



**Epping Forrest  
District Council:  
Local Plan Submission  
Draft 2011-2033  
Examination in Public**

**Statement of Case  
Matter 8**

**Produced for  
Princess Alexandra Hospital NHS  
Trust**

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# Statement of Case

Epping Forest District Council: District Local Plan 2011-2033: Examination in Public

Produced for Princess Alexandra Hospital NHS Trust

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## 1. Introduction

- 1.1 This Statement of Case (Statement) has been prepared by Lawson Planning Partnership Ltd (LPP), on behalf of the Princess Alexandra Hospital NHS Trust (PAH). The Statement addresses Matter 8, Issues 2 and 4 concerning the potential relocation of the hospital to land within the East Harlow allocation (Policy SP5.3).
- 1.2 PAH operates the Princess Alexandra Hospital (PAH), Hamstel Road, Harlow, CM20 1QX and also provides services at St Margaret's Hospital, The Plain, Epping, CM16 6TN.
- 1.3 This Statement should be read in conjunction with representations submitted to Epping Forrest District Council (EFDC) by LPP dated 26th January 2018 on the Local Plan Submission Document covering the following matters:
  - a) General support for Policy SP5.3 and its requirement that a hospital wellbeing campus on an approximately 14 hectare site should be included as part of the strategic site allocation concerning the East of Harlow development site.
  - b) Provision of evidence which supports the case for a relocated hospital within the East Harlow development area and commentary on the evolving intentions of the hospital Trust in this regard.
- 1.4 This Statement addresses the Inspector's matters and questions relating to points a) & b) above, along with related matters raised in the Planning Inspector's Matters, Issues and Questions.

## 2. Background

- 2.1 Since representations were submitted in early 2018, PAH has undertaken substantial additional work to inform its Strategic Outline Case (SOC) and subsequent Outline Business Case (OBC) concerning identification of preferred development and location options for improved acute and general hospital services covering the Harlow area.
- 2.2 PAH has essentially identified two shortlisted development options, i) to redevelop or part redevelop/part refurbish the existing hospital campus located off Hamstel Road and ii) relocate to a green field site within East Harlow (in line with Local Plan Policy SP5.3). All other development options and scenarios have been discounted at this stage. The location of the proposed Hospital Campus and illustrative layout for the East Harlow site option is shown on the plans forming Appendix 1 to this Statement.
- 2.3 Following an options evaluation process in line with Treasury best practice, the PAH Board will determine the preferred way forward at its meeting to be held on 7<sup>th</sup> March 2019 for the provision of new and improved core-hospital services and the Planning Inspector will be appraised of this decision as soon as practicable after this date. In the meantime, given that the East Harlow site remains the only hospital relocation option, this Statement considers this scenario along with implications for Local Plan policy in the event the relocation did not occur.
- 2.4 Subject to Board approval, the preferred development option will subsequently be taken forward to OBC and Full Business Case (FBC) stages with a view to development implementation within a 5 year period.

- 2.5 The EFDC Local Plan states that, *“alongside the new homes that will be provided”*, the Garden Town policy approach will be to *“make provision for the relocation of Princess Alexandra Hospital”* (para. 2.112).
- 2.6 PAH has accepted that, at the time this policy was drafted in 2017, its business case was not sufficiently advanced to commit to utilising this policy provision. Since a decision was made in mid-2018 to focus on the East Harlow development as its ‘preferred *relocation* option’, PAH has invested significant resources into investigating the development feasibility including transport and masterplanning aspects of this development option, and has a strong evidence base to support the deliverability of such a scheme in this regard.
- 2.7 This Statement therefore, additionally provides an update of PAH’s position explained in the context of the relevant Matters, Issues and Questions to be raised at the Examination in Public hearings concerning the draft EFDC local plan.

