

# **EPPING FOREST LOCAL PLAN EXAMINATION IN PUBLIC**

## **HEARING STATEMENT**

### **MATTER 8: GARDEN TOWN COMMUNITIES**

**ON BEHALF OF MARTIN GRANT HOMES, PERSIMMON HOMES &  
TAYLOR WIMPEY (STAKEHOLDER ID: 19LAD0107)**

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

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## 1. Introduction

- 1.1 This Hearing Statement is prepared by Pegasus Group on behalf of Martin Grant Homes, Persimmon Homes and Taylor Wimpey, who are promoting land at West of Katherines within the Water Lane Area Allocation (Allocation reference SP5.2). As part of the ongoing support of the Water Lane allocation and collaborative working with the Councils and other stakeholders, the developer consortium has agreed a Statement of Common Ground regarding the Water Lane Allocation and has entered into a Planning Performance Agreement with the Council to assist with the Strategic Masterplan process which is currently underway.
- 1.2 The project team is due to present the latest Strategic Masterplan to the Quality Review Panel on 28 March 2019 with the promoters of West Sumners, Manor Oak Homes as part of the ongoing development of the Strategic Masterplan.

## 2. Issue 1: What is the Garden Town concept as applied to proposed allocations SP5.1, SP5.2 and SP5.3 and is this significant for plan making purposes?

### Questions 1-3

- 2.1 The Councils (Epping Forest, Harlow and East Hertfordshire) are working in partnership together with all stakeholders including land owners and promoters, to bring forward transformational growth in the form of Harlow and Gilston Garden Town. The Garden Town represents a major opportunity to accommodate around 16,000 homes up to 2033 between the global centres of London and Cambridge.
- 2.2 Harlow and Gilston was designated as a Garden Town by MHCLG in 2017. The approach to delivery of the Garden Towns means that the new Communities will not only provide a long-term supply of new homes, but will also deliver a quality of development, environment, infrastructure, services and community. The Council's have been jointly developing a Spatial Vision (2018) [EB1403], including key principals to inform its growth and management. In addition, it has been setting out a process by which Spatial Masterplans are created, including input from stakeholders, local community and an expert design panel.
- 2.3 Growing the pioneering New Town of Harlow to the west has been informed by the original Gibberd Masterplan. Gibberd's original masterplan for Harlow New

Town was strongly influenced by the character of the existing landscape, including the curving formation of Rye Hill containing the built-up area to the south, east and west. The masterplans will ensure continuity with these principles. This area to the west of Harlow was envisaged to come forward as part of the 1974 Gibberd Expansion Plan to support the future growth of Harlow. In keeping with the Gibberd Plan, the Water Lane Area will provide a well-designed sustainable extension within the west of Harlow area identified in the Plan.

- 2.4 The Water Lane Area will be a forward thinking 21<sup>st</sup> Century Place within this overall Garden Town concept and in compliance with the Harlow And Gilston Garden Town Spatial Vision (2018) [EB1403]. The intention is to create an aspirational living environment that provides a strong sense of place with a choice of different high-quality living patterns.
- 2.5 The Strategic Masterplan which is currently progressing for the Water Lane Allocation will demonstrate how the site can be developed in accordance with the Garden Town approach and the Harlow and Gilston Garden Town Spatial Vision (2018) which provides an overview of the comprehensive Garden Town and will show how the site will contribute to the strategic infrastructure identified as part of the Garden Town approach.

**3. Issue 2: Are the Garden Town allocations deliverable in respect of their impact on transport infrastructure?**

Question 1

- 3.1 Policy SP 5 requires that: *“Development identified in this policy will be expected to make a contribution proportionate to its scale and impact for the delivery of improvements to Junction 7 and other strategic infrastructure requirements.”*
- 3.2 As part of the local plan evidence base, ECC has provided a January 2019 transport assessment [EB 503] which includes modelling outputs setting out the expected impacts of the allocations on both M11 junction 7 and 7a. Although the modelling does not disaggregate the individual allocations from the overall impacts, it will be possible at planning application stage to undertake specific model runs to identify the absolute impact of individual allocation areas on any specific junction. The modelling indicates that EFDC growth comprises around 18% of the total future flows at both Junction 7 and 7a.

