient pedestrian and cycle routes linking new and existing villages and link into existing Public Rights of Way network. HCC is working with EHDC to achieve this as part of the current planning applications.</p> <p>Paragraph 353 – As set out, HGGT has adopted an overall objective of achieving a target of 60 % of all journeys within and 50 % to the new Garden Town Communities, which HCC would endorse. The issue of how this will be monitored is being considered by the Highway Authorities as part of the current planning applications and via a Transport Review Group which forms part of the application proposals as well as being charged with monitoring performance against modal share aspirations and instigating changes where necessary.</p> <p>Paragraph 355 – Through its planning and highways responsibilities, HCC support the development of the villages based upon the active design principles, which is the basis of approach in engagement on the current planning applications. As set out, new homes should be located within short walking distance of open space, community</p>

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	<p>facilities, shops, and schools to promote a healthy and active community.</p> <p>Paragraph 356 – Outlines several considerations any future transport provision should incorporate. From experience, HCC would support:</p> <ul style="list-style-type: none"> -A user hierarchy based upon the need to travel and the top, walking, cycling, public transport, shared services, freight and delivery vehicles and private cars - in that order -Layouts of developments should be open and permeable to walking and cycling but should discourage short journeys by car -Frequent and efficient public transport which connects people with places. Connectivity to link new and existing developments -Parking provision for the car should be minimised or smarter (shared services car, freight etc) <p>This is precisely the approach which HCC is working with EHDC and GT Partners to achieve in Gilston.</p> <p>Community Perspective</p> <p>Paragraph 357 – HCC are aware of the sensitivity around the capacity of the local highway network. HCC is working with EHDC to promote the LTP 4 hierarchy of movement and delivery of a transport and movement network based upon encouraging active and sustainable transport choices and the greater level of public transport provision, and filtered permeability.</p> <p>Paragraph 358 – Furthermore, HCC will work with its partners and operators to provide robust public transport services which allow a realistic alternative to simply using the car. As part of the Gilston applications this also includes, seeking to provide segregated, direct and safe walking and cycling infrastructure.</p> <p>Policy TRA1 – Sustainable Mobility</p>

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	<p>The overall policy does support the targets as set out by HGGT, as suggested within our initial response to HGGT transport strategy, achieving the target of 60 % of all journeys within and 50 % to the new Garden Town Communities could be achieved, however, this is based upon HGGT securing the funding to have the infrastructure and public transport services in place before developments are occupied.</p> <p>HCC would fully support the role monitoring and evaluation could have in achieving the proposed model targets. As stated, this will only be delivered through clear objectives, targets and a range of practical and achievable solutions.</p> <p>As detailed in section 3 of the policy, HCC supports development proposals that clearly promote reducing the need to travel by encouraging more sustainable transport choices to be adopted by residents within the villages. Supporting the introduction of a coordinated active and public transport network, within and throughout the area. Make it easier to simply hop on a bike or walk to a destination rather than drive a car.</p> <p>HCC will be looking to explore synergies between off site cycle and walking opportunities in the Stort Valley with the infrastructure which will be delivered by the Gilston allocation and wider HGGT.</p> <p>It can be difficult to anticipate changes in transport technology or new mobility services; however, by delivering the Sustainable Transport Corridors proposes as part of the GT, the opportunity is provided for innovative Public Transport solutions to be applied in the future, accepting that this might be bus technology in the short term.. HCC are currently developing a use-case project (Hertfordshire Living Lab), as an experimental ecosystem that aims to develop solutions at the intersection of Connected Autonomous Vehicles (CAVs), drones, robots, smart infrastructure and smart services. This approach combines the use of Digital Twins (DTs), Semantic Maps (SMs), Connected Autonomous Vehicles (CAVs), future mobility services, sophisticated sensing infrastructure, mobile technologies and machine learning (ML) techniques. The project will allow “learning by doing” by providing experimental services to real customers and communities, in order to accelerate learning towards a vision for smart villages. HCC can share the outcomes of experience of this work in order to help with developing a resilient</p>

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	<p>transport network for the Gilston area.</p> <p>HCC as part of future mobility role, has undertaken work to identify locations and equipment in terms of EV infrastructure, and is keen to share this learning etc.</p> <p>Environment Resource Planning (Historic Environment)</p> <p>HCC recognise that the Gilston Area Neighbourhood Plan is comprehensive in many aspects relating to Historic Environment.</p> <p>Within the wider document HCC welcome the recognition that heritage assets are an irreplaceable resource and intrinsic to the character of the Gilston Area (2.6, 317, p129). The inclusion of a detailed policy on heritage assets (Policy H1 – Celebrating the existing Heritage Assets) is also welcome, though HCC note that it does not make specific mention of below-ground heritage assets of archaeological interest, or of the potential presence of unknown buried heritage assets of archaeological interest within the Area. There is also no mention of the importance of appropriately conserving and/or recording any such assets that may be impacted by development within the Area.</p> <p>Furthermore, in comments on the Gilston Area Regulation 14 Pre Submission Neighbourhood Plan Consultation, (October 2019) HCC stated that views on the Historic Environment of the Area ‘are set out in full in the consultation response which has been provided in relation to the Gilston Outline Residential planning application.’ And ‘It has been suggested that a combination of conditions can successfully protect Heritage Asset interests – which will need to be factored into the formulation of Village Masterplans and subsequent Reserved Matters planning applications (or to cater for any subsequent full planning application in the event one is submitted).’</p> <p>It remains HCC view that specific, staged, archaeological conditions in relation to the currently submitted</p>

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	<p>planning applications should be applied to each village and to those areas of land outside the developable areas of the Villages that will ensure the further evaluation of each area via geophysical survey and trial trenching is carried out prior to, and should inform, the finalisation of detailed Village Masterplans, and the submission of planning applications for Reserved Matters consent. The conditions should also make provision for any further appropriate mitigation measures indicated as necessary by these evaluations.</p> <p>This is broadly covered by POLICY H1 – Celebrating the Existing Heritage Assets 1. A comprehensive assessment of the area should be undertaken to identify all heritage assets within and in proximity to the development and set out a clear approach for their protection and where possible, enhancement.</p> <p>Wider Planning Issues</p> <p>HCC have some concerns with repeated reference to the ‘countryside setting’ (or similar) and ‘villages’ which although not restrictive in itself, does send the wrong message in suggesting that the development in the Gilston Area will be rural in nature or that the villages will be in anyway related to traditional ‘Hertfordshire’ villages and not villages in the context of a Garden Town development. Some examples of this include: Policy AG1: -Part 1, Criterion iii. = “...balanced approach to village development and preservation of the countryside setting.” -Part 3, Criterion iv. = “Maintain the countryside character of the landscape setting...” Policy AG2: -Part 2 = “...ensure the integrity of the landscape and countryside setting whilst creating...” Policy BU1: -Part 3, iii. “Height of buildings appropriate to village character, with taller buildings located in...”</p> <p>While noting the above references and acknowledging the importance of seeking to ensure the development is sympathetic to landscape considerations, it is inevitable that the introduction of 10,000 houses including at least 5 ha of employment provision, and 20FE of school provision, potentially in the form of 7 number primary schools and 2 number secondary schools will have a visual impact. It is reasonable to expect that the approach to delivery of any element seeks to minimise the impact on the landscape and character of the area, but it is unlikely to be</p>

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	<p>possible to accommodate such a scale of development without any impacts and it might be helpful if that point was acknowledged.</p> <p>Infrastructure provision policies appear to refer to a 'retrofitting' approach or how the existing settlements should be improved alongside the new developments. Of course, NP's can set out where contributions are expected, however as the PPG states "...these and any other requirements placed on development should accord with relevant strategic policies and not undermine the deliverability of the neighbourhood plan, local plan or spatial development strategy."</p> <p>Given the level of contributions expected from the Gilston development with regards to areas such as affordable housing and significant infrastructure provision (river crossings etc.) HCC have concerns that some policies in the NP jeopardise a policy compliant Gilston development.</p> <p>HCC would like to refer to our previous comments on the (Regulation 14) pre-submission consultation of this NP, in October 2019. Paragraph 1.7 States "Planning Practice Guidance confirms that planning obligations can assist in mitigating the impacts of unacceptable development to make it acceptable in planning terms. It is relevant to note that there are three specific statutory tests which planning obligations must meet, which are reflected as policy tests in the National Planning Policy Framework (NPPF). Planning obligations must be:</p> <ul style="list-style-type: none"> -Necessary to make the development acceptable in planning terms; -Directly related to the development; and -Fairly and reasonably related in scale and kind to the development. <p>Policy AG8 Infrastructure Parity for Existing Settlements</p> <p>The aspirations within the policy that existing settlements benefit from enhanced access from a pedestrian and movement perspective are consistent with LTP4, and the potential for new Suds networks at Gilston to offer benefits by addressing historic problems with surface water runoff have been noted. It is worth caveating that any other infrastructure requirements would need to pass the tests set out in NPPF policy and practice guidance</p>

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	<p>and referred to at 1.7 above”</p> <p>HCC would also highlight that that an indication of the projects which need to be delivered in order to mitigate the impacts of the development are as set out in the Harlow and Gilston Garden Town Infrastructure Delivery Plan 2019</p> <p>Conclusion</p> <p>HCC would like to stress the importance of the Local Transport Plan (LPT4) and its sustainable travel policies and broadly supports the policies that underpin this in the preparation of the NP. As proposed, local centres within the villages are intended to include transport hubs and will be accessible by walking and cycling and from villages to the wider key destinations with reliable and affordable public transport to avoid congestion, improve air quality Transport infrastructure that can adapt to new technologies and changing habits must be recognised and facilitate for. A fully integrated public transport network that connects within and beyond the Garden Town must be envisaged and designed.</p> <p>In addition, HCC would simply note that historic environment colleagues have advised that appropriate conditions will mitigate the impact of development from a historic environment perspective.</p> <p>HCC welcome the opportunity to comment on the NP, and are looking forward to continuing working with the LPA, and other stakeholders, including the existing and emerging communities in delivery of the Gilston allocation which is a long term project.</p>
Individual GA-004	<p>Support:</p> <p>I support the protection of our villages to maintain heritage.</p>
Individual GA-005	<p>Comment:</p> <p>I am writing in response to the request for comments on the above plan as a local resident residing in Terlings Park, Gilston. As a dweller in a relatively new home, I can see the need for construction of housing to meet significant demand in the area. However, I would like to note a few comments about the nature of the planned</p>

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	<p>construction, based on the experience of living in the area. These comments relate to: (i) Transportation proposals; (ii) The proposed division of the village with a large new road in the middle of the village, instead of a bypass; and (iii) Intensity of development.</p> <p>The most significant concern from the proposals relates to transportation. Specifically, I am concerned by the 20% modal shift proposed, which is not realistic. The area benefits from excellent transportation links, which will be available to residents in new homes as well (e.g. A414; A10; M11). All surrounding areas are much more easily accessed via car (e.g. Harlow retail sites; Sawbridgeworth; Bishop's Stortford; Hertford). Incomes in the area support easy car ownership, and driving is often both faster and cheaper than public transportation, especially for families. Against this suburban/exurban backdrop, the call of the car will be irresistible and once one is owned, it will be used.</p> <p>The plans seek to develop the land in a way that Harlow itself attempted to develop, with initial postwar construction seeking to zone areas so that work and shopping would be nearby, not unlike the current discussion of the "15 minute city". The problem with this proposal is that it is unlikely to prompt a shift away from the car in a suburban/exurban location such as Gilston. Even in Harlow, with higher population density, it was found that subsequent land and human development prompted travel beyond the immediate vicinity of residences, and the attempt to build work, home and retail together was abandoned. It is not enough for some services to be nearby, as others will inevitably be further away and prompt car use; and once the car is owned, it will be the car's driving distance that is the relevant isochrone, rather than the walking isochrone.</p> <p>In short, unless there are plans to ban drives to Sainsbury's, and to force people to walk there instead—or to force them to work only locally—the reality is that cars will be bought and used by most people living in a semi-rural location, even if is built out somewhat.</p> <p>In some ways this desire to limit car use is the most puzzling aspect of the proposals. With the shift to electric cars and ever more use of renewable energy – now >50% of energy use on some days and set to rise – cars are not the environmental harm they once were. With low lease payments, sharing schemes, and increased durability, they are eminently accessible to large numbers of people, including relatively low-income groups. The wonderful thing about the car is that people can get where they want to, when they want to, and it is hoped that it is not this aspect of motoring which the planners appear to dislike; especially with the liberal heritage of our</p>

