

Karen Page
Development Management
East Herts District Council
Wallfields
Pegs Lane
Hertford
SG13 8EQ

Our Ref:

Your Ref:

31st January 2020 (by email)

Dear Karen Page,

3/19/2124/OUT | Outline planning application for development including demolition of existing structures, refurbishment and change of use of existing Grade II Listed Brickhouse Farm Barn and structures and erection of a residential led mixed use development comprising: up to 1,500 residential market and affordable homes; a mixed use local village centre; retail, business and community uses; primary school, early years and nursery facilities; leisure and sports facilities; open spaces, ecological areas, woodlands and public realm; pedestrian, cycle and vehicular accesses and network within the site; associated drainage, utilities, energy and waste facilities and infrastructure; works to and realignment of the existing highway; other supporting works, facilities and infrastructure; together with associated temporary enabling works or structures. With all matters reserved apart from detailed works to the A414 Church Lane junction. | Gilston Village 7 Land Off Church Lane A414 Hunsdon And Eastwick Hertfordshire

Related application: 3/19/1045/OUT Mixed use residential development up to 8,500 homes. Land north of Stort Valley.

Introduction and Summary

The concept and form of the Harlow and Gilston Garden Town (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.

Now part of the adopted East Herts District Plan, CPRE Herts (CPREH) vigorously resisted the unprecedented loss of Green Belt land to the north of Harlow and its allocation as a 'Garden Town'. As Smart Housing commented back in 2017, there remains great concern that the label of a Garden Town, is simply 'car-dependent sprawl with a bit of green-wash applied'. Those arguments were lost at the Local Plan stage. The site is allocated. Nonetheless, it is not well located and sensitive to sprawl. CPREH made substantive representations to the outline

application for the adjacent scheme of six villages for the Harlow and Gilston Garden Town (HGGT) in its letter of 2nd August 2019. We challenged the status of the Concept Framework for the overall site particularly objecting to the disconnect and sprawl of villages 3 and 4. The Gilston Area Conceptual Framework July 2018 we observed was not subject of statutory public consultation, local endorsement or critically tested by Design Review.

This application for Village 7 raises similar objections of urban sprawl and low density; the successful and timely deliverability of sustainable transport and infrastructure; land value capture and the ability to achieve a Zero Carbon development. Moreover, there is a concern about it being developed independently and co-ordination across the whole HGGT site.

The recently published national Housing Audit by Place Alliance and CPRE provides up to date evidence of too much 'poor' and 'mediocre' design in new developments. In particular, greenfield and rural sites are witnessing higher rates of 'poor' design. The use of Design Review and Design Coding, as site specific design guidance, were identified in the report as the two least used yet the two most effective means of raising the quality of new design to ensure distinctive design approaches in all locations. These should be fully engaged for HGGT.

CPREH consider that the establishment of the Quality Review Panel (QRP) is a positive development, but question why it was not done earlier so that it could more obviously be involved in the formative Concept Plan stage, especially so for a highly controversial Green Belt site. We also believe that early and detailed Design Coding is required at outline stage to deliver more robust guarantees on quality.

Village 7 has to overcome poor public transport and connectivity to the main town of Harlow and must design in and prioritise the County Council's Sustainable Transport Corridor. This strategic east- west link will be able to regenerate town centres, link existing rail lines and provide a genuine public transport option across central Hertfordshire.

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.

Documentation

The online Design and Access Statement could only be viewed as 29 separate documents. A single low-resolution document would have made it more accessible to the public.

Have the Quality Review Panel's full responses to meetings held 19 July 2018 and 22 February 2019 been made public? In the interests of transparency for a design-led project, these should have been attached within the planning submission rather than just limited and selective quotation.

Detailed Comments

Density and place making:

CPREH consider that a low-density approach overall is a wasteful use of Green Belt and countryside. The NPPF requires the efficient use of land and 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 built area, the degree of sprawl, loss of countryside and field of landscape impact.

