

Ref	Page	Comment	Proposed Changes to CDF	Response
SECTION 1: INTRODUCTION				
1	6	The Concept Framework Status is confusing: here described as evidence to enable the site allocation, and in other instances (including Policy GA1) it is stated that the document is intended to be adopted as guidance for future planning applications	Our recommendation is that the CDF is amended to become a Framework to guide future master planning and assess the planning applications. If an evidence base document is needed, it should be titled in such a way to avoid confusion: 'Summary of Proposals' or similar	The CDF will act as a material consideration in the future village masterplanning and the determination of any planning applications. Up to date context to be added to the CDF inc reference to Policy GA1.
2	7	No reference is included to the need for the CDF to be prepared in consultation with local communities and how this has informed preparation of the draft CDF. Reference should also be included to Policy GA1 and the requirements of that policy as this sets the context for preparation of the CDF and specifies the considerations to be taken into account. The introduction should also explain the status of the document, how it is to be used and the intention of East Herts regarding its formal endorsement.	The current consultation should be seen as part of an ongoing process of engagement with the community before the CDF is finalised. The purpose and expected outcomes of the consultation and timescales for further consultation to finalise the CDF should be clearly stated. Text amendments to address points raised and provide necessary clarification.	Text to be updated to include a timeline of engagement with the neighbourhood planning group, including the themed workshops, and the wider consultation event undertaken. Reference to Policy GA1 covered above.
3	7	Para 4 states that the document relates solely to the Gilston area. Development in the Gilston area, whilst very different from the 'urban extensions' being considered for Harlow, cannot be considered in isolation from the wider area. Consideration needs to be given to the cumulative impacts of development and the Visioning Work being undertaken for the wider Harlow & Gilston area and confirmation is required that this has been taken into account in preparation of the CDF. Clarification is also required of how the development and wider planning matters are being addressed in other cross boundary forums.	Include reference to the wider Visioning Work for the Harlow & Gilston area and relevant governance structures	Text to be updated to acknowledge the successful Garden Town bid, the resultant ongoing visioning work, and subsequent ongoing engagement being undertaken with A&M as part of the Steering Group. Text to clarify that the A&M visioning work will not affect the concept proposals for the Gilston Area – two elements are complementary. Text to confirm that cumulative effects are being considered in the evidence base prepared to date as far as is necessary at this planning stage, with further cumulative work to be undertaken as part of future planning applications in the normal way.
4	7	The map should show the District Plan boundary of the Gilston Area, as informed by a East Herts led master planning approach - not limited to the land holdings of principal landowners. The map does not identify all villages within and adjacent to the development area; without this we believe that other landowners will seek to gain consents to add their land in a wholly unplanned manner. The lack of consultation on the District Council's master plan ambitions is a root cause of the issue.	Amend map to show boundary of Policy GA1 Add Gilston, Eastwick, High Wych, Gilston Park and the full Stort Valley	Proposals Map extract relating to Policy GA1 to be shown. Include a plan to show the GA site allocation in the context of the surrounding villages. Cross refer to Aecom strategic sites assessment regarding how the council defined the land parcels to be included in the allocation. Add text to say that if additional sites come forward adjacent to the boundary of GA1 they will be required to positively respond to the details set out in the CDF.

Ref	Page	Comment	Proposed Changes to CDF	Response
SECTION 2: CONTEXT				
5	10	The Strategic Context makes no reference to the proposals for the Harlow & Gilston Garden Town and the wider visioning work being undertaken. What are the implications of this for the Gilston development? The Gilston Area needs to be considered in the wider context and the cumulative impacts of development in the Harlow area need to be fully assessed to ensure that there is adequate infrastructure capacity to accommodate the level of growth proposed. The Strategic Context is the only section in the CDF which considers risks and opportunities but no mention is made of the impacts of the development on local communities. For example the CDF makes no reference to the immensely important Stort Valley corridor and/ or commitments to this as remaining in the Green Belt.	<p>Review and update text</p> <p>Update plan to show development proposals in wider area</p> <p>Identify all other development and growth areas, including those of Harlow and Gilston Garden Town</p>	<p>See similar comment above – relevant text to be added</p> <p>Text to be added to explain that the relationship with the Stort Valley will need to be considered in future proposals, and also that it will be covered in the A&M visioning work as the linkage between the Gilston Area and development across Harlow.</p> <p><i>Note: The CDF is not the appropriate document to identify wider growth locations across greater Harlow area.</i></p>
6	12	The Local Context contains limited reference to existing villages and the need to manage and mitigate impacts of development on existing communities & the smaller house “groupings”. The section does not identify risks and opportunities presented by Local Context eg: traffic and capacity of infrastructure.	<ul style="list-style-type: none"> · Include summary of risks and opportunities from a local perspective (as in case of Strategic Context) · Amend map to highlight existing villages & smaller house “groupings”, roads and network of paths. 	<ul style="list-style-type: none"> · Add text explaining that the development is to 'respect existing settlements'. · A summary of key local risks and opportunities to be added albeit this should not duplicate the baseline section in the CDF.
7	14-15	This section should make clear the status and purpose of the CDF and how East Herts intend to use it. No reference is made to Policy GA1 which provides the planning policy context for preparation of the CDF. We do not agree with the final paragraph on page 15 (see ref. 1): the purpose of the CDF should not be to support the allocation of the site in the District Plan but to set out the principles for development and provide a framework for future planning applications. It would also be appropriate to include reference to the status of proposals and DCLG funding for Harlow & Gilston Garden Town.	<p>Amend and update text to include details of Policy GA1</p> <p>Include reference to status of proposals and DCLG support for Harlow & Gilston Garden Town.</p>	<p>See response to similar issues above.</p>

