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Harlow Local Plan  
Examination in Public

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Hearing Statement

on behalf of

Miller Homes

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Matter 3 – Overall Strategy; Harlow & Gilston  
Garden Town – General Principles & Infrastructure

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 3 of the Harlow Local Plan Examination.

## MATTER 3 – OVERALL STRATEGY – HARLOW & GILSTON GARDEN TOWN – GENERAL PRINCIPLES & INFRASTRUCTURE

***Question 3.2 – Is Policy HGT1 to guide the overall development and delivery of the new Garden Town communities justified and would it be effective? Does Policy HGT1 inappropriately seek to set policy for areas beyond the plan boundary? If so how should comprehensive policies for the overall Garden Town be established?***

5. Miller Homes is broadly supportive of Policy HGT1 and particularly Part 1(c) which seeks to deliver approximately 3,350 dwellings at the East of Harlow site, comprising approximately 2,600 dwellings in Harlow District and 750 dwellings in Epping Forest District. This is consistent with Miller Homes' emerging plans for the site.
6. However, Miller Homes objects to the following criteria in Policy HGT1:

### Part 2(c)

7. It is accepted that a supporting statement is necessary to set out sustainable long-term governance and stewardship arrangements for the community assets on-site, including green infrastructure, public realm, community facilities and other relevant facilities. However, there is no need for this supporting statement to be provided prior to the submission of an outline planning application as required by Part 2(c). Indeed, Miller Homes will not be in a position to make such a statement until further details are available on the scale of provision required and what the management and maintenance liabilities are likely to involve. Therefore the first line in Part 2(c) should be revised to read "Prior to the commencement of development, developers must submit a supporting statement..." This change is necessary to ensure that part 2(c) is the most appropriate strategy when considered against the reasonable alternatives – i.e. to be "justified".



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Part 2(d)

8. This expects proposals to accord with the Harlow and Gilston Garden Town Spatial Vision and Design Charter, now named the Harlow and Gilston Garden Town Vision (HEBGT2) and Design Guide (HEBGT3). However, Miller Homes objects to this policy requirement on the basis that the Design Guide (HEBGT3) contains two errors in respect of East of Harlow.
9. First, page 43 of HEBGT3 notes that road access will come from Moor Hall Road and Hobbs Cross Road. This is misleading, as the main access strategy for East of Harlow does not rely on either of these existing roads. Three potential points of vehicular access are being planned, including: one at Mayfield Farm; another from the new M11 J7A link road roundabout (known as The Champions Roundabout); and, the third to the south via HDC's depot site adjacent Gilden Way. No vehicular access is planned via Moor Hall Road or Hobbs Cross Road, other than to serve existing properties / land and potentially some limited frontage development. Detailed junction designs are being considered to prevent vehicles from the new development (with the exception of some limited frontage development) using these routes.
10. Second, the diagram on page 42 of HEBGT3 suggests that land to the north of the M11 J7A link road (i.e. in Epping Forest District) is "only to be developed for potential hospital relocation". Although Miller Homes has reserved this land for the potential relocation of the Princess Alexandra Hospital (PAH), if for any reason the PAH does not relocate here, this land could accommodate residential uses or other forms of development consistent with the overall strategic allocation at East of Harlow. Certainly it would be premature to rule out the possibility of other uses here (in the event that PAH does not relocate) or elsewhere on the northern part of the site, prior to the preparation of a collaborative Strategic Masterplan Document.
11. For these reasons, pages 42 and 43 of the Design Guide (HEBGT3) should be amended to correct the two issues described above. This will ensure that Policy HGT1(2)(d) is effective (i.e. deliverable over its period) and justified (i.e. the most appropriate strategy when considered against the reasonable alternatives).

Part 2(k)

12. This refers to developing specific parking standards for the Garden Town. Miller Homes supports this approach, but requests that "... in collaboration with the development industry..." is added prior to "... which recognise that car ownership..." to ensure that unrealistic or undeliverable parking standards are not forced on the new Garden Town Communities, via Policy HGT1(2)(k). This amendment is necessary to ensure that the Plan is effective (i.e. deliverable over its period).