### 3. Matter 8: Issue 2: Transport Infrastructure

#### Issue 2: Are the Garden Town allocations deliverable in respect of their impact upon transport infrastructure?

##### Transport Improvements; Necessity & Funding

- 3.1 The aspirations of policy are for development within the Garden Town to be holistically and comprehensively planned, with delivery *“phased and underpinned by a comprehensive package of infrastructure as set out within the Infrastructure Delivery Plan”* (as per Policy SP4, b).
- 3.2 In order to deliver the quantum of development required in the Garden Town, the plan acknowledges that *“a step change in modal shift”* is required to provide for, and encourage, sustainable travel patterns (SP4, c, xii).
- 3.3 It is understood that a range of transport improvement measures may be required to ensure a well-functioning network by the end of the plan period in 2033. However, there is funding already in place to deliver Junction 7A and its associated infrastructure (as per SP5, h, xii) and therefore, developer funding is not required to contribute specifically to the scheme which currently has planning approval and an anticipated completion date towards the end of 2022.
- 3.4 PAH has funded further technical assessment work (using VISUM and VISSIM traffic modelling software) in conjunction with Essex County Council, and its retained advisors Jacobs, which suggests that subject to further sensitivity testing, the hospital can be accommodated alongside the committed development without resulting in a significant material impact upon the function of the surrounding road network.
- 3.5 It is acknowledged however, that the modelling suggests that minor highway improvements, to supplement the committed Junction 7A and Gilden Way works may be required to mitigate the cumulative impacts of development in this area.
- 3.6 It is noted that the wording of policy SP5, h, (xii) requires that Junction 7A and associated infrastructure are in place *prior to development commencing* on the East Harlow allocation and, at present, the projected completion date for these works is 2022.

- 3.7 Current PAH programming estimates that the delivery of the hospital within this site allocation could occur concurrently with the provision of the Junction 7A infrastructure. The *commencement* of hospital development therefore, should not be unnecessarily delayed by waiting for the delivery of Junction 7A infrastructure. It is therefore, considered that the stipulations of Policy SP5.3, c, (xii) are not necessary and not positively prepared, justified or effective in this regard.
- 3.8 In the event that site access is required to construct the hospital in advance of the new junction opening, this could potentially be obtained directly from the M11 works access rather than routed through the existing network, although there are likely to be alternative options to explore as part of a Construction Management Plan. It could also be practicable to implement the development in tandem with the Junction 7A works to ensure the impact upon the surrounding road network is minimised during the construction phase.
- 3.9 It is acknowledged that improvements to the J7A (Campion's Roundabout) scheme may be required to facilitate access to a hospital campus. Provision of a link to the Sustainable Transport Corridor, via a subway under the J7A slip road, will also be highly desirable. The Policy should also allow for and not prohibit this occurring within a deliverable timeframe for the hospital.
- 3.10 Policy SP4, c, (xviii) suggests that where wider, off-site infrastructure costs are identified these should be shared and can be delivered via Section 106 Agreements in the usual way, consistent with the provisions of the Infrastructure Delivery Plan (IDP) having regard to the key tests of proportionality and reasonableness as set out in para 56 of the NPPF.
- 3.11 PAH supports the policy requirement for these costs to be apportioned among developments referred to in the Harlow and Gilston Garden Town IDP, in so far as it recognises the hospital as public health infrastructure in its own right which warrants a proportion of developer funding.
- 3.12 As mentioned in PAH's Local Plan representations, PAH is also likely to request developer contributions towards healthcare services in order to mitigate the impacts of Local Plan generated population growth in the Garden Town as a whole as referred to in the Infrastructure Delivery Topic Paper (EB1101C) and paragraphs 6.24 & 6.27 of the EFDC submission version Local Plan.

## 4. Matter 8: Issue 4: SP5.3 East of Harlow

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

#### The Preferred Location of Princess Alexandra Hospital

- 4.1 Policy SP5.3, as currently worded, requires the land allocated in East Harlow (Epping Forest District portion) *"to include... approximately 14 hectares of land for a health and well-being hospital campus"*.
- 4.2 As explained above and given that East Harlow remains the only hospital relocation option, PAH has invested significant resources in support of the delivery of this policy. Since representations were submitted in early 2018, PAH has identified a preferred hospital development envelope immediately north of the planned Junction 7a, south of Pincey Brook (see Planning Parameters plan and illustrative Masterplan attached at Appendix 1).
- 4.3 Liaison has occurred with the landowner's agents, LPA, Essex County Council, Miller Homes (the residential developer promoting housing within the strategic allocation), Candent Gas and the Health

and Safety Executive (HSE), with a view to collaborative working and coordination over the delivery of this development area, which is also to be the subject of a strategic masterplanning process. There are no in principle objections to a hospital development at this location, which is consistent with Policy SP5.3 and reflects the emerging masterplan produced by Miller Homes.