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SECTION 3: VISION & DEVELOPMENT OBJECTIVES				
8	18-19	<p>The vision statement is positive in presenting a focus on people and community life. It also (second half) talks about local character and seven distinctive villages.</p> <p>It is however, somewhat generic and could refer to other new locations and does not clarify the relationship of the Gilston Area's 7 villages to Harlow and the existing villages: functionally interdependent but with strong identity as individual villages.</p> <p>The Vision offers no guidance of what is intended as high quality development. We are concerned that the 5 principles are not easily translated in design and development proposals and lack practical relevance when discussing implementation.</p> <p>A vision for change of this magnitude should be ambitious for the well-being and prosperity of all in the area – in particular, it needs to make clear that this refers not only to new development but also to existing communities, who make a significant contribution to local character, and community lifestyle.</p> <p>Infrastructure is key and the principles need to include reference to the provision and appropriate phasing of necessary infrastructure (which needs to be provided before development proceeds) and reference should also be included in para 4 to the need to manage and mitigate the impacts of development on existing communities- not just visual impacts.</p>	<p>Review Vision Statement to include reference to the well-being of all, including existing communities</p> <p>Clarify relationship to Harlow</p> <p>Emphasise that vision is based on 'Garden Village' principles</p> <p>Strengthen the commitment to delivery of 7 distinctive villages</p> <p>Include new principle relating to infrastructure provision at required time.</p> <p>Amend para 4 to include need to mitigate and manage impacts on local communities</p>	<p>Text will be updated to respond to all 'proposed changes'.</p> <p>Reference to made to 'Garden City' principles as presented by A&M at a recent steering group meeting.</p>
9	18-19	<p>The birds' eye view and diagrammatic plan presented in this section have no caption nor explanation and do not match the vision or objectives for the creation of 7 distinct 'villages'.</p> <p>Both present the development like a suburban town or an urban extension rather than as villages in a landscape setting. The birds' eye image shows a very dense development with insufficient green space separating the villages and no evidence of individual character. The photo is also out of date as it does not include other largescale housing development which has taken place in the area (eg: Harlow Leisure Centre).</p> <p>The diagram ignores the local context and shows details of village layout which are clearly not consistent with village character. The street and block layout go far beyond the scope of the CDF.</p>	<p>Remove diagram showing layout of villages</p> <p>Replace aerial view with more appropriate image which represents key principles underpinning the Gilston Area Vision and the spirit of village development</p>	<p>Diagrams to be updated to refer to a more conceptual form of development – ie no village layout details</p>

Ref	Page	Comment	Proposed Changes to CDF	Response
		Whilst it may be argued that the images are illustrative we believe they are misleading and potentially very dangerous to include alongside the vision statement as they are not consistent with the aims set out in this section and suggest a very different form and density of development. The images are at also at odds with the site promoters pre- application material for the outline planning application which suggests 7 storey development which is unacceptable in the context of 'villages'.		
10	20-21	The use of the term 'aspirational' questions the commitment to delivering a high quality development and necessary infrastructure. It does not give the community confidence that the objectives will be achieved.	Remove 'aspirational' from heading and amend to 'Meeting the Objectives'	Agreed, remove aspiration, and amend to 'Meeting the Objectives'
11	20-21	<p>The objectives should all relate to the vision. 10,000 new homes should not be identified as a development objective, but a possible outcome. Objective 2 refers to a private estate and there are no specific proposals to satisfy this objective.</p> <p>Objectives 3 and 8 are supported. Objective 4 needs to be qualified as it would be expected that there would be a hierarchy of villages and that this would be reflected in the location of social infrastructure and facilities. Objective 5 needs to distinguish between drainage and water supply. There is inadequate explanation and justification for objective 10- regeneration of Harlow. It is noted that at the EIP for the East of England Plan the benefits to Harlow regeneration were challenged. This objective highlights the need to take into account the visioning work for the wider area.</p>	<p>Reword Objective 1 to read: Delivery of 7 new Garden Villages to provide for the future growth of East Hertfordshire</p> <p>Qualify Objectives 4 and 5</p> <p>Review Objective 10- this should be informed by the wider visioning study</p> <p>Additional objective: Mitigate and manage the impacts of development on existing communities and ensure that existing communities benefit from development</p> <p>Add new objective: Ensure the provision of adequate infrastructure to meet the needs of existing and new development</p>	<p>The CDF is a direct response to Policy GA1, and this policy requires the delivery of 10,000 homes. Reference to 10,000 homes is therefore to be retained.</p> <p>Review and update Objectives 4 and 5. Response to later point also picks up village hierarchy.</p> <p>Objective 10 to remain, but cross reference to be made to wider visioning work as part of the Garden Town status.</p> <p>Additional objective - 'Mitigate and manage the impacts of the development, and ensure that the existing and new communities benefit from the development through the provision of new infrastructure to meet the needs of the new development'.</p>
12	20-21	We feel the image is 'promotional' and misleading (no cars, etc) and perhaps not representative of village character. The provision of parkland within the villages overlooked by direct frontages is welcomed.	Consider replacing/ amending image	Remove CGI and replace with precedent images
13	22-23	We are generally supportive of the Strategic Influences but are concerned that the reference to Gibberd's legacy suggests that the development is perceived as an extension to Harlow and a town, rather than villages. It is a factor to take into account in promoting good planning but we understand that Gibberd advocated land to the north remaining green. The visioning work being undertaken by Allies and Morrison has highlighted that a different form of development will be appropriate in the Gilston Area. We agree that the landscape and village life are important influences but would question the integrity of these objectives given that the development will impact so significantly on existing villages, heritage and landscape quality. We believe that the text needs to be more specific to the local area with references to existing landscape assets and villages and the need to mitigate and manage impacts on existing character.	<p>Amend or remove Strategic Influence 2 to make clear that this is not an extension to Harlow</p> <p>Amplify text to include more specific inspiration from local references</p>	<p>Amend para to make it clear what aspects of the Gibberd vision are applicable at Gilston- agree universal application is not correct but lessons can be learnt.</p> <p>Additional text referencing existing landscape assets etc is not considered appropriate for this strategic section. Address at later part of the CDF.</p>

