



EAST HERTFORDSHIRE LOCAL PLAN EXAMINATION IN PUBLIC

STATEMENT IN RESPONSE TO INSPECTORS' QUESTIONS ON BEHALF OF GILSTON & EASTWICK AND HUNSDON PARISH COUNCILS BY NAVIGUS PLANNING

18th October 2017

CHAPTER 11 – THE GILSTON AREA

1. Gilston and Eastwick Parish Council and Hunsdon Parish Council ('the Parish Councils') wish to make their position clear to the Local Plan Examination in respect of matters relating to the Gilston allocation. The Parish Councils are opposed to the release of green belt of this scale in this location and consider that the Local Plan and its supporting evidence base does not provide sufficient justification for such a release to be made. Nevertheless, it is recognised that East Hertfordshire District Council (EHDC) must fulfil its obligations in respect of meeting its objectively assessed housing needs and that the Gilston allocation represents a fundamental part of the emerging Local Plan's strategy to deliver that. They welcome the stated commitment of the Leader of EHDC to deliver a development of the whole Gilston site that complies with Garden Town/Village concepts and principles. They also welcome the requirement in Policy GA1 for the Concept Framework to be prepared 'in consultation with local communities'. However, the concerns of the Parish Councils are that this commitment has not been happening effectively to date and that this will continue into the future without, amongst other things, amendments to the Local Plan. The communication channels between EHDC, the site promoters Places for People (PfP) and City & Provincial Properties (CPP) and the local communities have been poor to date and the activities of EHDC/PfP/CPP mean that they are moving forward without proper engagement with local people. It is therefore seen as vital that the Local Plan and Policy GA1 in particular are amended to make them more robust and provide more clarity about the responsibilities of EHDC/PfP/CPP and other stakeholders. Our statement addresses these issues in more detail.

3. What progress has been made on funding and delivery of necessary infrastructure?

2. Clearly this is principally a matter for EHDC to respond to the Examiner about. At the Matter 4 (Infrastructure) session, EHDC stated that a critical infrastructure list would be provided by 27th October. The Parish Councils shall therefore reserve any response they make for the Gilston hearing session, following publication of EHDC's response. However, the absence of clarity on this matter highlights the concern of the Parish Councils that not only has little progress been made on providing assurances on the funding and delivery of necessary infrastructure, but EHDC has failed to clearly

explain to the Examination in Public: (i) what infrastructure is deemed to be necessary; (ii) how it will be funded, sufficient that there can be reasonable confidence in this funding coming forward; (iii) when it will be delivered and how this relates to the proposed phasing of the overall scheme; and (iv) what contingencies would be in place if particular matters are not addressed as envisaged.

3. By way of example, our response to the questions raised by the Inspector on Matter 4 (Infrastructure) was very clear that, for a step change in sustainable movement to be achieved, significant investment in infrastructure for cycling, walking and bus travel is required. Yet the evidence base underpinning Policies GA1 and TRA1 provides no understanding of what infrastructure is necessary, how it will be delivered and what impact it will have on modal split. EHDC's response to Matter 4 states that in respect of Gilston and Harlow, it recently commissioned consultants to undertake work relating to sustainable transport corridors. It is not known whether this work will be completed and submitted to the Examination, much less what it might say. This is a significant concern to the Parish Councils and in its absence, Policies GA1 and TRA1 cannot be considered to be sound because they have not been positively prepared (infrastructure requirements not having been objectively assessed), justified (against reasonable alternatives, based on proportionate evidence) or demonstrate to be effective (as there is no evidence that it is deliverable).
4. Policy GA1 is particularly weak, only 'encouraging walking and cycling' as sustainable transport measures and only referring to cycleways and footways that provide links into Harlow and enhancement of existing bridleways and footpaths. This part of the policy needs strengthening with more specific requirements. The Parish Councils would have expected to be able to make suggestions about this. However, this can only be done when the evidence is in place to inform this.
5. As the Inspector has identified in note (c) on the Part 2 Matters and Issues, EHDC has failed to provide a list of critical transport schemes. It has simply, in its Matter 4 statement, provided a list of studies being undertaken. Normally at this stage of an EIP, such a request should not be a difficult exercise because EHDC should know what transport schemes are required. However, it does not have this knowledge and this has a knock-on effect on demonstrating deliverability. There is a lot of reference to 'processes' but to demonstrate that the Plan is sound, it must present and justify proposals alongside this.
6. Transport is not the only matter where there is uncertainty. There is a lack of clarity over the provision of water and sewerage infrastructure. The Thames Water Position Statement in June 2017 (EIP

document ED108) states that the capacity of the sewer network has yet to be tested. Furthermore, Thames Water's assessment of capacity at the Rye Meads Sewage Treatment Works (STW) simply refers to there being capacity up to 2036 based on "our current growth forecasts". This raises a number of issues:

- a. What are the current growth forecasts that Thames Water has used? Do these fully reflect the scale of growth in the wider area that will need to be served by the Rye Meads STW and is there sufficient flexibility to serve higher levels of growth if needed? Thames Water must provide robust and clear evidence but has yet to do so.
 - b. It states that there is capacity to 2036 but what happens beyond this, particularly given that the Gilston allocation alone will be delivering an additional 7,000 dwellings beyond the plan period.
 - c. How has this taken into account the significant environmental issues relating to the impact of growth of the STW on protected species? Whilst there may be the physical space to expand capacity, there has been no assessment of the impact on habitats and whether any significant environmental effects can be properly mitigated.
7. Significant doubt therefore remains about the delivery of the necessary sewage and water infrastructure to support growth at Gilston.
8. Another unresolved matter is the possible re-location of the Princess Alexandra Hospital from Harlow. The implications of this decision for the overall sustainability of development at Gilston is immense. This will impact on the level of housing delivery, sustainable patterns of movement and on service provision, with a regional hospital being a major economic driver for a local area. The lack of understanding of the likelihood of such a move occurring, how it will be funded and how it should be planned for is a major concern. The Local Plan should create more certainty and therefore Policy GA1 should use more robust wording than "...consideration of the potential..." when referring to such a major strategic infrastructure planning matter.

4. Apart from infrastructure, what other risks are there to delivery?

9. A particular issue of concern to the Parish Councils with respect to the delivery of Gilston is governance. Policy GA1 does not address any governance matters, other than making brief reference to 'managed public open space'; paragraph 11.2.7 suggests some structures for achieving this but they are nothing

more than suggestions. By contrast, the Colchester Borough Local Plan Publication Draft 2017¹, which was the subject of public consultation between June and August 2017, has extensive sections addressing governance and related matters for its Garden Communities which has then been followed through into the respective policies.

10. With completion of consultation recently on the Gilston Concept Development Framework (CDF) document and PfP/PPP already undertaking pre-application consultation with the community, the Parish Councils are greatly concerned that such matters of governance are being forgotten. The Parish Councils have sought to engage on a number of occasions with both EHDC and PFP on these matters but with limited success. It has been suggested to the Parish Councils by the promoters that land transfers will not be made until after the project is complete in 35 years' time. We do not believe this is the correct approach and we are awaiting further discussions on this matter. Whilst this goes beyond the scope of the CDF, it is such an important aspect of the development that substantially more detail is required than has been provided to date. This same principle applies to the Local Plan but failure to adequately address these matters could mean the very real prospect of the failure to deliver a demonstrably sustainable garden settlement.
11. Whilst related to infrastructure, it is relevant to make the Examination aware that the site promoters have indicated they will agree to a 'land value capture model' and will enter into legal agreements committing them to funding of the necessary infrastructure but have not specified how this will work, despite repeated requests for more information by the Parish Councils. The Promoters' legal advisor had stated that such agreements needed to be in place before the EIP but the Parish Councils understand there has been no progress.

5. Monitoring the progress of such a large site and setting out actions to be taken should progress be delayed will be critical to the contribution the allocated site makes to the provision of housing. Therefore, what mechanisms have been put in place to manage progress? What are the trigger points where action will be taken if set milestones are not met? These should be included in the Plan to assist monitoring.

12. Effective monitoring firstly requires a clear plan for delivering the site allocation and a timetable for achieving this. No such plan has been provided, either in the draft Local Plan or in any other document

¹ <http://www.colchester.gov.uk/CHttpHandler.ashx?id=23478&p=0>

prepared, including the CDF. As such, it is impossible to monitor progress because it is not clear what each stage of the process is. The Parish Councils would expect the draft Local Plan to include at very least a high level timetable/project plan and clear indicators for monitoring of progress (including indicators which assess the effectiveness of engagement with local communities). This should then be linked to a process for undertaking more detailed timetabling and review, which should involve the local communities.

13. It is important that progress is monitored not only in terms of what is delivered but how effectively the process is engaging key stakeholders such as the local community. A project of this scale, totalling 10,000 dwellings, is going to take most of the plan period to properly plan and deliver. Without a comprehensive framework for effective engagement, there is a danger that there will be no mechanism to hold the promoters to account and the focus on delivery at the expense of engagement will result in an unsustainable development.
14. The Parish Councils are greatly concerned that EHDC is not established or sufficiently experienced as a delivery authority for a project of this complexity and specialist expertise will be required. It is therefore ceding increasing levels of responsibility to Pfp/PPP which, as a corporate body, will inevitably have a differing set of objectives to a local authority. It is vital that the governance structures which are established and put in place are robust. The Local Plan is a key part of this process but the draft Plan lacks any structure for management or monitoring and does not provide any assurance that this will be put in place. The experience of the Parish Councils since the draft CDF was published in September 2016 has borne this out. Repeated requests for information or responses to work undertaken by the Parish Councils to inform the process on matters such as governance have not only been disregarded but have not even been acknowledged. Appendix A summarises the activity of the Parish Councils and the lack of response by EHDC and Pfp/PPP.
15. Meanwhile, the Parish Councils have seen little by way of tangible outputs to provide assurance about the role of EHDC as the local planning authority, its relationship with Pfp and the programme for delivering such a major development. Whilst a period of quiet activity over the early months of 2017 in order to address these matters, prior to any announcement by the respective parties, would perhaps be expected, there has been almost no progress shown. Meanwhile August and September 2017 have seen simultaneous consultation on the draft CDF and pre-application matters, which implies that the promoters envisage they are much further along the process than the Parish Councils consider they are.

In the absence of a programme or any meaningful engagement with the Parish Councils, it is impossible to tell.

16. The Monitoring Framework in Appendix C of the draft Local Plan should include an indicator relating to the level of engagement with local communities in respect of strategic sites.

6. There are comprehensive documents setting out development aims for the area as a Garden Town, including the Concept Framework. What is the status of this document?

