

GR/CAM.0262

29 January 2018

Planning Policy Team
Epping Forest District Council
Civic Offices,
323 High Street,
Epping,
Essex CM16 4BZ

Dear Sirs

Epping Forest Submission Draft Local Plan Consultation 2018
Land at Latton Park, London Road, South Harlow
Response on behalf of Martin Grant Homes and Harcourt Developments

Thank you for this opportunity to submit comments in relation to the Epping Forest District Draft Local Plan. We submit comments on behalf of our clients Martin Grant Homes and Harcourt Developments who have land interests at Latton Park, London Road, Harlow within the administrative boundary of Epping Forest. The LPA reference for this site is SR-0092.

Comments have previously been submitted to Epping Council and Harlow Council (due to the cross-border connections) regarding the availability of this site during the previous Local Plan stages. These previous comments remain valid and should be read in conjunction with these comments.

We have completed the appropriate forms and submit these accordingly.

Draft Policy SP2

Legally compliant – Yes

Duty to Cooperate compliant – No

Sound – No

If not sound, on what grounds? – Justified

Effective

Consistent with National Policy

Draft Policy SP2 sets out that approximately 23 hectares of new employment land will be provided through the Local Plan as well as the protection and enhancement of existing employment sites.

This policy is informed by the 'Employment Land Supply Assessment' (Arup, December 2017) which reviewed all the available employment sites in the District as well as the West

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Essex and East Hertfordshire Assessment of Employment Needs (Hardisty Jones Associates October 2017) which reviewed the employment needs within the Functional Economic Market Area (FEMA).

The West Essex and East Hertfordshire Assessment of Employment Needs reviews the employment needs across the four Districts in the FEMA and sets the employment provision for each Local Plan. In this report, it is noted that the baseline forecasting model has changed over the course of the period of the study. The East of England Forecasting Model (EEFM) 2016 update took into account a number of substantive changes when compared with the EEFM 2014. In particular, the spatial distribution of forecast employment growth was very different and there was substantial adjustments to the sector growth forecasts. However, all four Councils in the FEMA agreed that the spatial distribution of future employment change within the 2016 EEFM was inconsistent with the evidence and a moderated baseline should be constructed.

It would appear that this moderated baseline is inconsistent with the SHMA OAN update (July 2017 which indicates a level of workforce growth far beyond that required to meet the demands of the moderated baseline. Therefore, it is considered that the preferred scenario of employment growth as set out in the FEMA report (October 2017) is inadequate and remains 2,100 jobs below the level required to balance the labour market. The FEMA report considers that this additional provision may be accommodated through increased job densities and/or windfall development.

However, it is considered that there is an opportunity to allocate additional employment sites as part of the Local Plan process to improve certainty and to ensure that sustainable employment sites which meet the economic needs of each District are identified in the right locations and come forward within the plan period.

Whilst it is acknowledged that Epping Forest Council is identifying land to meet the economic requirements in the FEMA, albeit these may be inadequate as set out above, it is considered that there is an over-reliance on the role of existing employment areas to accommodate future needs. Paragraph 2.50 of the Local Plan explains that for the FEMA "*approximately half of the future accommodation needs will be provided through the regeneration of existing office and industrial sites.*" It is unclear if evidence exists which demonstrates how the role of existing employment areas can meet the future economic needs and requirements of the FEMA and what proposals are in place to ensure the enhancement and regeneration of these areas.

There is an opportunity for the LPA to allocate employment sites, in addition to those already identified in the Local Plan, in order to ensure that there will be a wide-ranging choice of employment uses to meet the diverse future needs of the District and the FEMA. By allocating additional sites, this will provide flexibility in the provision of employment sites and reduce the reliance on existing employment sites to meet future needs which may be higher than those forecasted in the West Essex and East Hertfordshire Assessment of Employment Needs (Hardisty Jones Associates October 2017).

Changes required:

Policy SP2 - Criteria E (ii) to be revised in order to include additional new employment land (more than 23 ha).

