



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

**Statement of Case  
Matter 14**

**Produced for  
Princess Alexandra Hospital NHS  
Trust**

**April 2019**

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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) to address issues raised in relation to Matter 14 (Infrastructure & Delivery) of the Epping Forest District Council Examination in Public.
- 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 raised by LPP, submitted to Epping Forrest District Council (EFDC) on 26th January 2018, regarding the Local Plan Submission Document. This letter offered general support for policies D1 (Delivery of Infrastructure) and D2 (Essential Facilities and Services). Specific points were made in relation to policy D2B; the wording of which currently restricts the loss of a hospital facility in a scenario where it would be re-provided elsewhere within the catchment area, therefore a minor amendment to the wording of policy D2B has been suggested to ensure this policy remains 'sound' and 'justified'.
- 1.4 This Statement addresses the additional issues raised by virtue of the Planning Inspector's Matters, Issues and Questions for Matter 14, along with other relevant infrastructure issues which have arisen as a consequence of discussions which have taken place during the examination concerning Matter 8 (Garden Town Communities).

## 2. Background

- 2.1 PAH is continuing to develop its Strategic Business Case (SOC) for the redevelopment or relocation of the acute and general hospital site at Harlow. At its meeting held on 7<sup>th</sup> March 2019, the PAH Board unanimously approved the recommended preferred way forward for the provision of a new hospital at Harlow. This option comprises the development of a new state of the art local acute hospital. The hospital is to be located on approximately 12 hectares of greenfield land within the East Harlow Strategic Development Allocation, as identified in the Epping Forest District Local Plan, Submission Version (2017), under Policy 5.3.
- 2.2 Following the Board's decision, PAH is also continuing to progress its Business Case and planning processes, and during this year, if funding is available and following regulator sign-off, it will be undertaking a related public consultation exercise on how best to deliver the preferred option. Therefore, subject to confirmation of Treasury funding, likely to be announced in Autumn 2019, PAH is aiming to deliver the new hospital by 2025.
- 2.3 It is also likely that, as the Trust's Business Case progresses, the role of existing services and buildings operated by PAH at St Margaret's Hospital will be considered in detail. It is likely that the existing Community Hospital and other services on the St Margaret's Hospital site will be retained. However, there are currently underutilised land and buildings within the western part of the site which may become surplus to healthcare requirements. Consequently, there may be opportunities to help cross fund the provision and re-provision of health facilities by the sale of any identified surplus land.
- 2.4 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 14: Infrastructure & Delivery: Issue 1

#### Will Policy D1 be effective in securing the infrastructure necessary to support development before it takes place?

- 3.1 In Questions 2 and 3 of the Inspector's Matters, Issues & Questions, it has been queried whether the relevant supporting text of policy D1 should explain adequately the role of specific documents which are designed to guide the delivery of infrastructure. Likewise, it is queried whether the supporting text provides sufficient guidance for a developer to derive the contributions which might be required.
- 3.2 Over the course of the examination, notably in relation to Matter 8 (Garden Town Communities), Epping Forest District Council maintained its intention to publish the Harlow and Gilston Garden Town Infrastructure Delivery Plan (HGGT IDP). It was understood that the Plan was intended to form part of the examination documents and thus be considered as part of this examination.
- 3.3 A provisional date of 15<sup>th</sup> April was proposed for publication of this document in draft, however, at the time of writing, this document has only just been made public. The late publication of this document has offered PAH no opportunity to review this document and comment upon it within its Matter 14 Statement.
- 3.4 It is understood that the HGGT is intended to become an integral document to the local plan and that this will assist developers in deriving the contributions which will be required for development in the Garden Town.
- 3.5 To do this, the HGGT IDP will need to link effectively to policy D1 and its role should be set out clearly in the supporting text to this policy. It is also necessary procedurally that this document is properly considered and consulted upon during the examination process, to ensure it carries the maximum weight and can therefore effectively deliver the local plan's objectives.
- 3.6 PAH therefore requests clarification in relation to the above process. PAH also reserves the right to comment on these recently published documents during the course of the examination hearing, should a separate opportunity not be provided for this beforehand.

#### Other Issues

- 3.7 PAH notes that the supporting text provided in paragraph 6.26 concerning the hospital options is now out of date.
- 3.8 PAH suggests the following minor amendments to the policy wording to update this:

*"The Princess Alexandra Hospital NHS Trust is currently considering options to meet its future service requirements through a Strategic Outline Business Case. This work concerns the potential to relocate the Princess Alexandra Hospital ('PAH') from its current site within Harlow to land to the East of Harlow within the Epping Forest District administrative boundary (see policy SP 5).*