17. Notwithstanding EHDC's response to this question, the Parish Councils wish to make clear that they do not consider the CDF (draft version published in September 2016) fit for purpose. This has implications for the Environmental Impact Assessment (EIA) Scoping application which was submitted in June 2017 (application ref. 3/17/1366/SCOPE) on behalf of PFP/PPP as it is based on assumptions made in the CDF. It is also relevant because the completed CDF is required before any outline planning application can be considered, yet pre-application consultation took place in August and September 2017. This activity clearly point to an intention by PFP/PPP to submit an application in the near future.
18. The CDF as presently drafted cannot be considered to represent the document described in Policy GA1 for the following reasons:
 - a. It is written as a presentation of proposals, and not with the intention of setting out requirements and accountabilities.
 - b. It has reference to old policies and an outdated evidence base. We have provided extensive representations on matters relating to evidence in this regard.
 - c. The base maps are out of date (perhaps 8-10 years) and do not show key new constraints. For example, many of the properties and play areas in Terlings Park are not shown, thereby ignoring the potential impact of the second Stort Crossing in separating them from the community they are part of.
 - d. It only covers the landholdings of the promoters and not the whole extent of the policy area.
 - e. Consultation has been poor and the comments from consultation have not been addressed.
 - f. The document fails to demonstrate that the proposed development can be delivered as seven villages as stated in the vision and objectives: not only is infrastructure provision uncertain, the very concept of distinct and separate villages is in doubt. One would expect to see the principles of low rise buildings, narrow streets, a mix of buildings, appropriate separation and contact with the countryside but none of these are in evidence.

19. We note the proposed amendment to Policy GA2, Part II, as contained in the Statement of Common Ground between EHDC and Hertfordshire County Council Property (EIP document ED134) which would read, “A Concept Framework has been jointly prepared by the landowners and Council, in consultation with local communities and other stakeholders...” The Parish Councils are very clear that only a *draft* Concept Framework has been prepared and this has not been done, in any meaningful way, in consultation with local communities (again, Appendix A documents the lack of engagement from EHDC/PfP/PPP in response to requests from the Parish Councils). Moreover, that draft Concept Framework is not fit for purpose, therefore for the Plan to suggest that it is would be misleading. Before this proposed amendment to the wording of Policy GA1, Part II, can be made, there is a need for substantial revisions and a commitment to a joint and collaboratively developed guidance framework. The Parish Councils consider that the draft Local Plan needs to be clearer about the need for this and the matters that should be addressed by the CDF.

7. Page 23 of the Position statement sets out a work programme – has this been adhered to, when will delivery commence?

20. The work programme in the Position Statement is clearly out of date by approximately one year. As such, it should be deemed not fit for purpose and it is of concern to the Parish Councils that this should represent the stated position of EHDC as it enters the EIP. As stated in response to Q5, the Parish Councils are very concerned that a detailed work programme and timetable has not been published. Whilst some key infrastructure items have been identified, information is lacking about the triggers for these infrastructure items or when they will be delivered during the plan period. Given the requirement of the Gilston allocation to be delivering housing completions early in years 6-10 of the plan period, this is worrying. The Parish Councils do not consider it acceptable if EHDC was to present this information to the EIP during the hearing sessions. The CDF was published over a year ago, giving ample time to address these matters prior to the EIP.
21. If EHDC cannot provide a clear answer of when delivery will commence and how this will be achieved, then the draft Local Plan cannot be found sound because it has not been demonstrated as being justified or effective.



Appendix A Timeline of engagement activity with Parish Councils and community

date	plan area	action/request
2014	Draft District Plan	<p>Community expectation of collaboration as stated within GA1 policy, and testing of proposals within a DPD prior to a site allocation.</p> <p><i>"I. To be acceptable, strategic scale development in Broad Locations must be based on an approved location-wide master plan, 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)." (draft district plan)</i></p> <p><i>"Development shall not proceed in the Gilston Area until the adoption of the DPD.....The DPD shall be prepared by the Council working with key stakeholders including...Hunsdon, Eastwick and Gilston, High Wych, and Widford Parish Councils"</i>. (GA1 draft DP 2014)</p> <p>☒The DPD was intended to address a whole range of issues that included infrastructure, green belt boundaries, governance, the impact on the existing settlement, density etc.</p> <ul style="list-style-type: none"> •As a DPD, these matters would have been examined prior to the policy adoption and the site allocation.
08/06/2015	NHP	In recognition of EHDC's shift in policy by including the GA as a broad location for development in the 2014 Draft District Pan, HPC and E&GPC submitted a joint application to EHDC for neighbourhood plan area designation as the GA straddled both parishes. Although the Parishes did not support this policy shift, it was recognised that this would be the most appropriate and positive way for the community to engage and collaborate with the District Council prior to any site allocation.
01/09/2015	NHP	<p>EHDC supported the HEG NP area designation despite concerns and a lack of support from the GA site promoters and the neighbouring authority.</p> <p><i>"It is...understood that the neighbourhood plan has been instigated in response to the draft District Plan proposals and would therefore be in the interests of the parishes to develop the plan alongside the emerging Plan. For these reasons, it is considered acceptable for the parishes to start preparing work on a neighbourhood plan.....to take account of as the Gilston Area is a Broad Location in the EHDC District Plan also bordering Harlow with cross-boundary issues. It is recognised that many strategic matters are still to be agreed and that neighbourhood plans are in place to shape development on the community level.... any work undertaken by the neighbourhood planning group is not considered to hinder on- going District Plan progress and may inform future proposals for this site. It will be the Council's role to ensure constructive partnership working between relevant stakeholders." (EHDC 1/9/15)</i></p> <ul style="list-style-type: none"> • There was a clear expectation that EHDC would work in partnership with the community on proposals for the GA.
01/09/2015	HEG area designation consultation	<p>EHDC supported the NP despite an unwillingness on the part of the site promoters and neighbouring authority to engage/collaborate with the community on proposals for the GA prior to any site allocation:</p> <p><i>"Harlow Council consider that it would be premature to grant neighbourhood planning status prior to the respective LPA's reaching a decision on housing numbers in this area." (EHDC 1/9/15)</i></p> <p><i>"Separate representations were received on behalf of Places for People and, City and Provincial Properties regarding the Gilston Area Broad Location in the emerging District Plan; to ensure that the neighbourhood plan status does not conflict or undermine the principle of development in this area. A recent decision by Epping Forest District Council to exclude land adjacent to Harlow in response to a neighbourhood area request by North Weald Parish Council for reasons of prematurity and uncertainty over the direction of growth in this area, was raised as a consideration." (EHDC 1/9/15)</i></p>
02/10/2015	Emerging District Plan	<p>There was no engagement with NP group, contrary to the site promoter's meeting notes with EHDC:</p> <p><i>"...ongoing discussions were being held with the promoters of the Hunsdon & Eastwick and Gilston Neighbourhood Plan to ensure that their thoughts were aligned with the emerging District Plan." (Meeting notes 2/10/15)</i></p>
25/02/2016	Emerging District Plan	<p>EDHC published their intention to test proposals for the GA through a DPD:</p> <p><i>"The site boundaries for the Gilston Area Development will be identified in a Development Plan Document (DPD)." (EHDC, SLAA responses, 25 Feb 2016)</i></p>
16/03/2016	Emerging District Plan	<p>The status of proposals for the GA which EHDC announced two months later - site allocation and the abandonment of testing via a DPD - was withheld by EHDC from the NP group when clarity was sought on the status of the GA for a funding bid the NP group were seeking to progress the NP:</p> <p><i>"Gilston Area is identified as a Broad Location in the Preferred Options for up to 10,000 dwellings. The Preferred Options anticipates that approximately 3,000 dwellings will be delivered in the Plan period." (EHDC 16/3/16)</i></p> <p>It would have been appropriate for EHDC to either inform the NP group or ask them to delay proceeding. This subsequently resulted in the NP group's funding application to be postponed and activities to stall.</p>



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12/05/2016	Emerging District Plan	District Planning Executive Panel 24 May agenda was published announcing EHDC's intention to allocate 10,000 houses in the GA and the intention to apply to the government for garden village/town funding. The community were not consulted or even informed.
18/05/2016	Emerging District Plan	Lack of appropriate communication from the EHDC: E&GPC queried why the District Councillor for the area had not informed the community of the recommendation to allocate the GA site for 10,000 houses or the Garden Town/Villages funding bid despite attending the PC meeting only a few days before: <i>"the principle of this area's development is not, in effect open for discussion here, hence there was no need for it to be brought up at PC"</i> (District Councillor 18/5/16)
24/05/2016	Emerging District Plan	Letter of complaint sent from E&G PC and HPC to EHDC regarding the GA site allocation, garden village/town funding bid, the lack of communication/consultation and bypass of the statutory democratic process: <ul style="list-style-type: none"> •No consultation with the communities affected by this new policy position. •10,000 house prejudices the outcome of the plan process for the plan period after 2031. •EHDC are working with neighbouring authorities, but as the elected representatives of the community who will be affected by the Gilston proposals over their 20-30 year development period, the community representatives would expect to have a substantial representation in these matters. Only a cursory acknowledgment was received from EHDC in response: <i>"Thank you for your email, I will ensure that your comments, where possible, are addressed this evening at the District Plan Panel."</i> (EHDC 24/5/16) And the community concerns do not appear to have been considered in any way at the District Plan meeting: <i>"The Officer stated that the submission of an expression of interest would not prejudice the Council's position in relation to whether or not to support the inclusion of the Gilston Area within the forthcoming Publication version of the District...It was the view of Officers that the Gilston Area should be allocated within the District Plan in order to deliver 10,000 homes within the current plan period and beyond."</i> (EHDC District Planning Executive Panel minutes 24/5/16)
24/05/2016	Emerging District Plan	EHDC District Planning Executive Panel voted to move to the allocation of the Gilston Area site and submit a Garden Town/Village funding application without notifying the community: <i>"It appeared that EH were committed to allocating a major green belt release to the 'Gilston' project when releasing the next iteration of the Local Plan. This news was a great disappointment as there had been no sharing of the information on how this decision had been reached and so it would conflict with the assurances given by EH about the consultation on the draft plan."</i> (HEG minutes May 16)
24/05/2016	Emerging District Plan	Guidelines for Garden Town/Village funding applications stated that applications: "...set how the local community is being, or will be, engaged at an early stage, and strategies for community involvement to help ensure local support." (www.gov.uk) <ul style="list-style-type: none"> •No consultation had taken place in advance of the decision and no notification of this decision was provided to the community and this resulted in the NP group's activities having to be suspended: <i>"....the Neighbourhood Plan would be further delayed and will have to be put on holdas the EHDC had seem to pre-empted the Distrct Plan by applying for funding for the planning of the proposed garden villages...There had been no consultation with any of the Parishes and EHDC regarding its proposal of garden villages. The EHDC are fully aware of Hunsdon & Gilston Designated Area and that the Garden Villages will have a direct impact."</i> (HPC Minutes June 16)
27/05/2016	Emerging District Plan	HPC attended the EHAPTC meeting and expressed the frustration the community felt at the lack of communication and engagement from EHDC: <ul style="list-style-type: none"> •In relation to the garden village/town bid for funding and site allocation - that the NP group was not notified or consulted as it clearly had a significant impact on work the NP group were undertaking. •The timing of consultations: those that had significant impacts on the community were inappropriately timed. •That the DP evidence base: Village Hierarchy was inconsistent and the scoring erratic. That PCs contested the outcome of the study, this was not reflected anywhere. EHDC invited HPC and E&G to attend an informal meeting.



