

### Appendix 3

#### Extracts from application amendment submission document 'Village Development Addendum Report', with HDC comment

##### Appendix 8 Gilston Park Estate - IDP Response

This note has been prepared to summarise Places for People's response to the requirements of the HGGT Infrastructure Delivery Plan. The table below identifies those infrastructure items from Appendix A of the IDP that have been assigned to Gilston Park Estate and explains Places for People's proposed response

IDP Ref	IDP Infrastructure Item	IDP Full Cost (£m)	Identified funding (£m)	IDP Cost to be apportioned (£m)	IDP Allocation to PpP (£m)	IDP Funding Gap (£m)	PfP Response	HDC RAG Rating of Position / Comment
TR9	Velizy / Second Avenue	£10,000,000	£100,000	£9,900,000	£4,805,825	£0	This item, which includes ped and cycle crossing works, would form part of the wider STC and would therefore be included in any STC contribution. It is assumed that this item is double counting of the STC item below. No specific contribution is proposed to be provided from Gilston Park Estate.	<b><i>This is part of the wider HGGT transport requirement, but is not double counting.  This is a well justified IDP proportional contribution.</i></b>
TR17	A414 Edinburgh Way/Howard Way	£7,000.00	£0	£7,000,000	£5,950,000	£0	The costings for this scheme have not been provided and the proposed scale seems high. The IDP currently attributes 100% of the cost to the Gilston Area, however, based on flow apportionment this is not justified. Further details are to be provided from HGGT and discussed as part of the S106 negotiations.	<b><i>It is inappropriate to present a major planning application with significant PO issues deferred as 'to be discussed as part of the S106 negotiations'. A planning agreement is not a matter separate from the planning application; it is integral to determination. It is unclear if the applicant response is now being suggested as a basis for determination.  This is a well justified IDP proportional contribution.</i></b>
TR18	Amwell Roundabout	£4,200,000	£0	£4,200,000	£3,570,000	£0	Vectos has developed an alternative scheme that mitigates the impact of the Gilston Area with a cost significantly below that identified in the IDP. Furthermore, flow analysis would show that this cost could be allocated across other developments albeit the majority is likely to be to Gilston Area. Matter to be discussed as part of the S106 negotiations.	<b><i>It is inappropriate to present a major planning application with significant PO issues deferred as 'to be discussed as part of the S106 negotiations'. A planning agreement is not a matter separate from the planning application; it is integral to determination. It is unclear if the applicant response is now being suggested as a basis for determination.</i></b>

								<p><i>This is a well justified IDP proportional contribution.</i></p> <p><i>The HA design and costing for this scheme are the clear requirement and they should not be redesigned by the applicant.</i></p>
TR19	CSC	£36,200,000	£0	£36,200,000	£30,770,000	£0	<p>The planning application proposes improvements and widening to existing crossing to create the CSC. It is the applicant's view that the crossing will benefit existing Harlow residents, as well as the other growth locations around Harlow, and therefore contributions should be made by others beyond the Gilston Area. Matter to be discussed as part of the S106 negotiations.</p>	<p><i>It is inappropriate to present a major planning application with significant PO issues deferred as 'to be discussed as part of the S106 negotiations'. A planning agreement is not a matter separate from the planning application; it is integral to determination. It is unclear if the applicant response is now being suggested as a basis for determination.</i></p> <p><i>This is a well justified IDP proportional contribution.</i></p> <p><i>Note in the IDP this item includes a comprehensive package of measures:</i></p> <p><i>'Central access to Gilston (Village 1) including Eastwick junction improvements with bus priority, provision of new walking/cycling bridge over A414, widening of 5th Avenue to create sustainable transport corridor including works to the bridges, <u>and improved access to Harlow Town Station from the north</u>'</i></p> <p><i>The northern access to Harlow Town Station is of particular importance to HDC. This is currently largely uncommitted in PO proposals put by the applicant</i></p>
TR20	ESC	£92,840,000	£0	£92,840,000	£45,912,264	£0	<p>The planning application proposes a new ESC. The crossing will support housing and employment growth across the Harlow area, both within and beyond the plan period. The cost of the item therefore needs to be shared proportionately across all growth locations. Matter to be discussed as part of the S106 negotiations</p>	<p><i>It is inappropriate to present a major planning application with significant PO issues deferred as 'to be discussed as part of the S106 negotiations'. A planning agreement is not a matter separate from the planning application; it is integral to determination. It is unclear if the applicant response is now being suggested as a basis for determination.</i></p>