The Housing Audit and other evidence also shows that the lowest density frustrates good place making and design. Development should be led by design principles and not arbitrary density figures. This is not to confuse height and density or to promote insensitive high-rise forms. CPREH do not see how five storey designs will foster a distinctively rural or village character. A gentle middle density can be the aim. House size and mix, plot size, building typology, parking provision are all factors that can increase density without requiring higher building. Low-density figures can ultimately lead to a predominance of large detached homes with large parking surfaces and weak street form. By contrast, the recent RIBA award-winning social housing in Norwich was built to 2-3 storeys but at a density of 80dph, a similar density to the compact communities originally conceived by the Garden City movement.

The latest Housing Audit revealed that best design schemes were built at densities of 56dph and that the average density of 'poor' schemes was 31dph. It recommends densities of at least 50dph to support public transport and amenities for good place - making. The great majority of Village 7 is proposed to be less than 30dph (Parameter Plan 4) likely leading to a 'garden suburb' density of predominantly large detached housing and a car dependent monoculture. This is not a sustainable form of urbanism nor an approach that minimises the loss of open countryside and former green belt land.

Will good design principles and place-making be the starting point which leads to reasonable densities? ...or are arbitrarily low density targets going to drive the final design and place-making? As the audit shows the latter approach is part of the reason for poor design outcomes.

Public transport / Sustainable transport

It is also a principle of Garden Cities that they be self-sustaining and make public transport the most attractive option. Without this they will essentially be dormitory estates for Harlow and beyond.



As transport is now the greatest source of UK Greenhouse Gas Emissions (GHG) emissions, it hardly needs restating that in order to meet future climate obligations and a national target of Net Zero by 2050, we need to do better than ‘business as usual’ in land use and transport planning. The NPPF, Section 9, promotes sustainable transport and requires opportunities for public transport to be identified and pursued (para 102) and that sites in rural areas ‘exploit any opportunities to make a location more sustainable’ (para 84)

As studies such as the Housing Audit show, the co-ordination of transport and land use planning at a strategic level remains weak within the UK and this is suggested by this application. The location lends itself to car dependency and the provisions and indicative layouts will not match the aspiration for modal shift.

Little consideration is made to ways to promote the Herts County Council A414 Sustainable Transport Corridor (STC) which is critical infrastructure for this project. CPREH support in principle for Hertfordshire, a major investment in light rail – a new east-west tramway. The Hertford Orbital Tramway is one detailed idea that has been advanced by the Hertford Civic Society reopening old east west rail lines. Trams / light rail are expensive to deliver initially, but once provided are comfortable and highly popular, experience growing ridership, often becoming extended later on. They enhance liveability and place quality, and unlike electric buses or cars, which generate particulates from brakes and rubber tyres, they encourage clean air. They also provide a strategy to make far more effective use of brownfield land and limit greenfield sprawl, avoid new road building and decarbonise our public transport systems. It is commonly noted that Hertfordshire has poor public transport, in particular its lack of east-west routes (railway lines run north to south).

While future decisions on this corridor depend on many factors, not least funding and political will, and may seem a little late in the day for deliberations on the HGGT scheme, as said in our letter of August 2019 the layout and access points should be adaptable and ‘future proofed’. No outline planning permission at this stage should frustrate the possible incorporation of an east - west STC that potentially continues to Harlow and offers a highly beneficial strategic public transport route.

Layout is currently a ‘reserved matter’ but access is proposed to be determined now as part of the current application. A genuine spine through the scheme, for maximum benefit for public transport, whether it was buses or light rail, would surely see a route through the western part of Village 7. It would ideally be a dedicated public transport route, to avoid any dangers of rat-running, and would not start half way along, the existing Church Lane – Route 1 in the Transport Assessment. Village 7 would be designed around such a spine rather than the indicative circular layout of the secondary distributor roads. The possibility of such a dedicated direct public transport route does not seem to have been considered or tested.