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27/05/2016	Emerging District Plan	<p>The PCs were informed by the District Councillor that EHDC had held a Gilston Area workshop. The NP group were not invited to attend:</p> <ul style="list-style-type: none"> •Despite a very large attendance group which included the Ward District Councillor, site promoters, council policy officers, planning officers, members from Harlow along with other local East Herts members. The workshop covered: "area concept, infrastructure, densities, listed building concerns, transferring of surplus land to a local collective" and an investment fund had been discussed with Harlow. •It is unclear whether any notes/minutes/record was taken of this event as there are none on the EHDC website.
28/05/2016	Emerging District Plan	<p>The District Councillor told E&G PC that he had been informed by the site promoters that the PCs were unwilling to engage. This is not accurate: No attempt had been made by the site promoters to engage with E&G PC further to the site being identified as 'a broad location for development'. Prior to EHDC's decision to change their policy and allocate the site there would have been little point in engaging with the site promoters - the council had stated their intention to collaborate with the community via a DPD and given the strategic value of the GA should it be allocated it would have been appropriate for proposals and engagement to be Council led as oppose to developer led.</p>
30/05/2016	Emerging District Plan	<p>The NP group discussed District Councillor's proposal to meet with the site promoters. The PCs informed him that the PCs whilst willing to meet with the site promoters, concluded that a meeting with them would be more appropriate after the meeting with EHDC which was already scheduled for 21 June.</p>
09/06/2016	Emerging District Plan	<p>District Plan evidence base: HPC were not consulted on Gilston Area land in SLAA (round 4 or earlier consults) despite the land being in Hunsdon Parish or on other land in Hunsdonbury promoted in the call for sites - noted by EHDC that: <i>"The site could provide strategic scale development, either in isolation or as part of a wider scheme, to the north of Harlow, subject to a review of the Green Belt".</i> (EHDC 9/6/16) The site in Hunsdonbury (SLAA reference 21/004) is not included in the Gilston Area boundary so should be removed or Gilston Area map changed.</p>
18/06/2016	Emerging District Plan	<p>IT/Communications failure. EHDC SLAA mapping system was too big to access which made it difficult for the community to respond to the SLAA consultation. Hard copies were required and requested.</p>
20/06/2016	Emerging District Plan	<p>The District Councillor told HPC that he had been informed by the site promoters that the PCs were unwilling to engage. This is not accurate: No attempt had been made by the site promoters to engage with HPC further to the site being identified as 'a broad location for development'. Prior to EHDC's decision to change their policy and allocate the site there would have been little point in engaging with the site promoters - the council had stated their intention to collaborate with the community via a DPD and given the strategic value of the GA should it be allocated it would have been appropriate for proposals and engagement to be Council led as oppose to developer led. <i>"Cllr Brunton urged the PC to engage with the potential developers. The council informed him that HPC had never been approached by any potential provider. The Neighbourhood Planning group would engage with Places for People, if contacted, but the Parish Council would like the District Council to firstly engage with them."</i> (HPC Minutes June 2016)</p>
21/06/2016	Emerging District Plan	<p>Informal briefing meeting between EHDC, Hunsdon PC and E&G PC: This meeting did not constitute EHDC engagement or collaboration with the community - as can be seen by the agenda that EHDC supplied, it was a briefing session: Key Dates; Garden Town Application; Communication with Parishes; Future Meetings. This was also not an attempt to engage with the NP group meeting despite the NP area designation the previous September, 9 months previously. EHDC specifically requested to keep small so not even all councillors on the respective PCs were invited: <i>"My understanding of the meeting was a fairly informal opportunity to discuss issues in general"</i> (EHDC 10/6/16)</p> <ul style="list-style-type: none"> •EHDC informed PCs a garden town which required a minimum of 10,000 houses was submitted instead of a garden village, only because of less competition for these bids. •The PCs asked why a DPD testing approach to Gilston was no longer going to be taken - no sound reason was provided for this change in policy and approach. •PC queried process of greenbelt removal - information to be forwarded. •PC queried deliverability/developability for GA - information to be forwarded. •EHDC IT (SLAA) issues. •No minutes were taken.



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22/06/2016	Emerging District Plan	<p>Follow up from meeting: EHDC stated that <i>"it was a good first meeting"</i>. EHDC and PCs agreed to further meetings and for the NP group to meet with the site promoter. In response to queries raised at the meeting :</p> <ul style="list-style-type: none"> •GA: 'developable': subject to sewage treatment issues and provision of a second Stort crossing issue being resolved - <i>"the approach to sewerage treatment has now been resolved and work is ongoing with regards to the second road crossing. A number of other issues also need to be resolved"</i> detailed in 11.5.6 of the Delivery Study. (EHDC 22/6/16) No evidence provided re sewerage or Second Stort Crossing. • Greenbelt: <i>"the Inspector at Examination will decide whether or not EHDC's approach to removing land from the Green Belt is sound. Although the Green Belt Review 2015 identifies land in the Gilston Area performing an important role in Green Belt terms, development strategy for the District has to be considered as a whole and having done this, it is considered that the Gilston Area represents a sustainable location for development. "Housing need represents the exceptional circumstances required to review the Green Belt. This was confirmed by a Planning Inspector during an advisory visit to the Council in early 2016"</i> (EHDC 22/6/16) •<i>"Garden Town expression of interest will be shared once finalised."</i> (EHDC 22/6/16) This didn't happen when the submission was later made. •<i>"Garden Town bid should not prevent progress with NP."</i> (EHDC 22/6/16) •IT (SLAA) problems: EHDC <i>"are looking to resolve these as soon as possible."</i> (EHDC 22/6/16)
15/07/2016	Emerging District Plan	<p>HPC & E&G PC expressed surprise that EHDC wish to include other PCs at the next meeting given that the site is within the two parishes NP group designated area and it was thought that EHDC were meeting in regard to this rather than it being a wider briefing meeting.</p> <p>This extended invitation further indicated that EHDC see the meetings as briefing sessions and nothing more meaningful.</p> <p><i>"We were surprised to see that Widford also want to attend as we had understood that this series of meetings was to address the Hunsdon and Eastwick & Gilston Neighbourhood Plan issues and questions. The proposals for housing development in the Gilston area are within the designated area of our Neighbourhood Plan and we see value in keeping the existing arrangements in place. However, if you think there is merit in a separate meeting for a wider group of surrounding parishes we suggest that this should include Widford, Much Hadham, High Wych and the Town of Sawbridgeworth."</i> (HPC E&GPC 18/7/16)</p>
21/07/2016	Emerging District Plan	<p>District Planning Executive Panel meeting: EHDC stated their intention to formally allocate the GA site for 10,000 houses:</p> <p><i>"Given the evidence that is now in place, Officers consider that the Gilston Area should be identified as a location for 10,000 new homes, to be delivered in this plan period and beyond, within the forthcoming 'Publication' stage of the District Plan."</i> (Chapter 12 Gilston - ERP B Issue Report)</p> <p>This document and the webcast of the meeting also mentioned that a Concept Framework that is being prepared for the Gilston Area. The NP group has not been approached for their involvement and this was not mentioned by EHDC when they had met with the PCs.</p>
23/07/2016	Emerging District Plan	<p>Rumours that emanated from EHDC were beginning to circulate in the community that EHDC and Princess Alexandra Hospital were in talks regarding the resiting of the hospital to the Gilston area. This had not been discussed with the PCs.</p>
23/07/2016	Emerging District Plan	<p>Revised policy documents not available in the public domain were given to attendees at the EHAPTC but not those parish councils who were unable to attend - this was the same with the minutes .</p>
01/08/2016	Emerging District Plan	<p>Infomral Briefing Meeting with EHDC, PCs agenda:</p> <ul style="list-style-type: none"> • Testing for the GA - how would it be done if not via DPD and how would key stakeholders be consulted? • Infrastructure: phasing to coincide with housing, funding details? • PAH rumours, was GA being considered? EHDC confirmed that the rumours were correct but nothing further was known. • Greenbelt and land stewardship, how would this work? Map of development area and green spaces were shown to the PCs and EHDC said that common ownership of the land would be one of the first items that would be resolved with Pfp.



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03/08/2016	Emerging District Plan	<p>EHDC follow up to queries from PCs at meeting:</p> <ul style="list-style-type: none"> Dates for items going to District Plan Executive Panel: SLAA, GA settlement appraisal and site boundaries, revised District Plan chapter for GA and "..the first iteration of the Concept Framework which we referred to last night. Once the Concept Framework is approved in draft form, we would certainly encourage you to be involved in developing the draft further over the next few months." (EHDC 3/8/16) Rail capacity: "it is not currently envisaged that the IDP will identify rail improvement schemes"(EHDC 3/8/16) Affordable housing: "we do have evidence within the Delivery Study that suggests that the Gilston Area is financially viable at 30% affordable housing, but only marginally viable at 40%." (EHDC 3/8/16) Road infrastructure: "In terms of the Northern Bypass, I understand that there still needs to be further transport modelling in order to fully understand what the impact of such a scheme would be, particularly with regards to the potential for increased traffic levels on the A414." (EHDC 3/8/16) Sewerage: documentation requested by the PCs at the previous meeting in July was not provided. No minutes were taken.
17/08/2016	Emerging District Plan	<p>First formal interest in the NP group from EHDC - there had been no communication from EHDC with the group prior to this. <i>"When we met last you mentioned that you planned to have a meeting of the neighbourhood team....Very happy to discuss or meet with the team, if you wish."</i> (EHDC 17/8/16)</p>
02/09/2016	CDF	<p>EHDC emailed notification that the first draft of the CFD had been published with the agenda items for the 8/9/16 District Planning Executive Panel meeting as well as the Gilston chapter of the Plan and a link to the agenda provided.</p>
08/09/2016	Emerging District Plan	<p>District Planning Executive Panel: Settlement appraisals, DP chapter and for Gilston - CDF presented to the Panel: <i>"The Gilston Area Concept Framework has been prepared to support the Gilston strategic site allocation in the East Herts District Plan.....The principal landowners and East Herts Council are working collaboratively to prepare the Concept Framework."</i>(EHDC 8/9/16) The CDF was prepared without any local community involvement. This contradicted the Gilston Chapter and Policy presented which said the CFD would be developed "in consultation with local communities". The GA site was discussed by the Panel for only 11 minutes (and this time included a 5 min introduction from the planning team) in contrast to an hour and a half for sites in Bishops Stortford.</p>
22/09/2016	Emerging District Plan	<p>District Planning Executive Panel: voted to approve the Presubmission District Plan for consultation.</p>
20/09/2016	CDF	<p>EHAPTC meeting informed:</p> <ul style="list-style-type: none"> Garden Town bid with Epping and Harlow: <i>"a successful bid would provide funding of up to £1.5 million and DCLG are to consider the bid over the next few weeks....preparation finance had been submitted."</i> <i>"...first version of the IDP.... further versions to follow. By the time of examination the IDP will have finalised how infrastructure will be provided and funded for developments that are coming forward in the first 5 years of the Plan." Comment by WPC "EHC seem to commission consultants to write reports, however it is not clear if the views of local people are fully considered." EHDC: "local perspective is very important in East Herts" EHDC were asked whether local people can be involved with Task and Finish group working on sustainable travel and EHDC said they would "be in close contact with local people."</i> (EHAPTC minutes, September 16) <p>This information was not circulated to PCs who had not attended the meeting and EHDC did not inform HPC and E&GPC.</p>
22/09/2016	Pre-submission District plan/CDF	<p>Extraordinary Council meeting voted to publish the Presubmission District Plan for consultation. The meeting was told that only a limited number of hard copies of the District Plan would be made available on request.</p>



