



Harlow Local Plan
Examination in Public

Hearing Statement

on behalf of

Miller Homes

Matter 2 – Housing – Quantitative Requirements,
Overall Provision and Five-Year Supply

March 2019

AM-P Ref: 13001



INTRODUCTION

1. This Hearing Statement has been prepared by 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 128.7 ha of land falls within Harlow District to the south of Moor Hall Road and the remaining 121 ha within Epping Forest District to the north of Moor Hall Road.
3. The southern part of the site is allocated in Policy HS3 of the Harlow Local Plan Pre-Submission Document (HSD1) for approximately 2,600 homes and other associated uses. The northern part of the site is allocated in Policy SP5 of the Epping Forest Local Plan Submission Version for approximately 750 homes, other associated uses and the potential relocation of the Princess Alexandra Hospital (PAH).
4. This Hearing Statement supplements our client's formal representations from July 2018 and considers the Inspector's Questions for Matter 2 of the Harlow Local Plan Examination.

MATTER 2 – HOUSING – QUANTITATIVE REQUIREMENTS, OVERALL PROVISION AND FIVE-YEAR SUPPLY

Question 2.7 – Would the allocations and policies in the plan deliver 9,200 dwellings over the full plan period to 2033? Will the strategic housing site east of Harlow and Policy HS2 sites be all but built out as appears to be assumed? Paragraph 7.31 states the allocations in the plan exceed the requirement by 105 dwellings - is this sufficient flexibility to ensure delivery?

5. Miller Homes supports the strategic housing site allocation at East of Harlow (as set out in Policy HS3) and considers that the site will be substantially built-out during the plan period to 2033.
6. The anticipated timescales for the delivery of the East of Harlow site have been set out in a Statement of Common Ground, signed by Miller Homes, Epping Forest District Council (EFDC) and Harlow District Council (HDC). These timescales include:
 - the submission of a Strategic Masterplan Document in Q3 2020;
 - the submission two separate but identical planning applications (i.e. one to each local authority) in Q4 2020;
 - the delivery of the 1st housing completion within Harlow District in 2023/24; and
 - the delivery of the 2,600th housing completion within Harlow District in 2032/33.
7. Although paragraph 7.31 states that the allocations in the Plan only exceed the housing requirement by 105 dwellings, it is notable that the Plan makes no allowance for windfall sites. Paragraphs 7.27-7.30 in the Plan state that windfall sites are not deemed to be a reliable source of supply in Harlow for the purposes of five-year housing land supply calculations. However, the National Planning Policy Framework (NPPF) (2012) does not require evidence to be presented in order to justify a windfall



allowance during years 6-15 of the plan period. It is inevitable that some new homes will be delivered on windfall sites during years 6-15 of the plan period and therefore these will provide additional flexibility, over and above the surplus supply of 105 dwellings referenced in paragraph 7.31, to ensure that the full 9,200 new homes are delivered in the District by 2033.

8. There is also the possibility of accommodating additional new homes and care uses on the northern-most part of the East of Harlow site (in Epping Forest District), which subject to further discussions with the local planning authorities and subsequent Strategic Masterplan work on the layout of the new development overall, could in turn facilitate additional new homes (beyond the 2,600 allocated in the Harlow Local Plan) on the Harlow part of the site.

Question 2.8 – Has the cumulative impact of the policies and standards in the plan together with nationally required standards on the viability of housing development been appropriately assessed? Would these put the implementation of the plan at risk and would they facilitate development throughout the economic cycle?

9. HDC and EFDC in the process of preparing a Garden Town Strategic Viability Assessment, which will establish whether the policies and standards in the Plan, together with other national standards, would have an impact on the viability.
10. However, at the time of writing, the Strategic Viability Assessment has not been published. Therefore, Miller Homes reserves the right to make further verbal comments on this matter at the relevant hearing session, once the final Strategic Viability Assessment is available.

SUMMARY

11. Miller Homes controls 249.7 ha of land to the east of Harlow. The southern part is allocated in Policy HS3 of the Harlow Local Plan for approximately 2,600 homes and other associated uses, while 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.
12. This Hearing Statement supplements representations made in July 2018. In particular:
 - It supports the strategic housing site allocation at East of Harlow, which plans to deliver 2,600 new homes (in Harlow District) by 2033.
 - It recognises that windfall sites will further supplement HDC's housing supply during years 6-15 of the plan period, providing additional flexibility over and above the surplus supply of 105 dwellings already identified in the Plan.
 - It reserves the right to make further verbal comments on viability at the relevant hearing session, once HDC's final Strategic Viability Assessment is available.
13. Miller Homes also has additional comments in respect of the Inspector's other Matters and Questions, which are set out in separate hearing statements.