Ref	Page	Comment	Proposed Changes to CDF	Response
SECTION 4: BASELINE SUMMARY				
14	28-29	We agree with the baseline summary of archaeology and heritage and the importance placed on this.		noted
15	40-41	Many local groups are deeply interested in local wildlife, which is one of the key assets of the area. We would welcome reference to involvement of local groups	Add reference to the need to involve local groups in the identification and protection of natural habitats and wildlife	Agreed, specific reference to be included to local groups feeding into future masterplanning work.
16	42-43	We do not feel that sufficient analysis has been undertaken of the existing villages, the various small pockets of houses and built form. Over-emphasis is placed on Harlow and there is limited analysis of the constraints (and opportunities) presented by existing villages. The plans of existing villages contain errors and need to be reviewed.	Further analysis required of exiting villages and constraints and opportunities these present for proposed development. Review plans of villages to ensure correct	Additional village contextual analysis to be included in the CDF. We propose to identify specific key topic headings and provide analysis under each for all surrounding villages. Images to be reviewed for accuracy.
17	46	We are very concerned about the capacity of existing infrastructure and are being given conflicting information. The final para states that the existing Rye Meads Sewerage Treatment Works has capacity for development up until the year 2040, which includes development in the Gilston Area. The development will not be completed within this period and it is unclear what allowance has been made for other development in the area and development beyond 2040. The map is incorrect and out of date. It does not include the watercourse systems through the airfield which impact Hunsdon and Hunsdonbury - areas which have seen increased instances of flooding in the last few years.	Further and more detailed information is required. Review watercourse maps to include the most recent and ensure the drainage/SUDs is using this data to inform the CDF.	Update text based on latest conversations with Thames Water including their feedback on existing system capacity. Maps to be reviewed Existing more localized issues to be identified where known.
	50-51	The paragraph states that there is capacity within their existing infrastructure to supply the proposed Gilston Area development however this does not address the supply of water in the area which is mainly derived from underground sources and aquifers. This year water restrictions due to low ground water levels were narrowly avoided. How this supply shortage would be met with an increased population needs to be stated within this section.	Further and more detailed information is required	This section is only deals with baseline conditions, not proposed solutions, which are addressed in subsequent chapters. Baseline conditions to be updated to reflect latest discussions with statutory provider.
18	50-51	We do not feel that (given the importance of the issue and current problems) this section presents a sufficient baseline analysis of congestion and bus and rail transport facilities.	Need further information on existing highway capacity and public transport provision Need a diagram or table that clearly identifies the current problem areas and deficiencies that need to be addressed or considered by the developers.	Additional detail to be provided based on the baseline data collected as part of TA preparation. It is not considered appropriate for safety and accident stats to be included in this strategic document, but reference can be made to the details needing to be provided as part of any future TA.
19	52-3	We do not think the image reflects the vision and should be removed. The form of buildings proposed (a crescent 4-5 times larger than the one in Bath) is not in keeping with village character and is more representative of an urban setting.	Remove image	CGI to be removed

Ref	Page	Comment	Proposed Changes to CDF	Response
SECTION 5: SPATIAL FRAMEWORK				
20	58-59	<p>We welcome the creation of village centres with houses, shops and community facilities.</p> <p>The image, however, shows a vast paved urban square and a wide road, not in keeping with village character. We believe this is detracting from the concept and is not appropriate for inclusion in the CDF. The Visioning work being undertaken (by Allies and Morrison) includes an analysis of the morphology of village settlements – this sort of understanding needs to be expressed in any revised CDF.</p> <p>Village 2 (in the caption of the picture) is perhaps intended to be the main centre with a supermarket and other services and it is therefore not representative of a placemaking framework that is inspired by villages.</p>	<p>Replace with image which reflects the vision of a typical village centre</p>	<p>We consider village squares and central spaces to be important, but the specific image will be replaced</p> <p>It is proposed that additional text be added to describe what is intended by the village concept. This will provide more clarity on the founding place making principles for the development.</p>
21	60	<p>We are supportive of the landscape led approach but do not consider this has been fully developed in the Spatial Framework and further work is required.</p> <p>The wording of this section should be amended to present the 'requirements' of the approach. For example instead of 'whenever opportunities arise...' the wording should reinforce guidance: the proposals 'should respect...', 'should integrate...' etc.</p> <p>We cannot agree with the statement in para 4 that the outcome is the protection and enhancement of existing assets- the proposals shown in the CDF would have a significant impact and change the character of the area. It would be more appropriate to say it 'seeks to minimise the impact on existing assets'.</p> <p>It does not appear that the landscape led approach is fully reflected in the concept masterplan and images. The landscape buffers and separation between villages need to be of sufficient width to avoid coalescence.</p>	<p>Amend tone and purpose of text throughout to reflects requirements and commitments.</p> <p>Further detail is required to reinforce the landscape led approach.</p> <p>Stricter requirements are needed to define the minimum separation between villages and between new and existing dwellings.</p>	<p>We will review the language used and ensure clarity is provided on the expectations for the development from a landscape perspective.</p> <p>Further discussion is required on the separation distances between villages. We consider the distances appropriate but we would be happy to discuss in more detail, including providing an explanation to the rationale behind the position proposed.</p>
22	60-61	<p>We welcome the approach of only developing part of the site, leaving large parts as landscape.</p> <p>However, we do not consider that the main plan is illustrative of the vision and landscape led approach advocated in the document.</p> <ul style="list-style-type: none"> - The most prominent aspect of the images is the footprint of the villages and their (urban) street pattern: the landscape is dimmed out and incidental - The concept plan should not show layout of individual villages. The layouts suggest an urban form and density and further work is required to define village character. This level of detail is not appropriate for the CDF. The villages should be shown in outline only. 	<p>Use Diagram 4 as the main illustration of this concept</p> <p>Remove prescriptive and detailed urban form from all plans and diagrams, which anticipates a development layout yet to be discussed and developed</p> <p>Simpler definition of the location of the villages and how they integrate and relate to the landscape and existing villages would be better</p>	<p>As described above we propose to add additional text describing the village context and intent.</p> <p>Building form/configuration to be removed from the plans, and broad development zones to be shown.</p> <p>Crescent development form in Village 4 to be replaced</p> <p>We consider the integration of development with Gilston Park a positive attribute. Heritage aspects are retained and new development sensitively fronts onto green spaces.</p> <p>Reference to existing villages, alongside the 7 proposed villages will be considered throughout the CDF.</p>