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28/09/2016	Pre-submission District plan/CDF	<p>EHDC informal briefing meeting with the PCs: agenda included information on housing numbers, boundary changes and:</p> <ul style="list-style-type: none"> • Process and timing for Gilston Area Concept Framework consultation [final version required for submission with the District Plan in March 2017]? • Process and timing for safeguarding green spaces and confirmation of scope? • Updates on PAH location and Junction 7A? <p>EHDC said these items were <i>"getting into quite technical planning issues" so will require a member of the planning team to attend</i></p>
29/09/2016	Pre-submission District plan/CDF	<p>EHDC response to queries from PCs at the meeting:</p> <ul style="list-style-type: none"> • DP housing numbers: EHDC said that if a plan adopted there would be an early review and the housing numbers raised. • CFD: PCs were concerned about the impact from the development on the local road network through Hunsdon, Widford and Much Hadham as it was proposed to connect it to villages 1-7 and CDF says there will be no impact as the only journeys in this direction will be local traffic. • Process and timing for safeguarding green spaces and confirmation of scope, governance arrangements: There would be an early delivery of green space, but governance had not been considered. • Updates on PAH location: No updates on this but EHDC conceded that if it was sited in the GA - housing numbers would have to be reduced. • GA Chapter: Cemetery provision (not in CFD) - where would it be provided: Unanswered. • GA Chapter: Gypsies, Travellers and Show people site provision (not in CFD) - where would it be provided - Would density or green space be impacted: EHDC were unclear - they said these could be accommodated without impact but did not elaborate. • Sewerage: documentation requested by the PCs at previous meetings in July and August not provided.
02/10/2016	Pre-submission District plan/CDF	<p>The GA: there had been no involvement of the local community in East Herts but 'negotiations' appeared to be ongoing with the neighbouring authority: the MP for Harlow publicised on Twitter that he had been meeting with the site promoters to discuss housing and technical education for Harlow.</p>
15/09/2016	Pre-submission District plan/CDF	<p>Prior to consultation on the Pre-submission District Plan, one of the site promoters submitted a planning application for Brickhouse Farm (3/16/2027) for the change of use of agricultural buildings to office space. This site was being proposed as the centre of 'village 7' in the CDF. HPC along with the tenant of the farm responded to the application with a number of concerns and the site promoters submitted a further statement to EHDC:</p> <p><i>"The East Herts District Plan Pre-Submission Document will be published for public consultation on Thursday. Central to the Plan is a draft allocation for approximately 3,000 dwellings in the Gilston Area (i.e. north of Harlow) by 2033. The attached screenshot demonstrates that Brickhouse Farm and all of the surrounding farmland is located within the proposed development area (in red). Policy GA1 also expects the Gilston Area development to provide "small scale office space to meet local needs. Therefore, it is nonsense to suggest that the relatively minor proposals to convert and refurbish the listed Brickhouse Barn would threaten the viability of Brickhouse Farm as a business and lead to a consequential loss of food production and employment. In reality the agricultural use of Brickhouse Farm and its surrounding farmland will be lost as part of far wider strategic proposals to develop the Gilston Area. It is common for agricultural land and uses to be lost when urban extensions are brought forward. ... In summary, the Applicant believes that the objection to the proposals is a cynical attempt to frustrate development, based financial self interest. ...With this in mind, the Applicant respectfully requests that the Planning Department gives very little weight to the Parish Council's objections (and any other associated local objections) and instead has regard to the wider merits of the proposals, particularly the heritage and economic benefits."</i> (C&P 8/11/16)</p> <p>This conflicted with what the community were being told about the proposed development being a sting of seven villages and not being an extension to Harlow, and appeared to the community an attempt from the site promoter to pre-empt the democratic process.</p>
06/10/2016	CDF	<p>IT/Communications failure: The CDF was difficult to find on the EHDC website as it was only attached to on the District Planning Executive Panel agendas and only online access to it was being provided which was resulting in the community being unable to access it due to the file size and the way in which the files had been uploaded: 20 copies of CDF were subsequently provided for the NP group, however no other copies of the documents were provided to the PCs or wider community. EHDC subsequently moved the document to a more appropriate location and had to break the document down into chapters however a number of the CDF chapters remain difficult to access still due to their size.</p>



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07/10/2016	Pre-submission District plan/CDF	<p>E&G PCs sent and open letter to the local press and social media, endorsed by HPC of their concerns with the proposals that had not been addressed:</p> <ul style="list-style-type: none"> • Major unanswered questions around provision of the critical infrastructure needed to support development including new roads, rail transport, schools and hospital facilities - these are at capacity breaking point now. • Commitment for the investment is needed and a delivery timetable synchronized with the delivery. • The need for this commitment needs to be in place before the the District Plan proposals can be adopted otherwise the District Plan is not sustainable.
10/10/2016	CDF	<p>EHDC stated to the PCs that they intended to "to get the CF completed by March" (EHDC 8/10/16) and "The District Plan (and Concept Framework) will be submitted to the Planning Inspectorate at the end of March 2017. We have had an internal discussion this morning with regards to timings, and in order to take the final version of the Concept Framework through our usual democratic processes (District Planning Executive Panel, Executive and Full Council), it is likely that the document would need to be finalised by the last week of February/first week of March." (EHDC email 10/10/16) The CDF remains a first draft a year later and EHDC never provided a reason for the change in approach.</p>
13/10/2016		<p>Garden Town Funding Bid - Although EHDC had said this would be circulated to the PCs once it was submitted, this never happened and the document was difficult to find on the EHDC website as it was only included within the duty to cooperate notes on the EHDC District Planning Executive Panel meeting notes for 13th October. The document was not referred to in the meeting. The PCs discovered this document by chance.</p>
17/10/2016	CDF	<p>The CFD was published incomplete. The PCs requested the appendices mentioned in Chapter 6 on phasing, infrastructure delivery and viability which were missing from EHDC and were told that this information would not be forthcoming:</p> <p><i>"Reference to Appendix 2 is actually a typo in the document which needs to be removed in the final version. When we were initially thinking about the structure of the document, we had thought that it would be helpful to include phasing plans to show how the site could potentially be built out over time. However, in the end we took the view as Officers that it would not be possible to include any plans because it is an area that still needs significant work with a range of organisations including HCC (and hopefully yourselves), particularly with regards to infrastructure delivery. It would have therefore been premature to have included such plans in the Framework, even if they were illustrative. I think it is likely that we will address this issue through more detailed masterplanning work and leave the Framework to cover the broad principles of development."</i> (EHDC 17/10/16)</p>
21/10/2016	CDF	<p>HPC and E&GPC made a complaint to EHDC regarding the CDF and the GA policy: "Preparation of the CDF had been without community consultation or involvement and that it contained many elements that would have been considered in the NP plan - and as it had been prepared with no community consultation - it undermined the group and the democratic process.</p> <p><i>"This has been prepared with no consultation with us as communities directly affected by it so we believe is flawed and runs counter to good practice and the Localism agenda....Your Officers know that we are committing time and resources to preparing a comprehensive Neighbourhood Plan for the joint parishes but have ignored that established planning process and spent time working up substantive elements of a Neighbourhood Plan for Gilston with no consultation – that is undemocratic."</i> (HPC and E&G PC 21/10/16)</p> <p>Given the scale of the proposals for the GA, the NP group also requested funding from EHDC to enable community engagement and response:</p> <p><i>"The document adds a further substantial document that these communities need to evaluate and prepare a response on the concept and many technical issues raised between the Local Plan publication, in November, and mid-March when the Concept Framework needs to be submitted. We need funding to secure suitable professional support to advise the community in this and subsequent representation at the planned EIP. As you are in regular discussion with the developers we assume that you will arrange for such funding to be available so that we can commission and work up suitable representations; we suggest that this needs to be done within the next two weeks, given your proposed consultation timetable."</i> (HPC and E&G PC 21/10/16)</p> <p>Information was requested from EHDC to address how the necessary infrastructure needed would be provided and when this would happen and how the existing communities would be protected during the 30 year building project:</p> <p><i>"The document offers images of communities served with the infrastructure needed but, as far as we can see offers no clue as to how the currently substandard infrastructure will be remedied at the outset and the community, that you and we represent, will be protected throughout this 30+ year building project."</i> (HPC and E&G PC 21/10/16)</p>
26/10/2016	CDF	<p>The NP group reiterated the willingness of the community to engage with EHDC and the site promoters and an introductory meeting between the groups was agreed but highlights EHDC's lack of community consultation in the preparation of Concept Framework.</p> <p><i>"Our Neighbourhood Plan Group is planning to have an informal meeting with Places for People to understand how future conversations with them and our elected Councils and so local community should take place....We intend to be open with East Herts Council even if all of this work related to exclusively these parishes has been done between East Herts Council and Places for People with no engagement with the communities elected councils."</i> (HPC and E&GPC 26/10/16)</p>