- 3.3 No single site could support the delivery of a major piece of infrastructure, consequently a financial contribution towards the delivery is the most appropriate method of ensuring that impacts are mitigated.
- 3.4 Future year modelling assumes that all development is completed along with M11 junction 7a in 2033. There is no suggestion that development cannot commence prior to works being completed. It is anticipated that the transport assessments for the allocation sites will be more specific about phasing of contributions in relation to impact. It is worth noting that the scale of housing sites means that vehicular traffic impact will build over a number of years as the site is built and occupied, rather than an instantaneous change.

#### Question 2

- 3.5 The policy sets out the improvements that are expected to be required, in relation to the Water Lane Area these include: Water Lane/A1169 roundabout; A1025/Abercrombie Way signals and traffic calming along the A1169 Southern Way Corridor. These improvements are anticipated from earlier modelling work carried out by ECC for both EFDC and Harlow Council, however the detail of the schemes is yet to be developed. Therefore, it is agreed that the specific list of potential highway improvements should be deleted from the policy in order to allow for flexibility.
- 3.6 Whilst the policy sets out what is expected to be required, according to EFDC it will be down to the Strategic Masterplan to further assess infrastructure requirements, including the distribution and timing of delivery. This will then inform individual application Transport Assessments to consider in detail the impacts and mitigation measures required as sites come forward. The method of implementation, via contributions under a s106 agreement or a planning condition to deliver works under a s278 agreement, is not considered necessary to be definitive within the high-level policy.

**4. Issue 3: Are the criteria in Policy SP4 justified, effective and consistent with national policy?**

Question 1

4.1 We have previously submitted comments in relation to the wording of Policy SP4 and suggested minor amendments to address issues.

4.2 Whilst minor changes to SP4 are sought, primarily to avoid unduly narrow prescription and to assist delivery, it is considered that SP4 is justified, effective and consistent with national policy. Para 72 of the NPPF (2018) recognises that the supply of large number of new homes can often be best achieved through planning for large scale development, provided they are well located and designed, and supported by the necessary infrastructure and facilities. In addition, para 72 of the NPPF contains a number of relevant criteria. Criteria C includes 'set clear expectations for the quality of the development and how this can be maintained (such as by following Garden City principals)'. In essence, Policy SP4 codifies those key elements that will go to create Garden Communities.

4.3 Notwithstanding the above, if it is considered necessary to revise this wording further to ensure sufficient regard is had to the historic environment, including built heritage; townscape; archaeology; and designed landscapes, we would not raise an objection to this depending on the proposed wording as these elements have been considered and will continue to inform our master planning for the site.

4.4 The minor amendments we have suggested previously for Policy SP4 are listed again here for reference purposes:

*B. Development within the Garden Town Communities will be holistically and comprehensively planned with a distinct identity that responds directly to its context and is of sufficient scale to incorporate a range of homes, employment, education and community facilities, green space and other uses to enable residents to meet the majority of their day-to-day needs. Delivery of each new Garden Town Community will be phased and underpinned by a comprehensive package of infrastructure as set out within the Infrastructure Delivery Plan and where relevant, a site-specific viability assessment.*

C. The design, development and phased delivery of each Garden Town Community ~~must~~ will seek to accord with the following principles:

C. (iii) Inclusion of opportunities for community-led housing development where this is based on need and where it is viable;

C. (vii) Strategic Masterplans and detailed design proposals ~~must~~ if necessary be reviewed and informed by the Quality Review Panel;

C. (viii) Promotion and execution of the highest quality of planning, design and management of the built and public realm so that the Garden Town Communities are characterised as distinctive places that capitalise on local assets and establish environments that promote health, happiness and well-being. ~~Proposals should adhere to~~ consider the Harlow and Gilston Garden Town Spatial Vision and Design Charter, and have regard to the original guiding principles established by Sir Frederick Gibberd's masterplan for Harlow, including the Green Wedge network;

C. (ix) Ensure that on-site and off-site infrastructure is provided in a timely manner, subject to viability considerations, ~~ahead of or in tandem~~ with the development it supports to mitigate any impacts of the new Garden Communities, meet the needs of residents and establish sustainable travel patterns;

C. (xv) Develop specific Garden Town Community parking approaches and standards, in consultation with all stakeholders recognising that car-ownership will need to be accommodated without impacting on the 'quality of place, and sustainable transport objectives' whilst making the best use of land;

