

EPPING FOREST LOCAL PLAN EXAMINATION IN PUBLIC

HEARING STATEMENT

MATTER 4: SPATIAL STRATEGY/DISTRIBUTION OF DEVELOPMENT

**ON BEHALF OF MARTIN GRANT HOMES & HARCOURT
DEVELOPMENTS (STAKEHOLDER ID: 19LAD0058)**

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CONTENTS:

Page No:

1.	INTRODUCTION	1
2.	ISSUE 3: IS THE DISTRIBUTION OF EMPLOYMENT LAND IN THE PLAN JUSTIFIED IN LIGHT OF THE DISTRIBUTION OF HOUSING?	1
3.	REQUIRED CHANGES:	3

1. Introduction

1.1 This Hearing Statement is prepared by Pegasus Group on behalf of Martin Grant Homes and Harcourt Developments who have land interests at Latton Park, London Road, Harlow within the administrative boundary of Epping Forest. The LPA reference for this site is SR-0092.

2. Issue 3: Is the distribution of employment land in the Plan justified in light of the distribution of housing?

Response to Question 1

2.2 As part of our representations to the Submission Draft Local Plan, we highlighted our concerns regarding the site allocation process for employment sites and how the published evidence base did not provide adequate justification for the proposed allocations in the Plan.

2.3 The Employment Land Supply Assessment (Arup December 2017) provides a review of all available employment sites in the District and in table 17 of that report recommends that 19 sites are suitable for employment purposes and should be subject to a further site selection process to determine which sites are identified as new employment allocations in the Local Plan. Latton Park is included in this list (ref: SR-0092).

2.4 There was not a published additional site selection report following the Employment Land Supply Assessment which identified why these 5 sites were preferred when compared with the other 19 sites identified and therefore it is not clear as to why these sites were allocated and not any of the other 19 alternative sites. We highlighted the necessity for the LPA to be clear in their justification regarding the site selection process. It is acknowledged that by allocating all 19 sites for employment purposes this would lead to an unnecessary surplus of employment sites. However, there was no clear published process as to how the preferred sites were selected and why those were considered more suitable than the other assessed sites.

2.5 The additional consultation and publication of evidence base documents in May 2018 outlined the process more clearly and showed that there were gaps in the evidence base during the previous consultation period in January 2018.

- 2.6 As identified by the Inspector in Issue 3, the proposed allocation of employment land identified in the Plan will lead to unsustainable travel to work patterns. There are other, more sustainable employment allocation options available.
- 2.7 The plan identifies 23ha of potential development sites to meet employment need. These are spread across five sites, with 20ha of this - or 85% - allocated to just two sites – North Weald Airfield and land north of the A121, south of Waltham Abbey. One of these, North Weald, is allocated to B1A office use. Without greater clarity on floorspace need and re-use rates it is hard to assess if these allocations are sufficient. What is clear is that the Plan is heavily reliant on just two sites to deliver the vast majority of its employment needs. Outside of these two large sites, industrial estates at Langston Road and Galley Hill Road and land at Dorrington Farm are identified as delivering 1ha each.
- 2.8 It is evident then that the Plan is severely limited in terms of employment development options and reliant on re-use opportunities, the scale of which we would suggest is not yet possible to determine with sufficient certainty.
- 2.9 The North Weald site presents potentially the most sustainable option with easy access to main road and motorway networks and relative proximity to Epping underground station. However, the options remain severely limited for employment land, in particular in the north and east of the district. Any difficulties or obstacles regarding to deliverability on a large site such as North Weald or the A121 site will leave the district entirely reliant on re-use and the three small industrial estate sites. Of these, two are in rural locations with small road access only.
- 2.10 Therefore, we would reiterate the importance, of identifying more sustainable employment sites. We would suggest the emergence of the 2017 EEFM update forecasts, that contain substantial additional employment growth to 2033, only increases the importance of identifying additional sites.
- 2.11 In particular, the site LPA reference SR-0092, we would suggest represents an obviously more sustainable and accessible location at the M11 junction #7 than the Galley Hill Road and Dorrington Farm locations, while also offering a valuable north district site that will support planned and forecast employment growth for Harlow, including potential further growth beyond that set out in the HJA 2017 report, indicated in the 2017 EEFM forecasts.

- 2.12 The site at Latton Park (Ref: SR-0092) would assist in meeting the key aims of the Local Plan. The site has good links to Harlow, Epping and the adjoining districts and would be a sustainable location for a significant employment provision which is accessible by public transport including bus, rail and London underground links. There are opportunities as part of the development proposals and a Section 106 agreement to enhance these further including a park and ride facility or a dedicated shuttle bus from the rail and underground stations at Harlow Town, Harlow Mill and Epping.
- 2.13 The site at Latton Park is directly adjacent to the proposed Latton Priory Garden Town (SP5.1) and opportunities are available to link with the proposed employment areas within the Garden Town and the residential areas. The initial master planning for this Garden Town site demonstrates that the employment areas are best suited to the east of the allocation which is within close proximity of the Latton Park site. Therefore, links could easily be established between the two proposed employment areas reducing the perceived 'isolation' of the site at Latton Park.
- 2.14 The Strategic Allocation has been identified as a key location for employment provision and the Local Plan Policy SP5.1 requires employment uses to be provided as part of the proposal. Therefore, the provision of an additional employment site adjacent to this strategic allocation will assist the Council in providing for a range of employment opportunities in this key location.

3. Required Changes:

- *Policy SP2 - Criteria E (ii) to be revised in order to include additional new employment land (more than 23 ha).*
- *Table 3.1 – to include reference to Latton Park Employment site (SR-0092). See below:*

Allocation reference	Site name	Allocated use	Indicative Development Area
LOU.E2	Langston Road Industrial Estate	B2	1 ha
NWB.E4	North Weald Airfield	B1/B2/B8	10 ha
RUR.E19	Dorrington Farm	B1a/B1b	1 ha
WAL.E6	Galley Hill Road Industrial Estate	B2/B8	1 ha
WAL.E8	Land North of A121	B1c/B2/B8	10 ha
<u>SR.0092</u>	<u>Latton Park, London Road</u>	<u>B1/B2/B8</u>	<u>18 ha</u>
Total			41 ha