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28/10/2016	CDF	Further to concerns raised by the PCs, EHDC pass on the site promoters commitment to work with the NP group and confirm that the NPs funding request will be considered: <i>"Clearly now that a meeting has been set up on 7th November, the issues you have raised can be discussed with Places for People directly. ... we had an Officer meeting with PFP and City and Provincial Properties yesterday where I did mention your concerns, particularly with regards to involvement in the Concept Framework process and its relationship with the Neighbourhood Plan. They have re-iterated their commitment to working with the Parish Councils in a positive manner over the coming months – hopefully the meeting on the 7th will be the start of that process. We also raised the issue of funding, and again this is something that PFP are happy to discuss in the meeting."</i> (EHDC 28/10/16)
02/11/2016	Pre-submission District plan	Pre-submission District Plan consultation begins.
	Pre-submission District plan	Change to the Gilston Are policy: Replacing the Development Plan Document with the Concept Framework is significant for the local community: The DPD was intended to address a whole range of issues that included infrastructure, green belt boundaries, governance, the impact on the existing settlement, density etc. As a DPD, these matters would have been examined prior to the policy adoption and the site allocation. The Concept Framework is only in its first draft and will continue to be developed after the presubmission consultation has ended and prior to the Plan's Examination - therefore the eventual plans for Gilston could be very different to the ones currently published. <ul style="list-style-type: none"> • Replacing the DPD and replacing it with the Concept Framework avoids the scrutiny of the Government appointed Inspector at Examination. • Removing the examination of financial viability means that it is unknown whether this project could in reality be successfully delivered. • Denies the local community the opportunity to make their views fully heard.
	Pre-submission District plan	There was no consultation or communication with the community on the matter of replacing the Development Plan Document with the Concept Framework and no sound reason was provided by EHDC for the policy change.
06/11/2016	Pre-submission District plan	Failure in publicity for the Presubmission District Plan Consultation: some residents begin to receive EH Link magazine advertising the consultation but this is extremely patchy, no-one in Hunsdonbury received one at all.
07/11/2016	CDF	First NP group meeting with site promoters and EHDC: <ul style="list-style-type: none"> • Request for funding from EHDC/PFP: to enable communities to make a reasoned response to the Local Plan, at both consultation and EIP stages and thereafter: Funding was refused but the site promoters offered workshops instead to explain their proposals. They also expressed concern regarding community support for Stop Harlow North. However they said that financial support might be provided post EIP if site is allocated and EHDC said they would look for additional resources to support the NP group. The NP group did not believe that it should be expected to promote the removal of the Green belt especially as the proposals offered the community nothing other than disturbance for c.30 years but were willing to engage in the process given the change of EHDC policy in allocating the GA site and raised concerns that the site promoters still did not fairly recognise the difference between SHN and the NP group's stance to the proposals.
07/11/2016	CDF	First NP group meeting with site promoters and EHDC: NP group request the creation of an Independent body to oversee the development of the 'string of villages'; assuming the site is allocated: this was not agreed but the site promoters said they were willing to establish principles in this regard.
07/11/2016	CDF	First NP group meeting with site promoters and EHDC: NP group request the concept of villages to be clearly stated: <p>☒The Landowners proposal is for a string of 'villages' not a Garden City and the concept plan put forward by East Herts supports this; it should be clearly stated that the proposal is indeed a string of Villages and not the discredited and we believe abandoned "Harlow North" or some form of 'Garden City' proposal: EHDC and site promoters maintain that proposal is for a string of villages as oppose to an urban extension to Harlow and that the concept is significantly different and better than the previous proposal of 25,000 houses.</p>
07/11/2016	CDF	First NP group meeting with site promoters and EHDC: NP group is concerned that the proposal should address how it will manage its impacts on the current community: the site promoters offered assurances in this regard but there were no proposals of how this would be addressed.



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07/11/2016	CDF	First NP group meeting with site promoters and EHDC: NP group requests that a land holding vehicle for community assets is established at day 1 should the site be allocated: the site promoters states that there was a commitment to stewardship.
07/11/2016	CDF	NP group raises concern over the phasing of infrastructure: ☒That the proper phasing of the delivery of infrastructure must be delivered to minimise the adverse impact of the project: the site promoters said that this had been considered in the CDF and wider infrastructure had already received detailed consideration. They said that delivery would come forward as development created demand for it and it required further consideration with consultees including PCs and recognised it needed to be aligned.
07/11/2016	CDF	First NP group meeting with site promoters and EHDC: NP group raises concern over the GA1 policy of the possible relocation of Harlow Hospital to the Gilston Area and states that this should be objected to and challenged as not fitting into the development villages' concept and as such should not be included in policy: the site promoters did not envisage the hospital being provided on site, although locations near to the Gilston Area may be appropriate.
07/11/2016	CDF	First NP group meeting with site promoters and EHDC: The site promoters asserted that they had tried to engage with the parishes for seven years but that the parishes had refused. <i>"we have tried since the outset of our involvement with Gilston to engage with the parishes but historically there has been an unwillingness, on the basis that any engagement was perceived to represent an acceptance of the proposed development. You had, we understand, mandated SHN to speak on your behalf."</i> (Pfp 24/11/16) This was not accurate. SHN is a campaign group for a much wider area which than just the villages of Hunsdon, Eastwick and Gilston. It is a completely separate entity to the PCs and cannot therefore speak on their behalf. HPC and E&GPC along with other PCs in the area do have representation on SHN but SHN also has community representatives and the PCs support it in recognition of the wishes of their communities. The period the site promoters refer to would seem to be 2011 to 2016. There would have been little value in the parishes engaging with the site promoters whilst EHDC maintained the position of protecting the Greenbelt from development which they did until 2014 when the area was included as a possible broad area for development in the Draft District Plan. The Parishes neighbourhood plan group was recognised in 9/15 and was established in order to allow the communities to respond and engage in a positive way to the change of EHDC policy. The Parishes were led to believe that any further change to policy in regard to the site being allocated would trigger community engagement with the parishes in form of a DPD investigation of the site. The council's published intent to remove this from policy and the publication of the CFD removed this engagement mechanism. Since the change in policy towards Gilston and its inclusion as a broad area for the development - no attempt at engagement with the Parishes or the NP group was made by either the site promoters or EHDC. This was discussed at numerous PC meetings and this is documented in HPC minutes. The NP group made it extremely clear that they were trying to engage in a positive and proactive way and that it was not constructive for the site promoters to keep returning to the old history of the site. <i>"I thought that we had discussed and accepted that we cannot keep on going back to the history of this.....We made the point, when we met you, that we do not like the proposals which seem to do nothing other than 'harm us' over a 30 year period ...BUT we understand that EH have seen fit to propose revoking their Green Belt policies here AND, in consequence, we have put forward our key objectives for discussion with you. These objectives, and our discussion, focussed on how things, if they happen, might move forward so that the delivery...lives up to the promises and CPP/EH are making alongside providing an efficient and professional approach to delivery."</i> (HEG 27/11/16)
9/11/2016	Pre-submission District plan	The PCs and SHN requested EHDC planning attendance at community meetings to explain the Gilston proposals in the District Plan to residents which was expected as they had attended meetings in 2014: <i>"...please may I request you or an appropriate nominee attend our two community meetings we are planning regarding the District Plan Consultation? One is to be held in the Hunsdon Village Hall on December 5th, the other in the High Wych Memorial Hall on a date to be advised / agreed. In the past, members of the District Planning Team have been kind enough to attend similar meetings which have been an invaluable opportunity for the local communities to understand aspects of the District plan etc. As per those occasions i would be very grateful if you would please consider the format whereby after an initial welcome and introduction you provide a synopsis of the proposed plan and be willing to answer questions from the floor."</i> (HWPC, SHN 8/11/17) Whilst EHDC refused the invitation, they offered to instead meet with representatives of High Wych PC instead who had submitted the request. <i>"...we have taken the decision during this consultation period, that Council Officers will not be attending consultation events. This is to ensure we take a consistent approach to the use of resources and because of the more limited focus of the consultation."</i> (EHDC 9/11/16)



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15/11/2016	Pre-submission District plan	SHN contacted EHDC to clarify the Council's IT system would be able to cope with the high level of responses submitted via SHN during the consultation and specifically that these will not be discarded as SPAM. EHDC assures SHN that this won't be an issue : the EHDC system will be able to cope.
24/11/2016	Pre-submission District plan	Residents began to notify SHN that their responses to the DP consultation were not being logged by EHDC.
24/11/2016	Pre-submission District plan	SHN contacted EHDC to notify them that there was a problem with their IT system and responses were not being logged on the EHDC system. EHDC acknowledged that there was a problem and would investigate.
24/11/2016	Pre-submission District plan	SHN lodged a formal complaint on behalf of local residents and supporters of Stop Harlow North in relation to the failure of EHDC's systems to accurately register responses to the District Plan as it appeared that as many as half of responses were being "lost". SHN asked that if this situation was not rectified immediately AND the lost responses recovered, that the deadline for responses should be extended. An IT issue was identified by EHDC and steps were taken by the council to rectify the situation and recover the 'lost' emails.
05/12/2016	Pre-submission District plan	SHN held a packed public meeting for the community in Hunsdon in the absence of any event run by EHDC. SHN asked the district councillor who supported the plan and the planning team to attend the event to answer residents queries on the site allocation and the change of policy. The District Councillor agreed but the planning team refused.
05/12/2016	Pre-submission District plan	Questions at the community meeting that were unanswered by the District Councillor on behalf EHDC and required following up: <i>"...the Concept Framework. Is this part of the evidence base? If not, what status does this document have?...why Rye Meads can now accommodate Harlow North. What has changed?You mentioned the affordable housing was now 40%. Earlier plans had this at 30%. Can you confirm it has been increased to 40%?"</i> (SHN 6/12/16)
05/12/2016	Pre-submission District plan	Follow up answers from meeting: <i>"with regards to the draft Concept Framework and its appendices. When Officers were working with the site promoters (Places for People and City & Provincial Properties) on the draft document, it was initially envisaged that there would be two appendices: Appendix 1 would refer to a list of documentation that has been prepared by the site promoters; Appendix 2 would include indicative phasing plans. However, having given this further thought, Officers took the view that it would have been premature at that stage to include any phasing plans even if they were just indicative. While the Infrastructure Delivery Plan identifies the infrastructure schemes that will be required to support the development, further work needs to be undertaken with service providers such as the County Council and other organisations, in order to identify how the development and supporting infrastructure will be phased together. Reference to Appendix 2 on Page 130 of the draft Concept Framework is therefore a typo. As a result there is only one appendix to the document which, as stated earlier, identifies the list of documentation that has been prepared by the site promoters. A decision still needs to be taken as to whether the final version of the Concept Framework, which it is hoped will be completed with the involvement of local communities, should include a second appendix with phasing information, or whether this should be left to the revised version of the Infrastructure Delivery Plan which will be completed prior to submission of the District Plan in March 2017."</i> (EHDC 6/12/16)