								<p><b><i>This is a well justified IDP proportional contribution.</i></b></p> <p><b><i>It should be noted that a HA traffic model based reassessment of appropriate, proportional, contributions to this major scheme has now been undertaken. This further details the justification for the developer contributions sought.</i></b></p>
TR21	Village 2 Access	£2,159,000	£0	£2,159,000	£2,159,000	£0	<p>This forms an inherent part of the planning applications. No additional financial contribution is required.</p>	<p><b><i>This is not a requirement for a separate financial contribution, but it is a requirement for in kind provision.</i></b></p> <p><b><i>The adequacy of the application proposals to meet IDP requirements (including specification, cost provision and timing of construction) is relevant and must be secured in POs. This is not so far agreed.</i></b></p> <p><b><i>The amendment application amendments have considerably improved the access /internal circulation scheme principles and designs.</i></b></p>
TR22	Village 1 Access	£13,240,000	£0	£13,240,000	£13,240,000	£0	<p>This forms an inherent part of the planning applications No additional financial contribution is required</p>	<p><b><i>This is not a requirement for a separate financial contribution, but it is a requirement for in kind provision.</i></b></p> <p><b><i>The adequacy of the application proposals to meet IDP requirements (including specification, cost provision and timing of construction) is relevant and must be secured in POs. This is not so far agreed.</i></b></p> <p><b><i>The amendment application amendments have considerably improved the access /internal circulation scheme principles and designs.</i></b></p>
TR24	STC between Villages 1-6 and 7	£10,350,000	.. £0	£10,350,000	£8,797,500	£0	<p>This forms an inherent part of the planning applications. No additional financial contribution is required.</p>	<p><b><i>This is not a requirement for a separate financial contribution, but it is a requirement for in kind provision.</i></b></p> <p><b><i>The adequacy of the application proposals to meet IDP requirements (including specification, cost provision and timing of construction) is relevant and must be</i></b></p>

								<p><b>secured in POs. This is not so far agreed.</b></p> <p><b>The amendment application amendments have considerably improved the access /internal circulation scheme principles and designs.</b></p> <p><b>There is a significant outstanding issue on this item; timing of delivery and cost apportionment between this application and V7 proposals. This relates to the current poorly developed position on comprehensive development and coordination, which is identified in HDC's general comments as a serious issue for this application.</b></p>
TR28	Harlow STCs and Town Centre Transport Hub	£157,161,083	£0	£128,911,083	£63,750,536	£28,250,000	<p>The costings and evidence for this scheme have not been provided. The STCs will support housing and employment growth across the Harlow area, both within and beyond the plan period. The cost of the item therefore needs to be shared proportionately across all growth locations relative to impact. Contribution to the Town Centre Transport Hub is not considered appropriate, especially in light of Transport Hubs being provided within Gilston Area. Matter to be discussed as part of the S106 negotiations.</p>	<p><b>It is inappropriate to present a major planning application with significant PO issues deferred as 'to be discussed as part of the S106 negotiations'. A planning agreement is not a matter separate from the planning application; it is integral to determination. It is unclear if the applicant response is now being suggested as a basis for determination.</b></p> <p><b>This is an IDP proportional contribution.</b></p> <p><b>This item is fundamental to the HGGT approach to transport. It is to be seen as a single piece of infrastructure with a central hub used by all in the Town Centre. The PfP response is a major concern.</b></p>
TR32	Off-road cycle and walking Village 6 to Pinnacles	£600,000	£0	£600,000	£600,000	£0	<p>At this stage, this scheme is not considered feasible due to land ownerships, flooding and need to cross the rail line. No additional financial contribution is necessary.</p>	<p><b>This is a small but important aspect of the overall HGGT transport approach. The feasibility issues should be investigated further as part of scheme design and specification, but the response cannot be accepted.</b></p>
TR33	Public and active transport support for Garden Town Active Travel	£7,317,195	£0	£7,317,195	£3,527,602	Unknown	<p>PfP have committed to fund the Travel Plan rather than make a contribution. Discussions on the Travel Plan are ongoing with the highway authorities. No additional financial contribution is necessary.</p>	<p><b>This is a crucial item within the overall HGGT transport approach. The current position on POs is very unclear in the application proposals. It may be acceptable to set out a GA specific arrangement, rather than a contribution to a wider scheme for HGGT, but</b></p>

