

Standing up for Hertfordshire's countryside

Adam Halford
Development Management
East Herts District Council
Wallfields
Pegs Lane
Hertford
SG13 8EQ

Our Ref:

Your Ref: 3/19/1045/OUT

2nd August 2019 (by email)

Dear Mr Halford,

Application ref 3/19/1045/OUT

Outline planning with all matters reserved apart from external vehicular access for the redevelopment of the site through the demolition of existing buildings and erection of a residential led mixed use development comprising up to 8,500 residential homes including market and affordable homes; retirement homes and extra care facilities; a range of community uses including primary and secondary schools, health centres and nursery facilities; retail and related uses; leisure facilities; business and commercial uses; open space and public realm; sustainable urban drainage systems; utility and energy facilities and infrastructure; waste management facilities; vehicular bridge links; creation of new vehicular and pedestrian accesses into the site, and creation of a new vehicular, pedestrian and cycle network within the site; improvements to the existing highway and local road network; undergrounding and diversion of power lines; lighting; engineering works, infrastructure and associated facilities; together with temporary works or structures required by the development at Land North of The Stort Valley And the A414, Gilston, Hertfordshire

Related applications.

3/19/1046/FUL. Alterations to the existing Fifth Avenue bridge

3/19/1051/FUL. Erection of new road, pedestrian and cycle bridge

3/19/1049/LBC. Works to Fiddlers Brook Bridge

Introduction

This application for the Harlow and Gilston Town (HGGT) comprises six 'villages' by Places for People. It is of local, regional and national significance. It is the main part (8,500 dwgs) of the largest release of Green Belt land within the UK (590ha). A separate application for Village 1 (1,500 dwgs) to the west is anticipated later this year by Briggens Estates. Consistent with government policy, the development must in practice, as well as in principle, meet the highest standards to demonstrate the 'exceptional circumstances' to justify the original Green Belt land release.

Even though Green Belt studies showed the land to have ‘very low suitability for development’ the Inspector nonetheless agreed to the allocation of the site within the recently adopted East Herts District Plan 2018. Co-operation has taken place between the neighbouring district and county authorities. The applicant has undertaken numerous rounds of consultations over a number of years. There is a huge amount of submitted documentation and it is possible this response may have missed some detailed points simply due to this volume.

Objection to the application and Conceptual Framework

The Gilston Area Conceptual Framework July 2018 implies a pre-approved strategy. However, this concept has not been locally endorsed or subject of external critical testing. It does not have the status of policy. CPRE Herts believes the concept could only be agreed as part of a formal process such as an Outline Planning Application or via a separate Development Plan Document.

CPRE Herts **objects** to the Conceptual Framework for HGGT for 3 main reasons.

1. Firstly, because it does not aim to minimise the loss of and impacts on the previously designated Green Belt and Countryside.
 - There is a basic policy presumption against the loss of Green Belt.
 - Two key purposes of the Green Belt are to reduce urban sprawl and encroachment of countryside (NPPF para 134)
 - The countryside must be valued for its own intrinsic character and beauty (NPPF para 170)
 - Greenfield land is a valuable carbon sequester or carbon sink. Its retention for Forestry, Habitat Creation and Sustainable Agriculture is needed as part of the climate action programme.

The NPPF requires the efficient use of land and says it is especially important that decisions avoid homes being built at low densities and make optimal use of land when there is a shortage of housing land (Para 123). This test should apply for HGGT as Green Belt land was exceptionally released due to the shortage of identified housing land. The proposed density is at the bottom end of the housing density spectrum increasing the degree of sprawl, loss of countryside and field of landscape impact. This appears most evident in its northward projection.

2. Secondly, following the IPCC call for unprecedented reductions in Greenhouse Gas Emissions, the Concept Framework predated Parliament's recognised Climate Emergency, its legislated target of net zero by 2050 and local declarations by Hertfordshire and East Herts Council for carbon neutrality by 2030. This has to inform the nature and form of such a major development. Development work on the Conceptual Framework over the last few years would not have prioritised the goal of

addressing the Climate Emergency. HGGT should aim to be at least Net Zero Carbon, allowing for lifetime carbon use as well as the embodied carbon of new buildings, roads, cars etc. The concept, density and form must all demonstrably support this objective by minimising the built footprint as well as the carbon footprint. This requires independent professional assessment.

