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Standing up for Hertfordshire's countryside

Nikki Dawney
Development Management
East Hertfordshire District Council
Wallfields
Pegs Lane
Hertford SG13 8EQ

Our Ref:

Your Ref:

29th December 2021 (by email)

Dear Nikki Dawney,

Application no. 3/19/2124/OUT

**Gilston Village 7 Land off Church Lane, North of the A414, Hunsdon and Eastwick.
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 etc...**

I write with regard to the above application following our previous objections in January and February 2020 and February 2021, and our long- standing opposition to this proposed development in the London Metropolitan Green Belt, dating from our representations to the East Herts Local Plan Examination in Public and before. As this application has still to be determined, we take this opportunity to reiterate a number of concerns which we believe have still not been addressed satisfactorily by the applicant.

We accept that the site allocations for the wider Gilston residential developments north of Harlow have been established in the Local Plan, but the already extended period for potential implementation of the schemes enables the consideration of further issues which are lacking in this outline application. We note that the Council engaged consultants Barton Wilmore to review the applicant's Environmental Statement and they prepared a detailed critique published in June 2021 of several major aspects of the proposals.

The recent enactment of the Environment Act and related legislation has also introduced further requirements for development in the future and it is reasonable to suggest that unimplemented schemes should be reviewed to take account of these factors. Together with the applications for "Gilston Villages 1 – 6", the magnitude of these applications and their potential impacts on open countryside, biodiversity and contribution to the amelioration of the damaging effects of climate change, suggest that there should be a re-evaluation of the proposals at the outline application stage.

The Barton Wilmore review of the Environmental Statement (ES) identifies 73 issues with the "potential for further clarification" or "clarification under Regulation 25" across all major

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topics in the ES. Particular short-comings are identified for socio-economic characteristics, transport, light and climate change, and at least six clarifications are requested each of the human health, air quality, biodiversity, and ground conditions topic areas which are relevant to impacts on the countryside.

It is not clear in the revised application that the issues identified by Barton Wilmore have been addressed satisfactorily. The applicant has submitted numerous documents purporting to deal with issues raised by the Council and their consultants but these do not appear to have amounted to any appreciable variations from the initial proposals.

Our response in February 2021 indicated significant short-comings in the amended application at that stage and our concerns remain unaddressed by the repetitive subsequent documentation provided by the applicant. In summary, our principal concerns are, in addition to the lack of indication of the climate change implications of the proposed development and how to address the legal challenges of carbon free development by 2050:

1. The inappropriate designation of the proposed wider development as a “Garden Town” and the titling of “Garden Villages” without any indication of adherence to Garden City principles.
2. The low densities envisaged, leading to a wasteful use of Green Belt and countryside, and urban sprawl.
3. The lack of sustainable transport provision throughout the proposed development.
4. The need to make use of design review processes and design codes which are likely to become more significant in the light of proposed changes to the National Planning Policy Framework.
5. The means to capture land value uplift to provide infrastructure early in the development process, and land stewardship in the future.
6. The lack of a Garden City Trust or similar institutional arrangements to ensure that maximum benefit is gained from the proposed development.
7. No indication of biodiversity gain as required by legislation.
8. Inadequate provision of social and genuinely affordable housing.



The volume of documents submitted for an outline planning application is causing concern that key decisions will be introduced in advance of the detailed application stage, by virtue of gaining approval at the outline stage. This may fetter the Council in assessing future detailed matter applications while there continue to be significant outstanding matters relating to the Environmental Statement and unresolved planning issues.

At the very least, the Council should engage with the applicants to vary the application to take account of the issues noted above. The previous history of developments by the new owner, Taylor Wimpey Ltd, do not provide confidence that appropriate account will be taken of these issues.

There is a great opportunity to pioneer development which will take account of the key concerns of climate change, carbon reduction and the protection of biodiversity which could go some way to make up for the loss of highly valued open countryside and agricultural land. At present the amended proposals are still a very significant distance away from addressing these matters appropriately, constituting another example of what would be largely car-borne and resource intensive development damaging to the countryside.

Yours sincerely,

Chris Berry
Planning Manager