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	<p>area (John Locke is buried near Harlow), and in more recent times, our region's very sizeable investments in appropriate, modern infrastructure accommodating an innovation that has been mass market for over a hundred years. Relatively low-income groups benefit especially from greatly increased employment opportunities as motorists (e.g. a single parent dropping off children at school before driving on to a better paying job, realistically accessible via car only). The local area is also best enjoyed in tandem with a car, opening up healthy recreational facilities at the weekend, such as Hatfield Forest, Broxbourne Woods, and the Lee Valley.</p> <p>It should be the aim to help people easily reach these excellent facilities and job opportunities, and not to discourage them from owning and using the technology that is the best and easiest means to access them, especially if residents are elderly, disabled, or infirm. In concrete terms, it might be said that the use of an electric car for a family of new residents to travel to Hatfield Forest and take a Sunday walk, picking up an elderly relative on the way, or to take a canoe down to the Lee Valley should be supported, and not impeded. It is unclear how the canoe would fit on the train, and the elderly relative might not be able to use the train at all, but happily the car obliges; likewise, Christmas shopping; likewise, three toddlers coming back from nursery on a cold, dark night. Covid-19 only makes the case stronger: a car owner is not a "shut in" and life can return to normal faster with more car use by decreasing disease transmission. A car-friendly development is dramatically more pandemic resistant, surely an urgent priority following past oversight on this point.</p> <p>This list of quality of life improvements brought by the car could continue for many pages—provided the infrastructure is built to support it, which might be a reasonable expectation by rate payers. There is a point of principle here that it is not for the planning system to "lead" British consumers to an enlightened future (as defined by technocratic policy), but rather to provide for their needs with technological neutrality. This is especially keenly felt as the electric car comes online and the case for "nudging" away from the car is thus so much weaker. Places for People claims to have put people first, but curiously absent is any serious attempt to cater for the number of cars people are likely to want, based on experience rather than rarefied aspiration.</p> <p>This last point is particularly clear in the locality. There is a natural experiment ready to see in Terlings Park, where it is possible to walk to the station, but on a cold, dark night, or frosty morning, many drive</p>

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	<p>nonetheless (in passing, it might be noted that that is a consumer benefit—cold walk saved). The residents own cars, for the reasons outlined above, and so they get into them to use them: it would take much more than proximity to a shop, school, and surgery to undermine the desire to have a car at all. As distances from the new area of development to transportation and employment will be greater, the reasons to own a car will be only more powerful, and it is unclear why the same transportation choices will not be seen.</p> <p>In this context and with attention to the locality, it is unclear what the factual basis for the 20% modal shift is. As has been modelled with sophistication in the supporting report to the submission from Pinsent Masons LLP, other development Plans have sought more realistic and lower shifts (c.10-12%). It is axiomatic in our constitutional law that powers conferred must be exercised on a rational basis. If there is no factual basis for the 20% assumption, it is doubtful that powers are being exercised in a rational way, with profound implications for the robustness of the Plan.</p> <p>In practical terms, the 20% modal shift means under-provision for cars which will, inevitably, be bought. They will be parked on jam-packed streets, with poor visibility and thus danger, especially to children. Parking scarcity is already an issue in Terlings Park and will only become more pressing as population grows: even an area with 2+ car parking spaces per dwelling is already overstretched.</p> <p>There will also be an acute need for more parking capacity at the station, by a competitive operator to limit exploitation by the provider (30%+ price rises in 4 years). Otherwise, the good intentions of the Plan will simply translate into (further) profits for the monopoly provider as demand for parking increases. This has iniquitous effects to those on lower incomes, who will be priced out.</p> <p>It would be much more sensible to accept that people will buy and use cars and to plan accordingly throughout, not least with the advent of low-carbon motoring.</p> <p>The above important points about lifestyle in the East Hertfordshire setting strongly suggest that adequate road infrastructure is a must for the new development. As the area is already congested, there will be an acute need for new roads, especially around Eastwick Roundabout. It is pleasing that the serious congestion in the area is noted. However, the solution to it could be more sympathetic to the locality.</p> <p>At present, the most likely option appears to be to build a new, dual-carriageway road dividing</p>

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	<p>Terlings Park from the rest of Gilston, effectively cutting the village in two. It is unclear why the newly released land is not considered suitable for the road. As there is a blank canvas with the new land, a tasteful parkway-style road could be constructed to the north of the Plume of Feathers, with suburban streets feeding the main thoroughfare. This would be a rare prize: excellent separation of people from traffic. Traffic would be diverted from any new town square or focal point—the current absence of one having been perceptively noted in the proposals—meeting the needs of pedestrians, motorists, and bus users. This often eludes planning in older British towns, where modal separation is unattainable for historic reasons. But where there is a blank canvas, there is every reason to strive to separate (electric) cars from pedestrians: especially, young pedestrians and the elderly who would really struggle to undertake basic tasks like posting a letter at Pye Corner or using the Terlings playground with the newly-diverted A414 dual carriageway to impede them.</p> <p>This could be accomplished by building a suitably sized road from the disused quarry exit at Eastwick Roundabout, and tracking to the north of the existing village, before turning south near Gilston's eastern boundary and still connecting with the new dual-carriageway provision on Edinburgh Way, and thus the new M11 junction. At a stroke, the road would be supporting the village, connecting it with the region in a way that is sympathetic to its needs, rather than dividing it.</p> <p>In time, and as the new town develops, there might be scope to link such a road to Sawbridgeworth, especially if a (much needed) bypass is built there. There may also be a case to consider grade separation at Eastwick Roundabout to address the persistent tailbacks there.</p> <p>The intensity of the planned development raises some serious concerns. Although it is appreciated that land, and especially greenbelt land, is perceived to be scarce, it does not follow that all land use should be intensive when it is released. The area will remain semi-rural, even with the expansion of Gilston and Eastwick. Development in keeping with the area could helpfully consider minimum lot sizes and height restrictions to ensure that new dwellings are consistent with a true "village" vision. It is very welcome that the proposals seek to retain existing woodland, especially those paths with a historic character such as Cock Robin Lane and other tree-covered walkways. Indeed, access to these recreational footpaths and bridleways form an important aspect of local life.</p> <p>However, proposals to build at higher levels of intensity would not be consistent with the locality. The area in</p>

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	<p>Terlings Park has proven successful in striking a balance between the needs of development, and green space, through requirements not to build more than existing footprint. There is of course no existing footprint for the new areas, but a requirement not to build beyond a similar density might be the minimum that would be consistent with retaining something resembling the village life surrounding Gilston, Eastwick and Hunsdon. It might also be helpful to engage with more than one builder and designer, as in Terlings Park, to ensure a degree of competition over design. This helps avoid a single point of failure and helps to ensure that people can choose the style of dwelling they would like to buy, rather than having a single builder decide how they think the land ought to be used—effectively, a local monopoly reflecting company rather than consumer interests. In this way, builders would have to assess preferences for density, and build in response to their perception of demand: and if one truly believes in putting people first, what possibly could be the objection to that?</p>
Individual GA-006	<p>Support: This is a beautiful area. I like the neighbourhood's plan to create green corridors and to protect the view and the entrance to the Terlings Park Estate. I also think that the nature reserve at the back of the estate should be protected. Nobody wants a new Harlow. Planning has evolved.</p>
Individual GA-007	<p>Support: We chose to move to * (a brownfield site) because of its proximity to the beautiful Green Belt land and feel astonished by the plans put in place to destroy this. We especially object to extension of the A414 which will bring not only noise and air pollution that will also remove the essence of why we chose to move to a lovely quiet development. Furthermore, my daughter attends * school and the new road extension will prove dangerous and increase congestion to the school run.</p>
Individual GA-009	<p>Support: Green buffer and no vehicle access into Eastwick from new villages</p>
Individual GA-013	<p>Support: Developers green space in plan crucial to retain.</p>
Environment Agency GA-015	<p>Comment: Thank you for consulting us on the submission publication (regulation 16) for the Gilston Area neighbourhood plan. We aim to work with partners to reduce flood risk, while protecting and enhancing the water environment.</p>

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	<p>Having commented previously on this plan in October of 2019 we are pleased to see that our previous comments have been taken on board. We are pleased to see that evidence from the Water Cycle Study, Strategic Flood Risk Assessment, Water Framework Directive and Stort Catchment Management Plans have informed the supporting text, and policies AG1, AG2, AG7 and AG9. The NP takes into account a wider spectrum of local and regional environmental issues as a result including the biodiversity of rivers, water resources, waste water infrastructure, water quality and flood risk.</p> <p>We therefore have no further detailed comments to make in relation to this plan.</p>
<p>Canal and River Trust GA-020</p>	<p>Comment:</p> <p>We are the charity who look after and bring to life 2000 miles of canals & rivers. Our waterways contribute to the health and wellbeing of local communities and economies, creating attractive and connected places to live, work, volunteer and spend leisure time. These historic, natural and cultural assets form part of the strategic and local green-blue infrastructure network, linking urban and rural communities as well as habitats. By caring for our waterways and promoting their use we believe we can improve the wellbeing of our nation.</p> <p>The Trust is the owner and navigation authority of the River Stort and its associated towpath, to the south of the neighbourhood plan area. The Trust has previously responded to planning applications intended to provide the overall framework for the development that is the primary focus of the neighbourhood plan.</p> <p>Much of the proposed development is some distance from the River Stort and so the Trust interests are the impacts of the proposed bridge crossings, the impact of development on use of the towpath and the opportunities for improvements to the waterway corridor to mitigate adverse impacts (on biodiversity, for example) across the wider development area.</p> <p>The Trust has previously commented on the draft Neighbourhood Plan and we continue to support many aspects of the vision and objectives and many of the draft policies. We are pleased to note that many of the changes we previously recommended have been made. The Trust has no significant concerns about the draft plan. However, we have suggestions for how we consider the plan could be improved further, largely in the interest of providing additional clarity to the draft policies and consistency between them.</p> <p>We suggest adding an additional 'view of the countryside' from the River Stort Navigation towpath looking north and east over Fiddlers Brook / Lowland Fens. This area provides an attractive view of open countryside from the</p>

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	<p>Stort Towpath and contributes positively to the character of the waterway corridor. This is a sensitive location in emerging development plans as they include highway infrastructure on the raised ground in the distance. Ensuring that this is sensitively designed and landscaped will be important to protect the quality of this view.</p> <p>We welcome the recognition of the importance of the River Stort Navigation and the protection of the integrity of the landscape and countryside setting elsewhere in the plan and suggest the suggestion above would be consistent with this.</p> <p>Elsewhere in the plan, policies are explicit that they relate to the River Stort and Navigation where this is the intention but this is not the case in part 2)vi) of this policy. To avoid confusion, we suggest that 'Areas of open space retaining important local views over the open countryside and from the River Stort' is amended to include 'and Navigation' at the end of this section. It is evident from the photographs in section 14, which show the Navigation, that this is the intention.</p>
Individual GA-021	<p>Support:</p> <p>The Neighbourhood Plan has been carefully constructed and a lot of people have worked extremely hard and consulted fully with local residents to formulate a workable solution for the area. I fully support the proposals.</p>
Harlow Council GA-022	<p>Comment:</p> <p>Harlow Council (HDC) welcomes the interest of the existing local community (as represented by the three Parish Councils) in the success and quality of the Gilston Area development, in accordance with policies and proposals in the East Herts District (Local) Plan 2018 (EHDC LP).</p> <p>The parish councils are to be congratulated for reaching this stage in the Neighbourhood Plan process. We recognise that to do so it was necessary to face up to challenging issues and make a significant resource commitment.</p> <p>HDC offers its strong support for the NP; particularly the following policies:</p> <ul style="list-style-type: none"> - Policy AG1 Promoting Sustainable Development - Policy AG9 Phasing of Infrastructure Delivery - PolicyTRA1 Sustainable Mobility

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	<p>HDC support recognises that, as is evident from these policies, the parish councils and their NP are aiming to achieve high quality development; that exceeds normal minimum development standards and meets the HGGT Vision. HDC shares these aims.</p> <p>As part of HGGT partnership working, HDC is content that it is the role of EHDC as Local Planning Authority (LPA) to lead on detailed place shaping and design decisions. Harlow's interest is in the fundamental infrastructure and place management issues that will determine the relationship of the Gilson Area development to the wider HGGT area.</p> <p>However, HDC considers it necessary for the LPA to carefully consider conformity of the specific wording of the GANP policies with the LPA's various policy documents covering detailed implementation and design issues. This is essential because the NP will, potentially, in Development Plan hierarchy terms, supersede / override them. This is also important for what is already a necessarily wide ranging and detailed policy framework.</p> <p>HDC wishes to make some suggestions to strengthen and improve the NP in this respect. These suggestions are not intended to be comprehensive in respect of conformity.</p> <p>Important matters to consider are:</p> <ul style="list-style-type: none">• Policy D1 Establishing a Partnership with the Community <p>Local community involvement in, and influence on, the proposed pre-reserved matters and reserved matters design process should be approached in a practical way. This process is rightly expected to be collaborative and to involve the existing local communities. Involvement techniques should also recognise future community needs and this should be more explicitly stated in the policy. Community interest group and youth representation from the communities across the Garden Town and beyond that might be expected to benefit from housing opportunities in the Gilston Area should be mentioned as part of the future community involvement process in collaborative master planning. It is expected that HDC and Harlow organisations / groups will be specifically included.</p>

