



Epping Forest Local Plan

Examination in Public

Hearing Statement

on behalf of

Miller Homes

Week 3

Matter 5 – Site Selection and Viability

February 2019

AM-P Ref: 13001



INTRODUCTION

1. This Hearing Statement has been prepared by Andrew Martin – Planning (AM-P) on behalf of Miller Homes.
2. Miller Homes controls 249.7 hectares (ha) of land, bounded by Gilden Way / Sheering Road, the M11, Church Langley and New Hall Farm, to the east of Harlow. Of this 121 ha of land falls within Epping Forest District to the north of Moor Hall Road and the remaining 128.7 ha within Harlow District to the south of Moor Hall Road.
3. The northern part of the site (allocation ref. SP5.3) is allocated in Policy SP5 of the Epping Forest Local Plan Submission Version (EB114) for approximately 750 homes, other associated uses and the potential relocation of the Princess Alexandra Hospital (PAH). The southern part of the site is allocated in Policy HS3 of the Harlow Local Plan Pre-Submission Document for approximately 2,600 homes and other associated uses.
4. This Hearing Statement supplements our client's formal representations from January 2018 and considers the Inspector's Matters, Issues and Questions in relation to Week 3 Matter 5 of the Epping Forest Local Plan Examination.

MATTER 5 – SITE SELECTION AND VIABILITY

Issue 1, Question 1 – Have the Plan's housing allocations been chosen on the basis of a robust assessment process?

5. Miller Homes is confident that the Plan's housing allocations, and in particular the East of Harlow site allocation (ref. SP5.3), has been chosen following a robust assessment process.
6. The selection of the strategic site allocations around Harlow (in Epping Forest District) is based on the evidence set out in the Harlow Strategic Site Assessment 2016 (EB1500), the district-wide Site Selection Report 2016/17 (EB801) and the subsequent Site Selection Report 2018 (EB805).

Issue 2, Question 1 –

The Council should provide a summary of the process by which the Plan's allocations for Gypsies and Travellers and Travelling Showpeople were selected. In particular:

- a. How was the initial pool of sites for assessment identified?***
- b. How was the Traveller Site Selection Methodology (TSSM) utilised in the Site Selection Report 2018 (EB805) established and is it robust? Is it consistent with national policy in the Planning Policy for Traveller Sites?***
- c. What is the relationship between the TSSM and the sequential approach to site selection set out in Policy SP2(D)?***



d. What was the role of the Sustainability Appraisal in selecting between the various sites?

e. Was any other evidence / factors taken into account in the site selection process?

7. Miller Homes objected to Policies SP2(D)(v), SP5.3 and SP5(H)(ii) and paragraph 2.129, in January 2018, on the basis that there was insufficient evidence to justify allocating a 0.5 ha Traveller site for up to 5 pitches at East of Harlow. This continues to be the case and therefore Miller Homes wishes to maintain this objection.
8. There is no evidence to demonstrate that the new East of Harlow Garden Town Community is a suitable location for new Traveller provision. To the contrary, paragraph 3.25 in the Plan suggests that Traveller communities actually prefer locations with a degree of separation from settled communities.
9. Paragraph 3.3 in the Site Selection Report 2018 (EB805) states that:

“The remainder of this chapter explains how the TSSM has been applied in the preparation of the Draft Local Plan published for consultation in Autumn 2016 and the Local Plan Submission Version published in December 2017. It provides a summary of the results, with reference made to detailed appendices which provide further detail of the assessment undertaken and justification for key decisions made. This includes Appendix E1.1 (Overview of Assessment of Traveller Sites), which provides an overview of how each site proposed for traveller accommodation was assessed at each stage of the TSSM.”
10. However, having reviewed the Site Selection Report 2018 (including Appendices E1.1 to E1.8.3) in more detail, there has not been any assessment undertaken of the East of Harlow site in relation to potential Traveller provision.
11. Paragraph 3.106 in the Site Selection Report 2018 (EB805) suggests that:

“... It was judged that traveller allocations continued to be required in the Garden Communities around Harlow in order to meet the increased requirement figure identified in the updated GTAA (2017).”
12. Notably there is no information to explain how or why that judgement was reached and the earlier Site Selection Report from 2016/17 (EB801) (including Appendices E1.1 to E1.7.3) again contains no assessment of East of Harlow in relation to potential Traveller provision.
13. Therefore in the absence of any meaningful evidence to justify a 0.5ha Traveller site allocation at East of Harlow, Miller Homes requests that this is deleted from Policies SP2(D)(v), SP5.3 and SP5(H)(ii) and paragraph 2.129 of the Plan.

SUMMARY

14. Miller Homes controls 249.7 ha of land to the east of Harlow. The northern part of the site is allocated in Policy SP5 of the Epping Forest Local Plan for approximately 750 homes, other associated uses and the potential relocation of the PAH, while the southern part is allocated in Policy HS3 of the Harlow Local Plan for approximately 2,600 homes and other associated uses.



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15. This Hearing Statement supplements representations made in January 2018 and maintains an objection to the proposed 0.5 ha Traveller site at East of Harlow, on the basis that there is insufficient evidence to justify this element of the allocation.
 16. Miller Homes also has additional comments to make in respect of the Inspector's other Matters, Issues and Questions, which will be set out in separate hearing statements to be submitted in February and April 2019.

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