

EPPING FOREST LOCAL PLAN EXAMINATION IN PUBLIC

HEARING STATEMENT

MATTER 5: SITE SELECTION AND VIABILITY

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

**TOWN & COUNTRY PLANNING ACT 1990 (AS AMENDED)
PLANNING AND COMPULSORY PURCHASE ACT 2004**

Pegasus Group

Suite 4 | Pioneer House | Vision Park | Histon | Cambridgeshire | CB24 9NL

T 01223 202100 | **W** www.pegasusgroup.co.uk

Birmingham | Bracknell | Bristol | Cambridge | Cirencester | East Midlands | Leeds | Liverpool | London | Manchester

PLANNING | **DESIGN** | **ENVIRONMENT** | **ECONOMICS**

CONTENTS:

Page No:

1.	INTRODUCTION	1
2.	ISSUE 3: HAVE THE PLAN'S NEW EMPLOYMENT ALLOCATIONS BEEN CHOSEN ON THE BASIS OF A ROBUST ASSESSMENT PROCESS?	1

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: Have the Plan's new employment allocations been chosen on the basis of a robust assessment process?

Response to Question 1

2.1 It is considered that the employment allocations were not chosen on a robust assessment process. It is acknowledged that there were more potential employment sites identified in the Employment Land Supply Assessment (Arup December 2017) [EB602] than were required. However, it is not clear on what basis the 5 allocated sites were chosen out of the 19 selected as suitable in the ELSA. It would appear that the selection process was justified after the Regulation 19 consultation (December 2017-January 2018) as there was no clear evidence base published at that time which justified the selection of the 5 allocation sites. The Site Selection report [EB805] which formed part of the additional consultation 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.

2.2 The Site Selection report detailed that the site at Latton Park (SR-0092) was subject to the further stages of the site selection process at stage 3 in 2017 (but not published until 2018 after the Regulation 19 consultation). Due to this omission it was not possible to comment satisfactorily on the selection process during the Regulation 19 consultation and we could only comment in May 2018 on the inaccurate information in the site selection report which was too late to influence the employment allocations as the Plan was too advanced and ready for Submission (this was delayed only due to a submitted legal challenge not due to changes required to be made to the Plan).

2.3 Our comments in relation to the inaccurate Stage 3 assessment for Site SR-00092 are below. At Stage 3, for each site, a judgement was made as to whether the site was considered suitable and should proceed to the next stage, or not. This took into account all material considerations including:

- the findings of the suitability criteria scoring from Stage 2,
- the outcomes of the transport, infrastructure and HRA modelling of the Draft Local Plan,
- local knowledge, and
- feedback from the Regulation 18 consultation.

2.4 At Stage 3, site SR-0092 was considered unsuitable for allocation and did not proceed to the later stages of the process. The detailed justification for this conclusion is as follows and is included on page F47 of Appendix F1.4 of the Report on Site Selection:

"The site scored poorly against several Stage 2 criteria including impacts on Ancient Woodland, impact on Ancient trees, landscape sensitivity, loss of agricultural land and the site's relative distance from existing settlements. When taking into account existing settlement patterns and the Council's proposals for the Harlow and Gilston Garden Town, this site is and would remain in a relatively isolated location, which is not adjacent or integrated into Harlow or the Garden Communities located within this District. It is therefore considered that this site would comprise an unsustainable location for employment uses as they would not be integrated with other residential or employment development and would promote less sustainable forms of travel. Whilst it is recognised that an access point will be required in the general vicinity of this site (although not through this site) to connect the Latton Priory strategic site to London Road B1393, it was considered that this could be designed sensitively to minimise the harm to the landscape and settlement character through, for example, appropriate landscape design/planting. Such an approach could not be adopted for the scale of development proposed at this site in this location. The site did not proceed any further."

2.5 The conclusions of this Stage 3 Assessment are disputed. It is stated that the site scored poorly against several Stage 2 criteria. However, the Stage 2 assessment highlighted issues but concluded that these could be mitigated and therefore was considered suitable to proceed to Stage 3. There were no immediate concerns at this high-level stage to conclude that the site would be

unsuitable for development due to the impact on ancient woodland, landscape sensitivity, loss of agricultural land or distance from existing settlements.