Ref	Page	Comment	Proposed Changes to CDF	Response
		<p>Landscape/ green buffers between villages need to be wider to prevent coalescence and maintain distinctiveness. The Illustrative Concept Master Plan suggest the villages merge. The central crescent shaped housing is built over the green area identified as a Key Landscape Feature (diagram 1). It appears locally as an alien imposition on the local area and is deeply resented for its scale and for the way it splits the landscape: it should be removed.</p> <p>- It is inappropriate for Gilston Park to be surrounded by development and there is a need for better integration with open countryside to the north</p> <p>- The existing network of parks, views and paths is not acknowledged nor integrated</p> <p>- It is misleading to talk about '7 villages of the Gilston Area' as this fails to acknowledge the existing villages. The existing villages need to be clearly identified on the concept plan.</p>		
23	61	<p>The concept shows area of land including the airfield and Gilston Park being retained as open space but we have no confidence that the necessary measures will be put in place to ensure these areas will not be built upon in the future. More information and a clear commitment/undertaking to the retention of open areas in perpetuity is required.</p>	<p>Further information and undertakings required about the retention of open areas in perpetuity</p> <p>Further commitment to the prevention of further development in the nearby areas (outside the promoters' landholdings) is needed</p>	<p>Policy GA1 and its related proposals map confirm that the area west of the pylons to be retained as parkland.</p> <p>The policy criteria of GA1 confirm the retention of Gilston Park, and this will be controlled in the outline planning permission, the determination of which will have regard to the CDF.</p> <p>In light of the above it is considered that sufficient commitment is already provided for this stage of the planning process.</p>
24	62-63	<p>We do not agree with the presentation of proposals for the villages and the rationale for different village layouts. All of the layouts appear to be of similar structure and density with an urban form inspired by Harlow and it is unclear how these have been derived and how they reflect village character.</p> <p>Moreover, it is unclear what is the urban design 'requirement' and guidance offered in this section.</p> <p>We need a longer and more meaningful discussion about how the villages will be distinctive and individual and suggest that the images in this section should be removed and the section revised to set principles for village development/ character. It must also be recognised that this is not just about creating new 'distinct villages'- the existing villages want to retain their character and distinctiveness as well and we feel this has not been understood or addressed in the CDF.</p> <p>There needs to be clear thinking about the illumination of villages and alongside this light pollution in the context of 7 villages.</p> <p>There is no reference to this important matter of character and we cannot understand why this has been ignored.</p>	<p>Revise or remove Section on Village Character</p> <p>Set guidance principles for village development/character</p> <p>Include commitment to protecting character and distinctiveness of existing villages.</p> <p>Existing villages, heritage and landscape features should be considered in detail to inform the character of new villages.</p>	<p>Commitment to character and distinctiveness of existing villages to be added</p> <p>As described above more text is to be added to describe the village context and proposed character.</p> <p>Internal layouts of the villages to be removed.</p> <p>Recognition of the need to consider and assess the impact of light pollution as the masterplanning evolves is to be added to the document.</p>

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25	64	<p>We do not think the Landscape Buffer Strategy has been adequately developed:</p> <p>There is no mention of the Stort valley as an asset and the landowners contribution to that as green infrastructure needs explanation and commitment;</p> <p>∅ The landscape buffers are too narrow;</p> <p>∅ Need for wider and connected green buffers to protect and enhance natural habitat;</p> <p>∅ The green infrastructure network and links between the parklands are poorly defined;</p> <p>∅ The plans for the parklands, buffers and other community assets need better explanation;</p> <p>∅ Gilston Park and its locally listed garden setting, including 'home wood' are not fully exploited for the wider setting.</p> <p>∅ Consideration needs to be given to the impact of sports fields/ floodlighting on adjoining woodland/ wildlife and existing local communities;</p> <p>∅ The site promoters own land between Eastwick and the A414- this could provide an opportunity to mitigate the sound and pollution from this busy dual carriageway but seems to be a missed opportunity.</p>	<p>Strategy 1 requires further development to address the comprehensive visual identity of the new and existing villages and the visual green background to Harlow</p>	<p>More detail to be added to explain and justify the approach proposed, especially to the village buffers</p> <p>Reference to stort valley to be included</p> <p>Imagery and explanation to be reviewed.</p>
26	66-67	<p>Strategy 2 should be about more than minimising visual impact but also about minimising impact on existing communities, local heritage and wildlife. The plans do not show how existing heritage and landscape assets will be protected and enhanced. In particular, we would note the following:</p> <p>∅ Eastwick seems poorly thought about as a community. It has a distinguished Listed Church and war memorial as well as the opportunities to create sound and pollution buffers to the busy A414;</p> <p>∅ The plans for the parklands, buffers and other community assets need better explanation;</p> <p>∅ St Mary's is a Grade I Listed building with c1,000 years of history and we do not feel the future of this important community asset has been adequately addressed;</p>	<p>Develop and amplify Strategy 2 to show the requirements for minimised local impacts</p>	<p>This context has informed the work to date. Include a plan showing key heritage assets, and how the proposals intend to mitigate any impacts</p> <p>Text from the HIA can be used as necessary</p> <p>Ecology principles to be included based on biodiversity strategy</p>