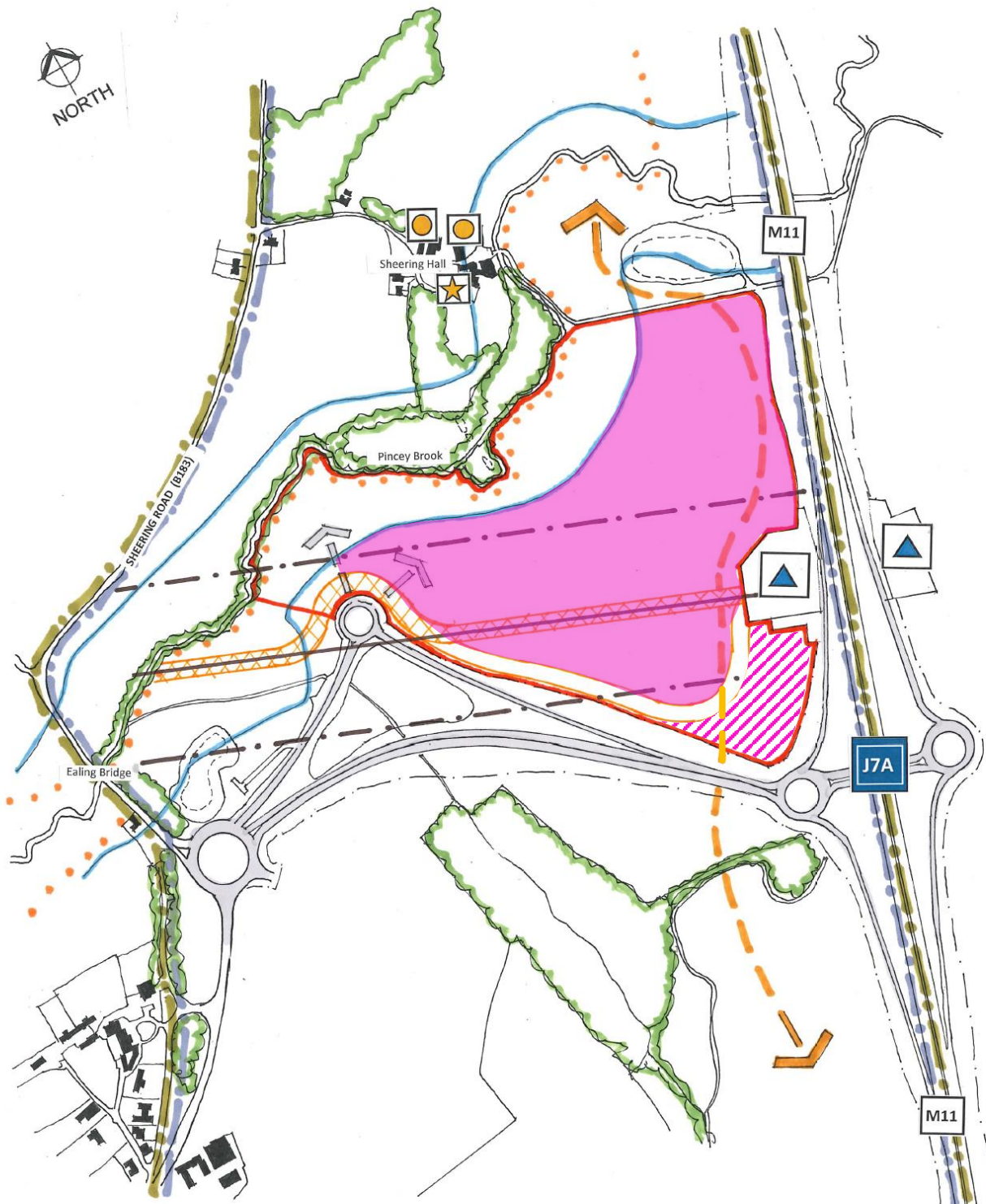
- 4.4 PAH has invested in substantial technical work, as required under paragraph 2.131 of the emerging EFDC local plan, to assess the impact of a hospital in this location and identify what infrastructure improvements might be necessary to facilitate this.
- 4.5 The technical work includes site analysis and a test to fit masterplanning exercise to examine the feasibility of a hospital provision on the identified site (see Appendix 1). Whilst still at a relatively early design stage and subject to a more detailed exercise to be undertaken at the OBC phase, work undertaken to date has concluded that around 12 hectares of land may actually be sufficient to provide for a hospital campus on this site, with future proofing flexibility, rather than 14 hectares as initially envisaged.
- 4.6 Taking account of site constraints, sufficient developable land is available without intruding into the existing flood zone areas (i.e. Flood Zones 2 and 3) with an additional buffer strip recommended to be safeguarded within the Epping Forest Strategic Flood Risk Assessment. Policy SP5.3, H, (xvi), as currently worded, already requires any increased volumes of water from the development site to be mitigated to existing run-off rates, consistent with national flood risk policy.
- 4.7 Following detailed discussions with the HSE and Cadent Gas, PAH has developed a broad constraints plan that demonstrates the required quantum of hospital development can be provided by re-routing the gas main to the south of the site as shown on the parameters plan, with ancillary development permissible within a redefined HSE outer consultation zone area.
- 4.8 The masterplanning process undertaken to date also allows for the provision of the continuation of a public transport corridor under the East-West Junction 7a access route, as discussed with Essex County Council and other parties. This would enable the provision of a bus loop into the healthcare campus, which would improve accessibility, connectivity and integration with the wider Garden Town area and community.
- 4.9 PAH also acknowledges that its plans are to be reflected in the strategic masterplan being developed by Miller Homes and LPA in support of the wider residential allocation. The provision of a hospital in this area in line with Local plan allocation is therefore both sound and deliverable.
