

Hearing Statement

Name of representor: Nigel Clark

Chapter 11 – The Gilston Area – policies GA1 and GA2

Issues

1. The Gilston Area is a very large allocation with the potential to eventually provide some 10,000 new homes. What considerations led to its allocation?

1. I have been involved on a personal basis opposing development north of Harlow in East Herts since 2003, as the Secretary of the campaign group STOP Harlow North (SHN), a position I held until recently, and as an elected district councillor from 2007- 2010.
2. My comprehensive personal response (Respondent ID: 490743) to the Regulation 19 consultation on the submission version of the plan is on file and I will not repeat my arguments again. I simply wish to draw your attention to some salient points based on my observations of the earlier hearing sessions.
3. For two decades or more East Herts Council opposed building on the green fields north of Harlow citing numerous environmental and infrastructure issues. They declared proposals to build in this location "unsustainable" on many occasions and passed formal resolutions to the same effect.
4. For example, in June 2010 Council passed a resolution that "East Herts Council maintains total opposition to any development north of Harlow, in East Hertfordshire District..."
5. The SHN campaign group worked closely with the Council for many years and sat side by side at the Examination in Public of the East of England Plan. Mr Griffiths represented East Herts and I represented STOP Harlow North.
6. I find the sudden allocation of the Gilston area for up to 10,000 dwellings, without any substantive community engagement, hard to explain in planning terms. The site allocation was not included in the preferred options version of the plan that was subject to full public consultation.
7. Policy GA1 in the Preferred Option document outlined the extensive technical work that was required to make the Gilston Area a site allocation rather than a possible Broad Area for Development. This work has not been completed.
8. In the Draft District Plan 2014, the Council stated clearly that the Gilston location (and the other broad locations already identified) would be subjected to feasibility testing through further DPDs.

"I. To be acceptable, strategic scale development in Broad Locations must be based on an approved location-wide masterplan, infrastructure requirements, delivery strategy, and appropriate assessment, which satisfy the principles set out in the Broad Location policies in this Plan (WARE3, EWEL1 and GA1) and a subsequent Broad Locations Development Plan Document (DPD)."

9. This DPD would have examined, amongst other major issues, financial viability and the likelihood of timely delivery of all necessary infrastructure for the proposals.
10. However, in the Submission version of the District Plan, the Council has removed all references to testing the Gilston location through a DPD.
11. It is not clear why East Herts Council have completely reversed their position.
12. Some may argue the land ownership will expedite delivery but, in their own evidence to the Examination in Public on the East of England Plan, East Herts Council stated:

“One argument advanced for northward expansion of Harlow is that the land is mainly owned or controlled by a single landowning interest. This is no guarantee, however, of the delivery of development, as it may be in the landowner’s interest to manage the release of land to maximise the financial returns from the investment. Ease of implementation, based on a single land ownership, would set a dangerous precedent for the purchase of large areas of countryside on the assumption that planning permission would be forthcoming”.
13. The issue of infrastructure delivery has yet to be adequately addressed. Whilst water supply is a problem, the mechanism for meeting discharge consents into environmentally sensitive waterways is technically complex and may not even be achievable in this location. Sewage treatment was a fundamental issue at the Examination in Public on the East of England Plan which does not seem to have been addressed.
14. I am reminded of a quote from the Planning Inspector at the at the Examination in Public on the East of England Plan Matter 8H1: Harlow section of Stansted/M11 corridor at around 17.20 on February 15, 2006. (The session was transcribed by Mary Edwards from Friends of the Earth and I would be happy to supply a hard copy if required). In closing the discussion about sewage treatment, the Chair addressed the East of England Regional Assembly representative who was proposing the Plan saying:

“is there any sense in which Sustainable Development, and considering Sustainable Communities, requires a more holistic approach rather than the sort of sequential one that you imply there, where you decide where development is going to go on a regional scale and how much you are going to have and then you deal with the consequences in terms of engineering the environment to cope with it.”
15. Unfortunately, one gets the impression East Herts Council have not adopted a holistic planning approach to sustainable development, as suggested above, but made the Gilston Area allocation for reasons of expediency rather than on sound planning principles.
16. For these reasons and those in my previous representations at the public consultation stages of the District Plan’s preparation, I believe the Gilston Area housing allocation to be unsound.