



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

**Statement of Case  
Matter 6**

**Produced for  
Princess Alexandra Hospital NHS  
Trust**

**March 2019**

**Lawson Planning Partnership Ltd**

882 The Crescent  
Colchester Business Park  
Colchester  
Essex CO4 9YQ

01206 835150  
[www.lpppartnership.co.uk](http://www.lpppartnership.co.uk)

# Statement of Case

Harlow District Council: District Local Plan 2011-2033: Examination in Public

Produced for Princess Alexandra Hospital NHS Trust

<b>Version</b>	Draft	Final
<b>Date</b>	1/03/2019	6/03/2019
<b>Details</b>	Statement of Case	Statement of Case
<b>Prepared by</b>	Kathryn Oelman BSc (Hons), MSc, MRTPI Associate Director	Kathryn Oelman BSc (Hons), MSc, MRTPI Associate Director
<b>Signed</b>		
<b>Reviewed by</b>	John Lawson BA (Hons), MPhil, MRTPI Managing Director	John Lawson BA (Hons), MPhil, MRTPI Managing Director
<b>Signed</b>		

## COPYRIGHT

The contents of this document must not be copied or reproduced in whole or part without the written consent of the Lawson Planning Partnership Ltd. Content is the copyright of Lawson Planning Partnership – © Lawson Planning Partnership. All rights reserved. Any redistribution or reproduction of part or all of the contents in any form is prohibited other than the following:

- you may print or download to a local hard disk extracts for your personal and non-commercial use only;
- you may copy the content to individual third parties for their personal use, but only if you acknowledge Lawson Planning Partnership as the source of the material

You may not, except with our express written permission, distribute or commercially exploit the content. Nor may you transmit it or store it in any other way or other form of electronic retrieval system.

## Contents

	<b>Page No</b>
1. Introduction	3
2. Background	3
3. Matter 6: Other Housing Allocations – Policy HS2 Sites	4

## Appendix

Appendix 1	PAH Site Location Plan
Appendix 2	PAH Existing Site Indicative Development Framework

## 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). The statement addresses Matter 6 concerning the draft housing allocation on the existing PAH site under Harlow District Council (HDC) local plan policy HS2.
- 1.2 PAH operates the Princess Alexandra Hospital 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 submitted to HDC by LPP dated 4<sup>th</sup> July 2018 on the Local Plan Submission Document covering the following matters:
- a) Support in principle for Policy HS2 which allocates the existing estate for housing.
  - b) A request for the indicative numbers of dwellings on the site to reflect a recent site planning exercise, suggesting capacity should be reduced by 200 dwellings to approximately 450.
  - c) A request for an equivalent level of policy support to be provided if PAH pursues its alternative option; which is to redevelop the existing site for acute and general healthcare purposes supported by a masterplanning exercise.

This Statement addresses the Inspector's matters and questions relating to points a), b) and c) above.

## 2. Background

- 2.1 Since representations were submitted in early 2018, PAH has undertaken substantial additional work to inform its Strategic Outline Case (SOC) and subsequent Outline Business Case (OBC) concerning identification of preferred development, and location options, for improved acute and general hospital services covering the Harlow area.
- 2.2 PAH has essentially identified two shortlisted development options: i) to redevelop or part redevelop/part refurbish the existing hospital campus located off Hamstel Road and ii) relocate to a green field site within East Harlow (in line with emerging Local Plan Policy SP5.3 of the Epping Forest District Local Plan). All other development options and scenarios have been discounted at this stage.
- 2.3 Following an options evaluation process in line with Treasury Green Book guidance, the PAH Board will determine the preferred way forward at its meeting to be held on 7<sup>th</sup> March 2019 for the provision of new and improved core-hospital services. The Planning Inspector will be appraised of this decision as soon as practicable after this date.
- 2.4 Subject to Board approval, the preferred development option will be taken forward to OBC and Full Business Case (FBC) stages with a view to implementation within a 5-year period. However, even if the Board's decision on 7<sup>th</sup> March indicates a preference for the hospital relocation option, until Treasury funding is awarded and planning permission granted, the need to retain the existing site option as a fall back cannot be completely discounted.
- 2.5 This Statement therefore, provides an update of PAH's position explained in the context of the relevant Matters and Questions to be raised at the Examination in Public hearings concerning the draft HDC Local Plan in the event of either of the two shortlisted scenarios being preferred.