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	<ul style="list-style-type: none"> <li data-bbox="409 240 2040 276">• Policy EX1 Improving the Existing Settlements, Policy D1 Establishing a Partnership with the Community <p data-bbox="409 328 2098 624">Mention of developer funding sources for improvements to existing settlements may be misleading. Potential community Infrastructure levy (CIL) approaches and mitigation payments are noted generally. Developer funding will be expected to be secured, in accordance with processes set out in the District Plan or other guidance, where necessary to mitigate impacts and accommodate that new development. As presently worded the policy may raise expectations that cannot be met; that all developments in a wider area will contribute and that such contributions will be used to meet local priority projects. This would only be possible if EHDC were to adopt a CIL and that s not a matter for the NP.</p> <ul style="list-style-type: none"> <li data-bbox="409 676 2033 756">• Policy AG6 Creating new Villages with a Distinct and Locally Inspired Character, Policy BU1 Housing and Residential Neighbourhoods <p data-bbox="409 809 2092 1106">An important feature of Harlow is the provision and protection of ‘green wedges’ which separate, but also connect, a series clearly defined neighbourhoods, each with their own local facilities and sense of community. Maintaining physical separation can be achieved through policies with a strong emphasis on protection of the green wedges. The GANP reflects this in detailed policies on the landscape setting of the new villages. It rightly establishes clear policies to provide, and thereafter protect, substantial structural open space and wildlife habitat creation opportunities between, and connecting, the new villages. This reflects the HGGT approach and is strongly supported.</p> <p data-bbox="409 1158 2092 1278">However, creating a sense of community and maintaining the viability and vibrancy of the centres of new villages / neighbourhoods also requires a clear growth approach and related positive policies, including for connecting routes.</p> <p data-bbox="409 1331 2056 1457">To make the green wedges approach more positive in respect of the primary aim of urban growth, it would be useful to explicitly acknowledge that the green wedges are important as corridors for connection. There should be clear continuity of green space between Harlow and Gilston in terms of walking routes and public access to</p>

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	<p>green spaces.</p> <p>Consideration may need to be given to whether there is sufficient design flexibility elsewhere in the policies to reconcile primary development and housing growth aims with the green wedge setting. This is especially so in respect of allowing for higher residential densities. Overall residential densities may be planned to be quite low, but inclusion of some higher density development may well be desirable to create variety and to reduce the overall built footprint in order to protect heritage assets and key views and maintain meaningful village separation. A more balanced policy approach therefore may need to be found. Efficient use of land is extremely important for environmental sustainability reasons as well as development and services viability. Higher densities in the right locations and sensitively designed should be seen much more positively as a means to achieving the whole range of policy aims, as they could assist with the design, transport, open space and local community facility aspirations set out in GANP.</p> <ul style="list-style-type: none"> <li data-bbox="409 810 2029 847">• Policy AG8 Minimising the Impact of Traffic and New Transport Infrastructure on Existing Communities <p>Expectations of the existing community about road access and traffic should be better balanced with the needs of the new / future community, for instance in accepting that significant changes to existing routes will be required to sport growth. The risk of severance is relevant to the new as well as exiting communities. Infrastructure design should not hinder proper integration of the new and existing villages and the relationship of development with the wider Garden Town, for instance in the design of the Eastern Stort Crossing. Overall, policy must allow for a balance to be reached between impacts, benefits and delivery.</p> <ul style="list-style-type: none"> <li data-bbox="409 1203 954 1240">• Policy BU3 Employment Areas <p>More support should be offered to the successful delivery of employment uses in the Gilston Area. Specifically, policy should allow for provision outside of village centres. Such provision can assist with the general aspiration for the Gilson Area to provide future work opportunities and allow for the specific needs of different employment uses. A better balance should be sought between rightly seeking to focus general employment uses into the new</p>

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	<p>village centres and protect against inappropriate forms of development and the danger of overly constricting and constraining opportunities for positive economic growth, innovation and entrepreneurialism. Some employment uses/ premises that are needed may not be best located in village centres. Successful examples in the local area of integrating employment outside of an urban setting include the Parndon Mill Arts Hub that sits within the Stort Valley and provides a centre for local artists. Given the scale of the Gilston Area and the broad mix of areas including the new country park, the policy framework should seek to plan more positively for employment growth</p> <ul style="list-style-type: none"> • Policy D2 Community Ownership and Stewardship <p>The Plan should better consider the broader interests that need to be involved in shaping and managing the community facilities stewardship and governance approach for the Gilston Area. HDC understands that the parish councils are key consultees and partners on this matter. However it may not be desirable, or practical; given the scale and complexity of the development and the need to ensure consistency in HGGT wide arrangements, for the existing parish councils to have a lead, or direct, role in ownership and stewardship arrangements. Stewardship is an important matter to secure through grant of planning permission, but may not be a matter best addressed in any detail in a NP. Flexibility will certainly be required in how the 'community' actually owns land. The intent; to ensure community assets are protected for that purpose long term, is understood and fully supported, but appropriate safeguards will be needed to ensure that the chances of failure in arrangements is minimised. Land ownership detail is a key part of that. The stewardship arrangement will need to be secured under the GA outline planning permission / agreement in accordance with HGGT principles and partnership guidance. Given the scale of growth on the border of Harlow, and its contribution to the Garden Town with the existing town of Harlow, HDC also has a vested interest in ensuring that any stewardship arrangements are appropriate. It will wish to input and engage on an equal basis with parishes. The GANP's support for HGGT principles should be sufficient to indicate the preferences of the existing local community. The Plan supporting text and policies should be clarified in this respect.</p> <ul style="list-style-type: none"> • Policy AG5 Protecting Areas of Local Significance

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	<p>Designations of Local Green Space (LGS) may in some cases conflict with development proposals. Also, where applied to existing areas of protection such as the Green Belt, they can act to suggest a reduced level of protection outside of the LGS.</p> <p>HDC advise that small parts of areas m. and n. are within the land proposed through current live planning applications for construction of the Eastern Stort Crossing (ESC) road improvements, (essential access to / from the Gilston Area and Garden Town). These areas are already designated Green Belt, which provides a high level of protection for their open character and ensures that the impact of the proposed road improvements will be considered appropriately. 'Double designation' as Green Belt and LGS is a questionable approach in principle. It can complicate and confuse the policy framework by suggesting that the special local character of the area can in some way receive additional protection through the LGS designation. It might also suggest a diminished or lower protection of Green Belt designations within the Harlow area.</p> <ul style="list-style-type: none">• Policy AG3 – Protecting and Enhancing the Countryside Setting of New and Existing Villages and Policy AG7 – Creating New Countryside Parks at Hunsdon Airfield and Eastwick Woodlands <p>HDC welcome the recognition in the GANP of the importance of the Stort Valley. The valley provides a connected green infrastructure network and routes for movement, including for recreational walking between the new and existing villages of the Gilston Area and Harlow, thus integrating the Gilston Area into the wider Garden Town. The Stort Valley also represents a shared asset that performs a wide range of functions, some of which, such as wildlife habitat and biodiversity, are particularly sensitive to the potential increased recreational pressure arising from urban growth.</p> <p>HDC encourages the LPA to consider whether Policy AG3 sufficiently considers the importance of protection of the countryside beyond its role as a setting for the new and existing villages. Whilst impacts to the Stort Valley are referenced, these should be recognised as not being limited to just noise and light pollution, but also include the potential increased impact from public access and recreation.</p>

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	<p>HDC supports Policy AG7, which positively seeks the creation of new country parks at Hunsdon Airfield and Eastwick Woodlands. This would provide a significant recreational asset for the area, helping to ease impacts on the Stort Valley. The policy should make specific reference to this. The level of recreation and public access afforded in the new country parks could have a direct, very beneficial impact on management of the pressures on the Stort Valley.</p> <ul style="list-style-type: none"> • Policies and supporting text – multiple references to ‘the community’ <p>General references to ‘the community’ throughout the document, with no clear or defined indication of what this means may be problematic. The needs of the existing local community, which in the case of the GANP area is made up of three existing but separate villages, must be considered alongside the needs of the emerging new / future community. This should be stated in the policy. Where there is a specific expectation from an existing community this should be clarified / explained as such and checked as reasonable and achievable. Where a clear and defined impact / relationship can be demonstrated this could be used to enhance the clarity of the policies.</p>
Individual GA-024	<p>Support:</p> <p>As a resident of Terlings Park I am appalled at the prospect of the destruction of our beautiful environment by the proposed Stortford Crossing and the road development in Gilston area. These concerns are to some limited extent picked up on in Paras 228, 237, and A4.4 and A4.6. The way Terlings Park is constantly treated as an afterthought in the Planning process / documents is a disgrace, perhaps with its roots in the failure of the process to adjust for the out of date Census which could not include this development, that we moved to in 2015, not 2017 as is constantly referred to. I want to be able to continue to rejoice in the location in which I live and not fear for its loss.</p>
Individual GA-025	<p>Support:</p> <p>East Herts and the Developers promised many times in Public meetings, to build “villages of beauty, and within keeping of the area and present architecture”</p> <p>As much as I support the HEGNPG Gilston Area Neighbourhood Plan, I do feel that in some areas we should be asking for even more, in order for East Herts & the Developer’s to meet the promises made to the public!</p>

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Individual GA-025	<p>Support: Gilston is/was in the middle of the green belt, we need to make sure that the planners stick to all the commitments that they have made over the last few years. The properties built need to be “of outstanding” quality that complement the existing countryside habitat. The wildlife also needs to be enhanced and allowed to thrive - as it does now.</p>
Individual GA-026	<p>Support: I support the local plan, we need to make sure that the developers stick to their commitment to build quality homes that are in keeping to the country environment, protect wildlife, and continue to liaise and listen to local opinion.</p>
Individual GA-027	<p>Support: Road should not go so close to Terling Park it will ruin the entrance to our beautiful estate!</p>
Cllr Eric Buckmaster GA-028	<p>Support: I am the District and County Councillor for the Gilston area. I'd like to applaud the positive approach the local parishes and Neighbourhood Plan Group have taken in producing the Draft Neighbourhood Plan. It is important that the Neighbourhood Plan is in conformance with the adopted Local Plan and I feel they have largely achieved this and it reflects the collaborative approach with the council and the site promoters over a considerable time with the aim to achieve the best for current and future residents. Specifically they appreciate that the area must be comprehensively planned as a single allocation (p49 section 117) and they have taken their lead on the previously agreed Concept Framework. Policy AG1 on page 54 reflects on the overall context of the area with regard to the landscape and character of the existing villages here and elsewhere they express the importance of landscape masterplanning and village masterplanning to create places of distinct quality while protecting the heritage assets. On page 54 3i it refers to drawing an inspiration from the morphology and character of existing settlements in the area. The point is that existing villages such as Widford, Hunsdon, and Much Hadham are different but have a definite local character. Also reflected on in 3xi is the strong need for early Governance arrangements in order to protect and enhance assets for the health and wellbeing of the community. AG1 on page again refers to the importance of masterplanning in creating a connected, healthy green infrastructure, aiding healthy pursuits as well as local sustainable travel modes. This can be linked also to the maintaining the individuality and separation of the</p>

