

Stakeholder Reference:

Document Reference:

---

**Part A**

---

**Making representation as Resident or Member of the General Public**

| <b>Personal Details</b>       |         | <b>Agent's Details (if applicable)</b> |  |
|-------------------------------|---------|--|--|
| Title                         | Mr      |  |  |
| First Name                    | Matthew |  |  |
| Last Name                     | Skeels  |  |  |
| Job Title (where relevant)    |         |  |  |
| Organisation (where relevant) |         |  |  |
| Address                       |         |  |  |
| Post Code                     |         |  |  |
| Telephone Number              |         |  |  |
| E-mail Address                |         |  |  |

---

## Part B

---

### REPRESENTATION

**To which Main Modification number and/or supporting document of the Local Plan does your representation relate to?**

MM no: 1

Supporting document reference: F. Epping Forest District Council Green Infrastructure Strategy (ED124A-G/ EB159A-G)

**Do you consider this Main Modification and/or supporting document of the Local Plan to be:**

Legally compliant: No

Sound: No

If no, then which of the soundness test(s) does it fail? Positively prepared, Effective, Justified, Consistent with national policy

**Please give details of why you consider the Main Modification and/or supporting document is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance, soundness of the Local Plan or compliance with the duty to co-operate, please also use this box to set out your comments.**

We write with reference to the modification to the Local Plan (LP) proposed by Epping Forest District Council (EFDC) 'SP 5.3 / SP4.3 East of Harlow Approximately 750 homes and potential relocation of Princess Alexandra Hospital 0.5ha for up to 5 Traveller pitches'.

We believe this modification will lead to a great amount of damage to our local environment and as such strongly object to this proposal. Please read below for our reasoning, and while reading our comments please remember this from the UK Government's National Planning and Policy Framework (NPPF):

137. The government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.

Reasoning:

The essential characteristics of the Green Belt is its openness and permanence. As Sheering residents we gain much enjoyment from this beautiful site as it currently is, as it forms part of an attractive landscape near to where people live with lovely views across the open countryside and towards nearby villages made possible due to its openness. This is especially important considering the busy suburban nature of the large nearby town of Harlow.

We currently gain much amenity from the site, since its numerous footpaths and rights of way allow us to use the land for a great deal of recreational activity, such as walking, running and simply taking 'time-out' from busy lives. It is also wonderful to see the abundant and diverse range of wildlife that currently live in this rich habitat. This enriches and preserves our quality of life along with many Sheering and Harlow residents alike.

The proposed modification to the LP would have a devastating impact on the openness of the

Green Belt and would have destroy these essential characteristics. If this modification is approved, that beautiful and accessible environment will be lost to the public forever. Approving this modification will destroy the openness of the Green Belt made up of an attractive landscape close to where people leave, in violation of the NPPF.

According to NPPF, the Green Belt serves 5 purposes:

- (a) to check the unrestricted sprawl of large built-up areas;
- (b) to prevent neighbouring towns merging into one another;
- (c) to assist in safeguarding the countryside from encroachment;
- (d) to preserve the setting and special character of historic towns; and
- (e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

This proposal violates ALL purposes (a), (b), (c), (d) and (e):

(a): Harlow is already a very large town, occupying 7,350/sq mi. and increasing in size annually. In recent years the town has seen considerable enlargement by way of building on the outskirts of the town, thus increasing its size. The Green Belt land in question currently serves the purpose of keeping this very definition of unrestricted urban sprawl under check. Removing Green Belt status will allow Harlow to increase in size with absolutely no restrictions, which is not of benefit to Harlow residents or those of neighbouring towns and villages. Approving this modification will violate purpose (a) of the Green Belt according to the NPPF.

(b): Harlow is very close to the nearby villages of Sheering and Hatfield Heath. The only land that separates the large town from the villages is this Green Belt land subject to this modification which acts as a green buffer. If this modification is approved, development will encroach the countryside that divides the city and villages and the settlements will merge and add to the enlargement of the Harlow UA. Again this is something that is unacceptable and would reduce the quality of life currently provided by the space and openness of the greenbelt. The land in question must retain Green Belt status to stop quiet villages being swallowed up by large towns and cities. Approving this modification will violate purpose (b) of the Green Belt according to the NPPF.

(c): The site is an integral part of the local countryside, and approving this application will set a prescient that it is acceptable to build upon the Green Belt and associated countryside simply to convenience developers and planners, subsequently providing huge amounts of revenue to EFDC. This will with time lead to further development and encroachment. The area in question provides much amenity to residents of both Harlow and Sheering, including 'The Sheering Countryside Walk', ironically developed and marketed by EFDC. The area also has a huge array of wildlife which will almost certainly be lost if the modification is approved. This includes deer, bats, hedgehogs, muntjacs, hares, badgers and a diverse and stunning array of birds, including woodpeckers. It would be a huge loss to quality of life for existing residents if this beautiful countryside was lost to development as a direct result of approving of this modification. Approving this modification will violate purpose (c) of the Green Belt according to the NPPF.

(d) Sheering is a historic village. It has long been surrounded by open countryside and this is part of its character and make-up. To build right up to the village in a continuous band of development all the way to Harlow would remove this special setting and indeed the character of this historic village. Approving this modification will violate purpose (d) of the Green Belt according to the NPPF.

(e) The removal of Green Belt status is a very lazy way of providing new homes in an area such as Harlow that has much depravation and derelict property. This proposal will see the deprived town centre left rotting, with its empty and vandalised office blocks prime candidates to regenerate into dwellings. Redevelopment of the town centre is a much better option as instead of building on beautiful countryside it would provide many new houses and also improve the environment to locals and visitors as well as driving the economy of nearby shops and service providers. It will also ensure this beautiful area of England's countryside is left for the enjoyment of all and to provide amenity to local resident. Approving this modification will violate purpose (e) of the Green Belt according to the NPPF.

Summary:

This modification to the Local Plan clearly constitutes a complete lack of regard to the importance of the Green Belt and it does not comply with the requirements of the NPPF.

Removal of the Green Belt status will lead to inappropriate development causing:

1. A permanent and detrimental loss of the openness of the area that can never be reversed;
2. Unrestricted sprawl from the nearby town of Harlow;
3. Merge the villages of Sheering and Hatfield Heath into Harlow;
4. Encroach the countryside forever;
5. Do nothing to assist with much-needed regeneration and investment of the town of Harlow;

There are no special circumstances that exist to allow approval of this modification and we ask planners to refuse permission for this harmful and damaging proposal in line with the NPPF. If approval is granted despite clear violation of the NPPF a full investigation will need to be conducted to ensure financial gain, bribery and corruption have played no part in allowing development to the detriment of the residents of Sheering, Harlow and Epping Forest District Council.

**Please set out what change(s) you consider necessary to make the Main Modification and/or supporting document legally compliant or sound, having regard to the test you have identified in the question above (Positively prepared/Justified/Effective/Consistent with national policy) where this relates to soundness. You will need to say why this change will make the Submission Version of the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.**

The only way to make the Main Modification legally compliant or sound, in line with NPPF, is to maintain the Green Belt status of the area East of Harlow (SW to Sheering) thus preventing violation of NPPF and local council policy regarding green buffers between settlements, etc.

Signature: Matthew Skeels Date:  
16/09/2021