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05/12/2016	Pre-submission District plan	<p>Follow up answers from meeting: <i>"we are expecting a response from Thames Water tomorrow which will provide a completely up to date position with regards to Rye Meads. If it's ok I'll respond to that question tomorrow when I have that latest information.</i> <i>In terms of the Concept Framework, it does form part of the evidence base and will be submitted as such to the Planning Inspectorate alongside the District Plan and the rest of the evidence in March. However, the document is different from the rest of the evidence base documents because:</i></p> <ul style="list-style-type: none"> · <i>It is in draft form (and it's likely that it will still be in draft form when we submit it to the Planning Inspectorate); and</i> · <i>Unlike the other documents, it has not directly informed the content of the District Plan, rather it is seeking to add to the content of the Plan by providing further information.</i> <p><i>In terms of affordable housing, our evidence shows that 30% is financially viable, whereas as 40% is questionable. This is a detail that will be addressed through masterplanning and the planning application process in due course. However, on other large scale developments elsewhere in the country, 30% affordable housing is generally what is achieved due to the amount of infrastructure that needs to be provided on site. As with anything in planning it's a balancing act – in the case of the Gilston Area, the Council needs to make sure the necessary infrastructure (schools, roads, health centres, parklands etc) is provided – therefore in my view 30% affordable housing is probably realistic."</i> (EHDC 8/12/16)</p> <p><i>"With regards to the Rye Meads position, we are still waiting for a full response from Thames Water. I think the best way to answer the question for now is to say that we are currently liaising with Thames Water in order to get the most up to date position with regards to the capacity of Rye Meads, including where necessary, details of how and why the advice has changed during the Plan making process."</i> (EHDC 9/12/16)</p>
11/12/2016	Pre-submission District plan	<p>SHN held a public meeting for the community in High Wych village hall to enable residents who had not been able to get to Hunsdon to attend. SHN asked the District Councillor who supported the plan to attend as the planning team had refused, in order that residents queries on the site allocation and the change of policy could be answered. The District Councillor for the High Wych ward refused to attend.</p>
13/12/2016	Pre-submission District plan	<p>NP group response to Pre-submission District Plan consultation was submitted.</p>
15/12/2016	Pre-submission District plan	<p>Pre-submission District Plan consultation ended.</p>
	Pre-submission District plan	<p>Consultation failures: Email mailings: Emails sent out by EHDC to those who have responded to the consultation before:</p> <ul style="list-style-type: none"> ☒ Many of these emails did not reach residents but were intercepted as SPAM bulk mailing. ☒ These emails only reached those residents with internet access who had responded via email in 2014 who still have the same email address. ☒ No new residents views were captured in this way.
	Pre-submission District plan	<p>Consultation failure: other than email, promotion of the consultation via: The East Herts Link Magazine:</p> <ul style="list-style-type: none"> ☒ This was only distributed after the consultation had already begun the consultation was only for 6 weeks in the run up to Christmas and some households didn't receive it for more than a week. ☒ A number of households didn't receive a copy of the magazine at all. <p>A small advert in the Public Notices section of the local newspaper was published only on the first day of the consultation. It should be noted that:</p> <ul style="list-style-type: none"> ☒ This ad was difficult to read and hard to find. ☒ The newspaper is not free - residents must pay for it. ☒ Not all the rural communities have a shop within walking distance and must purposefully make a special journey to buy it. <p>It is believed that EHDC may have used their social media Facebook page:</p> <ul style="list-style-type: none"> ☒ However the reach of EHDC in this way is very small given that they have very few followers. <p>Promotion via the EHDC website: This is a passive form of promotion - residents would need to be visiting the site and 'come across' the consultation details.</p>



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	Pre-submission District plan	<p>Consultation failure: EHDC IT systems:</p> <ul style="list-style-type: none"> ☒EHDC's IT system marked many responses to the consultation as SPAM. ☒EHDC were unaware they had IT problems - they were notified of this by STOP Harlow North.
	Pre-submission District plan	<p>Consultation failure: Presubmission District Plan document:</p> <p>The community were asked to view the District Plan document online:</p> <ul style="list-style-type: none"> ☒A large number of the community do not have online access of any kind. ☒Only two hard copies of the Plan itself were made available to each parish council on a request basis. ☒These had to be shared between all councillors and were needed by them to make the community response. ☒No hard copies were made available to residents except in Hertford, Bishops Stortford and libraries - however, those working or those without their own transport (given the poor bus services) were able to access these.
	Pre-submission District plan	<p>Consultation failure: Consultation documents:</p> <p>The Concept Framework was presented to the community as a supporting document to the Presubmission District Plan:</p> <ul style="list-style-type: none"> ☒Given the rural nature of the district, many of the residents in the areas closest to the Gilston Area- so those most impacted by the proposals did not have superfast broadband and so were unable to access the document properly online. ☒No alternative provision was mad for the community to access the document - no hard copies were made available. ☒The status of the document was unclear - it stated that it was for illustrative purposes only - but was also presented to the community as a masterplan. ☒It was an incomplete document or had information missing - the appendices relating to phasing, viability and infrastructure referred to within the main body of the document were missing. Appears to be a marketing document written by the site promoters ☒Does not relate well to the GA policy which proposes the inclusion of 15+ traveller/gypsy/showpeople pitches within the site as well as the possible relocation of PA Hospital and cemetery provision. None of which are included in the document. <p>The documents were difficult to find on the EHDC website.</p>
	Pre-submission District plan	<p>Consultation failure: Supporting evidence:</p> <p>Documents were difficult to find on the EHDC website and some were not loaded at all for example:</p> <ul style="list-style-type: none"> ☒The Duty to Co-operate Notes on the main District Plan website were out of date, the newer ones were only available with a Dsitrict Plan meeting agenda. ☒The Harlow Gilston Garden Town Bid was only available within Duty to Co-operate Notes stored with the District Plan meeting agenda on 13th October. ☒The Gilston Concept Framework was moved at the request of Hunsdon PC via the Ward District Councillor because it was so hard to find. ☒The SLAA mapping, which had parts missing in any case.
	Emerging District Plan	<p>Consultation failure: lack of appropriate consultation with Parish Councils in general:</p> <p>EHPTC meetings were always held during the day in Hertford following a District Plan meeting however:</p> <ul style="list-style-type: none"> ☒A variety of different locations and times should have been held to allow engagement from all PCs to account for transport difficulties and work commitments.
02/01/2017		<p>The Government made an announcement that it was allocating funds to support the continued design work for proposed Garden towns and villages which included Harlow and Gilston Garden Town. The community were concerned about this: infrastructure requirements for the GA proposal estimated to be in the region of £1billion would not be addressed by the money awarded but more importantly, the EHDC Presubmission District Plan consultation had only just ended and the plan had still to be submitted to the Planning Inspectorate and an EiP to take place. The Garden Towns were meant to be locally led but more than 2,000 objected to this policy in the consultation for the Presubmission District Plan.</p>
28/01/2017	CDF	<p>Gilston Area Workshop.</p> <p>The NP group reiterated the concerns raised in their first meeting with EHDC and the site promoters in November 16 and repeated their requests for funding and a legal agreement to protect the green space from further development.</p>
28/01/2017	CDF	<p>Site promoters acknowledged the NP group's willingness to engage with them on the Gilston Area proposals:</p> <p><i>"Thank you for the mail and for your very active participation yesterday. I applaud your open-mindedness and look forward to our future meetings."</i> (C&P 29/1/17)</p>



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28/01/2017	CDF	The NP group's proposal for governance was circulated to EHDC and the site promoters - the group did not receive any feedback to these proposals from EHDC until July 2016: <i>"I am attending a meeting of senior officers of the five councils (Harlow, Epping Forest and East Herts district and Hertfordshire and Essex County) next week, to look at how we approach the wider garden town delivery collectively. As I mentioned on Saturday, while Gilston Park is what matters to us specifically in East Herts, the wider garden town bid is where we can potentially influence some of the key issues (road/rail infrastructure, modal shift etc) most effectively. The funding awarded by DCLG is for the wider garden town (16,100 houses by 2033, of which 3,000 are in Gilston Park). I would like to have that dialogue with our neighbours before committing to any particular structures/governance for Gilston Park."</i> (EHDC 31/7/16)
15/02/2017	CDF	The site promoters issued a paper on Governance, however: ☒The NP group were not given sight of it for two months despite it having been in circulation to a number of other bodies during this time.
15/02/2017	CDF	HEG complained about a lack of communication and commitment to engage from the site promoters "I thought we were hoping to have a seminar this weekend but that proved not possible so the next date being considered was 25 March; it now seems that that cannot be achieved. There is a lot to review so we need to make progress? Thank you for your note setting out your thoughts on what might work for you, as promoters of the development. Despite us being in discussion this is the first time that I have seen a copy of it, two months after it was in circulation - can your team please try and do better in keeping us, as a community engaged in this stuff - the White Paper seems to emphasise the need to consult with local communities!" (HEG 15/2/17)
25/02/2017	CDF	Gilston Area Workshop (2): cancelled
09/03/2017	Pre-submission District plan	Community concerns regarding sustainable transport and infrastructure delivery / phasing as well as concerns regarding PA hospital, appear to be confirmed by EHDC during the District Planning Executive Panel meeting webcast. EHDC appeared to have had problems working with some of the other agencies: the NHS, network rail and Essex CC and members expressed concern regarding the timing of infrastructure generally during developments and were critical of Herts CC highways expertise. Concerns were also generally expressed regarding viability and the funding impact on the delivery of Infrastructure provided.
31/03/2017	Pre-submission District plan	EHDC had access to new housing data in mid-March but agreed not to share this information with the community because it: <i>"...is likely to result in different bodies trying to use this as a means to prevent the progress or alter the content of local plans by arguing that the data undermines existing evidence. The release of the projections would, therefore, add to LPA's workload in addressing questions from members and the public."</i> (WSE Political Steering Group Meeting minutes 31/3/17) A new housing paper referencing this GLA data was loaded on to the EHDC website only on 11/8/17.
01/04/2017	CDF	Gilston Area Workshop (2) The NP group reiterated the concerns raised in their first meeting with EHDC and the site promoters in November 16 and repeated their requests for funding and a legal agreement to protect the green space from further development.
17/04/2017	CDF	Detailed Request for funding submitted to the site promoters by the NP group including the approach to procurement for: Task 1: Delivery mechanisms; Task 2: Urban design; Task 3: Planning support with liaison between the site promoters, EHDC and the local community; Task 4: Assessment of social infrastructure needs; Task 5 Programme Management and Facilitation
20/04/2017	CDF	Request for funding for professional support to facilitate the NP group and local community participation: The MP for the area Mark Prisk wrote in support of the NP group's funding request <i>"I am writing in strong support of the request by the HE & G Neighbourhood Planning group for resources for professional support" without it "local people through the NPG are unable to participate for lack of professional support".</i>
20/04/2017	CDF	The MP for the area Mark Prisk notes <i>"the positive engagement which Neighbourhood Planning Group has undertaken"</i> .
24/04/2017		The site promoter agreed <i>"to fund resources to help the community understand the technical detail, provide meaningful feedback and support them through the next stages of scheme development. I will be responding.... agreeing the scope, brief and procurement process for that support."</i> (PFP 24/4/17)
04/05/2017	CDF	The site promoter responded to the NP group's funding request - setting out the ground rules and procurement process.