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	<p>villages as mentioned in AG4 on page 72. The Distinctness theme runs through the policies and again should be achieved Policy AG6 referring to layout, integration with the countryside and soft edges. I believe an extremely important element is the reference to phasing of infrastructure delivery in AG9 on page 108. The Neighbourhood Plan recognises that settlements and infrastructure across the site cannot be built out without the means to get to through sustainable travel modes. This will also have a bearing on the village Centres in Policy BU2 and BU3 and C1 to ensure they are well connected and contain the necessary social and financial infrastructure to maintain strong and active communities. Perhaps not appreciated at the time of writing the plan was the shift in employment and travel patterns created by the Covid crisis and how local centres may continue to grow in importance. Finally I support the understanding in D1 of establishing a long term partnership with the community through positive engagement since this is a development that will take form and shape over more than one generation. Adapting to the needs of residents and society while at the same time maintaining the high objectives and principles as expressed in the plan.</p>
Individual GA-032	<p>Support: I support this fully as I believe it is vital we keep the future and children safe and nice neighbourhood free from pollution and worry.</p>
Places for People GA-033	<p>Comment: As the Council will be aware, Places for People has submitted three planning applications promoting a residential led development at Gilston Park Estate, which represents a large part of the Gilston Area, consistent with Policies GA1 and GA2 of the District Plan.</p> <p>Places for People has enjoyed a positive working relationship with the Hunsdon, Eastwick and Gilston Neighbourhood Plan Group (HEGNPG), particularly during the preparation of the Gilston Area Concept Framework which sets out the vision, objectives and development principles for the Gilston Area. Furthermore, constructive engagement has occurred during the preparation and determination of the current live planning applications at Gilston Park Estate.</p> <p>Overall Places for People support the HEGNPG's intent to produce the GANP and welcome the desire to set policies that will ensure development at the Gilston Area delivers on the commitments made by the landowners</p>

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	<p>during engagement to date, particularly the East Herts District Plan and Concept Framework processes. The District Plan provides the platform to enable development to be realised at the Gilston Area. In particular, site allocation Policies GA1 and GA2 set out the strategic requirements and expectations of the development within the Gilston Area, which includes a range of criteria from sustainable transport, to heritage to design quality. It is, therefore, important that the policies of the GANP positively support and facilitate the Gilston Area development, whilst also setting out specific matters which the local community wish to see considered as part of the detailed design process.</p> <p>National planning policy and guidance is clear on the role and function of neighbourhood plans in supporting strategic policies and site allocations, in particular:</p> <ul style="list-style-type: none"> -Paragraph 13 of the National Planning Policy Framework ('NPPF') requires that neighbourhood plans "...support the delivery of strategic policies..." such as Policies GA1 and GA2 of the District Plan; -Neighbourhood plans "...should not promote less development than set out in the strategic policies for the area, or undermine those strategic policies" (paragraph 29); - Neighbourhood plans must be in general conformity with the strategic policies contained in any development plan; -National Planning Practice Guidance (NPPG) states that neighbourhood plans should be "positively prepared" and whilst they may contain policies on contributions and other requirements expected from developments these "...should accord with relevant strategic policies and not undermine the deliverability of the ...spatial development strategy" (ID 41-005-20190509); -A neighbourhood plan "must be in general conformity with, and plan positively to support, the strategic policies of the development plan" (ID 41-036-20190509); - "Proportionate, robust evidence should support the choices made and the approach taken. The evidence should be drawn upon to explain succinctly the intention and rationale of the policies ..." (ID 41-040-20160211); - Policies should be "...concise, precise and supported by appropriate evidence" (ID 41-041-20140306); and -Recognition that neighbourhood plan policies can provide an additional level of detail to strategic policy in so long as it does not undermine that policy (ID 41-074-20140306).

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	<p>Places for People have engaged positively with the HEGNPG during the preparation of the GANP. Formal comments were provided at the Regulation 14 stage, and separate meetings and feedback has been provided to subsequent iterations. In each instance Places for People focused comments on those areas where the draft policy wording risked undermining the successful delivery of Policies GA1 and GA2, and was directly inconsistent with the live planning applications that aim to deliver the policy requirements.</p> <p>The Gilston Area represents an important part of East Herts development strategy and is a critical component of the Harlow and Gilston Garden Town (HGGT), and therefore it is essential that the GANP positively support the development aspirations for the Gilston Area, and avoid setting unnecessary policy tests that will undermine the delivery of sustainable development.</p> <p>Places for People's consultant team has completed a thorough review of the Submission draft and has identified a number of areas where alterations are considered necessary if the GANP is to satisfy the 'basic conditions' as set in Schedule 4B of the Town and Country Planning Act 1990, in particular ensuring it is in general conformity with strategic policies and contributing to the achievement of sustainable development.</p> <p>In summary, the key points made in these representations are as follows:</p> <ul style="list-style-type: none">- the general conformity of the draft GANP to strategic policies of the District Plan and its relationship with the submitted planning applications;- the requirement to protect existing open views (Policy AG5);- the design of the proposed villages (Policy AG6);- the delivery of the Eastern Stort Crossing; and- other general observations on specific policy wording. <p>Conformity with Strategic Policies & Relationship with Live Applications</p> <p>National planning policy and guidance is clear that the role and function of neighbourhood plans is to support strategic policies. As a result one of the core basic conditions that a neighbourhood plan is required to</p>

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	<p>demonstrate at independent examination is that the plan is in conformity with the relevant strategic policy - in this context primarily Policies GA1 and GA2.</p> <p>The NPPG provides additional clarification explaining that a neighbourhood plan can provide an additional layer of detail on top of a strategic policy, however, the policy needs to positively support and not undermine the strategic policy direction, and avoid promoting less development.</p> <p>Policies GA1 and GA2 act as a strategic policy in the context of District Plan, and unusually for a strategic policy sets out 30 policy criteria covering a variety of planning related matters. Policy GA1 also specifically refers to the Gilston Area Concept Framework, which “identifies design principles, potential land uses, infrastructure requirements and phasing, and will be used as a benchmark in reviewing proposals for development.” To this end the Concept Framework already acts the guide in informing the acceptability of application proposals.</p> <p>The supporting text of the draft GANP notes the role of Policies GA1 and GA2, and makes reference to previous engagement undertaken with the landowners specifically in relation to the preparation of the District Plan, Concept Framework and Charter. However, the document contains no reference to the extensive engagement undertaken as part of the live applications currently being determined by the Council.</p> <p>Consistent with the terms of the Concept Framework and the Charter, once granted the outline planning permissions will form the basis for future engagement with the HEGNPG and other local groups as part of future Masterplanning and Reserved Matter Applications.</p> <p>This important context is not reflected in the drafting of the GANP, which results in policies which are not in line with the planning framework. For example, the GANP lists the objectives and development principles from the Concept Framework but in a number of instances alterations are proposed. This creates a tension with Policy GA1 which requires that the Concept Framework be used as a benchmark in testing the acceptability of planning applications.</p> <p>In addition, Policy AG5 requires the protection of defined views across open fields which conflicts with the location of the proposed villages as required under Policy GA1 and the Concept Framework, and potentially undermines the delivery of the 10,000 homes. This is explained in more detail below.</p> <p>Furthermore, Policy GA1 encourages the creation of a variety of green spaces across the site which is to include naturalised areas, as well as play space and opportunities for outdoor sport and recreation, linked to the Garden</p>

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	<p>City principle of creating healthy communities. However, the green infrastructure network set out in the GANP, specifically Policy AG2, fails to recognise the role of sport and recreation facilities as part of this provision. The effect is to require all sports facilities be located within the village boundaries placing pressure on the ability to deliver the homes set out in Policy GA1.</p> <p>As a final example, Policy AG1 suggests that the Strategic Landscape Masterplan (which follows the grant of outline permission – see Concept Framework Page 173) will define the development boundaries of each village, however, this is an important part of the current outline applications.</p> <p>To avoid the risk of such conflicts, Places for People would suggest an overarching policy is introduced which confirms that ‘All policies in this plan should be interpreted, both individually and together, in a way that is consistent with strategic policies GA1 and GA2. Development proposals will be supported where they are consistent with strategic policies GA1 and GA2 of the East Herts District Plan, having regard to the policies in this GANP as relevant’.</p> <p>Places for People note that a number of the draft policies contained within the GANP cover similar matters to those set out in Policies GA1 and GA2 which, strictly speaking, is not necessary and raises the potential for conflict to occur – inconsistent with the NPPF (see paragraph 16 re avoiding duplication) and the NPPG (see paragraph 41-041-20140306 re concise and precise).</p> <p>Policy AG5</p> <p>Criteria 3 of the draft policy requires that important views across open fields and from other vantage points be protected, with land retained in agricultural use or presenting a natural greenspace setting to ensure the image of the villages within the countryside is retained. These views are documented on Figure 21.</p> <p>Places for People are fully committed to delivering villages that are surrounded by green corridors, including around existing villages to ensure their integrity and character are protected (as per Policy GA1 criteria Vn and the development principles within the Concept Framework). This is reflected in the outline planning application submitted for Gilston Park Estate.</p> <p>However, the wording of Policy AG5 criteria 3 is imposes a more significant constraint on development across the</p>

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	<p>Gilston Area, inconsistent with Policy GA1. Figure 21 shows a series of views that pass across the developable areas of the villages (as shown in the Concept Framework) and as such it would not be possible to 'protect' such views across open fields. To do so would be inconsistent with the ability to deliver 10,000 homes across the Gilston Area in 7 villages as required by Policy GA1.</p> <p>Criteria 3 of the policy should either be deleted or significantly altered to reflect the changing context of 10,000 homes as per Policy GA1.</p> <p>Policy AG6</p> <p>Policy GA1, the Concept Framework and the submitted planning applications provide clarity on how the 10,000 homes of the Gilston Area will be distributed across the proposed seven villages.</p> <p>It is inherent in Policy GA1 and the Concept Framework that the villages proposed will be larger than the existing villages around the site, as well as some villages across Hertfordshire. The Concept Framework makes clear that the proposed villages will be distinct, each with an individual character, informed by the landscape and built features of the area (Vision, Page 10).</p> <p>The Concept Framework explains that the success of a village will be determined not by its scale, but instead by its character. Page 14 notes that the Gilston Area's villages are to be informed by a series of core village characteristics (eg landscape, enclosure, public realm, vibrant centres materials etc), with the application of each determined by local and contextual factors as part of the Village Masterplan stage. The Concept Framework therefore seeks to apply the core principles that underpin a successful village in a larger format as part of the delivery of 10,000 homes.</p> <p>This core ethos is not consistently and clearly reflected across the GANP, which in part implies a desire for a form of development identical to the current villages that surround the site. This is in conflict with the delivery of strategic policies GA1 and GA2.</p> <p>Policy AG6 criteria 2i to 2v set out a series of village characteristics that should inform the Village Masterplan process – Places for People are supportive of this approach. However, criteria 2vi requires the local characteristics shown in Appendix 4 to the 'reflected' in village design. Appendix 4 contains photographs from the neighbouring villages and a series of very specific local conditions. The prescriptive nature of the appendix would</p>

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	<p>essentially require the existing villages to be replicated in the new villages which is not consistent with Policy GA1 and the need to deliver 10,000 homes.</p> <p>Places for People fully support the requirement that the new villages be founded upon the core principles that underpin a successful village (as outlined in criteria 2i to 2iv), however the approach suggested in criteria 2vi and Appendix 4 undermines the overall vision. The villages are required to be of an appropriate scale to enable delivery of 10,000 homes, but also to support the mix of services and facilities sought within Policy GA1.</p> <p>Policy AG8</p> <p>The policy sets tests that will be applicable to the design of infrastructure associated with the Gilston Area. Places for People are aware that the local community have concerns with proposals for the Eastern Stort Crossing, and are concerned that the proposed wording of the policy has the potential to hinder the delivery of this important infrastructure which supports growth across the HGGT, contrary to the requirements of Policy GA2. The draft policy does not appear to be grounded in a foundation which acknowledges that the crossing will come forward consistent with strategic planning policy.</p> <p>The policy correctly requires new road infrastructure to minimise impact on local communities, but limits consideration to the existing villages only and fails to require consideration of the impacts on the new 10,000 homes proposed. The policy seeks to limit any increase in traffic on existing roads and lanes, and requires no significant increase in heavy vehicle movements.</p> <p>The policy is inconsistent with Policy GA2 and the Concept Framework, as well as the live planning application. The draft policy should be altered to recognise the strategic policy requirement and proposed alignment of the Eastern Stort Crossing, and in this context set criteria to ensure the impact on the local community (existing and proposed) is demonstrated to be acceptable.</p> <p>Other Matters</p> <p>Places for People would also like to draw the following other matters to the Council's attention:</p>

