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Standing up for Hertfordshire's countryside

Jenny Pierce
Development Management
East Herts District Council
Wallfields
Pegs Lane
Hertford SG13 8EQ

Our Ref:

Your Ref:

12th October 2022 (by email)

Dear Jenny Pierce,

Application no. 3/19/1045/OUT

Land North of the Stort Valley and the A414, Gilston

AMENDMENTS: 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; provision for Gypsies and Travellers pitches/ Travelling Showpeople plots...etc

I write with reference to the continuing negotiations to the above outline application for "garden villages" north of Harlow, and the recent proposed amendments by the applicant which include reducing the proportion of affordable housing. I recognise that the statutory period for consultation finished some time ago but this is to comment more generally on our present position and the strategic matters it continues to raise regarding Local Plan allocations for previously designated protected land.

We support the wide-ranging concerns raised by other consultees with regard to the Viability Appraisal and I note with interest the Initial Officer Response dated 11th August 2022. We welcome the Council's requirement for further justification by the applicant of their unacceptable position.

In noting that the outline application of 2019 is yet to be determined, this in our view permits a re-consideration of various issues in the light of recent legislation such as the Climate Change Acts, in addition to the proposed amendments. We have also consistently maintained in previous representations that this large-scale residential proposal does not constitute a "garden village" approach in any meaningful sense.

The recent proposed reduction in affordable housing and other infrastructure re-emphasises this position. Our concerns remain at the lack of a wide range of the requirements for dynamic and well balanced communities with appropriate services, facilities and infrastructure; issues we have raised previously.

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CPRE Hertfordshire is a Charitable Incorporated Organisation

President: Sir Simon Bowes Lyon, KCVO
Chairman: Allan McNab

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We believe there is a specific responsibility to achieve the highest possible quality of development when the land was previously designated as protected to preserve its rural character permanently. This responsibility is compounded by the environmental requirements of recent legislation, including Climate Change Acts, and given the length of time that has elapsed since the original application, it seems appropriate to review the key objectives and components of the proposed development, including the overall need for housing in this area.

With specific reference to the proposed amendment to the proportion of affordable housing, recent research by CPRE Hertfordshire shows that, with the present Government definition for affordable housing, it is not possible for an average earning Hertfordshire household to afford an averagely priced house in the County. Market housing in former Green Belt locations is typically highly priced which further exacerbates the situation, rendering existing assessments of viability to justify affordable housing proportions effectively meaningless.

CPRE Hertfordshire will continue to monitor the progress of the outline application. An early review of the Local Plan would offer the opportunity to reassess the provision of land for housing in the District and we continue to press the Government to provide urgent clarification of the situation regarding the future of designated protected land.

Yours sincerely,

Chris Berry
Planning Manager