Policy E1

Legally compliant – Yes

Duty to Cooperate compliant – No

Sound – No

If not sound, on what grounds? – Justified

Effective

Consistent with National Policy

The Draft Policy E1 relates to Employment Sites and in point B refers to new employment sites and states that “*The Council will meet the identified need for employment sites through new allocations as set out in Policies SP2, SP5 and Chapter 5.*”

The Local Plan lists in table 3.1 the proposed new employment allocations. These comprise only 5 new employment sites. See Table 3.1 below:

Table 3.1 New employment site allocations

Allocation reference	Site Name	Allocated use	Indicative Development Area
LOU.E2	Langston Road Industrial Estate	B2	1 ha
NWB.E4	North Weald Airfield	B1/B2/B8	10 ha
RUR.E19	Dorrington Farm	B1a/B1b	1 ha
WALE.E6	Galley Hill Road Industrial Estate	B2/B8	1 ha
WALE.E8	Land North of A121	B1c/B2/B8	10 ha
Total			23ha

The Employment Land Supply Assessment (Arup December 2017) provides a review of all available employment sites in the District and in table 17 of that report recommends that 19 sites are suitable for employment purposes and should be subject to a further site

selection process to determine which sites are identified as new employment allocations in the Local Plan. Latton Park is included in this list (ref: SR-0092).

There does not appear to be any additional site selection report following the Employment Land Supply Assessment which identified why these 5 sites were preferred when compared with the other 19 sites identified and therefore it is not clear as to why these sites were allocated and not any of the other 19 alternative sites. It is necessary for the LPA to be clear in their justification regarding the site selection process. It is acknowledged that by allocating all 19 sites for employment purposes this would lead to an unnecessary surplus of employment sites. However, there is no clear process as to how the preferred sites were selected and why these were considered more suitable than the other assessed sites. This justification has been requested from the LPA, however, no additional evidence has been forthcoming.

The Employment Review – Final Report (Hardisty Jones December 2017) sets out the economic needs and supply for the FEMA. The report recommends in paragraph 6.3 that it is important to ensure sufficient flexibility in any strategy to respond to unforeseen demand as set out in the NPPF. This will mean offering a range and choice in terms of typology, location, mix and timing of allocated supply. The report concludes that strong accessibility is a key driver to the allocation of new employment sites. Therefore, locations with strong access to the M25, M11 and the Central Line should be a priority. The site at Latton park has good access to the M11 and M25 and would assist in the provision of a flexible supply of employment sites.

The Employment Land Supply Assessment appraises the proposed employment site at Latton Park and concludes that this site is suitable for employment uses and should be considered during the next stage of the site selection process. The report considers that although there is an existing site access, the access arrangements need to be upgraded and enhanced as part of the development proposals. The existing adjacent uses are compatible with proposed employment uses. A copy of the ELSA assessment is attached to these representations.

These conclusions align with our technical work and discussions with Essex County Council Highways with regards to the potential new access arrangements.

These positive conclusions and our discussions with statutory consultees demonstrate that the proposed employment site at Latton Park could form a suitable allocation in the Local Plan. Therefore, it is unclear as to how the site selection process was undertaken which led to only 5 sites being identified and why the site at Latton Park was not included.

The identification of this site as an employment allocation will assist the Council in providing a range of employment uses which meet the need as set out in the West Essex and East Hertfordshire Assessment of Employment Needs (Hardisty Jones Associates October 2017). As stated previously, this report is based on a moderated baseline which may not take into account the full employment needs of the FEMA and therefore additional provision is required to meet future economic demand.

Employment and Commercial Uses at Latton Park, Harlow South

To support the identification of the site at Latton park, Harlow South for employment and commercial uses, we have previously submitted detailed technical information including a

concept masterplan and a transport appraisal. It is understood that this information was reviewed as part of the Employment Land Supply Assessment (Arup, December 2017):

This supporting information clearly demonstrated how this site can be developed for employment and commercial purposes and how it can assist the Council in meeting its aims and objectives for employment growth in the area.

Latton Park is located to the south of Harlow and provides the opportunity to achieve a high-quality business park and associated commercial uses with a potential park and ride facility close to the M11 at the gateway to both Harlow and Epping. The quality of sites to meet modern business needs/aspirations is one of the critical factors in ensuring economic success and attracting inward investment which are the main objectives of the Local Plan.

A Sustainable Gateway Location

The Harlow southern corridor, incorporating London Road/Southern Way, presents the opportunity to establish an identity for both Harlow and Epping Forest by creating a visually attractive gateway to and from the M11 adding to the experience, image and perception of the area.

The allocation of an employment site in this location will assist in meeting the key aims of the Local Plan. The site has good links to Harlow, Epping and the adjoining districts and would be a sustainable location for a significant employment provision which is accessible by public transport including bus, rail and London underground links. There are opportunities as part of the development proposals and a Section 106 agreement to enhance these further including a park and ride facility or a dedicated shuttle bus from the rail and underground stations at Harlow Town, Harlow Mill and Epping.