	Plan							<p><b>the measures and level of investment must match the IDP. The LAs have made specific proposals to cover this item but they have not been accepted by PfP.</b></p> <p><b>This item is fundamental to the HGGT approach to transport and the PfP response is a major concern.</b></p>
TR34	Pump-priming of new bus services in Gilston Area	£18,900,000	£0	£18,900,000	£16,065,000	£0	<p>PfP has submitted a Bus Strategy which is being discussed with the highway authorities to determine the scale of contribution necessary. Matter to be discussed as part of the S106 negotiations.</p>	<p><b>This is a crucial item within the overall HGGT transport approach. The current position on POs is very unclear in the application proposals. The LAs have made specific proposals to cover this item but they have not been accepted by PfP.</b></p> <p><b>It is inappropriate to present a major planning application with significant PO issues deferred as 'to be discussed as part of the S106 negotiations'. A planning agreement is not a matter separate from the planning application; it is integral to determination. It is unclear if the applicant response is now being suggested as a basis for determination.</b></p> <p><b>This is an IDP proportional contribution.</b></p> <p><b>This item is fundamental to the HGGT approach to transport and the PfP response is a major concern.</b></p>
ED4	Childcare facility Villages 1-6	£4,024,350	£0	£4,024,350	£4,024,350	£0	<p>The planning application allows for up to 300sqm GEA per village for childcare facilities. No additional financial contribution is required</p>	<p><b>The application amendments have considerably improved the detail of childcare / education and related community facility provision measures and related detail is emerging.</b></p> <p><b>This is not necessarily a requirement for a separate financial contribution, but it is a requirement for in kind provision, including free land and possibly financial contributions.</b></p> <p><b>The adequacy of the application proposals to meet IDP requirements (including specification, costings and timing of provision) is relevant and must be secured in</b></p>

								<b>POs. This is not so far agreed.</b>
ED18	17FE of primary education	£74,071,820	£0	£74,071,820	£62,961,047	£0	In total, alongside the Village 7 application, an allowance is made for up to 20FE of primary education provision. No additional financial contribution is required	<p><b>The amendment application amendments have considerably improved the detail of childcare / education and related community facility provision measures and PO detail is emerging.</b></p> <p><b>This is not necessarily a requirement for a separate financial contribution, but it is a requirement for in kind provision, including free land and possibly financial contributions.</b></p> <p><b>The adequacy of the application proposals to meet IDP requirements (including specification, costings and timing of provision) is relevant and must be secured in POs. This is not so far agreed.</b></p>
ED19	Additional safeguarded 3FE of primary education	£11,450,464	£0	£74,071,820	£9,732,895	£0	(As above)	<p><b>The application amendments have considerably improved the detail of childcare / education and related community facility provision measures and PO detail is emerging.</b></p> <p><b>This is not necessarily a requirement for a separate financial contribution, but it is a requirement for in kind provision, including free land and possibly financial contributions.</b></p> <p><b>The adequacy of the application proposals to meet IDP requirements (including specification, costings and timing of provision) is relevant and must be secured in POs. This is not so far agreed.</b></p>
ED23	8FE secondary education	£38,303,512	£0	£38,303,512	£32,557,985	£0	In total the scheme makes an allowance for up to 20FE of secondary education provision. No additional financial contribution is necessary.	<p><b>The application amendments have considerably improved the detail of childcare / education and related community facility provision measures and PO detail is emerging.</b></p> <p><b>This is not necessarily a requirement for a separate financial contribution, but it is a requirement for in kind provision, including free land and possibly financial</b></p>

