

Places for People/City and Provincial Properties

East Herts District Plan Examination

Chapter 11 – The Gilston Area – Policies GA1 and GA2

Issue 1

The Gilston Area is a very large allocation with the potential to eventually provide some 10,000 new homes. What considerations led to its allocation? How and where did the loss of Green Belt and countryside fit into those considerations?

1. The Gilston Area is strategically located immediately north of Harlow, on the border of East Herts and Harlow Districts. As a Site Allocation, the Gilston Area has a central role to play in assisting East Herts to meet its objectively assessed market and affordable housing needs in a sustainable location and manner whilst, at the same time, supporting the economic and social regeneration of Harlow.
2. The Gilston Area is the most sustainable location outside existing settlements to accommodate 10,000 new homes during the plan period and beyond, due to its proximity to existing employment opportunities (and future employment opportunities within the Harlow Enterprise Zone), public transport facilities (including Harlow Train Station and bus services), as well as other services and facilities within Harlow. The scale of development proposed at 10,000 homes is required to support the delivery of essential infrastructure, which has wider benefits for growth across the Harlow area. A comprehensively planned development in this sustainable location enables infrastructure needs and impacts to be managed more effectively than through alternative locations or a dispersal strategy.
3. The Gilston Area has been identified in the Hertfordshire LEP Economic Strategy 2017 as a priority location for accelerating the delivery of housing growth, and it has also been identified by the Government as part of the Harlow & Gilston Garden Town.
4. Overall, the Gilston Area is considered to be a strategically advantageous location for development given:
 - the substantial housing need in East Herts both during the plan period and beyond;
 - the need to deliver the successful regeneration of Harlow and meet growth needs, particularly given its existing Green Belt which tightly constrains land surrounding the town;
 - the Hertfordshire Growth Deal and the A10/M11 being one of three transport corridors with significant potential for growth;
 - the fact that Harlow lies in the middle of one of the most important economic sub-regions in the UK; and
 - the London-Stansted-Cambridge Consortium (LSCC) listing Harlow as an integral economic location and labour market needed to support the prosperity of the LSC corridor.

5. Within this context, the Gilston Area proposals have been under consideration as part of the East Herts District Plan process for a considerable period of time. Evidence has been prepared by Pfp/CPP, as well as that prepared by EHDC, as summarised below.

Pfp/CPP Submissions

6. Pfp/CPP has commissioned a full consultant team to undertake a comprehensive audit of the site context, including full ecology, heritage and landscape constraints analysis, and based on this information has developed strategic placemaking principles, as well as emerging illustrative masterplanning concepts.
7. This level of information is more advanced than would typically be required for a Local Plan process because, Pfp/CPP are keen to demonstrate that there are no obstacles to the development and to emphasises their commitment toward delivery.
8. Pfp/CPP have provided the following material as part of the District Plan process:
 - Consultation response to the Issues and Options Core Strategy in November 2010, which included technical information on the site context and detailed responses to the Issues & Options raised;
 - Completion of the developer/land owner questionnaire in August 2012;
 - Submission of information in relation to the site specific questions posed by ATLAS in September 2013;
 - Consultation response to the Preferred Options District Plan in May 2014 which was accompanied by 10 technical reports covering a variety of matters including design, landscape, bio-diversity, transport and sewerage;
 - Submission to support the preparation of Peter Brett Associate's Delivery Study in August 2014;
 - Preparation of the draft Concept Framework in September 2016; and
 - Consultation responses to the Pre-Submission District Plan in December 2016.
9. This extensive body of information was provided to assist EHDC in its decision making as part of the local plan process. Pfp undertook a series of public consultation activities during this time as summarised at Appendix 1.

EHDC District Plan Evidence

10. In light of the substantial and growing housing need identified in the overlapping Housing Market Areas within which East Herts operates, and given the absence of brownfield sites following the Call for Sites submission, it was identified at an early stage of the EHDC District Plan process that development would need to occur outside of current settlement boundaries, on greenfield and/or Green Belt land – see paragraph 3.14.11 of the East Herts Issues & Options Core Strategy (Ref No: PDP/002).

11. In developing the evidence base to support the District Plan, EHDC undertook a structured process to determine the most appropriate development strategy considering the reasonable alternatives. This involved:
 - Issues and Options consultation (completed in 2010) which identified the main development strategy options under consideration;
 - Preparation of the preferred options, which involved a six stage 'stepped assessment' of 69 'areas of search'. This is documented in the Supporting Document (Ref No: SSS/001) which explains the assessment process undertaken for all sites/areas including the Gilston Area which was considered both as an area of search North of Harlow (split into 3 sub areas), and as a New Settlement in the Hunsdon Area. This structured assessment and sieving process culminated in the publication of the Preferred Options District Plan (May 2014) which identified the Gilston Area as a 'Broad Location for Development' for the delivery of between 5,000 and 10,000 new homes; and
 - The Pre-Submission Draft District Plan was informed by the outcomes of the Preferred Options consultation and the completion of various technical studies (including the Green Belt Review (2015), Harlow Strategic Sites Assessment (2016), Gilston Area Settlement Appraisal (2016), Draft Concept Framework (2016), Delivery Study (2016), and the Infrastructure Delivery Plan (2017)) which provided sufficient evidence to enable EHDC to identify the Gilston Area as a Site Allocation for 10,000 homes.
12. Furthermore, during the preparation of the District Plan, the Government confirmed in January 2017 its support for the Harlow and Gilston Garden Town (of which the Gilston Area forms part). The Garden Town initiative intends to deliver approximately 16,500 homes by 2033, and coordinated long term growth beyond the plan period. The Gilston Area represents a key part of this Government initiative.
13. The identification of the Gilston Area as a Site Allocation was the subject of a thorough process that was supported by technical evidence prepared both by PfP/CPP and that commissioned by EHDC.