3. Thirdly, because the Concept Framework does not adequately align with Garden City Principles (NPPF para 72). The concern is that the principles are being used more as a branding exercise. A particular issue is the conceptual shift from building ‘all in one area’ to the more expansive ‘ring of villages’. The experience of the 3 villages concept of Cambourne may offer lessons. A more compact linear form for North of Harlow was suggested by Ropemaker developers in 2009 as the most sustainable development pattern (attached) as this would avoid “contentious northward growth into the Green Belt and beyond at land more disconnected from existing Harlow town centre”. A more compact form could leave Gilston Park protected within the Green Belt and limit the northward urban sprawl of development with a less extravagant use of open countryside. In terms of strategic design, higher densities established around an arterial public transport corridor would be a more sustainable form. The reasoning behind the change is said to be firstly that local communities wanted ‘villages’ rather than ‘high density development’ and secondly to focus development around Gilston Park. The first reason is at odds with a lot of thinking on sustainable development form and it isn’t apparent the local communities were offered a genuine choice. The second reason seems to result in more harm than good. The overall change of concept direction should be subject to critical external assessment such as by the newly appointed Quality Review Panel. If Allies and Morrison, consultants to East Herts Council, commented on the Concept Framework then their assessments should be made public in full.

The proposal fails to meet Garden City Principles in several respects:

- **Community Ownership of Land, Land Capture and Long-Standing Stewardship of Assets.** A master developer mechanism is required. TCPA has advocated New Town Development Corporations. An alternative could be the establishment of a Garden Town Trust as advocated by the Wolfson Prize winning scheme in 2014. The role of a trust is historically proven by Bourneville Village Trust, the original garden village. The submitted Governance Strategy focuses on disposal of green infrastructure and proposes a complex set of village bodies. It is feared this will be ineffective as well as overly complex. The whole governance aspect requires expert external scrutiny and testing by the Quality Review Panel and bodies such as the TCPA.
- **Garden City principles seek to make public transport the most attractive option.** To do so settlements need to be planned around public transport, relatively

compact, use density positively and minimise sprawl and the loss of open countryside. Villages 3 and 4 in particular will be hard to service and more remote from the services and transport connections of Harlow. They cannot align with any new west - east arterial route and public transport corridor being envisaged by Herts County Council. The application seems unaware of the potential of the Hertford Orbital Tramway scheme being supported in principle by CPRE.

- It is also a principle of Garden Cities that they be self-sustaining. Details of employment for residents of these villages are notably absent. Without this they will essentially be dormitory estates for Harlow and beyond.
- Involve **open community engagement** and an independent design process responding to publicly agreed planning objectives and principles. While many good design principles are referred to, and a lot of workshops have taken place, it is suspected the local community feel overwhelmed and do not feel they have any professional designers working on their behalf. The provision of an independent Quality Review Panel is welcome but this was relatively recent in 2018 so earlier public consultation was not informed by their expert input.
- Be relevant to and **integrated** with Harlow to enable regeneration of areas to the North side of Harlow. This was part of the original justification of the exceptional Green Belt allocation by the Council and accepted by the Inspector. The lack of links, infrastructure and expansive layout undermine this objective.

A Garden Town Trust (as Wolfson) might be owned jointly by the local councils, central government, the local community and land owners and their stakes would have a tradable capital value. There are precedents for this in the development of Letchworth and Welwyn Garden Cities. A Garden Town Trust would be vested with the land, would commission masterplanning work and then use the equity of the land to raise a Bond to fund the initial investment in infrastructure. Development would take place on a rolling programme with early land receipts being reinvested. Experience from Holland suggests that such a rolling programme can procure infrastructure investment three times greater than the value of the initial bond. A Trust can therefore help to guarantee design quality, public engagement, comprehensive and early delivery of infrastructure and long-term stewardship of a full range of cultural, recreational and commercial assets.

Density: Higher densities are more able to support mixed use, local services and public transport, including mass rapid transit. The overall density of the scheme is stated in the Environmental Statement to be 33 dph. Comparisons highlight the low density. Historically, Ebenezer Howard's original Garden City movement conceived of compact communities which would equate to densities of around 80dph. In 2008, CABI with BioRegional (developer of the One Planet Living concept) in its report *What makes an Eco Town?* advised densities of between 50 and 100 dph. The Essex Design Guide 2018 advises average

density of at least 65dph for sustainable development. Recent examples of award-winning urban additions at higher density are Newhall, Harlow and the Zero Carbon development at Hanham Hall, Bristol both delivered at approximately 50dph.