The site is also closely located to the proposed strategic allocation at Latton Priory (SP5.1). The Strategic Allocation has been identified as a key location for employment provision and the Local Plan Policy SP5.1 requires employment uses to be provided as part of the proposal. Therefore, the provision of an additional employment site adjacent to this strategic allocation will assist the Council in providing for a range of employment opportunities in this key location.

Technical Reports

Initial technical work has been undertaken at the site at Latton Park, including highways, environmental and ecological appraisals and master planning. These documents have been previously submitted to the Council and their technical advisors to assist in their assessment of this site.

The conceptual masterplan sets out how the site can be developed for a high-quality employment area and the opportunities to provide other associated uses such as hotel and leisure. The main access route is proposed from the M11 roundabout as set out in the WSP Transport Appraisal with opportunities for a secondary access from the A414 and other infrastructure improvements such as cycle and pedestrian links.

The masterplan provides significant buffers for the protected areas adjacent to the site including the ancient woodland at Latton Park.

The initial environmental assessment including landscape, ecological and archaeological work has not highlighted any constraints which will prevent this site from coming forward.

Changes required:

Preamble to policy in paragraphs 3.37-3.49 to include justification as to why employment sites have been selected when compared with other available sites.

Table 3.1 – to include reference to Latton Park Employment site (SR-0092). See below:

Allocation reference	Site name	Allocated use	Indicative Development Area
LOU.E2	Langston Road Industrial Estate	B2	1 ha
NWB.E4	North Weald Airfield	B1/B2/B8	10 ha
RUR.E19	Dorrington Farm	B1a/B1b	1 ha
WAL.E6	Galley Hill Road Industrial Estate	B2/B8	1 ha
WAL.E8	Land North of A121	B1c/B2/B8	10 ha
SR.0092	Latton Park, London Road	B1/B2/B8	18 ha
Total			41 ha

Summary

Draft Local Plan Policies SP2 and E1 do not allocate a sufficient level of new employment sites and over-rely on the role of existing employment sites in meeting the future needs of the FEMA and the District. In order to provide sufficient employment and to meet the wide-ranging need and choice of employment provision in the future, it is considered that the identification of the site at Latton Park for employment and commercial uses in the Local Plan will assist the Council in meeting the objectives as set out in the Local Plan for job and

economic growth in the area as well as the aims and aspirations of the London Stansted Cambridge Corridor Commission.

The LPA has not justified the identification of the 5 sites that have been allocated for employment needs in the Submission Draft Local Plan and therefore it is possible that the site selection process is flawed and unsound.

Our comments can be summarised as follows:

- There is an over-reliance in Policy SP2 on the role of existing employment areas to accommodate future economic needs.
- There is a lack of justification as to how the 5 proposed allocations for employment land were selected and not the remaining 19 sites identified in the Employment Land Supply Assessment (ARUP 2017);
- The site at Latton Park, South Harlow is well related to Harlow and the Enterprise Zone as well as having good links with the M11 and nearby train and London Underground stations.
- This development will provide a key gateway employment and commercial site for both Harlow and Epping Districts.
- The existing evidence base for the Draft Local Plan, including the Employment Land Supply Assessment (ARUP 2017), the SLAA, the SSA (AECOM 2016) and the Green Belt Stage 2 Review provides suitable justification to identify this site for employment and commercial uses.
- The West Essex and East Hertfordshire Assessment of Employment Needs (Hardisty Jones Associates October 2017) is based on a moderated baseline and therefore may inaccurately forecast future economic need. The preferred scenario remains 2,100 jobs below the level required to meet the labour market.
- The Hardisty Jones report (2017) sets out the need to identify more employment sites to meet the aspirations of the FEMA and to balance the projected housing provision. It identifies the need for a flexible supply of employment sites and the need to prioritise those with good access to the M25, M11 and the Central Line.
- The identification of this site for employment and commercial uses will help to achieve the objectives of the London Stansted Cambridge Corridor Growth Commission

We trust this information will be considered as part of the Local Plan. If you require any further information please do not hesitate to contact me.

Yours faithfully

.....Redacted.....

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Associate

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Enc: Employment Land Supply Assessment Extract for Site SR-0092
Representation Forms – Local Plan Policy SP2
Local Plan Policy E1

c.c MGH
Harcourt Developments