C. (xvii) Integrate a sustainable approach design and construction that secures net gains in local biodiversity, ~~and the highest standards of energy efficiency and innovation technology;~~ incorporates energy efficiency measures to reduce impact of climate change (including through the provision of electric charging points), water efficiency (with the aim of being water neutral in areas of serious water stress), and sustainable waste and mineral management; and

**5. Issue 4: Are the site allocations (SP5.1, SP5.2 & SP5.3) in Policy SP5 sound and deliverable?**

Question 1

- 5.1 The Water Lane Area part of the policy requires a “two-form entry primary school”. The quantum of growth envisaged would, once complete, normally justify a two-form entry primary school. However, the Statement of Common Ground agreed with all parties requires:” Provision of new primary school accommodation with Early years and Childcare provision on land of at least 2.5 hectares.” It is acceptable to provide this more detailed requirement within Policy SP5.2.

Question 2

- 5.2 It is considered that there are suitable existing employment opportunities near to the Water Lane Allocation, specifically the existing Pinnacles Employment Area to “enable residents to meet the majority of their day-to-day needs” and the proposed pedestrian, cycling and sustainable transport improvements proposed as part of the scheme will ensure that sustainable transport opportunities are available to access other employment area within Harlow.
- 5.3 The requirement to make provision for small-scale employment uses in the Water Lane Allocation as listed in Criteria B of the Local Plan Policy SP5 is considered to refer to the employment arising from the uses within the Local Centre, Primary School, early years provision. It is not considered that a specific land use allocation for employment is justified in this location by the employment base evidence or by its location, given the proximity to the Pinnacles Employment Area.
- 5.4 Although there is mention of the Strategic Garden Settlement sites providing employment uses both in the ARUP report and the Local Plan, with the exception of Latton Priory (Dorrington Farm), there is no quantum of employment provision identified for these sites. It is considered that there are more suitable locations for dedicated employment allocations.
- 5.5 Nevertheless, as part of the emerging Masterplan work, a local centre is proposed for the Water Lane Area (at land north of Water Lane) which would provide for a range of retail / community and health uses. The provision of a primary school



will make a further valuable contribution to meeting/exceeding the Council's employment provision requirement. It is not considered suitable to provide more employment uses than those ancillary uses mentioned in the policy at the Water Lane allocation.

- 5.6 If additional separate employment sites are required over and above those identified in the Local Plan, it is considered that there are more suitable locations available than the strategic site locations.

### Question 3

- 5.7 The area to the west of Harlow, including land north of Water Lane, was envisaged to come forward as part of the 1974 Gibberd Expansion Plan to support the future growth of Harlow. In keeping with the Gibberd Plan, the Water Lane Area will provide a well-designed sustainable extension within the west of Harlow area identified in the Plan. We support the findings of the Council's 2016 Stage 2 Green Belt Assessment which assessed areas which either make a limited contribution to the Green Belt purposes set out in Paragraph 80 of the NPPF (2012), or as in the case of the area west of Harlow, are in close proximity to existing settlements where development allocations are more likely to be considered acceptable in sustainability terms.
- 5.8 Land north of Water Lane was assessed as part of the area west of Harlow. The assessment demonstrates that even though the site has some function in the Green Belt, its proposed release from the Green Belt for allocation/development is acceptable in planning terms due to Harlow's status as a substantial town in the Metropolitan Green Belt with opportunities to meet housing, employment and regeneration needs along with necessary infrastructure. Land north of Water Lane is therefore a sustainable location for development, enjoying good access to services, facilities and employment thereby reducing the need to travel by car. In this regard, the site represents a natural evolution of the Gibberd vision, and so is an entirely appropriate allocation.
- 5.9 There is sufficient justification to warrant an alteration to the existing green belt boundaries in this location. Development at West Katherines will deliver a sustainable development on land which is unnecessary to keep permanently open.

