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## Epping Forest Local Plan

### Examination in Public

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#### Hearing Statement

on behalf of

Miller Homes

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Week 6

Matter 13 – Transport

April 2019

AM-P Ref: 13001



## INTRODUCTION

1. This Hearing Statement has been prepared by RPS and 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 6 Matter 13 of the Epping Forest Local Plan Examination.

## MATTER 13 – TRANSPORT

***Issue 1, Question 4 – Are different parts of this policy [T1] intended to apply to development of different types / scales? If not, why are Part C and Part F, which both concern the circumstances in which development will be permitted, separate? Should amendments be made for clarity?***

5. Policy T1C(iv) is inconsistent with NPPF (2012) paragraph 32 (3<sup>rd</sup> bullet) which states that “...Development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe.”
6. Policy T1C(iv) is also inconsistent with Policy T1F(i) using the phrase ‘inappropriate traffic generation’ and is confusing as to what is actually required from new development.
7. In order to ensure greater clarity Miller Homes believes that Policy T1C(iv) should be amended to read: “do not result in severe increases in traffic generation or compromise road safety”.
8. Alternatively, and mindful of the Inspector's question, Policy T1C(iv) could be deleted as it appears unnecessary in light of Policy T1F(i).

## SUMMARY

9. 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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10. Miller Homes made formal representations to the Epping Forest Local Plan in January 2018. This Hearing Statement supplements those representations and in particular to provide better clarity:
- seeks an amendment to Policy T1C(iv) to accord with NPPF (2012); or
  - seeks deletion of Policy T1C(iv), as Policy T1F(i) already covers the issue in accordance with NPPF (2012).
11. Miller Homes also has additional comments to make in respect of the Inspector's other Matters, Issues and Questions, which is set out in separate hearing statements.

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