***Question 3.6 – Do Green Wedges and Green Fingers have different roles? Are the proposed deletions from the Green Wedges justified? Are the additional areas proposed for Green Fingers justified? Would the policies to prevent inappropriate development in Green Wedges and Green Fingers be effective? Is the definition of permissible development in Policy PL4 justified and is it sufficiently clear? Should small-scale be more clearly defined?***

13. Policy PL4 relates to Green Wedges and Green Fingers, and limits uses in such areas to: (a) small-scale development; (b) essential infrastructure and local transport infrastructure which must demonstrate a requirement for the location; (c) replacement buildings that are not more harmful than



the buildings they replace; or, (d) strategic infrastructure development which has a wider community benefit. Additionally, such development must: (e) demonstrate that the role and function of the Green Wedge or Green Finger is not adversely affected; and, (f) enhance the landscape, promote biodiversity and integrate with existing green infrastructure.

14. Although Miller Homes agrees with the broad principle of safeguarding the Town's Green Wedges and Green Fingers, this policy is too restrictive and arguably more so than the Green Belt policies set out at paragraphs 87-91 of the NPPF. Green Belt is the strongest form of planning policy protection against major development on open land and therefore HDC's Green Wedge and Green Finger policy should represent a step-down from Green Belt policy.
15. For example, the Town's existing Green Wedges already accommodate a number of social clubs, sports clubs, schools (including their extensive playing fields), allotments, public open spaces and other uses which respect the role and function of the Green Wedges.
16. Therefore, to be consistent with national policy and the most appropriate strategy when considered against the reasonable alternatives (i.e. justified), Policy PL4 should be amended to allow the above uses in the Town's Green Wedges and Green Fingers.
17. There also may be merit in providing greater flexibility, either in Policy PL4 or on the Proposals Map, to alter the alignment of the new Green Wedge at East of Harlow, in the event that the subsequent Strategic Masterplan stage raises any good reasons to do so.

***Question 3.8 – Are the infrastructure requirements listed in Policy SIR1 necessary and justified? How would they be delivered? Would there be any adverse impacts?***

***1. North-South Sustainable Transport Corridor and River Stort Crossing to Eastwick Roundabout***

***2. East-West Sustainable Transport Corridor***

***3. Second River Stort Crossing at River Way***

***4. Access Route for Strategic Housing Site East of Harlow – covered in Matter 4***

***5. Cemetery Extension***

***6. New Allotment Provision***

18. Policy SIR1 refers extensively to an Infrastructure Delivery Plan (IDP) which it claims: has been prepared for the Harlow area; prioritises infrastructure projects required in the Local Plan period; and, sets out funding mechanisms and lead agencies responsible for their delivery.
19. However, at the time of writing, the Garden Town IDP has not yet been finalised and published. Miller Homes has seen a draft of the IDP, including an outline of the required transport and highway measures, and funding apportionment. But few details have been provided to date on how such apportionment has been calculated or whether other schemes will be added to the IDP list. Accordingly Miller Homes reserves the right to make further verbal comments at the hearing session, once the final Garden Town IDP has been published.
20. It is noted that the Harlow and Gilston Garden Town Sustainable Transport Corridor Strategy (HEBGT4a) was published in February 2019 and seeks to provide more information on the Sustainable Transport Corridors identified in Policy SIR1. Although HEBGT4a is helpful in providing high level plans and costings for the Sustainable Transport Corridors, including the East-West Sustainable Transport



Corridor which will provide connectivity to the Town Centre, further detail will need to be worked up to understand the specific master planning and cost implications for the East of Harlow site. In particular and in the absence of a final version of the Garden Town IDP, it is not clear whether the draft proportion of costs the site will be expected to bear for the new East-West Corridor and the new Town Centre Interchange are justified.

***Question 3.9 – Should wastewater infrastructure and new schools provision be included in this Policy?***

21. Miller Homes would not support the inclusion of any additional items in Policy SIR1, unless justified by a final published version of the Garden Town IDP which has been subject to consultation with the development industry.

**SUMMARY**

22. 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.
23. This Hearing Statement supplements representations made in July 2018. In particular:
- It supports the site allocation in Policy HGT1 for approximately 2,600 dwelling at East of Harlow.
  - It raises detailed objections to Policy HGT1 in respect of: the need for a long-term governance and stewardship arrangements statement, prior to the submission of a planning application; the Harlow & Gilston Garden Town Design Guide which contains two errors when referring to the East of Harlow site; and, the importance of consulting the development industry when preparing new parking standards.
  - It seeks changes to Policy PL4 to widen range of uses permitted in the Town's Green Wedges.
  - It reserves the right to submit further comments at the Matter 3 hearing session in respect of Policy SIR1 and the apportionment of infrastructure costs, once the Garden Town IDP has been finalised and published.
24. Miller Homes also has additional comments in respect of the Inspector's other Matters and Questions, which are set out in separate hearing statements.