								<p><b>contributions.</b></p> <p><i>The adequacy of the application proposals to meet IDP requirements (including specification, costings and timing of provision) is relevant and must be secured in POs. This is not so far agreed.</i></p>
ED24	9FE secondary school	£45,539,274	£0	£45,539,274	£36,158,383	£0	(as above)	<p><i>The application amendments have considerably improved the detail of childcare / education and related community facility provision measures and PO detail is emerging.</i></p> <p><i>This is not necessarily a requirement for a separate financial contribution, but it is a requirement for in kind provision, including free land and possibly financial contributions.</i></p> <p><i>The adequacy of the application proposals to meet IDP requirements (including specification, costings and timing of provision) is relevant and must be secured in POs. This is not so far agreed.</i></p>
ED25	Additional safeguarded 3FE secondary education	£12,707,287	£0	£12,707,287	£10,801,194	£0	(as above)	<p><i>The application amendments have considerably improved the detail of childcare / education and related community facility provision measures and PO detail is emerging.</i></p> <p><i>This is not necessarily a requirement for a separate financial contribution, but it is a requirement for in kind provision, including free land and possibly financial contributions.</i></p> <p><i>The adequacy of the application proposals to meet IDP requirements (including specification, costings and timing of provision) is relevant and must be secured in POs. This is not so far agreed.</i></p>
ED26	SEN provision	£11,000,000	£0	£11,000,000	£5,286,966	£0	Appropriate facilities for Special Educational Need will be made available in the Village Development within school sites, capacity for which	<p><i>The application amendments have considerably improved the detail of childcare / education and related community facility provision measures and PO detail is</i></p>

							will be met within the maximum education and community floorspace allowance in the planning applications. No additional financial contribution is necessary.	<p><b>emerging.</b></p> <p><b><i>This is not necessarily a requirement for a separate financial contribution, but it is a requirement for in kind provision, including free land and possibly financial contributions.</i></b></p> <p><b><i>The adequacy of the application proposals to meet IDP requirements (including specification, costings and timing of provision) is relevant and must be secured in POs. This is not so far agreed.</i></b></p>
HE3	Contribution to healthcare	£44,993,300	£0	£44,993,000	£21,625,278	£0	<p>The planning application includes an allowance of 74,200sqm for education and community floorspace. A main health centre will be provided within the scheme, either within Village 1, or if required and agreed with the health authority, as two smaller facilities across Villages 1 and 4. The format, location and size of the facilities will be determined following discussions with the health authority within Village Masterplans and/or in Reserved Matters Applications. Village 7 also allows for up to 2,500 sqm of D1 for healthcare to be provided if needed. This total floorspace across the Gilston Area is well in excess of what the CCGs are likely to need to provide primary healthcare services, even if a large multi-speciality health practice is brought forward, and it can therefore accommodate other health services. PfP has submitted a Health and Wellbeing Strategy in support of the outline application. This sets out a Health and Wellbeing Vision which includes measures to support the health of future residents through: - the types of housing on offer, through independent living and step-down care options; - the provision of a wide range of sports and recreation opportunities; - supporting active travel; - facilitating partnership working between health</p>	<p><b><i>This is not necessarily a requirement for a separate financial contribution, but it is a requirement for appropriate in kind provision. This may need to include priority access to land / premises at costs that make high quality provision feasible. There is an important linkage to the general arrangements for village centre delivery and long term stewardship, (in this instance particularly in V1).</i></b></p> <p><b><i>The adequacy of the application proposals to meet IDP requirements (including specification, costings and timing of provision) is relevant and must be secured in POs. This is not so far agreed. It is certainly not adequate to refer to a very general well being strategy that will have no legally enforceable commitments attached and to defer all considerations to a voluntary applicant commitment at RM stage.</i></b></p>