### **3. Matter 6: Other Housing Allocations – Policy HS2 Sites**

**Are the other housing allocations listed in HS2 the most appropriate when considered against any reasonable alternatives in the light of current use, site constraints, infrastructure requirements and potential impacts?**

**Do the sites meet the NPPF definition of either being deliverable or developable during the plan period?**

**Are the estimates of site capacity justified? Does the plan provide sufficient guidance to secure suitable development on each site?**

**Princess Alexandra Hospital – are plans for relocation sufficiently certain to secure suitable development on each site?**

#### **1. Princess Alexandra Hospital**

- 3.1 In the event that PAH Board approval is given to pursue the hospital relocation option to the strategic development site in East Harlow (in line with Policy 5.3 of the draft Epping EFDC Local Plan), the existing site at Hamstel Road, would become mostly surplus to healthcare requirements. The Derwent Centre, which is owned and operated by a separate Mental Health NHS Trust may be retained in situ if it does not relocate with the main hospital function (see areas identified on the plan forming Appendix 1). Following this scenario, the surplus areas would form a suitable site for housing as identified in the draft Harlow Local Plan.
- 3.2 The Hamstel Road site lies adjacent to residential areas to the east, west, north and part south, whilst the edge of the Town Centre lies within close proximity to the south east. The site includes Pardon Hall a Grade II listed building, which previously had planning permission and listed building consent (now lapsed) for a residential conversion to apartments in addition to new dwellings in the grounds. The site also contains a scheduled monument, protected trees and water mains which run through at the southern end. Notwithstanding these constraints, the hospital site contains significant areas of hospital accommodation and areas of hard surfacing, which would be ripe for redevelopment.
- 3.3 The on-site constraints and opportunities have been considered as part of a site planning exercise undertaken by PAH, which informed the preparation of an Indicative Development Framework Plan (see plan attached at Appendix 2). An earlier version of this plan (submitted with PAH's representations in July 2018) was discussed with planning officers and refined as a result of comments received, concerning the need for improved permeability and defensible space. It is also considered that suitable infrastructure can be provided to support the development of the site and the existing water mains may either be planned round in situ as shown on the Development Framework plan, or diverted as agreed in principle with Affinity Water.
- 3.4 It is therefore, considered that in the event the Hospital relocates to East Harlow, the current site would be a highly suitable and sustainable residential development location with or without the retention of the Derwent Centre. The proceeds of any sale on PAH property would also contribute to funding the re-provided hospital, which forms part of the PAH's Business Case.