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	<p>-Policy AG2 criteria 1i refers to separation distances and buffers zones for natural landscape assets to be in accordance with (or where possible exceed) best practice. However, it is not clear what best practice is being referred to - we are not aware of any such evidence base or best practice in relation to natural landscape assets;</p> <p>- Policy AG2 and Policy AG3 refer to the creation and maintenance of a Green Infrastructure Network. Places for People support the importance of this network which underpins the landscape-led approach to development and ensures the new and existing communities have access to a range of spaces and environments. However, the description of the network as set out in Policy AG2 criteria 2 does not recognise the role these spaces will play in fulfilling the sports and recreation requirements of the development. This position is not aligned within strategic policy (Policy GA1 criteria Vi), and Pages 126 to 129 of the Concept Framework;</p> <p>- Figure 13 uses an incorrect Green Belt boundary which does not reflect the East Herts District Plan;</p> <p>- A number of the draft policies (ie AG9, C1 and D1) suggest that the development should contribute to infrastructure improvements within the existing villages. Places for People are committed to ensuring the existing community can access and gain benefit from the facilities provided within the new development, however, consistent with Regulation 122 any obligation requiring an improvement to facilities within the existing villages needs to be necessary, directly related, and fairly and reasonably related in scale and kind to the development. The policy should be updated accordingly;</p> <p>- Policy LA1vii requires that outdoor sport and recreation facilities, including surfaces and floodlighting, demonstrate no adverse impact on the environment and residential amenity. However, given the nature of the existing site it is inevitable that there will be some adverse impact and the test should quantify this to ‘...no significant adverse impacts...’; and</p> <p>- Policy D2 requires the future governance arrangements to be ‘agreed’ between the landowners, local planning authority and the local community. Places for People are committed to the governance measures set out in Policy GA1 and the Concept Framework, and their proposals are outlined in the Governance Strategy submitted with the planning application, however, it is not appropriate for these measures to be ‘agreed’ with the community. Instead the details should be prepared in close dialogue with the community as set out in Policy GA1 criteria IV and VII.</p> <p>Places for People are supportive in principle of the HEGNPG’s draft GANP but consider specific amendments</p>

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	necessary if it is to be able to demonstrate general conformity with Policies GA1 and GA2.
Individual GA-034	Support: Against high density housing in village 7, especially 3 storey buildings which are not conclusive with the term village. Ensure green corridors between each village for wildlife protection.
Thames Water GA-035	<p>General Comments:</p> <p>Thames Water support Objective 13 which seeks to ensure that infrastructure is delivered alongside new development.</p> <p>Section 248 indicates that capacity appears to be available at Rye Meads Sewage Treatment Works. This position is frequently reviewed taking account of the latest information available regarding growth in the catchment. A copy of the most recent position statement is attached for information.</p> <p>Thames Water support Policy AG9 on the phasing of infrastructure delivery and the requirements for a infrastructure delivery strategy. It is considered to be essential that there is early engagement with Thames Water in the preparation of the infrastructure delivery strategy and ahead of the submission of applications to discuss proposals and timescales for delivery. A phasing plan may be required to be secured through planning conditions to ensure that development is aligned with the provision of any necessary sewerage network upgrades and upgrades to the sewage treatment works.</p> <p>Introduction</p> <p>This is a statement from Thames Water on our position regarding development proposed in and around Harlow by all the appropriate Local Planning Authorities (Harlow, Uttlesford, Epping Forest & East Hertfordshire) for the current asset management plan period.</p> <p>It is our position as of October 2018 and subject to revision.</p> <p>Sewer Network</p> <p>We have carried out growth assessment up to 2026. The existing network has some additional capacity and on</p>

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	<p>most occasions will be able to accommodate proposed growth. Areas with insufficient capacity have been identified and high level solutions established. Detailed design will be required and delivered based on provided phasing programmes for the sites.</p> <p>A modelling study confirmed a high level of infiltration into the foul water sewers. Most of the proposed solutions assume limiting this infiltration through system separation and creation of extra capacity for proposed development. This is very flexible solution which allows us to gradually increase sewer capacity to match growing need.</p> <p>Using the above approach solutions for following sites have been established: Harlow East, Latton Priory, Sumners, Katherines and developments in Sawbridgeworth.</p> <p>For the Newhall and Gilston Park developments more traditional minor upgrades will be required.</p> <p>Sewage Treatment Works</p> <p>Upgrades to Rye Meads Sewage Treatment Works was completed early 2020. The main scope of the project was to extend the treatment capacity and improve discharge quality standards of the existing sewage treatment works to enable it to treat an increased volume of incoming flow. The upgrade will provide Rye Meads STW with a treatment capacity of 447,134 PE (Population Equivalent).</p> <p>A number of local authorities within the Rye Meads catchment are proposing significant housing growth. Based on our current growth forecasts, our recent high level assessment indicates that from a final effluent stream point of view we currently expect the site to have capacity up to 2036. However, we might need to deliver upgrades in sludge and storm streams during AMP7/8 (between 2020 and 2030). We are currently producing our business plan for the period 2020-2025 and any planning for additional capacity will follow our normal growth process, which means growth review and modelled view of risk to prioritise which sites will need a project and when.</p> <p>Given the scale of development coming forward in the region we are keeping a regular review of our sewage treatment works capacity. We are also working closely with local councils on understanding their future growth projections and likely changes in Environment Agency discharge consents.</p> <p>Our position statement is subject to change if growth forecasts within the catchment change.</p>

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	<p>Revision of Statement</p> <p>We propose to revise this statement periodically in response to any significant changes in the proposed levels of development within the catchment or changes in circumstances.</p> <p>Working with Stakeholders</p> <p>We are keen to work pro-actively with local authorities and other stakeholders to monitor the progress on the delivery of growth proposed in Local Plans and to ensure that any necessary infrastructure upgrades are delivered at the required time. We will provide any data requested by Local Planning Authorities to assist with their processes as best we can. We would welcome the early sharing of any information regarding any significant changes in circumstances within local authorities including any changes to delivery programmes of major developments.</p>
Individual GA-036	<p>Support:</p> <p>Disappointing that these homes are to be built on been belt but if they are going to be when we need quality befitting the existing areas, respectful of the countryside and with adequate provision of amenities for the new and existing.</p>
Harlow Civic Society GA-038	<p>Support:</p> <p>We support this neighbourhood plan for the Gilston Area as part of the Harlow and Gilston Garden Town. It is consistent with the vision for the Garden Town, providing 10,000 home in seven villages.</p> <p>We support the objectives of the plan to ensure that new developments respect the nature and integrity of the local area in way that minimises the impact on landscape, local heritage and existing communities, while providing development of exceptional quality. At the same time, we note that it recognises the area as part of the Harlow and Gilston Garden Town intended to provide comprehensive infrastructure upgrades and to regenerate Harlow.</p> <p>We believe that development in accordance with this plan and its policies will be sustainable and provide high quality places in keeping with the landscape and the character of the local area. It will connect to Harlow and the</p>

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	rest of the Garden Town area and contribute to meeting the vision of the Garden Town. We support the plan and its adoption as part of the East Herts District Development Plan.
Individual GA-041	Support: We support the plan but would like the cgis to be clearer showing that there is a clear way of Terlings Park residents to turn right out of the development towards the Hertfordshire amenities that we use regularly including doctors, schools and dentist services
Individual GA-042	Support: Certainly support improvements to Burnt Mill lane and look forward to having more walkable shops and restaurants from Terlings Park
Individual GA-043	Support: In general: I support self-build and custom built opportunities for architectural variety. I like that density towards the centre of villages is higher and that there will be walkable employment, shopping, services and leisure and not just another suburb. I like that buildings will not be a pastiche of old styles and rather an up to date but locally consistent style. I like that buildings provide frontage to open spaces so they feel safer. I like that homes are low carbon. I support cycling provision over cars provision For me personally: I am happy we'll finally have proper broadband in Terlings Park! Especially important to me is point 347.11: "Improvements to Burnt Mill Lane including provision of appropriate lighting" - it is quite scary at night with cars coming back from the pub also this "footpath improvements and prioritisation measures for pedestrians and cyclists to provide a safe route to Harlow Station."
Individual GA-044	Support: Infrastructure, so important. Qualified Doctors and Nurses, Fully equipped hospitals, Traffic control, thousands of extra cars in the A414, better policing. Adequate shopping parades. Schools with qualified teachers. Green areas play areas. Please don't make ghettos.

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Individual GA-045	<p>Support:</p> <p>I feel it's very important that the plan is adopted to provide guidelines for the protection of the character, habitat and wildlife of the area wherever possible. Specific safeguards should be put in place to ensure the physical and visual impact on existing residents of new development is reasonable, proportionate and mitigated. Particular attention should be paid to the sequencing of landscaping and building work.</p>
Individual GA-047	<p>Support:</p> <p>I feel it's very important that the plan is adopted to provide guidelines for the protection of the character and habitat of the area wherever possible.</p>
Individual GA-052	<p>Support:</p> <p>Good plan</p>
Individual GA-053	<p>Support:</p> <p>I believe the Neighbourhood Plan will help assist the delivery of good quality homes and infrastructure that East Hertfordshire Council has committed to and also to ensure developers are fully aware of what is required.</p>
Individual GA-054	<p>Support:</p> <p>Please take on board the proposals in the neighbour plan. We were promised an exceptional development given the loss of a significant level of green belt forever</p>
Individual GA-056	<p>Object:</p> <p>Green belts should be protected not destroyed, focus on brown sites and you have less opposing opinions. We need trees and fields for crops not more unaffordable housing (no matter how much you say it's affordable)</p>
Individual GA-057	<p>Support:</p> <p>Ensuring that we have secure fencing surrounding the perimeter of Gilston Park. This is a private area & which we all pay into a yearly maintenance fund to maintain this area. We do not want all & sundry being able to walk/picnic these areas!! The closure of our private lane is also an intrusion. This should be kept open for our access only!!</p>
Individual GA-058	<p>Support:</p> <p>I do not support the development of 10,000 houses and destruction of Green Belt land, but this was a "Fait Accompli" for this plan, having already been determined by EH. I support the work of the group and the report in mitigation of the effects of this development and the other proposals. It is important that any development</p>

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	proceeds together with Village 7 and 1-6 and that the infrastructure is in place. It is of concern that the owners of Village 7 appear to be trying to evade their responsibilities towards infrastructure costs. It is also of concern that we are being asked to approve the "Country Park" without all the detail and already the boundaries are being eroded by the proposal of the developers to include structured recreation facilities.
Individual GA-059	Support: Importance of local involvement and contribution to the future.
Individual GA-060	Object: Hunsdon area plan and the whole Harlow North scheme Should be stopped
Individual GA-061	Support: Keep our areas green.
Individual GA-063	Object: We are a village and developing a huge estate on our border will take away the whole reason people want to live here. The area is already heaving with traffic in the mornings and the schools are under pressure with no places, transport links into London are only accessible by road adding to the traffic with these kinds of additional housing numbers. Our hospital is not big enough and it's just too large a scale of development to put here. It's not fair on the existing residents and you will also make our houses harder to sell as people will not want to come and live here with that monstrosity down the road. Please do not allow this to happen.
Individual GA-064	Support: New Properties being built need to blend in with the existing buildings within Gilston and Eastwick. These are mainly red brick built houses. There are no high rise buildings or flats. Also Gilston park needs to have a boundary high fence enclosing it as this is private land which we all pay high service charges to maintain. It is not for the general public to use.
Individual GA-065	Support: 4. Monitoring and Review. Whilst I support the aims of the Gilston Neighbourhood plan, I am distrustful of both the developers and the council. It would be natural for the developers to try and circumvent, distort or modify by any means possible the aims of

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	<p>the Neighbourhood Plan.</p> <p>The Neighbourhood Plan must be adhered to in spirit as well as the wording, and it is the council's responsibility to ensure that this happens, it will be unacceptable for the council to claim they do not have the time or resources to devote as much time and effort as necessary, I am pleased to see that the Neighbourhood Planning Group will be keeping the plan under review, however, this at a minimum should entail a member of the Neighbourhood Planning Group being present whenever a planning meeting or decision is taken.</p> <p>This will require more than voluntary help, how will members of the Neighbourhood Planning Group be recompensed, given that East Herts Council have championed this development they must provide funding for the Neighbourhood Planning Group to employ several fulltime professional members throughout this process.</p>
Individual GA-066	<p>Support:</p> <p>Houses should be appropriate and built after infrastructure is in place.</p>
Individual GA-067	<p>Support:</p> <p>Please implement the suggestions presented by Hunsdon, Eastwick, and Gilston Neighbourhood Plan Group. Many people have spent time and effort to ensure that all important factors are covered including the new homes plan to fit into our way of life. Development, landscape, environment, roads and access plus heritage must be considered. It is critical that our views as a community are taken into account. It is so important that those who live here are full heard and our suggestions actioned.</p>
Individual GA-069	<p>Support:</p> <p>Please respect our remaining green belt.</p>
<p>Chairman Stanstead Abbotts Parish Council GA-070</p>	<p>Comment:</p> <p>I think the imposition of these Garden Villages has been a challenge for all of the rural area in this part of East Herts but this document clearly argues for assimilation of the villages and simultaneously provision of infrastructure from the beginning. That is certainly what we would also want and indeed need to see.</p> <p>There cannot be enough attention drawn to the impact the additional traffic will have on nearby settlements such as Stanstead Abbotts, with traffic inevitably forced down narrow rural roads not built to accommodate such volumes extra traffic generated will be noticeable even though there are laudable intentions are all very well nut without concrete proposals on how use of sustainable forms of transport will be promoted, these remain</p>