							providers and stakeholders. This vision is focussed on prevention of ill health and supporting healthy lifestyle choices. These objectives align with those of the CCG and of the PAHT, who will be aiming to reduce pressure on hospital beds and reduce the need for acute and emergency services. High level discussions on this topic took place between PfP and PAHT in 2018/2019 and the idea was well received. Given the floorspace provided within the application and the commitments set out in the Health and Wellbeing Strategy which will be bound into any planning permission granted, no additional financial contribution is necessary.	
ES1	Emergency services hub	£6,000,000	£0	£3,000,000	£1,483,593	£3,000,000	The application includes an allowance of 1,600sqm GEA for police, fire and ambulance space. The application also includes up to 29,000sqm of employment space part of which could potentially be utilised as an emergency services hub subject to agreement of acceptable commercial terms. No additional financial contribution is necessary.	<b><i>This is not necessarily a requirement for a separate financial contribution, but it is a requirement for appropriate in kind provision. This may need to include priority access to land / premises at costs that make high quality provision feasible. There is an important linkage to the general arrangements for village centre and employment land delivery and long term stewardship, (in this instance particularly in V1).</i></b>  <b><i>The adequacy of the application proposals to meet IDP requirements (including specification, costings and timing of provision) is relevant and must be secured in POs. This is not so far agreed.</i></b>
ES2	Joint police custody facility	£25,000,000	£0	£12,500,000	£6,181,638	£12,500,000	The police service have not provided a scope or estates strategy that sets out what type of facility will be required (if any at all). If a significant facility is required (such as a custody facility) this is likely to involve the closure and relocation/consolidation of other services in the wider Herts/Essex area and we would expect some reinvestment of funds from the sale of that land/building into any facility built. No additional financial contribution is	<b><i>This is not necessarily a requirement for a separate financial contribution, but it is a requirement for appropriate in kind provision. This may need to include priority access to land / premises at costs that make high quality provision feasible. There is an important linkage to the general arrangements for village centre and employment land delivery and long term stewardship, (in this instance particularly in V1).</i></b>

							necessary.	<b><i>The adequacy of the application proposals to meet IDP requirements (including specification, costings and timing of provision) is relevant and must be secured in POs. This is not so far agreed.</i></b>
CF6	Approx 3,120 sqm of community space	£6,929,520	£0	£6,929,520	£5,890,092	£0	<p>As set out in the Placemaking Strategy community spaces are intended to be flexible and be able to meet a wide variety of arts and cultural needs as well as providing essential services. The Development Specification and Parameters have been drawn up with flexibility and sustainability in mind – facilities are intended to be: - Flexible, with more detail on their future uses to be agreed as part of the Village Masterplans and Reserved Matters Applications, - Adaptable (at different times of the day or over time), - Sustainable (providing a variety of services and needs so as to be resilient to changes in demand over time). With this in mind, the proposed provision is as follows: - Community Centre - Dedicated floorspace for community, social or faith based groups, likely in the form of a Community Centre (1,000sqm); - Youth Centre - Dedicated floorspace for youth activities, either co-located with or separate to the Community Centre (460sqm); - Flexible youth space – Floorspace to which young people will have dedicated access at set times of the week outside of school hours. This space will include facilities for arts/creative work and a sports and/or performance hall. This space could be provided within a school building or premises, or as part of another community facility (520sqm); - School Halls - Space has been provided to bring forward a primary school in every village, if it is needed. Halls in primary schools (totalling an estimated 1,080 sqm) and sports halls, halls and studios in Secondary</p>	<p><b><i>This is not necessarily a requirement for a separate financial contribution, but it is a requirement for appropriate in kind provision. This may need to include priority access to land / premises at costs that make high quality provision feasible. There is an important linkage to the general arrangements for village centre and employment land delivery and long term stewardship.</i></b></p> <p><b><i>The adequacy of the application proposals to meet IDP requirements (including specification, costings and timing of provision) is relevant and must be secured in POs. This is not so far agreed.</i></b></p> <p><b><i>The importance of considering joint use of buildings is acknowledged, particularly as this can make long term stewardship arrangements more manageable. Nevertheless this is another matter that must be explicitly provided for in the principles agreed as part of specific POs. These must deal with the different types of land / premises provision and related stewardship arrangements.</i></b></p>