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		<p>Ø Gilston Park and its locally listed garden setting, including 'home wood' are not fully exploited for the wider setting;</p> <p>Ø Consideration of Hunsdon and Hundonbury, home to Grade 1 listed Hunsdon House and St Dunstan's Church as well as numerous other Grade II listed properties appears to have received scant consideration in assessing the impacts from the traffic generated by the proposal and the plans for the collection of historic buildings and garden at Brick House Farm are particularly poor;</p> <p>Ø The scheduled monuments are noted but little more is said about how they will be protected and enhanced;</p> <p>Ø The Pye Corner war memorial seems to be ignored rather than used as an opportunity to mark the respect it deserves, especially in the context of the proposed adjacent park.</p>		
27	68	We do not understand the emphasis placed on the design of Harlow when the Gilston Area is being conceived as 7 distinctive villages and not as an extension to Harlow. Whilst some lessons may be learnt, the development of Gilston should draw from wider best practice and precedents in the development of Garden Villages- this theme needs developing as a part of the core vision.	Strategy 3 should be reviewed to include references to wider best practice in the development of Garden Villages.	Language and text in this section to be reviewed for clarity – no intent to replicate Harlow and this can be confirmed, but there are some useful lessons that can be learnt.
28	70	There is no clear rationale for the proposed height of buildings in villages. We are concerned that the proposed height of buildings is not appropriate to village character. Further work is required in relation to defining village character and the focus in the CDF should be on establishing broad principles. The images suggest an urban form of development with a uniform height of 4 storeys in Village 3 and 3 storeys in Village 4. Villages are characterised by a variety of building types and design. This is at odds with the developers' ambitions as set out in their consultation on the outline application where they suggest 7 storeys, which we feel is simply out of context and so should be specifically excluded by the CDF.	Set out a clear rationale for height control in the villages and distribution of massing to enhance individuality and separation.	Text to be updated to clarify that landmark buildings are not considered appropriate Text and plans to be inserted to confirm that generally buildings will be 3 or 4 storeys, but the overall range will be from 2 to 5 storeys. No intent for 7 storeys.
29	71	The status of the Illustrative Concept Masterplan is unclear. We do not consider that it is consistent with the vision and objectives and should be amended as set out above (ref.20).	Include conceptual diagram about rationale for heights and massing Identify maximum heights	Conceptual plan to be inserted based on above.

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30	72-73	<p>We agree with the statement in para 1 that the focus should be on quality of place rather than quantity of development and support the approach of not building across the whole site.</p> <p>However, we find the explanation of density very confusing and further clarification is required. We would like to better understand what a development with an average net density of 33 dph would look like in terms of height and massing.</p> <p>The images contained in the CDF would suggest an urban form with a higher density than is characteristic of Garden Villages and we are concerned about the implications of this for the overall scale and form of development. We would like the CDF to establish clear guidelines which all developments will be required to comply with to ensure a high quality development based on Garden Village principles is delivered.</p> <p>We note that the separation of the villages is 'incidental' and the individuality of the villages is virtually undetectable</p>	<p>Clarification required of density calculation</p> <p>Establish guidelines for determination of planning applications</p> <p>Replace the precise footprints of the urban blocks with generic form</p>	<p>Linked to the comments above.</p> <p>Plan and text edits to be proposed to clarify the broad density ranges anticipated across the villages, including those locations expected to accommodate higher densities and why they are considered appropriate.</p> <p>Village separation point addressed in earlier comment above.</p>
31	74-75	<p>We disagree with the statement made in para 1 regarding the Green Belt. This is a matter which will be determined through the District Plan. Reference should be made to proposals in the draft District Plan and Policy GA1. The revised Green Belt boundary has not been approved. Amend title of plan to '<i>Proposed</i> Green Belt Boundaries'. The justification for Green Belt review is not a matter for the CDF and will be determined through the District Plan and debated at the EIP.</p>	<p>Amend section to reflect policy position and status of District Plan</p> <p>Amend title of plan</p>	<p>We agree that the GB roll back is covered in Policy GA1 and the associated proposals map. No need to repeat the detail in the CDF. Section to be simplified with appropriate cross reference to Policy GA1/Proposals Map to be made.</p>
32	76-81	<p>We disagree with the opening reference to Harlow's Green Wedges, which are in an urban setting and between neighbourhoods of the same town. But we also note that the Harlow Wedges are wider and more generous than the village separation described in the vision and objectives of the development.</p> <p>We support the creation of new managed parklands, but we would like to see more emphasis on the integration of historic features, views and paths and equally important, the process for these being transferred to the community for long term management with endowed funds/assets to provide for their maintenance to the quality expected.</p> <p>The existing park and play area at Terlings Park are ignored. It appears that this area is targeted for an A road dual carriageway; that cannot be right?</p>	<p>The Stort Valley will be a key separation from Harlow and needs to be treated with a comprehensive plan, not limited to the land ownership of the proponents</p> <p>Gilston Park and surrounding Key Landscape Feature (page 60) should be integrated in the proposals on plans on all pages.</p> <p>The separation of the villages and the green buffers should be clearly identified as structural elements in both plans (plans on all pages) and text</p> <p>Existing landmarks and paths should be integrated (plans on all pages)</p> <p>The built crescent clearly interrupts a key landscape area and should be removed</p>	<p>We recognize the value of the Stort Valley as set out in our Landscape Strategy. Details to be reflected in this section of the CDF.</p> <p>Generally landscape principles are inherently incorporated into most plans, but the team will review.</p> <p>Identification of village buffers on appropriate plans to be reviewed.</p> <p>Comparison with Harlow green wedges.</p> <p>We are investigating the Terlings Park point in more detail and will update the CDF as necessary.</p> <p>Village 4 amendments to address crescent form underway.</p>