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06/05/2017	CDF	Gilston Area Workshop 3. The NP group reiterated the concerns raised in their first meeting with EHDC and the site promoters in November 16 and repeated their requests for funding and a legal agreement to protect the green space from further development.
18/05/2017	CDF	The NP group was given a funding offer from the site proposer based around the the NP group's task 2urban design funding proposal which had been to: <i>"to understand how the established principle of the 'string of villages' will be planned and, in particular, how it will pay due regard to the existing communities. The Landowners and EH have developed an extensive Concept Development framework with no consultation with the Plan Group and there have been unhelpful references to a range of concepts from what we are assured is the current concept (7 villages each with their own identity in a landscape setting) to the development being a Garden City linked into the urban structure of Harlow so more akin to the discredited, and thankfully abandoned, Harlow North This would need an urban design specialist with experience relevant to this specific task, potentially from a recognised body such as Design Council/CABE, who would act as the strategic advisor to the Community and a 'critical friend' on the work of Places4People and EH to ensure that, if the project moves forward it does so embodying the promise of EH that the villages will be places of quality all can be very proud of."</i> (HEG)
12/06/2017	Outline PA	Request for a Scoping Opinion Gilston Area, North of Harlow Consultation: the EHDC planning team requested a response due within 21 days of the notification which was undated. The report this was based on was a very large document which appeared to be based upon the CDF which the community did not feel was adequate and in any case had not been consulted on and before the District Plan had been through and EIP and been found sound.
24/06/2017	CDF	The NP group state that in regard to the workshops they have engaged with EHDC and the site promoters in, they are: <i>"...concerned that the agenda does not include an item specifically for the review of items identified in the workshops for action/next steps. We therefore hope this can be covered in the update.....At some point during the morning we would like to discuss just how the fruits of our workshops are going to be taken forward. We assume this will inform the development of the concept framework prior to the wider consultation but in relation to our joint Neighbourhood Plan we see these discussions as relevant to the development of your masterplan for the villages. I think some clarification of the process would be helpful as the NPG is not clear how our communities will be involved/consulted"</i> (HEG 24/6/17)
24/06/2017	CDF	Gilston Area Workshop 4: Topic Infrastructure deficits and local issues
24/06/2017	CDF	During the workshop, the site promoters said that EHDC would hold a formal consultation on the CDF over the summer and the site promoters would support this with their own events. The site promoters also stated their intention to begin consultation on an outline planning application for 10,000 houses. The NP group raised a number of concerns in relation to this: <ul style="list-style-type: none"> •Residents would find it confusing to be consulted again on this document which had been promoted by EHDC to support the Presubmission District Plan consultation six months previously. •It would give the impression that the decision on allocating the 10,000 in Gilstion had been decided. •The timing was inappropriate - many in the community would be on holiday so there would not be much response. •It was also highlighted that many of the older residents do not use the internet or have email so other forms of communication would need to take place to reach residents.
25/06/2017	CDF	The NP group raised concerns with EHDC that the "The Visioning Brief" for the Harlow & Gilston Town written by EF DC conflicted with the proposal for 7 villages promoted by EHDC and the site promoters.
14/07/2017		EHDC submitted new housing data to the inspector however this still didn't reference the GLA data EHDC had had access to since mid March and this was only referenced in the revised Housing Topic paper submitted on 11/8/17. (see earlier comment).
14/07/2017	CDF	NP group's engagement with the GA proposal misrepresented on EHDC's website: <i>"In the course of the last Gilston Area workshop it was mentioned that EHC has put up a new webpage to communicate the ongoing position on this element of the District Plan. This includes the paragraph Councils, developers and representatives of the local community are working together to ensure that we deliver a development of the highest quality and that is reflective of Garden Town principles. Please check in here for updates and news in relation to the Gilston Area. Although this is true, the local community has made it abundantly clear that it remains fundamentally opposed to the proposition and is not contributing to the ongoing work willingly or in good heart. Collectively we would be much happier if this could be reflected in the wording of this webpage in case there should be any misunderstanding on our residents' part"</i> (HEG 14/7/17)



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24/07/2017	CDF	<p>Concept Framework consultation began. <i>"East Herts Council recently submitted its District Plan to the Planning Inspectorate for independent Examination. The Plan includes a proposal to deliver 10,000 new homes and supporting infrastructure on a site known as the Gilston Area, located to the north of Harlow. In order to support the Examination process, and inform more detailed design work in due course, the Council is working with the developers to prepare a Concept Framework document. The purpose of the document is to provide more detail with regards to what the development could look like, including establishing development parameters and principles. A draft version of the Concept Framework has been produced and a period of public consultation is now being held between Monday 24th July and Friday 1st September. As part of this process we would like to invite you to comment on the content of the document. In order to view the Concept Framework and respond to the consultation, please visit: https://www.eastherts.gov.uk/gilstonconsultation Following the end of the consultation period, the Council will summarise all of the comments received, before working with the developers in order to produce a final version of the Concept Framework. We look forward to hearing from you in due course."</i> (EHDC email to PCs 24/7/17)</p>
25/07/2017	CDF	<p>There was general confusion in the community as to why this CF document has been sent put out for consultation: EHDC had said that the CDF would be revised and submitted to the Inspector in March so the PCs queried whether the CDF had been revised as it looked the same as the version presented to the community with presubmission District Plan Consultation. EHDC said that there had been no changes and it was the same version published last year. This was incomplete and contained misleading images. <i>"...and submitted to the Inspector on 31st March. The idea is for this consultation to take place and the document would then be updated, taking account of responses received. A final version will then be submitted to the Inspector."</i> (EHDC 25/7/17)</p>
25/07/2017	CDF	<p>General confusion as to why this CF document has been sent put out for consultation unchanged, the PCs queried this with EHDC who said: <i>"...the purpose of the Concept Framework is really to act as a 'bridging' document between the District Plan and future masterplanning work...we consulted on the District Plan in November/December last year. The Plan contains a policy that identifies the site area as well as a number of aspects that the development will be expected to deliver. However, given the complexity of the site, we didn't want to start a consultation without any further information being in the public domain. We therefore agreed a draft document with the developers to help inform that consultation process. The document will also help provide our Inspector with more detail about the site at the forthcoming Hearing sessions, while also informing the future masterplanning work. It is obviously a fairly long document...but we think it is important to get the views of the local community and other organisations like Natural England and the Environment Agency etc before we finalise it and submit it to the Inspector. When we do submit the document it will replace the version that we previously submitted alongside the District Plan on 31st March. It is intentional that the document contains quite a lot of images rather than just plain text - hopefully that makes it a bit easier for people to engage with it. However, the document clearly outlines in a number of places that the images are indicative only and will change through more detailed design work in future....Detailed proposals for the Gilston Area will need to be shaped by further technical and design work, which will involve the participation of key stakeholders including the local communities. However, it provides a useful tool in showing how a high quality outcome could be achieved and forms the basis for assessing broad development impact and mitigation as a result of the proposals at this strategic location.."</i> (EHDC 26/7/17)</p>
26/07/2017	CDF	<p>The NP group were concerned that the consultation was being rushed and this would impact community awareness that a consultation on the CFD was being run: <i>".. if I understand you correctly:- The dates and venues for the consultation presentation meetings are unknown....but the consultation period expires at the end of August, so just over four weeks away. It cannot be right that the date times and venues are not fixed before the consultation starts? ... East Herts are however starting a consultation on a document that has been around for months and was prepared without any consultation with the community (despite knowing that we are doing a Neighbourhood plan). We and P4P have agreed at a seminar that it is in parts a deficient document when we discussed aspects of it at the seminar. "</i> (HEG 26/7/17)</p>
26/07/2017	CDF	<p>The NP group were also concerned that the 'land agreement' to protect the undeveloped green space had still be seen by anyone. The NP group had been told that the site promoters were: <i>"...currently undertaking a lot of work in order to inform their outline planning application, including the legal agreement ...[EHDC] haven't seen anything on this as yet"</i> (EHDC 26/7/17) The NP group had been raising this particular aspect of the proposals since November 2016: <i>"...are doing a lot of work on the 'legal agreement' but you imply East Herts is not involved - you are our local planning authority how can this work be done without you being involved as a Community we have suggested an approach to get around such problems - can we please have a serious response from East Herts on that proposal..."</i> (HEG 26/7/17)</p>



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05/08/2017	CDF	<p>Consultation failure: the site promoters ran an exhibition to support the EHDC consultation at the Manor of Groves High Wych and to advertise this had: <i>"...produced approximately 50,000 flyers to put through letterboxes in the local area. They have also set up a micro-site to provide more information which will go live very shortly (there will be a link to this on the Council's website too): www.gilstonarea.com/framework"</i> (EHDC 24/7/17)</p> <ul style="list-style-type: none"> •It was inappropriate - that the site promoter should be running the publicity for an EHDC consultation. It was unclear whether the publicity/events was for the CDF consultation or the outline planning preapp for 10,000 houses which was being run in parallel. The site promoters used their own exhibition boards which were also used in their events for their outline planning application events - and the event was manned by site promoters instead of EHDC - the community felt that they were being 'sold to' and the soundness of the proposal had already been decided. •The promised publicity failed: The number of leaflets produced was enough to cover nearly the whole of East Herts but leaflets were not received in Gilston or Hunsdon and the other villages although anecdotally it appeared that Hertford and Harlow had been well covered. Posters for community display in Hunsdon were sent to the Parish Clerk who was on holiday so not received until the day of the consultation so were no use.
09/08/2017	CDF	<p>Community meeting with the Louse St John Howe Programme Officer for the EIP attended by Mark Prisk representatives from HPC, E&G PC, WPC, the NP group and SHN. The Programme Officer explained the documents attached and the procedures at the EIP. It appeared that the CDF had not been submitted to the Inspector in March as stated by EHDC, however the community provided her with a copy of the document.</p>
??/08/2017	Outline PA	<p>The site promoter's outline planning application community engagement events were run in parallel to the EHDC CDF consultation: <i>"We will start by targeting those closest to the site – offering meetings with all of the Parishes and asking the Parish Councils to encourage local people to attend</i></p> <ul style="list-style-type: none"> • We will maximise existing channels of communication wherever possible – Parish newsletters, village noticeboards, pubs, etc ... • The closer to the site, the more "intimate" the event and we would like to use Village Halls or schools • We will then broaden out into a wider District exhibition event at, for example, The Manor of Groves • We will also be distributing invite flyers to our Framework consultation event (c50k households) as well as our Outline Application consultation events (c80k households) • We also want to capture people who may wish to be involved more deeply in future stages of engagement as we develop the specific proposals on, for example, schools, housing, greenspaces ..." <p>(PFP GPE Engagement Programme 11/7/17)</p>
25/08/2017	CDF	Concept Framework consultation deadline for response is extended to 30/9/17 for the NP group.
25/08/2017	CDF	EHDC website was down - so there was no access to the document, and no one was able to access the EHDC website to respond.
26/08/2017	CDF	EHDC website was down - so there was no access to the document, and no one was able to access the EHDC website to respond. EHDC tagged on social media to report in their promotional post that the site was down and had been since at least the day before.
27/08/2017	CDF	EHDC website was down - so there was no access to the document, and no one was able to access the EHDC website to respond.
28/08/2017	CDF	EHDC website was down - so there was no access to the document, and no one was able to access the EHDC website to respond. EHDC finally acknowledge problems on Facebook: they said that it was a 'technical issue' and the consultation would be extended until 8/9/17.
31/08/2017	CDF	<p>The NP group notified EHDC of their concerns regarding the consultation process: <i>"While extending the consultation period by a week helps I have a concern that you are not fully reflecting the position people find themselves in. This consultation, on a document printed a year ago is being rushed through in August at the same time as we are having to devote time to getting ready for the EIP and briefing the new and very welcome urban design advisor; the whole thing looks like it is being done for the greater convenience of the landowner than an exercise in consultation. I have had email traffic from people complain to me that they feel due process is not being followed."</i> (HEG 29/8/17)</p>
31/08/2017	CDF	Gilston Area Workshop: Infrastructure.