							<p>Schools (totalling an estimated 1,940 sqm) will potentially be available for community use out of school hours; - Club houses, pavilions and leisure buildings - Associated with sport and recreation, this will include sports pavilions which will serve as a community meeting places and are likely to be suitable for event hire and the like (up to 3,000sqm); - Health - The amount of floorspace allocated of health across the Gilston Area is in excess of what the NHS/CCG is likely to require (as confirmed in the CCG's response to the planning application). Space not required for primary care use may be used for alternative appropriate community, health or leisure uses; and - Leisure Centre - A leisure centre, including a sports hall of up to six courts and three studios. The planning application therefore includes a sufficient allowance of space to meet the needs of the existing and new community, with flexibility for it to evolve over time as requirements and needs change. No additional financial contribution is necessary.</p>	
CF7	Youth provision	£490,455	£0	£490,455	£416,887.06	£0	<p>The application makes an allowance for dedicated youth space, as well as out of hours access to education floorspace. No additional financial contribution is necessary.</p>	<p><b><i>The application amendments have considerably improved the detail of childcare / education and related community facility provision measures and PO detail is emerging. Youth provision can be taken as included in this, particularly in respect of some joint use of school premises.</i></b></p> <p><b><i>This is not necessarily a requirement for a separate financial contribution, but it is a requirement for in kind provision, including free land and possibly financial contributions.</i></b></p> <p><b><i>The adequacy of the application proposals to meet IDP requirements (including specification, costings and timing of provision) is relevant and must be secured in POs. This is not so far agreed.</i></b></p>

CF8	Increased/approved capacity and library provision	£2,250,876	£0	£2,250,876	£1,913,244	£0	<p>No library space is currently proposed within the application, although a significant amount of flexible community floorspace is included in the application. Based on the latest library strategies from Essex and Herts CCs it is not clear where any off-site capital costs will be spent and therefore how they are justified. If a small on-site facility is requested by the community, which may be run with or by the community under the proposed governance structure, this could be accommodated within the wide range of community, education, health and leisure floorspace proposed.</p>	<p><b>The value of local community based provision is acknowledged. This may need to include priority access to land / premises at costs that make high quality provision feasible. The importance of considering joint use of buildings is acknowledged, particularly as this can make long term stewardship arrangements more manageable. There is an important linkage to the general arrangements for village centre delivery and long term stewardship.</b></p> <p><b>Nevertheless this is another matter that must be explicitly provided for in the principles agreed as part of specific POs. These must deal with the different types of land / premises provision and related stewardship.</b></p> <p><b>The adequacy of the application proposals to meet IDP requirements (including specification, costings and timing of provision) is relevant and must be secured in POs. This is not so far agreed.</b></p> <p><b>Given the importance of specialist centralised provision in Harlow this is a matter that should also be addressed in terms of cross County boundary enhancement of such facilities.</b></p>
CF10	Contribution towards on site or off site public art	£1,768,500	£0	£1,768,500	£850,000	£0	<p>The planning application proposes significant enhancements to green space and new high quality areas of public realm. However, in addition the applicants will consider a planning obligation to contribute towards on or off site public art. Matter to be discussed as part of the S106 negotiations</p>	<p><b>Achieving high quality public realm is always necessary as part of the design approach to development. This is very different from this specific public art requirement, which links to Harlow's 'Sculpture Town' initiative / theme.</b></p> <p><b>It is inappropriate to present a major planning application with significant PO issues deferred as 'to be discussed as part of the S106 negotiations'. A planning agreement is not a matter separate from the planning application; it is integral to determination. It is unclear if the applicant response is now being suggested as a basis for determination.</b></p>

CF11	Upgrades to sculpture trail leading to Harlow Town Station	£75,000	£0	£75,000	£36,047	£0	The application commits to making a financial contribution toward enhancements of the Stort Valley. Places for People will work with the Stort Catchment Partnership to assist deliver the enhancements, as described on Page 126 of the Landscape and Green Infrastructure Report. The Report explains the potential opportunities to deliver a sculpture trail as an extension of existing facilities which will be explored with the Partnership. No additional financial contribution is necessary.	<b>As for CF 10 above. This requirement extends beyond the Stort Valley Park.</b>
CF12	Playhouse Square development	£500,000	£0	£500,000	£240,317	£0	No details have been provided setting out what is proposed and its associated costings. Furthermore, as described in the various documents that support the planning application high quality design, art and sculpture trail form an inherent part of the scheme proposals. In the absence of any details, a contribution to the Playhouse Square development is not considered Reg 122 compliant.	<b>The scale of the development is such that there is a direct and proportionate relationship to enhancements of Harlow Town Centre. It is disappointing that the applicant is not prepared to see the GA development in context, as reliant on, and seriously impacting on, the 'central place' of Harlow.</b>
OS5	Approx 11.42ha of amenity greenspace at Gilston Villages1-6	£1,598,800	£0	£1,598,800	£1,598,800	£0	This forms an inherent part of the planning application. No additional financial contribution is required.	<b>The application documents are clear in providing for high quality open spaces. It is accepted that on site open space and play provision, in all its forms, is an integral part of the application and that provision is to be secured through PCs and POs.</b>  <b>It is incorrect to indicate that no additional financial contribution is required as provision must be made for all aspects of stewardship. This is likely to be costly and must be built into the economics of the development.</b>  <b>Specific stewardship proposals are generally a missing element in the current application proposals. This is a serious concern.</b>  <b>The arrangements for open space provision and stewardship have not yet been set out in agreed POs.</b>