Parameter Plan 4 is presented as a *fait accompli* as it aligns with the Concept Framework, neither should be seen as binding at this early stage.

As a matter of detail, the critical east-west link to connect Village 7 with the six other villages must be a non-negotiable requirement too. CPREH would argue for it to be a dedicated public transport link for the STC, i.e. light rail route or busway. However, the visual in the Design and Access Statement (Page 190) entirely ignores this link and documentation refers to it as an 'indicative connection'.

The approved access arrangement and layout must secure a rapid public transport corridor, providing time advantages as a direct route and should not bypass western Village 7. A spine route through the whole scheme would guarantee good quality transit within 5 minutes' walk of all new homes and layouts should be designed around this. The current proposal does not sit well with the ambition to achieve genuine modal shift and 50-60% of trips by Sustainable Transport modes at HGGT. HCC has approved Route 1 for buses and had discussion about S106 contributions but much of the work on the Concept predated the A414 Strategy. The STC is as much a question of Strategic Design and needs to be evaluated at the Design Concept stage with all efforts taken if the ambitious targets for Sustainable Travel are to be realised.

It is noted that a key point already made by the QRP was to ensure that sustainable travel options are secured in the proposals. The above points are entirely in accordance with that advice.

To illustrate the point, the Public Private Joint Venture scheme at Barton Park, Oxford, an award-winning NHS Healthy Town' demonstrator, can be seen to deliver a primary road corridor and a central spine that connects through and beyond the site and will serve the full area with accessible public transport. The attached plan and google aerial image (see below) indicate the highway layout is proceeding as approved.

Design

With reference to the Housing Audit findings, we consider that this scheme should aim to make full use of both Design Review and Design Coding

- Design Review – The Quality Review Panel QRP is now established. Its contributions must be openly and fully shared with the wider public and local groups and all the issues raised by the QRP must be shown to be responded to by the applicant. In particular its response to the Gilston Area Concept Framework, assuming it was invited to appraise this, should be made public.



- Design Coding. At outline stage it is entirely appropriate that some Design Codes are provided to give greater assurance about the form and detailing of streets, places, plot layouts, sustainable drainage features, landscaping and other elements that make up the distinctive character of the proposed villages. This can reassure those concerned that medium density can support good design and character.

Village 7 as part of HGGT should aim to be 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. The Planning Statement advises that the low density of the scheme prevents a District Energy Scheme (CHP) which indicates another limitation of design being driven by numbers.

Infrastructure, land value capture and land stewardship

The reliance on S106 as the primary means to capture land value uplift and to deliver infrastructure is seen as a weakness and some form of 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 Governance Strategy for Village 7 seems similar to the approach of the adjacent site with a focus on disposal of green infrastructure and setting up new village bodies. It is feared this will be ineffective, resource deficient as well as too complex. We repeat the request for this vital governance aspect to receive expert external scrutiny and testing by the Quality Review Panel and bodies such as the TCPA.

A Garden Town Trust would be vested with the land, commission masterplanning work and could 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. This can procure much greater investment and early delivery of infrastructure. As proposed, there is reference to 'trigger points' as part of the S106 with the likelihood of many people moving into new homes well in advance of infrastructure provision. This is a problem the new government promised to address in its manifesto. Not only is this an inconvenience but something that drives behaviour too, as a lack of early options for sustainable travel will encourage higher car ownership.



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 potential failure to deliver advanced and sufficient infrastructure.

Other detailed points:

1. Net biodiversity gains, net reductions of carbon are needed with ambitious place making and travel objectives.
2. Early and advance infrastructure delivery is critical, including public transport, walking and cycling routes as well as green spaces, schools and other services.
3. Social housing and genuinely affordable housing, not so called 'affordable housing' at 80% market rents, should be delivered to meet established needs.
4. 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.

Yours sincerely,

Kevin FitzGerald
Honorary Director

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

Below: Extract – Barton Park Oxford – Spine Road within Masterplan



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Barton Park Oxford – Spine Road within Masterplan