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33	83-89	<p>We support the spirit and approach to the formal open space provision, but we would like to see more and better local inspiration from the 'countryside' rather than managed municipal parks to reflect the core vision of 7 villages within a rural setting.</p> <p>Governance by the community in perpetuity is a strong concern alongside an assurance that it will not be 'rolled back' for future development.</p>	<p>It is evident that the crescent fragments the continuity of the landscape – it should be removed.</p> <p>Pitches and managed open space should not be located in sensitive areas</p> <p>· Clear guidance for future control of pitch floodlighting and club parking in sensitive areas is required.</p>	<p>Village 4 being updated to provide alternative to Crescent</p> <p>Sports pitch locations and uses will be reviewed.</p> <p>General principles for car parking and flood lighting for sports pitches to be included.</p> <p>The detailed layout and use of each open space area will be subject to more detailed masterplanning at a later stage, at which point local inspiration from the countryside can be included. However, recognition of the point will be identified in the updated CDF text.</p>
34	92	<p>The illustrations are mis-leading. They are not of villages but of towns (similar to Harlow) and are inconsistent with the vision. The fact that they show specific villages is of concern as this suggests design work is further developed than has been stated. This level of specificity is anyway inappropriate to the CDF which is a guidance document.</p> <p>The first Placemaking principle that 'Gilston will exploit the rural setting with all the amenities of a town' could be misinterpreted.</p>	<p>Remove/ replace images with more appropriate illustrations of village environments</p> <p>Delete first sentence of first placemaking principle</p> <p>Clarify place-making guidance in relation to village vision.</p>	<p>All CGIs to be removed and replaced with other illustrations. Village vision addressed in updated text referred to above.</p> <p>Remove first sentence of place making, and start with 'This 'sense of place'...'</p>
35	92	<p>We support the second placemaking principle- provision of a range of high quality low-carbon homes</p>		Noted
36	92	<p>We do not agree with the last placemaking principle that development will promote more sustainable transport choices and high density development is appropriate near station. Existing services are at capacity and this principle is meaningless without a commitment to improving the frequency and capacity of bus and rail services</p>	<p>Amend last placemaking principle to include reference to commitment to provision of improved public transport.</p>	Agreed.
37	92	<p>The CDF provides no guidance about how the development of the centres and community and service provision should be phased and subsequently managed. The inclusion of details regarding phasing in the CDF is a requirement of Policy GA1. We are concerned that provision will not be made until the later phases of development giving rise to increased pressures on existing facilities.</p>	<p>Provide guidance relating to phasing and timescales for village centres and provision of community facilities</p>	<p>Text to be inserted to clarify that the phased delivery of community and service provision will be in line with the progress and delivery of the development ie not back end of the development.</p> <p>Management of village centres is sufficiently covered for this stage of the planning process elsewhere in the CDF and in Policy GA1 re governance</p>
38	92	<p>No guidance is provided regarding the proposed size of each village or how these relate to existing villages. There appears to be an assumption that each village will have a range of facilities but it would be expected that there would be a hierarchy of service centres. Policy GA1 requires the provision of serviced sites for Gypsy and Travellers and Travelling Showpeople. The CDF does not identify which village these will be located in. The policy also allow for the provision of a cemetery but does not show where this would be situated.</p>	<p>Provide clear guidance on size of villages and hierarchy of service centres</p> <p>Clarify criteria for location of sites for Gypsy and Travellers and Travelling Showpeople.</p> <p>Clarify location of cemetery.</p>	<p>Text to be inserted to provide an indication of the size of each village ie potential number of homes in each.</p> <p>Principles also to be added to indicate that main service centres will be villages 1, 2, 4 and 7, with villages 3, 5 and 6 accommodating less facilities.</p> <p>Gypsy and cemetery provision currently not assumed. However initial discussions with the Archdeacon have taken place on the latter</p>

Ref	Page	Comment	Proposed Changes to CDF	Response
39	93	<p>The plan shows a level of masterplanning detail which is not appropriate for the CDF. The CDF should establish principles and the masterplanning work should follow.</p> <p>The layouts of the villages should be omitted and the plan should be revised to show the boundaries of villages and proposed location of village centres. The plan raises questions about how the new road network will connect with the existing road network and suggests that traffic will be routed through Hunsdon. It also shows an additional Stort Crossing to the west but provides scant detail about this important new route which will carry considerable traffic through the proposed development; this should be better explained.</p>	<p>Amend Village Centres Plan</p> <p>Address inconsistencies with other plans in the CDF (including access and movement)</p>	<p>Plan on page 93 to be updated.</p> <p>Integration principles of primary route to existing local routes to be included in the transport section.</p>
40	94-95	<p>No information is provided about the phasing of village centre development. This will have implications for infrastructure provision. There is a concern about the viability of retail facilities in every centre and a need to establish a hierarchy of centres which will also benefit existing residents. The individual village plans are unhelpful. The main plan should be amended to show location of centres and boundaries of villages only with details of village layouts omitted.</p>	<p>Further information on phasing of village centre development and provision of facilities</p> <p>Amend plan. Remove village insets And identify existing villages.</p>	<p>General phasing principles to be provided (as referred to above).</p> <p>Viability of retail facilities is not a relevant matter for the CDF</p>
41	96-97	<p>The paragraph should be amended to include a commitment to how Early Years education will be provided.</p> <p>The last sentence of the second para should be amended to include firm requirements:</p> <p>'Secondary school provision SHOULD include sixth forms'</p>	<p>Amend text</p>	<p>Text to be reviewed and updated</p>
42	96-97	<p>Greater clarity is required about the number of schools required and how these will be phased and how much land land will need to be safeguarded to allow future expansion.</p> <p>If schools will take children from the wider area outside the site, this needs to be reflected in the traffic modelling.</p> <p>Local schools are already under pressure and do not have capacity to accommodate new development. Additional school places are required before any development takes place. Plans to be amended to show village boundaries and location of facilities- omit village insets</p>	<p>Include clear requirements on number and timescales/phasing of new schools</p> <p>Identify need for safeguarded land, if any in future.</p> <p>Ensure that the transport model takes account of pupils travelling from the wider area to the site</p> <p>Amend plans</p>	<p>Section to be updated to reflect latest discussions with HCC education services</p> <p>Phasing principles to be inserted</p>
43	98-99	<p>Greater clarity is required about the type of facilities to be provided and the timescales and phasing of new health provision.</p> <p>Existing facilities are inadequate. A clearer commitment is required to a phased provision of facilities to meet the demands arising from the development. Plans to be amended to show village boundaries and location of facilities- omit village insets</p>	<p>More information required on phasing</p> <p>Amend plans</p>	<p>Phasing principles to be included</p> <p>Village layouts to be removed</p>