OS12	Approx 15.23ha of amenity greenspace (including parks and gardens) at Gilston Villages 1-6	£4,569,000	£0	£4,569,000	£4,569,000	£0	This forms an inherent part of the planning application. No additional financial contribution is required.	<b>As for OS5 above.</b>
OS19	Approx 60.93ha of natural and seminatural greenspace at Gilston Villages 1-6	£3,046,500	£0	£3,046,500	£3,046,500	£0	This forms an inherent part of the planning application. No additional financial contribution is required.	<b>As for OS5 above.</b>
OS27	Approx 4.76ha of children's play facilities	£3,498,600	£0	£3,498,600	£3,498,600	£0	This forms an inherent part of the planning application. No additional financial contribution is required	<b>As for OS5 above.</b>
OS35	Approx 5.71ha allotments	£142,750	£0	£142,750	£142,750	£0	This forms an inherent part of the planning application. No additional financial contribution is required.	<b>As for OS5 above.</b>
OS41	Stort Valley green infrastructure	£5,000,000	£0	£5,000,000	£4,250,000	£0	The Village Development planning application identifies potential enhancement opportunities to the Stort Valley as described on Page 126 of the Landscape and Green Infrastructure Report. The Report recognises that such enhancements will be defined and delivered by the Stort Catchment Partnership, but the applicant commits to providing funding to support these initiatives. The scale of contribution, informed by the indicative proposals prepared to date, will be discussed as part of the S106 negotiations.	<b>It is inappropriate to present a major planning application with significant PO issues deferred as 'to be discussed as part of the S106 negotiations'. A planning agreement is not a matter separate from the planning application; it is integral to determination. It is unclear if the applicant response is now being suggested as a basis for determination.</b>  <b>The scale of contribution required is clearly indicated in the IDP.</b>
SF2	New affordable community leisure centre	£11,015,680	£0	£11,015,680	£9,363,328	£0	The Development Specification submitted in support of the planning application includes reference floorspace for a new Leisure Centre. No additional financial contribution is required.	<b>The amendment application amendments have considerably improved the detail of leisure and sports facility provision.</b>  <b>This is not necessarily a requirement for a separate financial contribution, but it is a requirement for in kind provision, including</b>

								<p><i>free land and possibly financial contributions. There is a close linkage to the current position on stewardship arrangements. These are ill defined and this is a major concern.</i></p> <p><i>The adequacy of the application proposals to meet IDP requirements (including specification, costings and timing of provision) is relevant and must be secured in POs. This is not so far agreed.</i></p>
UT14	Household Waste Recycling Centre	£6,700,000	£0	£1,662,067	£1,412,757	£5,037,933	No evidence of the demand for a new facility has been provided. No additional financial contribution is required. (£m)	<p><i>The scale of the development is such that there is a direct and proportionate relationship to the need to improve these facilities. The issue is also a key sustainability matter and is linked to the need for adequate employment land provision, including for 'dirty uses'.</i></p> <p><i>It is disappointing that the applicant is not prepared to see the GA development in context; as reliant on, and seriously impacting on, key facilities in Harlow. This is a cross County boundary issue that is important for the HGGT Partnership.</i></p>

### HDC general comments

The applicant has now usefully provided an analysis of how their application proposals take account of the infrastructure requirements for the GA development as set out in the HGGT IDP. This was a requirement set out in the HGGT 'How To' Guide for Planning Obligations, Land Value Capture and Development Viability, that should have formed part of the original application submission (within a more comprehensive Delivery Statement).

