

---

# EXAMINATION STATEMENT – MATTER 3

## Harlow Local Development Plan

Representations on behalf of  
Redrow Homes

March 2019

**EXAMINATION STATEMENT – MATTER 3**

**HARLOW LOCAL DEVELOPMENT PLAN**

**REPRESENTATIONS ON BEHALF OF  
REDROW HOMES**

**MARCH 2019**

<b>Project Ref:</b>	28775/A3
<b>Stratus</b>	Final
<b>Issue/Rev:</b>	01
<b>Date:</b>	05 March 2019
<b>Prepared by:</b>	DM
<b>Checked by:</b>	HE
<b>Authorised by:</b>	HE

Barton Willmore  
The Observatory  
Castle Hill Drive  
Castle Hill  
Ebbsfleet  
Kent  
DA10 1EE

Tel: 01322 374660  
Email: [david.maher@bartonwillmore.co.uk](mailto:david.maher@bartonwillmore.co.uk)

Ref: 28775/A3/DM/cg/kf  
Date: 05 March 2019

**COPYRIGHT**

The contents of this document must not be copied or reproduced in whole or in part without the written consent of Barton Willmore LLP.

All Barton Willmore stationery is produced using recycled or FSC paper and vegetable oil based inks.

## **CONTENTS**

	<b>PAGE NO.</b>
<b>1.0 INTRODUCTION</b>	<b>01</b>
<b>2.0 RESPONSE TO MATTER 3 – HARLOW &amp; GILSTON GARDEN TOWN</b>	<b>02</b>

## 1.0 INTRODUCTION

- 1.1 This Statement has been prepared by Barton Willmore LLP on behalf of our Client, Redrow Homes, who has an interest in land to the south of Moor Hall Road, hereafter referred to as “the Site”.
- 1.2 The Site forms a land parcel and is located within the wider Strategic Housing Allocation to the East of Harlow (ref. HS3) in the submitted Local Plan. The allocation provides for 2,600 No. dwellings and associated infrastructure as forming one of the new Garden Communities in the Harlow and Gilston Garden Town.
- 1.3 Representations have been made on behalf of our Client during the production of the Local Plan. Our representations to the Reg 19 Pre-Submission Publication Local Plan were supportive of the Plan (and the Site allocation), however, we sought to provide commentary on some areas of the Plan for which we did not consider to be sound. These aspects are addressed again in matter statements to the Examination of the Local Plan.
- 1.4 Notwithstanding the land interests of our Client, these representations have been prepared in recognition of prevailing planning policy and guidance, in particular the National Planning Policy Framework (NPPF) and Planning Practice Guidance (PPG).
- 1.5 The Local Plan was submitted during the period for when transitional arrangements for applying the 2012 NPPF were in place. Reference is therefore made to the 2012 NPPF in responses to the Inspector’s questions, unless otherwise stated. These representations respond to the Inspector’s questions within Matter 3 and have been considered in the context of the tests of ‘Soundness’ as set out at Para 182 of the NPPF which requires that a Plan is:
- **Positively Prepared** – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where reasonable;
  - **Justified** – the plan should be the most appropriate strategy, when considered against the reasonable alternative, based on proportionate evidence;
  - **Effective** – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities;
  - **Consistent with National Policy** – the plan should enable the delivery of sustainable development in accordance with the policies in the NPPF.

## 2.0 RESPONSE TO MATTER 3 – HARLOW & GILSTON GARDEN TOWN

**Topic: Overall Strategy; Harlow & Gilston Garden Town – General Principles & Infrastructure.**

***Question 3.1 – Is the overall spatial vision and spatial development strategy for Harlow to form the focus of the Harlow and Gilston Garden Town well considered, justified and would it be effective?***

***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?***

- 2.1 Our response on this matter is aligned with our response to Matter 4 with regard to the site at East of Harlow.
- 2.2 Policy HGT1 sets out a number of design, development and phased delivery criteria (a – n) for each of the proposed four Garden Towns (inc. East of Harlow).
- 2.3 Redrow broadly supports these criteria, aside from criteria (d) which requires:

**A Strategic Master Plan must be developed for each of the Garden Town Communities in accordance with the Harlow and Gilston Garden Town Spatial Vision and Design Charter and have regard to the original guiding principles established by Sir Frederick Gibberd's Master Plan for Harlow including the Green Wedge network.**

- 2.4 As per our response to Matter 4, there is current uncertainty with regard to the status and weight to be attributed to the "Harlow and Gilston Garden Town Design Guide" (November 2018) as it has not been the subject of formal public consultation/testing. This uncertainty has the potential to delay development.
- 2.5 From our response to Matter 2, it is clear that there is a pressing need for sites to come forward in the short-term (in the first five years of the Plan). In this context, the Redrow parcel within the wider East of Harlow allocation could come forward as an individual proposal in the short-term. This would contribute to ameliorating the five-year housing land supply, as detailed in our Matter 2 statement.
- 2.6 It is therefore recommended that criteria d. of the policy is deleted to ensure it is sound.