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44	98-99	<p>Policy GA1 states that consideration should be given to the potential of the site to facilitate the delivery of a re-located Princess Alexandra Hospital (PAH). This is not addressed in the draft CDF.</p> <p>We do not consider that a major hospital of regional scale is consistent with the vision for villages. We would like to see a firm assurance that the traffic and infrastructure of a major hospital will not be located here. There has also been suggestions that it might be resited outside of the site but within the vicinity of the Gilston Area which would significantly impact traffic modelling.</p>	<p>Clarification required regarding the status of proposals for PAH</p> <p>Firm guidance to prevent major regional infrastructure to be located within villages</p> <p>Ensure that the transport model takes account of PAH relocation</p>	<p>PIP/CPP do not intend for the PAH to be provided within the Gilston Area as defined by Policy GA1.</p> <p>Add 'no blue light' in options</p>
45	100	The top photo shows a density and form of development which is inappropriate in a village environment.	Remove photo	Agreed
46	100	The guidance provided on residential mix and typologies is very limited. No reference is made to social and affordable housing to meet local needs.	<p>Add guidance on maximum densities and typology mix</p> <p>Add reference to affordable housing</p>	Details are not yet determined, but general para describing intent to be inserted.
47	101	The village insets should be removed for reasons previously stated. Plan should be amended to show boundary of villages only.	Amend plan	Plan to be updated.
48	102-103	Inadequate information/ guidance on requirements is provided and further clarification is required regarding future governance arrangements and how/ when these will be implemented. Detailed comments are set out in our Interim Response. We are particularly concerned about the management of community assets and the need to ensure that existing communities (including Hunsdon and High Wych will have a role in this). The protection of undeveloped land (eg: Hunsdon Airfield) needs to be much stronger. It is imperative that the shared green/ recreational spaces remain in the control of and accessible to all residents not just residents of new villages (we have requested details on this for several months but have yet to receive anything). Additional land in Hunsdonbury not connected to the site but under the same ownership has been included in the SLAA with the same reference as being promoted for the Gilston Area although it is outside the site boundary maps. There is concern that it may be brought forward for further development so clarity needs to be provided on its status and whether it would be afforded the same treatment and protection as the Airfield.	<p>Precise guidance and requirements to be provided on Governance Approach (see also Interim Response).</p> <p>Strong and clear policy commitment to prevent further development in the nearby area and in the existing villages</p>	<p>It is considered that matters are already well advanced for this stage of the planning process including:</p> <p>Policy GA1 commitments</p> <p>Proposals map commitments around the airfield</p> <p>We have also proposed to EHDC further wording for GA1 re governance</p>
49	104-105	<p>The transport vision is supported in principle, although we do not believe that people with cars will choose walking cycling or buses instead.</p> <p>The Illustration of page 105 shows a wide road, a large articulated bus (unsuitable to a village) and very narrow walking space</p>	<p>Replace image with one that is more in the spirit of a people orientated village street</p>	Image to be updated

Ref	Page	Comment	Proposed Changes to CDF	Response
50	106-107	<p>The title is inappropriate as it suggests that there are no strategic transport issues off- site.</p> <p>We are concerned that the focus on Harlow as the only destination and the rail link to London is misleading as it underplays other destinations in Hertfordshire that attract traffic through the villages, especially when the development is set within the London Cambridge corridor with Stansted being some 9 miles distant with is planes approaching landing overflying the development c.35% of the time.</p>	<p>Replace Title with 'Strategic Connections'</p> <p>Include firm requirements to manage additional traffic in off-site congested hot spots</p> <p>Include specific reference to all main destinations</p> <p>Identify routes that are at risk of attracting traffic through villages (Hunsdon & High Wych in particular)</p> <p>Amend plans accordingly</p>	<p>Agreed, title to read 'Strategic Connections'</p> <p>Additional details to be inserted into the section to address 'proposed changes' from NPG</p>
51	108-109	<p>The section is not presented as guidance or requirements.</p> <p>No reference is made to the requirements to minimise impacts on existing communities and local roads.</p> <p>There are grave concerns about:</p> <ul style="list-style-type: none"> Ø The scale of the Primary Road – presented as a 4 lane segregated road with side access roads: completely out of character with the aspiration for villages and slow community setting Ø In village 7 the primary road appears to converge with a tertiary road at Brick House. This fails to consider the setting of this collection of historic buildings and garden at Brick House Ø The eastern access proposed fails to respect the setting and children's play space of Terlings Park Ø The expectation that the wide Primary Road will feed into Church Lane and Hunsdon is wrong Ø The requirements for slow speed and liveability on the Primary Spine are needed. Ø The road sections are inappropriate, as are the images which show an urban boulevard in Rotterdam. 	<p>Give clear indication of requirements and commitment to good access infrastructure at Gilston Roundabout.</p> <p>Set out clear criteria to protect Terlings Park from the impact of the Eastern Access.</p> <p>Set out clear requirements to prevent additional traffic through Hunsdon.</p> <p>Set out clear requirements for low impact integration (no through traffic, but good access) for the existing villages, smaller pockets of houses and Terlings Park.</p> <p>Add requirements for adoption and maintenance of the proposed new roads.</p> <p>Set out a clear commitment to slow speed, human scale roads, including a maximum road width consistent with village concept.</p> <p>Replace/ amend images and sections accordingly.</p>	<p>Section to be reviewed to respond to comments.</p> <p>In some cases precise details may not be able to be provided, but principles will be included to require the matter to be resolved at the appropriate masterplanning stage.</p>
52	110-111	<p>The community does not believe that a strategy of walking and cycling is a credible foundation: people have cars and will use them. If the Council and Developers are planning to encourage cycling then they must put forward measures to do this and explain how that will work.</p> <p>However, this section should set out clear commitments to maximise sustainable travel, including but not limited to physical provision.</p>	<p>Plans – integrate the existing villages and paths into walking and cycle network.</p> <p>Reinforce requirements and commitments to the promotion of walking and cycling – including marketing and promotion.</p> <p>Add requirements for integration with Harlow's sustainable transport initiatives.</p>	<p>Update text based on the updated ped/cycle strategy</p> <p>Reference to emerging documents i.e. the TA which will be included in the outline planning application, which will contain detailed information</p>