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	<p>intentions only. We are certainly concerned about additional vehicles coming through Stanstead Abbots and also creating tail backs at the usual pinch points at junctions and parking problems around stations. The positioning of the new bridge will be crucial also. It also needs to be remembered that there are multiple new developments of large numbers of housing being planned for the whole area all adding to vehicles on the roads.</p> <p>Sewage is another issue of concern. I have noted from the local plan how many thousands of new homes are expected to be relying on Rye House Sewage Treatment Works – the Gilston Area included. It is essential that expansion work is carried out there to avoid the unfortunate backing up incidents which some residents of Stanstead Abbots have experienced.</p> <p>The construction of education and health facilities must be undertaken at once rather than when a set number of homes have been completed as otherwise our already over-burdened providers will be unable to cope – I endorse your comments in paragraph 254.</p>
Individual GA-071	<p>Support: Is this development still relevant in the current and future environment we live in? The blocking off of Gilston Lane will cause residents considerable inconvenience. There seems to have been too little consideration for the wildlife, Will they return after they have been driven away?</p>
Individual GA-072	<p>Support: Just listen to what the local population say.</p>
Individual GA-073	<p>Support: Strongly approve</p>
Individual GA-076	<p>Support: Should this whole plan to develop this area in Gilston be reviewed? Particularly in view of the current Covid Pandemic and the associated financial position generally and in local councils. Additionally with the changes planned for Public Health England and the effect this may have on the development and regeneration in Harlow. Will the demand for this volume of housing and infrastructure be all necessary? The numerous amounts of housing developments in the area, are these all being occupied?</p>

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Individual GA-077	<p>Support:</p> <p>I thoroughly support this excellent document which I hope will ensure that any future developments are done in a sympathetic way to the current environment, provide plenty of green space for wildlife corridors and traffic impacts on current residents are minimised.</p>
Individual GA-078	<p>Comment: Refers to p. 92</p> <p>We should like to support the general aims of the neighbourhood plan, in respect of the quality of development, protection for the landscape, heritage and quality of living. Picking up on these last two points, and applying them to ourselves in a listed property of some age, we should prefer the plan to be more specific in regard to Pye Corner. The amenity of the area would considerably enhanced by the blocking of the road, and quality of life would be improved enormously. At present a rat-run, Pye Corner is an accident blackspot and heavily polluted. We welcome the reassessment of the area as regards to the war memorial and appalling traffic furniture. Instead it could become a beauty spot and even a conservation area. As regards the lane usually known as Gilston Lane, please note that permission for the residential development of the Smith and Nephew site was granted originally on the assumption that its resultant traffic would access the Eastwick Roundabout directly rather than through Pye Corner. The lane is totally unsuited to the volume of traffic coming and going from these new houses, let alone from a further development.</p>
Individual GA-81	<p>Support:</p> <p>I think that there are far too many houses being built. Our village is becoming more like a small town which none of us want to happen.</p>
<p>Cllr. John Hickford Stanstead Abbots Parish Council Ga-082</p>	<p>Comment:</p> <p>I write on behalf of residents in Kitten Lane Stanstead Abbots. Our greatest concern is the Gilston Garden Village 7 development. We believe that not enough focus has been made by the developers on public transport to access Harlow infrastructure and rail connections. The expectation is for even more congestion on the A414 leading to increased use of rat runs to find alternative routes which will be on unsuitable rural roads. This would channel traffic down the B180 into Stanstead Abbots to reach St. Margarets Station which has very limited parking availability, and all exit routes westbound and to the A10.</p> <p>The junction of Hunsdon Rd. B180 and Roydon Rd. is a point of frequent collisions, being on a blind bend to the</p>

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	<p>right and such a high camber caused by the steep hill to the left that it is impossible to turn in that direction without crossing into the oncoming traffic lane.</p> <p>Those wishing to take a left turn to access the A414 and Roydon, or to make a safer right turn, cut through Kitten Lane. As the name suggests, this is narrow lane almost single track with listed buildings and no footpath for pedestrians. Two large vehicles cannot pass in the lane and residents have frequently reported HGV's causing congestion and even having to back out onto Roydon Rd. Traffic traveling in the opposite direction towards Hunsdon have also difficulties with both high camber to the left and traffic traveling at speed from the blind bend to the right.</p> <p>Kitten Lane is a very popular cycle route, being part of the annual London to Cambridge cycle race and the well-known 50 mile Epping/Bishops Stortford circuit. There have been numerous incidents involving cyclists. The increase of traffic from Village 7 can only increase the danger to safety for residents and cyclists alike.</p> <p>There should be no access from Village 7 to the B180.</p>
Individual GA-083	<p>Object:</p> <p>To destroy this wonderful arable farm land, with its beautiful landscape, to increase the already over populated area of Harlow, together with many planning permissions given for new housing areas, plus various high rise flats and hundreds of homes already under construction, will create stress and disturbance for many years during the infrastructure construction re the technical problems of existing main road alterations. Plus, internal estate roads, sewer, draining, water, electricity and gate and telephone installations, even before any houses are built. The traffic problem in and around Harlow is at breaking point now and it's hard to imagine how stressful it will be when this proposed project starts.</p> <p>However, it can only be hoped that more common sense and not greed will prevail to provide a more liveable type of housing area than the rabbit hutch type builders' squeeze into the land they have bought. Not caring about room sizes, reasonable garden area and decent parking. i.e. instead of parking on pavements and green space areas which the government are considering fines for parking on pavements. They will make a fortune in</p>

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	Harlow.
Individual GA-086	Support: HEGNPG have worked tirelessly to make sure that all these homes have the least impact on the existing Community, wild life and public rights of way.
Individual GA-087	Support: Concerns over: Density of the development with 3 story buildings which is not a village road access to Hunsdon via village 7 centre very dangerous.
Individual GA-088	Support: I am strongly in support of the following elements of the neighbourhood plan: Neighbourhood Plan sets out in policy terms what matters to the community and reflects the essential aspects of what has been agreed with the Council and developers since September 2017. Key development principles for comprehensive and integrated development, respectful of the character of local villages and maximising benefits for the existing and new communities; Preparation of the landscape masterplan and village masterplans will be undertaken in consultation with the local community; Other controls needed to protect existing communities and actions required to deliver improvements; A framework for partnership working between the Council, developers and the local community. The need to protect the countryside setting, heritage assets and the general character of the area. The desire to enhance the landscape, green spaces and areas of importance for nature conservation and to protect areas of ancient woodland. Maintaining collaboration and dialogue with the local planning authority, the developers and their technical teams so that they can understand and take account of local perspectives. This includes providing technical responses to outline planning applications and Supplementary Planning Documents such as the Gilston Area Charter SPD. The community would like to ensure that the release of Green Belt in this area genuinely leads to development of exceptional quality, that will create a strong and distinctive community and eventually mature into attractive villages for the future. Character: The development will be of high-quality design, with careful consideration given to layout, architecture, building heights and materials. It will also be sensitively integrated visually in the wider context of the surrounding landscape. Landscape buffers will be provided in order to

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	<p>maintain the distinct identities of Eastwick, Gilston and Hunsdon within the context of the overall development. Heritage: The site contains multiple heritage assets, including listed buildings and Scheduled Monuments. The development will be designed in order to ensure that these assets and their settings are conserved and, where appropriate, enhanced within the context of the overall development. Ecology and Environment: The development will retain and protect important hedgerows, Local Wildlife sites and ancient woodlands. New habitats will be created in order to achieve an overall net gain in biodiversity. A Sustainable Urban Drainage (SUDs) network will be integrated to provide additional planting and biodiversity.</p>
Individual GA-089	<p>Support: Sustainable transport. The electrification of transport must be supported by charging points for people who cannot install charging points at their own home. We support the overall plan.</p>
Individual GA-091	<p>Comment: I fully support the Gilston Plan and its efforts to ensure that the any development is carried out in a responsible, considered and sustainable manner though am somewhat concerned that no mention of an 800 acre 20 year gravel quarry that is being planned directly alongside the development. The plant for the quarry will be easily visible from Village 7 on the top of the hill between Long Springs and Square Spings Woods remaining in operation for 20 years. As much of the report is concerned with the retention of scenic views surely this must be of some concern. The current land owner is the same for both Village 7 and the quarry site (City and Provincial).</p>
Individual GA-093	<p>Support: The building of a playground for Kids</p>
Individual GA-095	<p>Support: I support this Neighbourhood Plan, which has accurately captured the concerns and wishes of the local community ahead of the major development.</p>
Individual GA-100	<p>Object: Ridiculous idea will cause traffic for everyone in this community</p>
Individual GA-101	<p>Object: This will cause Hunsdon area to be too busy</p>

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Individual GA-102	<p>Support: I wish to support the Neighbourhood Plan making sure East Herts and landowners hold good their promises.</p>
Individual GA-105	<p>Support: Strongly support the Gilston Area Neighbourhood Plan. Strongly identify with the concerns raised by existing residents, as spelt out in the Plan, about the potential negative impact of the proposed housing development etc. on the local community. Strongly support the proposals in the plan to mitigate this potential negative impact.</p>
Individual GA-106	<p>Support: Strongly support para 2. As a local resident I am very concerned about the potential negative impact of the proposed new development on the existing community. To mitigate local concerns paras 27 and 29 sum up those concerns very well and identify the assurances the local community is seeking from the developers. Strongly support section D Vision and Objectives, especially paras 109 and 111. Strongly support the Neighbourhood Plan policies detailed in pages 47-151 which represent a very thoughtful rationale and justification for these policies. Especially supportive of Policy D of section 3.2 on establishing a partnership with the community. Recognise the importance and significance of the monitoring and review section, paras 393-399 and the role of the council in this respect along with the engagement with the neighbourhood plan group in this process.</p>
Hertfordshire Gardens Trust GA-107	<p>Object: The NP area contains the remains of the 3 Hunsdon medieval and Tudor Royal Parks, Pisho Park of similar date, and Gilston Park. It adjoins Stanstead Bury Park (HE Registered) and Briggens Park (HE Registered and on the HAR Register), Sayes Park and Hunsdonbury Park and within the setting of Bonningtons Park. Detailed information on the parks in this area from medieval to Tudor times can be found in the publications of Anne Rowe (University of Hertfordshire Press).</p> <p>The significance of the Hunsdon parks is only now beginning to be discovered and the scheduling on the Hunsdon ponds as a relic of Henry VIII's great park is only the start. The setting of this scheduled heritage asset within sight of the church and the possible site of the former hunting lodge indicate there may be other significant relics of this park within the area of this application. Relics such a park boundaries, ditches, wood banks, boundary trees etc. have not been plotted for the site and are not detailed in documents.</p> <p>We advise that consideration of these important heritage assets be included in any robust NP.</p>

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Terlings Park Management Company Limited GA-108	<p>Comment:</p> <p>I am writing on behalf of Terlings Park Management Company Limited (TPMC) in relation to the Gilston Area Neighbourhood Plan.</p> <p>Terlings Park is part of Gilston Village and was built on a brown field site with 200 properties.</p> <p>We would like to register our support for the Gilston Area Neighbourhood Plan which has been created by the Hunsdon, Eastwick and Gilston Neighbourhood Plan Group (HEGNPG).</p> <p>When Terlings Park was built there was no Neighbourhood Plan in place and there are clear benefits to both existing and future communities from having such a document.</p> <p>There are a series of issues that remain 3 years on from the completion of the site which we feel the Gilston Area Neighbourhood Plan would have guided the developers to address were it in place.</p> <p>Gilston Parish Council has made significant efforts to integrate Terlings Park in to the existing community and we very much support this collaborative approach to creating new communities.</p> <p>The policies detailed in the Neighbourhood Plan covering:</p> <ul style="list-style-type: none">• Accommodating Growth;• Delivery Quality Places;• Implementation and Delivery; and• Monitoring and Review <p>have been created with input from residents across the area including those in Terlings Park.</p> <p>TPMC will continue to work with HEGNPG to ensure that Gilston residents living in Terlings Park are an integral part of the Neighbourhood Plan and any future development</p>

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Individual GA-109	Support: This plan is needed to give voice to the community to ensure that all the promises to build excellent quality houses In the Gilston Development are fulfilled.
Individual GA-110	Support: I am particularly concerned about the style of housing that will be built and the density. The new houses should look like they have always been here and blend into the existing traditional villages. I would not want a copy of the very modern dystopian architecture that is being built on the outskirts of Harlow at New Hall. We were promised a good boundary fence around Gilston Park House by Mary Parsons to prevent local people from wandering onto our private grounds. Please ensure that this is carried out by Places for People. Also please remove the viewing platform that will force us to plant tall trees on our boundary.
Individual GA-111	Support: I feel the plan is well considered and thought out. However as a resident of Terlings Park I am very concerned about the proposed river crossing and the effect the new road will have on my local environment. The road will increase all forms of pollution e.g. noise, dust, vehicle emissions, and in our case visual, because of the elevated section near the entrance to Terlings Park where we live at No 8. The Place for People webcast did nothing to allay my fears that this monstrosity will have huge impacts on our daily lives. Our view will go from seeing mature trees to an elevated busy major road with HGVs thundering past 24 hours a day. This is not something we get at present moment with only cars, vans and non HGVs using the road. The value of our property will suffer accordingly and make our property potentially unsaleable.
Individual GA-112	Support: I salute all the hard work that has gone into preparing this plan and support it wholeheartedly.
Individual GA-113	Support: I feel that the neighbourhood plan has been extremely reasonable and accommodating in its requests.
Individual GA-115	Support: I support the neighbourhood plan that tries to help the Gilston residents in what is a terrible situation for them.
Individual GA-116	Comment: I am writing regarding the road network opposite my business (Eastwick road) and would like to know the suggested plans and how it will affect access for customers visiting.