- 5.10 Our landscape analysis shows the West Katherines site to play a limited role in fulfilling Green Belt purposes (paragraph 80 of the NPPF (2012)). The village of Roydon lies over 1km from the western edge of the site, and therefore the site plays a very limited role in preventing the coalescence of primary or secondary settlements. The strong physical boundaries on the site provide effective visual containment for new development, which would not be perceived as urban sprawl, in conjunction with a sensitive masterplan respecting the character of the visually less enclosed land and Conservation Area on the southern part of the site. Similarly, the perception of encroachment into the countryside would be limited, due to the good visual enclosure of the site.
- 5.11 Strong revised Green Belt boundaries in accordance with the criteria set out in the NPPF would be provided by the B1133 to the south and to the west by the B181, Old House Lane and the strong hedgerow extending northwards. The existing urban area of Harlow would visually contain new development to the north and east.
- 5.12 The revised Green Belt boundary will provide a long-term defensible boundary to future development to the west and secure a clear distinction between town and country in accordance with the masterplan principles of Sir Frederick Gibberd.
- 5.13 In relation to the potential impact of the site on the identity of Old House Lane, this has been reviewed as part of the master planning for this site and will continue to inform the proposals. Old House Lane is a rural lane with three distinct characteristics; to the west it comprises suburban houses along its southern edge setback behind long front gardens; in the centre, the location of the Old House, houses front both sides of the lane with a mixture of styles, groupings and setbacks; whilst to the east the lane becomes a bridleway. Behind the houses and hedgerows along Old House Lane are a large number of industrial scale glasshouses and associated water towers, part of the various commercial horticultural nurseries within the area.
- 5.14 As part of the development proposals, the glasshouses will be removed. The Masterplan work undertaken to date shows how a landscape buffer could be sited to the south of the long rear gardens of the houses along the southern side of Old House Lane. Development parcels could back onto this landscape buffer to provide mutual protection of private amenity for existing and proposed residents.

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5.15 Access will mainly be from new streets within the development proposals, however, some access, including for emergency vehicles, pedestrians and cyclists, is envisaged from Old House Lane. Existing hedgerows and trees along Old House Lane would be retained except where new access is required. The Council's Sustainable Transport Corridor, linking Water Lane with Third Avenue, will likely cross the bridleway.

Question 4

5.16 We would support the additional clarification that the residential site areas are also expected to include land for schools and other services and infrastructure. This will ensure clarity and remove any ambiguity at the master planning and planning application stages.

## 6. Site SP5.2 Water Lane Area

### Question 7

- 6.1 The West Katherine's Consortium currently has options over a significant proportion of the land allocated at St Katherine's. In addition, the West Katherine's Consortium is contracting on additional land within the allocation and has an option on c.10ha (26 acres) of land to the north of Old House Lane which is capable of being used for mitigation, should it be needed.
- 6.2 The remaining landowners within St Katherine's allocation who do not form part of the West Katherine's Consortium support the land coming forward for residential re-development.
- 6.3 The redevelopment will be shaped by the Strategic Masterplan being produced jointly between West Katherine's Consortium and Manor Oak. West Katherine's Consortium are leading on producing a detailed Strategic Masterplan for St Katherine's parcel to the north of Water Lane. The other landowners who do not form part of the West Katherine's Consortium will have the ability to input into this Strategic Masterplan for St Katherine's.
- 6.4 The West Katherine's Consortium currently controls a substantial proportion of the allocation between Old House Lane in the north and Water Lane in the south. Currently, this includes the ability to form means of access from Water Lane in a manner which has been discussed with and is agreeable to the Local Highway Authority. In addition, it also means that the boundary adjoins the adjacent established residential area of Katherine's to the east. Furthermore, the land currently under West Katherine's Consortium control would allow for the phasing delivery of on-site infrastructure including a primary school, local centre, sport / recreational facilities and green infrastructure.
- 6.5 There is a reasonable prospect that the totality of the Site will become available and could be viably developed during the Plan period. The West Katherine's Consortium comprises national house builders with a strong track record of delivery. Phases of residential development at St Katherine's area would be deliverable within the first 5 years post adoption of the Local Plan (i.e. between 2019/20 to 2024/25) and we support the Housing Trajectory as being realistic.

Question 8

- 6.6 All parties agree that policy SP 5(G) and DM 7, and the Strategic Master planning process along with the Harlow and Gilston Garden Town Design Guide are sufficient to ensure that sensitivities and significance of the heritage assets are understood and respected throughout the process. The input and measures incorporated into the Master planning and Design process will ensure that the Water Lane development will lead to less than substantial harm to the Nazeing and South Roydon Conservation Area and the other Heritage Assets.