- 4.10 Whilst PAH has no objections in principle to the land being used for alternative purposes in the future if it did resolve not to acquire and develop the East Harlow site, there should be acknowledgement that this occurrence is becoming increasingly unlikely. As explained above, the planning inspector and public examination will be updated on the PAH's position following its Board meeting on 7<sup>th</sup> March 2019.
- 4.11 Having regard for the depth of work undertaken as summarised above, it would be detrimental to PAH's Business Case if the level of planning certainty for the provision of a hospital development was weakened by the removal of the hospital allocation from the Local Plan Policy.
- 4.12 However, it is noted that no representations have been submitted, which raise objection to the proposed Hospital allocation with Policy SP5.3. It is therefore, considered that the Hospital allocation should be retained as an appropriate and sound Local Plan Policy to help enable PAH to secure its development objectives by providing a much needed new state of the art hospital campus to serve the local community and surrounding catchment area.

## **Appendix 1:**

### **Planning Parameters Plan & Illustrative Masterplan**

### **Potential Hospital Relocation Option: East Harlow**





# Development Appraisal of proposed hospital site: East Harlow

## Parameters Plan

- Potential Hospital Site Area
- Planned M11 Junction 7A
- Greenbelt (as retained in emerging Local Plan)
- Existing woodland / hedgerows
- Public Footpath
- Grade II\* Listed building
- Grade II Listed building
- Flood Zone (with climate change buffer)
- Existing Gas main with 200m HSE Consultation Zone
- 18m Protection Corridor to existing Gas Main (with diversion to avoid approved new road)
- Alternative route for gas main, with 18m Protection Corridor
- Gas Main compound areas
- East of Harlow Masterplan Area boundary
- Potential Sustainable Transport Corridor
- Development Envelope (with link road) assuming gas pipeline diversion & encasing
- Staff Parking only

**Lawson Planning Partnership Ltd.**

November 2018 - Plan No. : 219/EH1

Scale 1:5000 approx. @ A3 size

Note: This plan is intended for Indicative purposes only and should not be relied upon for precise location of specific features or structures.



## PAH: East Harlow Hospital Option

### Illustrative Masterplan