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Organisation	Summary of Comments
Individual GA-117	<p>Support: I really support this local plan as a former resident as it ensures the developers and planners meet all their promises for high quality homes with all the necessary infrastructure and facilities for future and existing communities.</p>
Individual GA-119 GA-120	<p>Support: I support this local plan to ensure the Developers and planners meet all their promises for quality homes with all necessary infrastructure and facilities for future and existing communities.</p>
Historic England GA-121	<p>We welcome the production of this neighbourhood plan, but do not wish to provide detailed comments at this time. We would refer you to any previous comments submitted at Regulation 14 stage, and for any further information to our detailed advice on successfully incorporating historic environment considerations into your neighbourhood plan, which can be found here: https://historicengland.org.uk/advice/planning/planmaking/improve-your-neighbourhood/</p> <p>I would be grateful if you would notify me if and when the Neighbourhood Plan is made by the district council. To avoid any doubt, this letter does not reflect our obligation to provide further advice on or, potentially, object to specific proposals which may subsequently arise as a result of the proposed NP, where we consider these would have an adverse effect on the historic environment.</p>
Individual GA-122 GA-123 GA-124	<p>I fully support the plan but wish to express my strong preference for extended buffers / green corridors around Channoeks Farm and Cottages that are majorly impacted from all sides in particular by villages 2 and 3. The buffers and green corridors need to be sufficiently wide, with high and dense planting to protect existing dwellings from new build vision, noise pollution and encroachment.</p> <p>Gypsy and travelling entertainment sites should be challenged and pushed back. Any that unavoidably go ahead should be limited to the smallest number for travellers passing through only, no permanents.</p>
Individual GA-125	<p>I am no longer a resident of the area, but Gilston was my childhood home and I regularly return, I very much love the area as it is, particularly the character of the various villages and access to green space / walks and woods. I support the proposed plan as being the best way to manage the drive for more housing, whilst protecting the current character and environment of the area.</p>

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Individual GA-126	Support: This plan seems to be the lesser of two evils. There are far too many houses been built right across the country.
Individual GA-128	Support: I fully support the Gilston Area Neighbourhood Plan, all its policies and recognise the enormous amount of hard work that went into putting it together.
Individual GA-129	Comment: I have attended meetings run by East Herts Council and the organisations in charge of the overall structure of the whole massive Harlow and Gilston Garden town and now have formed my own personal definite views. Because of the enormity of the whole massive enterprise I think it is absolutely vital that we have a local caring body of people, to represent resident's views over this huge housing development. Having lived in the area for thirty three years I know neighbours and contacts do not want another sole less sprawling development lacking in character and "done on the cheap". We need the new villages to slightly echo the existing ones but each having their own individual character. As the area is historical with connections as far back as King Henry V111 we should be careful to respect this. We need to be sure that this is continued beyond the planning stage and carried out as promised, providing quality homes in desirable settings. It is essential that each village has the required adequate infrastructure of schools, with doctors/ dental surgeries, and community centres -village halls for the wellbeing of everyone and play areas for children. Most importantly there should be central green spaces for people's wellbeing and opportunity to them to meet, sit, socialise and feel part of the community.
Individual GA-130	Object: There is not enough infrastructure to cope with this many new houses. At least each household will have 2 cars. Hospitals, doctors and dentists all over run as it is. Also the peak trains are full to the maximum capacity. Lastly we will lose our country feel and wildlife.
Individual GA-131	Support: I strongly support this Plan and hope it will become fully enshrined in the planning of these Gilston Villages
Individual GA-132	Support: I wholeheartedly support this neighbourhood Plan. And trust the planning authority will make it an integral part

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Organisation	Summary of Comments
	of the planning deliberations/approvals
Individual GA-133	<p>Support: Having accepted that the desecration of a large section of green belt and quality agricultural land cannot be avoided I would like voice my support for the HEGNP in the hope this will mitigate some of the disastrous environmental and social consequences.</p>
Individual GA-134	<p>Support: Refers to p.32 para 101, p.100 para 1.8, p.102/3 para 236/237</p> <p>Page 32 Para 101 Transport and Mobility Patterns Page 100 Para 1.8 Minimising impact of traffic and new transport infrastructure on existing communities</p> <p>I make my comments albeit as a Sawbridgeworth resident but more so as an active grandparent who on a daily basis collects and returns our young grandchild who lives with her parents in Terlings Park, Gilston</p> <p>Not enough emphasis is made in the Plan for the fact that Terlings Park residents are Hertfordshire council tax payers and all the services they require and use (apart from the Princess Alexandra Hospital) are either in High Wych, Sawbridgeworth or Bishops Stortford. There is no public transport. The necessity for private vehicles to turn right with comparative ease exiting Terlings Park cannot be emphasised enough.</p> <p>The re-routing of the A414 passed the entrance to Terlings Park will have a huge detrimental effect upon the lives of Terlings Park residents. Ease of ingress and egress for current residents is essential and careful consideration of this could be some recompense for the huge disruption over the construction period and once the 7 villages are built including the possible fall in property values.</p> <p>The Plan needs to encompass this.</p> <p>Page 102/3 Para 236/7 Minimising impact of traffic and new transport infrastructure on existing communities</p>

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	<p>Currently there is a reasonable tree buffer between Terlings Park and Fiddlers Brook bridge and the proposed routing of the new road. It is essential that none of these trees are felled or pollarded. No reference to the current trees is made in the Plan.</p> <p>It is obvious that the new road from River Way over the marshland will be elevated. However all presentations to date have been vague and it is not clear at what height the road will be as it approaches Fiddlers Brook bridge and passes Terlings Park. It is vital that sufficient and environmentally friendly noise and visual buffers are provided. I can find no reference in the Plan to mitigation as a result of the likely height of the road.</p>
Individual GA-135	<p>Support: Notwithstanding my fundamental opposition to large scale development north of Harlow in East Herts, I support the Gilston Area Neighbourhood plan as a way for the community to control/limit the damage to the area.</p>
Individual GA-136	<p>Support: The Plan builds on the Concept Framework agreed before the Local Plan EiP and when completed will give this status in the Local Plan so the commitments made will have enduring meaning, for this reason the NP should be welcomed and supported, even if trashing the Green Belt remains unwelcome.</p>
Individual GA-137	<p>Support: I'd like to take this opportunity to whole heartedly support the Neighbourhood Plan submitted by HEGNPG for the Gilston Area. This is an incredibly well thought out plan, prepared by the existing community that will ensure that the developments being brought forward adhere to Garden Village principles and most importantly the Concept Framework.</p>
National Grid GA-138	<p>Comment: Following a review of the above document we have identified that one or more proposed development sites have been identified as being crossed or in close proximity to National Grid assets.</p> <p>Policy GA1 Gilston Area Site Allocation 4ZM ROUTE TWR (017 - 078): 400Kv Overhead Transmission Line route: PELHAM - RYEHOUSE 1</p> <p>National Grid also provides information in relation to its assets at the website below.</p>

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	<p>https://www.nationalgrid.com/uk/electricity-transmission/network-and-assets</p> <p>Please see attached information outlining guidance on development close to National Grid infrastructure.</p> <p>Distribution Networks Information regarding the electricity distribution network is available at the website below: www.energynetworks.org.uk</p> <p>Information regarding the gas distribution network is available by contacting: plantprotection@cadentgas.com</p>
<p>Sport England GA-139</p>	<p>Object: Policy AV3 – Protecting and Enhancing the Countryside Setting of New and Existing Villages</p> <p>It is requested that ‘small scale ancillary facilities’ in criterion 2 (iv) of policy AV3 be replaced with ‘ancillary facilities appropriate to the scale and nature of the sports pitches and formal recreational facilities’. While the need to minimise the scale of the ancillary facilities supporting sports pitches and other formal recreation facilities in the Green Infrastructure Network is understood, to ensure that the ancillary facilities are fit for purpose and meet the needs of the users of the facilities they have to be of a proportionate scale. For example, the number of changing rooms required to support a sports pitch site will be proportionate to the number of pitches proposed and the type of pitches proposed (e.g. adult pitches will require more changing rooms). Therefore a large sports pitch site would therefore require a relatively large pavilion building that has the changing room capacity to meet the needs of the users. If all ancillary buildings on sites within the Green Infrastructure Network were required to be small scale regardless of the scale and nature of the facilities they support this may compromise the ability of these facilities to meet the needs of the community. The suggested wording is broadly consistent with the approach taken in paragraph 145 of the NPPF in relation to ancillary facilities for outdoor sport in the Green Belt.</p>

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	<p>Policy AV7 - Creating New Countryside Parks at Hunsdon Airfield and Eastwick Woodlands</p> <p>It is requested that a new criterion is added to part 2 of the policy along the following lines: “New and enhanced footpaths, cycle ways and bridleways that are segregated where appropriate should be explored to increase opportunities for active recreation within the Countryside Parks. Small scale and appropriately sited and designed ancillary facilities that support active recreation will be acceptable in principle.” This addition is requested in recognition that the Countryside Parks offer a strategic opportunity for providing active recreation resource for existing and new communities especially for walking, cycling and equestrian use. To maximise the opportunities, the design of the parks may require new routes or existing routes to be enhanced and there may be a need for segregated or separate routes for different users to address potential conflicts between walkers, cyclists and horse riders. For instance, there could be a circular walking/running route around the parks or part of a park could be designed as a mountain bike trail or for a family cycle route. If the parks do attract significant numbers of people from the existing and new communities, small scale ancillary facilities may be necessary to support this such as a café, toilets, bike hire facility etc. A policy which supports the principle of such ancillary facilities subject to them being small scale and appropriately sited and designed is considered to be preferable to resisting such facilities which based on Sport England’s experience could result in ancillary facility needs being addressed by unplanned mobile or temporary facilities. The reasoned justification to the policy could also include some commentary to explain the approach which draws upon this advice.</p>
Individual GA-140	<p>Support: I would like to add my personal support to the Gilston Area Neighbourhood Plan. The plan has considered many aspects of future development and I believe should progress through to the adoption referendum.</p>
Individual GA-141	<p>Support: I feel the HEGNPG Plan is exceedingly thorough. I just hope that when it comes to the actual Planning Applications for development of the Gilston Garden Town the Policies, nos: 1:3, 1:4, 1:7 will be adhered to by Planning Authorities. Also that Village 7 will be treated as part of the whole; both with infrastructure, height of buildings etc. and not become stand alone.</p>
Individual GA-142 GA-143	<p>Support: I am fully supportive of this neighbourhood plan. The decision to build 10,000 homes in Gilston on green belt</p>