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53	112-113	<p>The vague language of the text is inappropriate and is not supported. It should be changed to clear requirements for quality bus service in the area.</p> <p>There is no clarity of how the existing villages (especially but not only Hunsdon) will benefit from the additional provision.</p> <p>We disagree with the identification of the key destinations.</p>	<p>Indicate requirements for minimum quality bus services.</p> <p>Identify likely passenger levels and requirement for services.</p> <p>Integrate all existing villages.</p> <p>Consider bus services to Hertford, Welwyn and Bishop Stortford.</p>	<p>Text to be reviewed</p> <p>Some matters regarding bus services are not within PfP/ CPP control.</p>
54	114-115	<p>The text paints a rosy picture of the rail service, with vague reference to forthcoming improvements. The community does not believe that capacity on the trains, in the station and in the car park will be available to serve the development.</p> <p>There are no 'transport requirements' but only 'possibilities' in this section.</p>	<p>Identify likely passenger levels generated by the development and requirement for additional services and relative timeframe.</p> <p>Express firm requirements for access to the station, for development in line with additional capacity at station and railway.</p> <p>Express firm travel planning and management expectations.</p>	<p>Text to be updated based on latest engagement with ToC and Network Rail.</p> <p>Express clearer desire for northern station access, albeit recognise not entirely within PfP/ CPP control.</p>
55	116-117	<p>The text of this section places no obligation on the developers to address transport requirements generated by the development and improve on current deficiencies.</p> <p>This section should set out clear parameters for strategic connections. There should be requirements to demonstrate good standards of service across the wider network and for minimal environmental impacts (noise and pollution).</p> <p>Our experience is that current roads are already congested and there is significant rat running already.</p>	<p>Firm requirements for transport infrastructure improvements off site.</p> <p>Clear guidance for good standards of service.</p> <p>Commitment to fund all necessary infrastructure in line with arising additional needs.</p> <p>The summary should indicate quite clearly the transport service offered to the existing communities.</p>	<p>Clearer statement of intent of need to address the impacts of the development, providing an indication of likely improvements required.</p> <p>Definitive position on exact infra improvements cannot be identified until detailed transport modelling is undertaken.</p> <p>Funding commitment to infra improvements required to mitigate the impact of the development is already provided, but additional clarity to be reviewed.</p>
56	116/121	<p>The statement that the second Stort crossing is not enabling works and will be required with or without the Gilston Area development gives rise to doubt upon its funding viability. Without this link the A414 will become more congested making rat runs through Widford, Hunsdon and Much Hadham all the more attractive.</p> <p>We question the statement made in column 3 that the development will not result in increased traffic in Hunsdon and High Wych given that the new highway network feeds into local roads. The route through Hunsdon is used as a short-cut to Bishops Stortford which is the areas natural shopping destination as well as a preferred route to Stansted Airport.</p> <p>Successful Outcomes Transport "Capitalise on good regional road and rail connections" – this suggests that the road and rail infrastructure is adequate already. Amend text.</p>	<p>Further clarification required of traffic assessment and how impacts on existing communities will be mitigated.</p> <p>Further information required regarding funding and phasing of highways infrastructure.</p> <p>Amend text on page 121</p>	<p>Text to be reviewed and updated where necessary.</p> <p>Second stort crossing is recognised by the highway authorities to be a strategic infra item which is required during the current plan period (2033) due to the cumulative effect of other planned growth around harlow. PfP/ CPP commitment to funding and delivery linked to mitigation of the Gilston Area development. PfP/ CPP happy to support early delivery in advance of when required to mitigate the GA development, but funding will be required to support early delivery.</p>

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57	130-131	The text does not set out any commitment or requirement (not even the delivery of the District Plan assumptions).	<p>Clear commitments for housing delivery in line with District Plan.</p> <p>Clear commitments to infrastructure first.</p> <p>Clear commitment to managed construction to protect residents.</p> <p>Clear requirements for community engagement in all future design and approval stages.</p>	<p>Text to be added to clarify that infra will be provided such that it is operational at the point required to mitigate the impacts of the development constructed.</p> <p>Text regarding intent to manage constructions impacts for local residents to be added Community engagement principles aligned with planning stages to be added.</p>