- 2.6 The Stage 3 assessment concludes that the site is distant from the existing settlement pattern and the Council’s proposals for the Harlow and Gilston Garden Town. Whilst the site may be distant from the central area of Harlow, this characteristic of the site would work well for a gateway employment area with good transport links to the wider transport network. Sustainable transport methods could be introduced to improve links to the railway station and to integrate within the existing public transport system.
- 2.7 Latton Park is located to the south of Harlow and provides the opportunity to achieve a high-quality business park and associated commercial uses with a potential park and ride facility close to the M11 at the gateway to both Harlow and Epping. The quality of sites to meet modern business needs/aspirations is one of the critical factors in ensuring economic success and attracting inward investment which are the main objectives of the Local Plan.
- 2.8 The Harlow southern corridor, incorporating London Road/Southern Way, presents the opportunity to establish an identity for both Harlow and Epping Forest by creating a visually attractive gateway to and from the M11 adding to the experience, image and perception of the area.
- 2.9 The allocation of an employment site in this location will 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.
- 2.10 The second point regarding location and proximity to the Harlow and Gilston Garden Town is also disputed. 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 and that a link

road will be provided to the existing road network close to the site's southern boundary. Therefore, links could easily be established between the two proposed employment areas reducing the perceived 'isolation' of the site at Latton Park.

- 2.11 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.
- 2.12 Initial technical work has been undertaken at the site at Latton Park, including highways, environmental and ecological appraisals and master planning. These documents have been previously submitted to the Council and their technical advisors to assist in their assessment of this site.
- 2.13 The conceptual masterplan sets out how the site can be developed for a high-quality employment area and the opportunities to provide other associated uses such as hotel and leisure. The main access route is proposed from the M11 roundabout as set out in the WSP Transport Appraisal with opportunities for a secondary access from the A414 and other infrastructure improvements such as cycle and pedestrian links.
- 2.14 The masterplan provides significant buffers for the protected areas adjacent to the site including the ancient woodland at Latton Park as suggested in the Stage 2 site assessment of this site.
- 2.15 The initial environmental assessment including landscape, ecological and archaeological work has not highlighted any constraints which will prevent this site from coming forward and demonstrates how the potential impacts of development can be mitigated for including those constraints highlighted by the Stage 3 assessment such as ancient woodland and landscape sensitivity.
- 2.16 It is not clear whether the technical information provided to support the inclusion of the Latton Park site (SR-00092) submitted in response to the Regulation 18 (December 2016) and Regulation 19 (January 2018) has been adequately considered by the LPA and ARUP as part of the Site Selection process. The conclusions reached in the Site Selection (March 2018) report are converse to the information provided and were published after the Regulation 19 consultation by which time it was too late for us to respond and correct these inaccuracies and

influence the site selection process. The site is well located to the proposed Latton Priory Garden Settlement and can assist in the employment provision. The introduction of proposed public transport improvements will also enhance the links with Harlow town centre and the public transport hubs which will further ensure the sustainability of the site.

- 2.17 The site represents an opportunity to ensure a flexible provision of employment options in the Local Plan. Draft Policy SP2 sets out that approximately 23 hectares of new employment land will be provided through the Local Plan as well as the protection and enhancement of existing employment sites.
- 2.18 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.
- 2.19 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.
- 2.20 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. These sites are not considered to be in sustainable locations.
- 2.21 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.

- 2.22 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.
- 2.23 There is an opportunity for the LPA to allocate employment sites, in addition to those already identified in the Local Plan, in order to ensure that there will be a wide-ranging choice of employment uses to meet the diverse future needs of the District. By allocating additional sites, this will provide flexibility in the provision of employment sites and reduce the reliance on existing employment sites to meet future needs which may be higher than those forecasted.
- 2.24 The site at Latton Park, which was considered suitable during previous assessments, would provide an opportunity to allocate additional employment provision if it is found that the evidence base and site selection process are not sound and that the employment forecasts in the Plan are inaccurate.