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GA-144	land is an utter travesty, especially when there are no facts to support the need. In fact new homes built in neighbourhoods surrounding the Gilston area remain unsold and cannot be filled. This well thought out and put together plan will at least help try to protect what remains of Gilston.
Individual GA-147	<p>Comment:</p> <p>Please note that the road leading into Gilston Village from the A414 is a weight bearing load for up to 7.5 tonne vehicles. Please make it part of the planning that no construction traffic is allowed to pass through Gilston Village.</p>
Individual GA-150	<p>We would like Pye Corner to be sealed off from through traffic.</p> <p>The Gilston by-pass which we understand will run from the A414 to Riverway, we ask to be built as far away as possible from the homes in Pye Corner. We would like to know exactly how far away this road is to be built. We anticipate a busy through route and do not wish to be subject to constant noise and vibrations.</p>
Individual GA-152	<p>Support:</p> <p>It could be even stronger.</p> <p>I fully support the proposal put forward by our Neighbourhood Planning Group. If anything, it can be stronger!</p>
Individual GA-153	<p>Support:</p> <p>Happy to accept the plan although I feel the plan could more strongly support the design of the existing rural villages of East Herts be used in the new development.</p> <p>I am very sceptical of the ambitious modal change to transport being achieved particularly with the changes enforced by the current Covid-19 situation. 10,000 additional houses will have significant detrimental impact on the transport needs around and through the district.</p>
Individual GA-155	<p>Comment:</p> <p>I would object to Gilston being cut in half as a village, I also object to the dual carriageway cutting across land on Terlings park across to Edinburgh Way, the main reason we moved here was the rural village setting.</p> <p>I would like to ensure that the frontage to village 1 Opposite Terlings Park be kept back as far as possible from the main road and have green space.</p> <p>I also have concerns re the infrastructure and how roads and trains will cope with the extra amount of commuters etc.</p>
Individual GA-158	<p>Object:</p> <p>Building and disruption of local roads.</p>

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Individual GA-159	<p>Support:</p> <p>With the massive loss of green belt land to development in this area it is critical that the neighbourhood plan supports the maintenance of the agreed remaining green belt and ensures the preservation of village's identity and history.</p> <p>With potential loosening of planning regulation the local plan must challenge any encroachment or loss of quality in the district development that impacts the neighbourhoods</p>
Individual GA-161	<p>Support:</p> <p>I support this neighbourhood plan as a mechanism to ensure only appropriate impact on existing communities</p>
Individual GA-162	<p>Support:</p> <p>I am in full support of any new development impacting current village life in the smallest way possible. A road through the centre of a village is utterly unacceptable which was shown to us by the developers.</p>
Individual GA-165	<p>Comment:</p> <p>The roads leading to Pye Corner are supposed to be weight restricted; this is not adhered to at any time. There are a few very beautiful listed buildings in our village; the houses often shake when the heavy lorries drive through the village.</p> <p>When the development starts please ensure that the construction vehicles are not allowed to drive through our village.</p>
Affinity Water GA-166	<p>Comment:</p> <p>You should be aware that there are three Environment Agency defined groundwater Source Protection Zone (SPZ) corresponding to Roydon Pumping Stations across most of the neighbourhood plan area with the more sensitive SPZ1 to the South West. This is public water supply, comprising a number of abstraction boreholes, operated by Affinity Water Ltd. We will be particularly concerned around any developments taking place within the SPZ and must be informed in all parts of the development process to ensure measures are put in place for public water supply protection. Particularly in the case of works involving deep excavations such as piling.</p> <p>To address our general concerns, all developments in the entire area will need to consider the following:</p> <ol style="list-style-type: none"> 1. General: The construction works and operation of any proposed development site should be done in accordance with the relevant British Standards and Best Management Practices, thereby significantly reducing

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	<p>the groundwater pollution risk.</p> <p>2. Ground investigation: Any works involving excavations below the chalk groundwater table (for example, piling or the implementation of a geothermal open/closed loop system) should be avoided. If these are necessary, ground investigations should first be carried out to identify appropriate techniques and to avoid displacing any shallow contamination to a greater depth, which could impact the aquifer.</p> <p>3. Turbidity: Excavations are also likely to generate turbidity in the aquifer, which could travel to the public water abstraction point and cause disruption to the service. Mitigation measures should be implemented and notification to Affinity Water at least 15 days prior from developers in advance of any such works, in order to intensify our monitoring and plan potential interruption of the service.</p> <p>4. Contaminated land: Construction works may exacerbate any known or previously unidentified pollution. If any pollution is found at the site then works should cease and appropriate monitoring and remediation methods will need to be undertaken to avoid impacting the aquifer.</p> <p>5. Infiltration: In certain scenarios surface water should not be disposed of via direct infiltration into the ground via a soakaway. This could be due to the potential presence of contaminated land and the risk for contaminants to remobilise, and the likelihood of surface water to carry on oil and hydrocarbons and cause groundwater pollution.</p> <p>6. Drainage: In certain scenarios surface water is likely to carry on oil and hydrocarbons. It is therefore recommended that onsite drainage systems should incorporate an oil/water interceptor which acts to prevent petrol/oil being discharged into the surface and groundwater network.</p> <p>7. Bunding: If any tanks, generators and filling areas are to be installed as part of the development, they will need to have secondary containment which can hold 110% of the volume the tank or generator is designed to contain. This is to prevent contaminants being discharged into the surface and groundwater network in the event of a spill.</p> <p>8. Substance Storage: The installation of a leak detection system should be considered, and a procedure should be adopted that includes directly notifying Affinity Water immediately if any leakage is suspected. The Environment Agency should also be notified. This so we are able to assess the impact on public water supply and implement protection measures if necessary.</p> <p>9. Water Supply: In this location Affinity Water will supply drinking water to the developments. Applications for</p>

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	<p>new or upgraded connections should be done through the Developer Services Team by going through their My Developments Portal (https://affinitywater.custhelp.com/) or aw_developerservices@custhelp.com. The Team also handle C3 and C4 requests to cost water mains diversions should there be any existing public water services already located on site.</p> <p>10. Infrastructure (pipes etc.): To check whether there are any existing public water mains running through or located near to proposed sites that may need removing, diverting or protecting, a developer will need to get in contact with the Mapping Team by emailing maps@affinitywater.co.uk. Upon request, they will issue maps of water mains which should also help identify the nearest water main for connection. For further information please see their Mapping Team webpage https://www.affinitywater.co.uk/my-water/mapping. Please note that map charges may apply if requesting information on a site you do not own.</p> <p>11. Water Efficiency: Being within a water stressed area, we would encourage developers to consider the wider water environment by incorporating water efficient features such as rainwater harvesting, rainwater storage tanks, water butts and green roofs (as appropriate) within each dwelling/building.</p>
Individual GA-167	<p>Support: I fully support the plans laid out in the Gilston area neighbourhood plan with respect to the Harlow and Gilston Garden Town initiative.</p>
Individual GA-168	<p>Support: I just wish to support the plan in its aims to ensure we will have developments of exceptional quality and protection for the landscape, heritage and quality of living for both the existing community and future residents.</p>
Individual GA-170	<p>Object: I think it is very important to maintain as much green and open space as possible for the wellbeing of all. But, more importantly the habitats and runs for the local wildlife. Hunsdonbury area.</p>
Individual GA-174	<p>Support: Although, I do not believe the land should have been released from the greenbelt, I fully support the details and outcomes the Gilston Area Neighbourhood plan as the very best way forward I have seen. It takes into account the promises made by East Herts and Landowners to deliver developments of exceptional quality. If they are not held to those promises the planning application should be overturned and reset to start again. We expect protection for the landscape, heritage and the essential quality of living for both existing community and future</p>

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Organisation	Summary of Comments
	residents.
Individual GA-175	<p>Object:</p> <p>The proposed housing development for the new town now appear to incorporate land around Actons, going north and east across to Fiddlers Brook. This area was not included in the original proposal nor does it appear to be within the Gilston neighbourhood plan, so at what stage and where can we comment on this part of the proposed development? The area around Actons is on rising ground and any development there will have a major adverse impact on the surrounding countryside. It's inclusion in the proposed development appears to run counter to many of the objectives set out for the development.</p>
Hertfordshire Constabulary GA-177	<p>Comment:</p> <p>Page 40 Objective 3 – New Homes Standard.</p> <p>In order to provide safe, secure and sustainable homes developers are encouraged to seek accreditation to the Police preferred minimum security standard that is Secured by Design (SBD). This initiative is proven, by academic research (Professor Rachael Armitage), to reduce incidents of dwelling burglary by over 75% (with additional reductions of at least 25% for both vehicle crime and antisocial behaviour). This has the additional bonus that, because of the reduced crime levels, people are less likely to want to move and so this can lead to increasing the sustainability of the developments in addition to assisting with the discharge of the obligations of Approved Document 'Q' – Security Dwellings. As such all project teams should consult with the Police Crime Prevention Design Service (CPDS) at the earliest stage. Details of the relevant Designing Out Crime Officer (DOCO) can be found in the 'Contact' section of www.securedbydesign.com.</p> <p>Page 41 Objective 5 – Promoting Healthy Communities</p> <p>It is noted that there is reference to Healthcare facilities, please be advised that there is a requirement under Health Building Note (HBN) 11 – 01 'Facilities for primary and community health care services', published by the Department of Health</p>

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	<p>and Social Care, in the section on security it states; "1.35 All schemes should be considered against the criteria set down by the Secure by Design initiative (www.securedbydesign.com). An individual should have responsibility for decisions on security matters. On small schemes it may be sufficient to follow the principles of this guidance. For larger schemes a formal application should be made and sign-off achieved. The Secure by Design initiative covers the public realm in and around the building (see www.securedbydesign.com). Advice should also be sought from stakeholders and service providers relating to personal safety and protection of property." In addition, as explained above in the 'New Homes Standard' it would be beneficial to incorporate SBD within Bullet point 2. Objective 6 – Promoting Sustainable Travel Bullet point 3 With regard to street lighting please be aware that the standard has been updated to BS 5489:2020. With reference to the last bullet point regarding car parking please note that the use of rear parking courts is to be discouraged as these tend to be under used and can become crime generators. Page 42 Objective 8 – Promoting High Quality Design Bullet point 6 with regard to back fences onto green spaces, from a designing out crime aspect fences are to be encouraged as there is anecdotal evidence that over 60 % of dwelling burglaries occur at the rear of the property due to lack of surveillance and poor security. However, this can be mitigated by discussions with the local DOCO over the use of other forms of boundary treatments – such as 'Hostile Planting'. Bullet Point 8 – The Police would encourage the use of 'Smart' meters etc. as this can reduce the opportunity for bogus callers etc. but the equipment should be certified to the appropriate British Standards. Page 97 Policy AG7 - Creating New Countryside Parks at Hunsdon Airfield and Eastwick Woodlands. Section 2.vii – with regards to car parking. These remote areas can become crime generators; it would be advisable to discuss the layout and design with the local DOCO and also consider seeking accreditation to the Police approved safer parking award that is 'Park Mark'. Page 106 Phasing and Delivery</p>

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	<p>Paragraph 246 – Please bear in mind the requirements of HBN 11 – 01, in addition there is also SBD guidance regarding Commercial and Schools available. Contact the local DOCO for more information.</p> <p>Page 113 2.2 Housing and Residential Neighbourhoods.</p> <p>Paragraph 271 states; “Each Village Masterplan will be supported by a Design Code which will establish the components of high quality place making, starting from the most strategic elements working through to more focus detailed elements.” The CPDS would like to be involved in drafting these Design Codes so that the opportunity to design out crime is not missed or having to be added at a later date.</p> <p>Page 119 2.3 Village Cores / Centres Rationale and Justification</p> <p>Paragraph 286 mentions several different elements including health care please be mindful of the requirements of HBN 11 – 01 and the benefits of incorporating SBD.</p> <p>Page 125 Policy BU3 – Employment Areas To aid the security and sustainability of the infrastructure. Consideration should be given to ensuring all developments are accredited to SBD.</p> <p>Page 127 Policy BU4 – Design of Village Streets and Lanes Section 2.iv – Please be mindful that the lighting standard has been updated to BS 5489:2020 and that the use of bollard style lighting is to be discouraged. Section 2.vi – With regards to car parking provision please see the earlier comments regarding rear parking courts.</p>
Individual GA-178	<p>Support: I fully support this Neighbourhood Plan as a means to mitigate the effects of the release of Green Belt land and allow housing development in the Gilston Area, and the consequent impact on historic rural settlements in East</p>

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Organisation	Summary of Comments
	Herts.
Individuals GA-003, 008, 010, 011, 012, 016, 017, 018, 019, 023, 029, 030, 031, 037, 039, 040, 048, 049, 050, 051, 055, 062, 068, 074, 075, 079, 084, 085, 090, 092, 094, 096, 097, 098, 099, 103, 104, 114, 118, 127, 145, 146, 148, 149, 151, 154, 156, 157, 160, 163, 164, 169, 171, 172, 173, 176	Support the neighbourhood plan.