- The HGGT IDP is an important evidence document that details the infrastructure requirements directly and proportionally related to the GA development. The IDP supports Development Pan policies that give very high priority to ensuring that the extremely large scale housing growth envisaged for HGGT is properly supported by developer funded infrastructure. The IDP originates in evidence work that was scrutinised and accepted through, and is effectively embodied in, decision outcomes from the current cycle of Local Plan preparation for all of the HGGT districts.

- There are few realistic opportunities for public funded infrastructure provision to support the HGGT. This is why the adequacy or otherwise of developer funding of infrastructure must be a central material consideration in determination of the application. The availability of HIG / RIF 'forward funding' does not diminish this issue. HIG is very valuable in supporting developer cash flow to progress the IDP, as it can help to 'unlock' sustainable development through temporarily funding essential infrastructure required at the outset / early on. It supports policy compliant growth and helps initial mitigation of development impacts to protect against planning harm. However it is not to be treated as 'gap funding' that ultimately reduces developer contributions. This is not the basis on which it has been awarded and a different approach would not meet the contractual requirements with Government for its release.
- The IDP includes a simple dwelling numbers based apportionment of the responsibilities for delivery and funding across the HGGT major development sites. Achievement of the funding outcomes set out in IDP is fundamental to successful progress on the HGGT project. If any particular development does not generally accord with the IDP, there are precedent and shortfall implications for the other developments. The LPAs responsible for determination of individual development site planning applications need to be acutely aware of these implications. In the case of this GA application this is crucial, because it is by far the largest HGGT development. Determination of the application falls to EHDC. However, any infrastructure delivery failures immediately and primarily impact on existing Harlow residents. In the longer term any deficiencies will impact most on the residents and workers in the wider HGGT, rather than on wider area populations. It is essential that there is delivery certainty for the infrastructure in order for any LPA to award consent; otherwise clear planning harm could arise.
- It is acknowledged that an IDP will always be based on available high level information and general, standard based, cost estimates. This does not diminish its importance in clarifying the infrastructure provision and responsibilities that fall to developers. It is, however, essential that details are finalised and agreed to support decision-makers.
- It is also acknowledged that responsibilities and cost estimates and apportionment can be explored in more detail as schemes are developed through, or in parallel with, planning applications. The HGGT partner LAs have followed this approach through for the GA development; most notably in respect of transport and education scheme development and in the always intended review of the transport modelling based cost apportionments for the ESC.
- In the context of the approach set out above, the PfP analysis / response text provided with the amended application illustrates just how far away the application is from providing an agreed planning obligations approach to infrastructure provision. This is the position at what is a very late stage in the intended application process. PfP's responses are challenging the fundamental IDP approaches and there are major items of infrastructure provision that will not be secured as a result of the current proposals. PfP seem to be claiming policy compliance in all respects for their application, including on infrastructure provision. From a HDC perspective the application is clearly not policy compliant on infrastructure provision, because the IDP is to be regarded as the appropriate evidence base for judging policy compliance on the detail of provision.

- The applicant rejects the HGGT guidance that planning applications should provide a full 'Statement of Delivery' setting out the basic economics of their development, so that the LPA can make appropriate and balanced assessments and decisions about whether there is delivery certainty for the necessary level of infrastructure and services. This is considered fundamental to ensuring that the HGGT Vision is achieved, that schemes are policy compliant and that land value capture for the benefit of the community is achieved. This approach is also set out because the LPA must be realistic in its judgements. However, the applicant's position appears to be that their development is viable, and their challenges to the IDP are based only of whether the requirements are directly and reasonably related in national legal and policy terms and on a 'fair shares' basis. This is a very fundamental challenge and does not sit well with the way in which the development proposals were promoted through the Development Plan and in the inception of the HGGT project. This position cannot be easily resolved. This matter is highlighted in HDC's overall response to the application as amended and its focus on the very poorly developed content of proposed POs.
- RAG rating colours are used in the extract table above to highlight the level of outstanding issues for infrastructure provision in general terms. Text in bold italics is added to provide some more specific 'HDC comment' on 'PfP's 'response'.