- 3.5 It should also be appreciated that in the event a hospital redevelopment in situ option is taken forward, it is likely that a significant area of land would still become surplus to healthcare requirements, which could then be redeveloped for housing. Feasibility work undertaken by PAH to date indicates that in excess of 100 homes could be delivered in this way, which would also be the subject of a more detailed masterplanning exercise.
- 3.6 With the above in mind, the main planning policy issues to consider relate the timing of the potential redevelopment for housing taking place and certainty levels (taking account of NPPF guidance on strategic 15-year policies and related deliverability and developability considerations) and the need for further planning policy flexibility to allow for a potential hospital redevelopment in situ scenario. To address the Inspector's related questions, the housing capacity of the site additionally needs to be considered further.
- 3.7 As explained, in the Background section to this Statement, a decision by PAH Board will be made on its preferred development option on 7<sup>th</sup> March 2019 and the Inspector will be appraised of the decision soon after this date.
- 3.8 In the event the Board elects to relocate the hospital to the East Harlow site, further technical work will be undertaken to establish the deliverability of this option through PAH's Business Case process. Again, if this option is pursued, PAH will rely on the redevelopment of the current site for housing.
- 3.9 Taking account of the constraints and opportunities of the site, the development capacity is likely to be approximately 400 to 450 dwellings as indicated on the attached Indicative Framework Plan. This is based on a gross site area of 11.42 hectares (excluding the Derwent Centre) and a net developable area of approximately 8.2 hectares, which equates to an overall density of 51 dwellings/hectare.
- 3.10 This overall density allows for a mix of house types including approximately 50% of units within apartment blocks as indicated on the Development Framework Plan. Again, this matter was discussed with the Council's policy planners in 2018, when it was agreed that the overall layout and density would be appropriate for this transitional location situated between the town centre and existing residential suburbs.
- 3.11 A higher density would require a greater proportion of apartments and likely shortfalls on levels of amenity space and car parking provision, which could create deliverability and viability issues. It is understood that the 650-unit figure referred to in draft Local Plan Policy HS2 was based on an earlier high-level study undertaken by Aecom, which assumed a higher net developable area of 10.77 hectares whilst applying a density range of 40 to 60 dwellings per hectare, with the higher density range being selected.
- 3.12 If the correct lower net developable area is used with a mid-point density figure of approximately 50 dwellings per hectare, a capacity figure of approximately 415 units is arrived at as illustrated on the Plan at Appendix 2. If the Derwent Centre (covering approximately 0.77 hectares) is included, the overall site capacity extends to approximately 450 units, which is considered to be a more realistic upper housing level in this instance.
- 3.13 Notwithstanding the planning merits of redeveloping the site for housing, PAH requires policy recognition and certainty to address a hospital redevelopment in situ scenario, as referred to in the representations.
- 3.14 It is therefore, considered that the PAH site warrants a separate site-specific policy that allows for an 'either/ or' scenario, along the following lines:

### Princess Alexandra Hospital

- In the event that the Princess Alexandra Hospital is relocated to the allocated strategic development site at East Harlow, as identified in the Epping Forest Local Plan, land at Princess Alexandra Hospital may be redeveloped for housing with a capacity of up to approximately 450 homes; and
- In the event that the Hospital is not relocated and remains in situ, the redevelopment of the site for healthcare purposes will be supported, which should be taken forward in accordance with an agreed masterplan for the site to be prepared by the Hospital Trust.

3.15 The first part of the above suggested policy is a derivation of the site allocation included in the draft Local Plan at Policy HS2, whereas the second part is an adaptation of saved Policy CP4 contained in the adopted Local Plan.

3.16 Alternative approaches would be to retain the draft housing allocation only. However, this would not provide PAH with sufficient certainty over a hospital redevelopment in situ option. Likewise, if the site-specific housing policy element was dropped, reliance on a windfall housing scenario would also not provide sufficient planning policy guidance and certainty to base a robust Business Case on.

3.17 In terms of timing over the implementation of a hospital and related housing development, current estimates indicate that the relocation option would allow for development within the next five years, whereas, redevelopment in situ is more likely to be phased over a longer 5 to 10-year period. **It is therefore, concluded that** plans for the development of the hospital are sufficiently certain to warrant a suitable planning policy basis as suggested in this Statement.



## Appendix 1: PAH Site Location Plan



Princess Alexandra Hospital Site, Harlow  
Site Location Plan















## **Appendix 2: PAH Existing Site Indicative Development Framework**

# Redevelopment Appraisal of Princess Alexandra Hospital Site, Harlow

## Indicative Development Framework

-  New build housing
-  New build apartments
-  Listed Building converted to flats
-  Existing health facilities retained
-  Existing trees / woodland retained
-  Open space / public realm areas
-  Existing pedestrian / cycle ways
-  New pedestrian / cycle links
-  Water main easement corridor
-  Site boundary



NORTH

Scale 1:2500 approx. @ A3 size

Lawson Planning Partnership Ltd.

November 2018 - Plan No. : 219/SK2C

