
EXAMINATION STATEMENT – MATTER 4

Harlow Local Development Plan

Representations on behalf of
Redrow Homes

March 2019

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HARLOW LOCAL DEVELOPMENT PLAN

**REPRESENTATIONS ON BEHALF OF
REDROW HOMES**

MARCH 2019

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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 4 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 4 – STRATEGIC SITE EAST OF HARLOW

Topic: Strategic Site East of Harlow.

Question 4.3 – Are the main elements of the development clear, including the elements required in Harlow as opposed to Epping Forest? Is a single masterplan required for the whole site?

Question 4.10 – Does Policy HS3 provide sufficiently clear guidance for the development of the site? If not, how should it be amended?

Question 4.11 – What is the landownership situation? Is it realistic for all 2,600 dwellings to be built out during the Plan period? What is the timetable for development – when would work commence, when would completions come on stream and how many dwellings would be built per annum at peak delivery?

Garden Town Charter

- 2.1 Redrow has interests at land south of Moor Hall Road and east of the Windmill Fields development. The parcel is located within the wider Strategic Housing Site East of Harlow (Policy HS3) for which Redrow broadly supports. The Redrow parcel is able to come forward for development on an individual basis (in the short-term) or as part of the wider allocation.
- 2.2 Policy HS3 requires the developers to produce a Masterplan based on the Garden Town Charter in partnership with the Council and other stakeholders (Epping Forest DC, East Herts DC, the local community, infrastructure providers and statutory bodies) and to comply with a set of criteria labelled a) - i).
- 2.3 Redrow supports the majority of the criteria applied (b - i), however, it does not currently support the necessity for the Masterplan to be based on the Garden Town Charter.
- 2.4 Harlow Council published the "Harlow and Gilston Garden Town Design Guide" (November 2018). Redrow does not necessarily object to this document, however it has not been involved in its conception. Moreover, the document has not been the subject of formal public consultation/testing, notwithstanding consultation "events" being held in July 2018.

- 2.5 The status of the document and the weight to be attributed to it is unclear at the current time. This may have the effect of potentially delaying delivery of the allocation site and from our submissions under 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). The Redrow land is able to come forward in the five-year supply period and the need to wait for the Garden Charter could unnecessarily delay this. It is therefore recommended that criteria a. is deleted from the policy to ensure it is effective and sound.

Phasing

- 2.6 Redrow welcomes the reference to part/phased development at the allocation site within Policy HS3. This would have the benefit of allowing different developers to come forward concurrently, thus accelerating delivery.
- 2.7 The Redrow land parcel could come forward as an individual parcel in advance of significant infrastructure works (e.g. new Junction 7a on M11) and this would contribute to meeting the short-term housing needs / five-year supply of land. In this context, the Redrow Site could secure appropriate mechanisms (S106 obligations) towards contributions to upgrades in the longer term and the proposals would not prejudice delivery of the wider allocated site.
- 2.8 For the same reasons addressed earlier, Redrow does not (currently) support the requirement for the part/phased development to be assessed on the Garden Town Charter. To reiterate, this relates to the uncertainty regarding the Garden Town document (and thus potential delays in terms of delivery).
- 2.9 It is therefore recommended that this aspect of the policy is deleted to ensure it is sound.