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		<p>Gilston Area Workshop Infrastructure: The NP group were concerned that issues highlighted and queries raised in November 2106 and frequently since them appeared to have progressed little and the queries remained unanswered:</p> <ul style="list-style-type: none"> •The site promoters described what they saw the main infrastructure deficits to be and how they would address them but did not allow enough time for discussion for how the issues would be addressed. •They referred to traffic modelling which the community have not been given access to, and it was unclear what the scope of this modelling had been and whether it was adequate: it was unclear if modelling for a resited PAH had taken place, or school traffic coming to the site had been factored in nor how the local road network had been considered. •It was announced that certain existing roads would be converted into 'green lanes' - this had not been discussed with the community before and the site promoters were unable to say how existing residents would access their properties. •Upgrades to critical road infrastructure was still unfunded and some had not been agreed. •Sustainable transport plans appeared sketchy and there was nothing to inspire that a modal shift would occur. •Rail capacity: the rail operator had invested in new stock so longer trains would be provided but there was to be no additional parking provision at Harlow Town train station nor any improvements to the drop off/pick up points and it did not appear that trains would be running with any greater frequency. There was no acknowledgement that there would be extra pressure on rail capacity as a result of other proposed development in the SHMA area. •Mobile phone coverage did not have appeared to have been considered. •An update to the resiting of the PAH - it was indicated that there had been problems in liaising with the NHS on this matter but some news might be forthcoming in the winter. •Capacity of the sewerage and water - the community were told that it was a legal obligation for the service providers to ensure there was capacity however the site promoters also noted that the service providers were still working on their future plans and in any case work in five year cycles. •No evidence has been provided although it is believed that EHDC may have commissioned a water study to be undertaken along with other councils in the area, however this has not been verified •The site promoters acknowledged that Rye Meads would not just be coping with an additional 10,000 houses if this was the sewerage option used but more like an extra 50,000+ houses due to proposed development in the whole of the sewerage provider's catchment area. •No evidence has been provided although it is not verified, it is believed that EHDC may have commissioned a water study to be undertaken along with other councils in the area, and that information from this has not been provided to the community for examination. •Cemetery provision in the GA policy - location and impact on marketability of dwellings: no answer was provided. •Gypsy, traveller and travelling showpeople provision in the GA policy - location and marketability of dwellings: no answer was provided. •The failing of the CDF consultation were raised and in particular the failure of EHDC's IT system during the consultation for a significant period of time and the timing of the consultation during August. The site promoters said that this was only an issue for people with children. •It was agreed that the slides used during the presentation to be circulated as per the MP's request. •No minutes have been circulated for this seminar.
01/09/2017	CDF	<p>Concept Framework consultation ends. Deadline is extended to 8/9/17 for the community and Parish Councils. Deadline is extended to 30/9/17 for the NP group.</p>
01/09/2017	CDF	<p>Despite the extended deadline for the Concept Framework consultation, EHDC emailed their 'Network News' with a consultation deadline reminder to the PCs however this was with the wrong deadline date, causing further confusion.</p>



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01/09/2017	CDF	<p>Concept Framework Consultation failures: The whole consultation has been rushed and badly planned - it appears that this is because it has been rushed through in order to be able to submit a "consulted" document at the EIP and to facilitate the site promoter's desire to rush through the outline planning process.</p> <ul style="list-style-type: none"> •Timing of consultation was aligned to the school summer holiday period when residents and community groups were on holiday. •The publicity strategy was exceptionally weak and would have only reached a very small proportion of residents. this included information on the EHDC website: residents would have to be visiting the site and effectively stumble across it; email to statutory bodies and other bodies who may have an interest: this did not include residents and did not even include Stop Harlow North; a press release to local media: a news article was published but it was misleading and inaccurate; an interview on Bob FM: looking at their listening figures this would have reached a very small number of residents impacted by the proposals; EHDC's social media platforms: the target audience reach on this would have been very small because EHDC do not have many followers. •Mailings to the community most impacted failed and publicity material provided to the Parish Councils to display didn't arrive in enough time. •The site promoters running an event on behalf of EHDC was confusing to everyone. •The consultation period was very short for such a large document - 140 pages - with such major implications for residents. •It was the same draft document as a year before, no changes had been made to it - the appendices were still missing with nothing in the document to explain why, the maps were still extremely out of date and the imagery was still misleading. •EDC IT failure: The EHDC website was 'down' for 3 days and during that time none of the consultation documents could be accessed by the community and no one could respond the consultation through the EHDC website. •EHDC were unaware of their IT failure until notified of it by STOP Harlow North. •Emails from EHDC with contradictory deadlines were sent to the Parish Clerks for circulation. •The site had been overhauled during the consultation period making it difficult to locate documents, saved links no longer worked. •The site promoters were running a number of outline planning application in the GA for 10,000 houses community events in the GA at the same time as the EHDC and this was incredibly confusing.
01/09/2017	CDF	<p>PCs request information on the Infrastructure delivery plan information as it appeared not to have been updated (as per the suggestion at the infrastructure seminar). Although the location of the document was highlighted, the query as to whether it was or had been updated was not.</p>
04/09/2017	CDF	<p>information not being shared appropriately by the council as agreed: EHDC had agreed to circulate the infrastructure seminar slides to attendees. This didn't happen and had to be requested again and when provided, a number of the key slides relating to traffic modelling were not legible.</p>
09/09/2017	Outline PA	<p>Outline planning application preapplication PFP exhibition - The Plume - Gilston</p> <ul style="list-style-type: none"> •The site promoters refer to traffic that's been modelled but not shared and told one of the councillors that three models had already been prepared but could provide no reason as to why they were not publically available. •The site promoters mislead residents in saying that the Parish Councils have been unwilling to engage (see earlier comments) and said that this was had prevented the opportunity for the community to be involved with the preparation of the CDF. •The NP group were asked not to promote this event online as it was only for the very community.
14/09/2017	CDF	<p>The PCs requested access to the traffic modelling reports referred to at the infrastructure workshop: EHDC said that they were: <i>"...trying to liaise with...the transport planner who gave the presentation at the workshop... in order to arrange for the emerging modelling information to be sent out with the minutes from that workshop.....if I receive it before tomorrow I will of course send it to you."</i> (EHDC 14/9/17) This would seem to indicate that EHDC haven't seen this traffic modelling either.</p>



Gilston & Eastwick and Hunsdon Parish Councils
Statement on EIP Chapter 11

15/09/2017	Outline PA	<p>Outline planning application preapplication PFP exhibition - Hunsdon Village Hall</p> <ul style="list-style-type: none"> •The Hunsdon event organised was as an afterthought on the insistence of HPC - unfortunately this meant that the main hall was unavailable and a small room had to be used instead which turned out not to be especially suitable. •The leafletting failed again and only houses in the centre of the village received information about the event from the site promoter. Those living in Hunsdonbury - so those closest to the proposed development site didn't receive anything. •This resulted in the NP group having to produce leaflets at very short notice and delivering leaflets themselves to all the houses in the village to be sure that the area had been covered.
16/09/2017	Outline PA	<p>Outline planning application preapplication PFP exhibition - Manor of Groves - High Wych</p>
20/09/2017	CDF	<p>Interim CDF consultation to the CDF response submitted from the NP group.</p>
23/09/2017	CDF	<p>NHP community engagement event on the CDF to inform community response.</p> <ul style="list-style-type: none"> •Effective and well targeted marketing to promote the event utilised to reach as many residents as possible. •Packed event for half a day. The NP group with support from the urbans design support provided by the site promoters went through the CDF page by page with the community. •Residents comment that it's the first time they have felt properly consulted and not 'sold to'. • The NP group were disappointed that due to the rushed CDF consultation process and the delay in receiving professional support, that there was not enough time to run more of these events in other locations at other times to allow more residents to attend.
26/09/2017	Outline PA	<p>The NP group response was submitted to Outline Planning App Preapp Consultation.</p>
30/09/2017	Outline PA	<p>Outline planning application preapplication PFP exhibition - Harlow</p>
30/09/2017	CDF	<p>The NP group response Part 2 was submitted to CDF Consultation and the NP group said that they "<i>would be pleased to arrange a presentation of the workshop findings leading to agreement of the way forward and timescale between all relevant organisations and communities prior to the EIP Gilston day.</i>" (HEG 30/9/17) A date for this has been arranged.</p>
30/09/2017	CDF	<p>Concept Framework consultation extended deadline for NP group ended.</p>
02/10/2017	EiP	<p>EHDC promoted the Harlow & Gilston Garden Town Director post to deliver the Gilston Area on the evening before the EiP started - residents were very upset by this as it appeared to residents that the decisions due to be taken at the EiP had been predetermined.</p>
03/10/2017	EiP	<p>EiP started.</p>
04/10/2017	EiP	<p>Government announces funding to fast track the 'build out' in nine Garden Town developments proposed including Harlow & Gilston Garden Town. This heightened the existing concern amongst the community that the decisions regarding Gilston at the EiP had already been decided.</p>