Green Belt and Countryside

14. The loss of Green Belt and countryside was considered throughout the process identified above. In particular at the Issues and Options stage EHDC acknowledged that if the full objectively assessed housing needs were to be accommodated in sustainable locations it would be necessary to locate development on Green Belt or greenfield land. As a result, a decision was made to carry out a Green Belt Review (at that stage in relation to the subsequently abolished regional policy), and an assessment was undertaken of the options for a new settlement in the countryside.
15. The process that EHDC went through in balancing the strategic planning considerations, including those related to the loss of Green Belt and countryside, were fully considered and reported in the Supporting Document (Ref No: SSS/001).
16. The revised inner Green Belt boundaries proposed around the Gilston Area are considered robust and defensible in the long term. A review of the outer boundaries, expanding the Green Belt, could be the subject of a future local plan review.

17. In summary, during the preparation of the District Plan all development strategy and site options were reviewed by EHDC, and following careful analysis of the evidence available, including on countryside and Green Belt matters, it was concluded that allocating development in the Gilston Area was part of the most appropriate development strategy for the plan, considering all reasonable alternatives.

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APPENDIX 1 – SUMMARY OF PLACES FOR PEOPLE CONSULTATION ACTIVITY

Summary of Places for People Consultation Activity

Event	Date	Event Details
Community Engagement Surveys	September 2009	<ul style="list-style-type: none"> • Community engagement surveys were sent to 14,000 households across Harlow and East Herts; • The survey was issued via a newsletter and by website; • Questionnaire was completed by 407 people; and • Residents were asked to make their views known regarding their current access to facilities and services, improvements that they might wish to see and their perceptions of Harlow.
Drop-in Sessions	October 2009	<ul style="list-style-type: none"> • Sessions were held at the Harvey Centre, Harlow; and High Wych memorial hall and Widford village hall, East Hertfordshire. <p>Approximately 700 people attended writing 1200 post it notes, containing approximately 1300 comments.</p>
Community Forums	November 2009	<ul style="list-style-type: none"> • Five community forums at The Latton Bush Centre, Harlow and the Manor of Groves Hotel, East Hertfordshire, and around 150 people attended.
North Harlow People's Panel survey	January 2010	<ul style="list-style-type: none"> • Out of a total of 304 people who voluntarily registered for the People's Panel via the earlier Drop-in Sessions, Community Forums and on the website, 172 entries were made with 156 completions.
Public Exhibitions	September 2010	<ul style="list-style-type: none"> • Public exhibitions at the Harvey Centre, Harlow and Manor of Groves in September 2010; and • 96 people completed a questionnaire.
Bus Tour: 'Where will you live in 20 years?'	September 2013	<ul style="list-style-type: none"> • 3-day exhibition bus tour, stopping at various locations across Harlow and East Herts, to directly consult with local communities; and • Distribution of 'Where will you live in 20 years?' brochure and feedback postcard.
Information Pack Distribution and Exhibition Events	May 2014	<ul style="list-style-type: none"> • Gilston Park Estate information pack (containing an introductory letter, fold-out information sheet and a DVD) was hand delivered to every home

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		<p>within 4km of Gilston Park, totalling 17,000 residents; and</p> <ul style="list-style-type: none"> • The information pack directed people to the website and two exhibition events in High Wych and Harlow on 16 and 17 May 2014. Over 80 people attended the events.
<p>Engagement with Neighbourhood Planning Group for Eastwick & Gilston and Hunsdon Parish Councils</p>	<p>October 2016 – September 2017</p>	<ul style="list-style-type: none"> • Met directly with members of the Neighbourhood Planning Group, including five thematic workshops: <ul style="list-style-type: none"> - Introduction to the Gilston Area (28th January 2017); - Governance (1st April 2017); - Design Concepts and constraints (6th May 2017); - Green and Blue Infrastructure (24th June 2017); and - Infrastructure Deficits & Local Issues (31st August 2017).
<p>Concept Framework Community Drop-in Event</p>	<p>August – September 2017</p>	<ul style="list-style-type: none"> • The Concept Framework public consultation was undertaken by East Herts District Council. An Information Event was held to provide residents and other stakeholders with the opportunity to ask any questions.
<p>Outline Planning Application Community Drop-in Events</p>	<p>September 2017</p>	<ul style="list-style-type: none"> • Community drop-in events were held in Gilston and Hunsdon providing details of the emerging outline planning application, and infrastructure applications.
<p>Outline Planning Application Consultation Events</p>	<p>September 2017</p>	<ul style="list-style-type: none"> • Public consultation events were held at the Broad Walk, Harlow and the Manor of Groves, East Herts. • Events publicised through weekly adverts in the local media, over 100k of leaflets to residents in East Herts and Harlow, and a series of bespoke leaflets, letters and site-specific posters; and • All consultation material available on the website.