Other **detailed** points:

1. Self-contained villages sound traditionally rural, but villages took centuries to evolve and now struggle due to modern lifestyles, gentrification and car dependency. The Post War New Towns were to be self-contained as were the villages of Cambourne but this did not happen in practice principally due to planning.
2. Self-sufficiency and mixed use is beneficial. However, a long-term land ownership role is key. For instance, the Duchy of Cornwall has driven the mixed-use evolution of Poundbury, now with 2,300 jobs in a 1,500-dwelling scheme. Public land ownership is being used to deliver a rich matrix of uses at Meridian Water (Enfield) where 80% of ground floors will be in non-residential use.
3. Layouts must be 'future proofed' and adaptable to allow for a mass rapid transit being considered by Herts and Essex CC for the east-west A414 corridor between Hemel Hempstead/Watford and Harlow. The Hertford Orbital Tramway proposal should be assessed. A potential regional hospital within Village 1 should be connected on this corridor by high quality reliable public transport.
4. Villages 3 and 4 will be poorly connected. They cannot lie on a through route for public transport or private vehicles as the country lanes north and east to High Wych and Allens Green are totally unsuitable for buses or additional traffic.
5. The transport infrastructure commitments include only two walking and cycling routes connecting across the Story valley to Harlow. These will be much less attractive placed alongside busy main roads. There should be opportunities for other quieter, more direct and segregated greenway links to Harlow from the Garden Town.
6. The northern area of Harlow Town includes two railway stations (neither with north side entrances), a sadly disregarded Roman Temple site, much underused brownfield land and retail parks of doubtful longevity. The integration and regeneration of these areas of North Harlow would be encouraged by a more compact and better-connected Garden Town.
7. Net biodiversity gains, net reductions of carbon are needed with ambitious place making and travel objectives.

8. Early and advance infrastructure delivery is critical, including public transport, walking and cycling routes as well as green spaces, schools and other services.
9. Social housing and genuinely affordable housing, not so called 'affordable housing' at 80% market rents, should be delivered to meet established needs.
10. To achieve a net zero carbon footprint, low carbon materials such as sustainable timber and recycled aggregate should be used and high energy materials such as concrete and plastics minimised or avoided.

The above objections and comments can be summed up by **seven key questions**:

1. Where is the strategic and independent professional design scrutiny of the Conceptual Framework?
2. Why is a sprawling series of low-density settlements preferred to a more compact linear form aligned with the Stort Valley, safeguarding countryside, more easily served by public transport, a sustainable transport corridor and linked to Harlow?
3. How achievable in reality is a ring of self-sufficient villages? How will employment be secured?
4. Why isn't a Garden Town Trust or similar delivery agency being established? Parishes and residents are rightly concerned about the lack of long-term control and a failure to deliver advanced and adequate infrastructure.
5. Has the TCPA or similar body reviewed the effectiveness of the proposed Governance Strategy and its ability to deliver infrastructure?
6. How does the concept support the Climate Emergency and achieve a Net Zero Carbon emissions target? How will this be independently assessed?
7. What percentage of homes will be genuinely affordable i.e. social rented? Will this be committed or is it to be subject of viability testing? If so, this raises doubts about the much broader range of infrastructure provision that is also required.

Summary

The concept and form of the HGGT development must meet the challenge of the climate emergency, the legal objective of a net zero target by 2050 amongst other broader planning challenges such as the value of open countryside and aligning with Garden City principles.

CPRE Herts has never accepted that housing need justified the huge release of Green Belt land to the North of Harlow. It acknowledges the principle is nonetheless established but the exceptional circumstances must relate to the details of what happens now as well as the principle. While a lot of preparatory work has taken place, and some detailed matters of local concern may have been taken on board, the scheme appears developer driven, lacking Strategic Design scrutiny and the result of an unequal match of resources.

The Garden Town, if it is to be that, needs to meet Garden City principles with the establishment of a body, such as a Garden Town Trust, that is truly long term and independent of the current land owner and developer. This can enable the scheme to be evolved as a genuine discussion and competition of ideas about development outcomes. The shift in the main concept from a linear development form to the much more expansive 'ring of villages' approach is not well justified and needs independent critical and professional examination.

As currently proposed in concept, CPRE Herts objects to the sprawling low-density nature of the built form, the failure to prioritise and safeguard open countryside and the inadequacy of relying on a S106 mechanism to deliver infrastructure. A sustainable transport corridor and its early provision is critical. CPRE Herts retains fundamental concerns about meeting Garden City principles, sustainable transport provisions and the unequal balance of consultation work with local parishes and public.

The appointment of the Quality Review Panel is welcome but to be meaningful its role should not only be to advise on detailed design. The Panel must be able to advise on the strategic design issues within the Conceptual Framework. The Quality Review Panel's views on the Outline Planning Application and Conceptual Framework itself must therefore be sought and made public to give greater opportunity for professionally informed local participation before any decision is taken.

Yours sincerely,

Kevin FitzGerald
Honorary Director

Cc CPRE CEO, Crispin Truman
CPRE Essex
Harlow Council
Epping Forest District Council

Enc: Summary of Wolfson Prize Winning Proposal 2014 Uxchester
<http://urbed.coop/wolfson-economic-prize>

City and Provincial. Gilston Area Brochure 2014. (Extract Page 40)

Lessons from Cambourne 2007 Stephen Platt. Cambridge Architectural Research Ltd
and Inspire East