

Stakeholder Reference:  
Document Reference:

Part A

Making representation as Resident or Member of the General Public

Personal Details		Agent's Details (if applicable)	
Title	Mr		
First Name	David		
Last Name	Weaver		
Job Title (where relevant)			
Organisation (where relevant)			
Address			
Post Code			
Telephone Number			
E-mail Address			

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## Part B

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### REPRESENTATION

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

MM no: 21

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: Yes

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.**

I wish to make a representation with regards to Main Modifications to Epping Forest District Local Plan Submission Version 2017 (LPSV) reference MM21

Specifically, I wish to make representation regarding the proposed change in designation from green belt land to residential site allocation with regards to the land marked as reference SP4.3 map 2.1. As a resident of the district I object to the proposed change in designation on the basis that it is inconsistent in with the proposed revised vision for the district (reference MM8) and the Green Infrastructure strategy for the district.

Loss of Green Belt protection

The Epping Forest District Council (EFDC) Green Belt Review Stage 1 sets out policy C1 General extent of the green belt as follows;

"A Green Belt will be maintained in the south and west of the Plan area. The main purposes of including land within this Green Belt are to:

1. Prevent the outward spread of London's built up area;
2. Prevent neighbouring towns located within the Belt from merging into one another;
3. Assist in safeguarding the open countryside surrounding London from encroachment by urban development;
4. Preserve the setting and special character of historic towns located within the Belt; and,
5. Assist in urban regeneration, by encouraging the recycling of derelict and other land

located within existing urban areas. "

The proposed development would run counter to intents 2 and 4 of this policy by effectively merging the boundaries of Harlow Town and Sheering village and removing the setting and character of Sheering village. The National Policy Planning Framework (NPPF) requires local planning authorities to demonstrate exceptional circumstances to justify any alteration to existing Green Belt boundaries. Although the The NPPF allows for some review in detail of Green Belt boundaries through the Local Plan process, it states that "the general extent of Green Belt's across the country is already established"

Relationship of the proposed development to the proposed vision for the district

The first article of the vision statement sets out the aspiration that "residents continue to enjoy a healthy, happy and good quality of life". The events of the last 17 months have demonstrated more clearly than ever the importance of green space to health and well being, both for individuals and the community at large. However, The proposed redesignation runs counter to this intent by replacing green space with a built environment. The proposed development, by effectively creating contiguous development from Harlow to Sheering will sever the 'green corridor' from the Stort valley to the surrounding area to the west and will re-characterise a number of public rights of way, enjoyed by the local community, that are currently rural in nature to essentially urban footpaths.

Article three of the vision statement sets out the aspiration that "development respects the attributes of the different towns and villages;" The proposed redesignation runs counter to this by failing to respect the village nature of Sheering, and to a lesser extent Lower Sheering by effectively making them contiguous with Harlow town. While no further encroachment is proposed at present, it is not unreasonable to foresee a situation in the future whereby the prior development of the site designated SP4.3, is used to argue in favour of further redesignation of green belt land within the parish, either to the west, north or east of site SP4.3.

Article four of the vision statement sets out the aspiration that "development needs will be met in the most sustainable locations" and article nine sets out that "public transport, walking and cycling infrastructure be promoted to residents of new and existing developments to encourage sustainable travel". However, while map "New Map 2.X - Sustainable Transport Corridors in the Harlow and Gilston Garden Town" suggest that the green belt land redesignated for housing will be supported through a "sustainable transport corridor" this is unlikely to mitigate the sustainability impacts of the development of green belt land a significant distance from the retail centres and travel hubs of Harlow town.

Assuming, given the current lack of detail on the nature of the proposed development, that it does not include a significant retail presence the nearest retail cluster to the northern end of the proposed development adjacent Longlands Bridge is within Old Harlow, a distance of ~2.5 miles. For larger retail facilities, including supermarkets, this distance increases to 3.6 miles to Edinburgh Way and or 5.1 miles to Harlow town centre. These distances are unlikely to be considered walkable or cycle-able for families with children, or in the winter months. Therefore, it is reasonable to assume that the proposed development will lead to an increase in road traffic, including private vehicle use, with a commensurate impact on air quality.

Alternatively, those living at the northern end of the development may favour access to retail in

Sawbridgeworth by car, a distance of approximately ~2.5 miles increasing the traffic volumes on Back lane, Sheering Lower Road, Sheering Mill lane, and Station Road Sawbridgeworth.

It is also unclear how the proposed development will provide sustainable access to travel beyond Harlow. The area proposed for development is currently served by a single bus service that terminates in the centre of Harlow, some distance from either Harlow Town or Harlow Mill stations. Again considering the northern most edge of the development adjacent to Longlands Bridge, this is 4.4 miles from Harlow Town station and 3.6 miles from Harlow Mill.

In both instances this is beyond practicable walking distance, requiring a walk of just under an hour to reach Old Harlow station, which has a limited timetable. Taking this into consideration it is likely that many residents will opt to drive to the station, with a commensurate impact on traffic volumes and air quality, especially at peak travel times. Alternatively those at the northern end of the development may seek to access the nearer Sawbridgeworth station (distance ~1.7 miles) via the undeveloped and narrow 'Back Lane' and Sheering Lower Road, with a consequent traffic increase and impact on the community of Lower Sheering.

There is long established policy by EFDC to retain green belt land as green breaks between urban areas and especially to preserve the definition of our historic villages. Development of this land (and the land to the south as proposed by HDC) would effectively not only mean the complete loss of Churchgate street as a village it would effectively join it to Sheering. Therefore. A significant green belt space must be retained to protect the historic nature of Sheering as a separate village.

The loss of natural habitat and valuable countryside is also of real importance. This land has significant natural beauty and wildlife habitats with water courses from the surrounding higher ground draining into Pincey Brook where the lower lying ground is a flood plain, with the potential for flood risk being increased by the proposed development without significantly altering the nature of the water course. Many species of wildlife from voles, stoats, newts and ground nesting birds; to deer and badgers; birds of prey including, buzzards, kestrels and red kites can regularly be seen here. The Buzzards and Red Kites have already moved north over sheering where they were not seen before which is highly likely due to the loss of their habitat from the development of the M11 J7a link road. Development of the land will further damage the delicate ecosystems that support this wildlife.

**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.**

I propose that part of the land in question could be used for some development under specific condition:

1. The Land north of the J7a link road must be retained as Green Belt to protect the separation of the historic village of Sheering and the delicate natural habit of the flood plain and surrounding fields and woodlands.
2. The land south of the new J7a link road should only be used in conjunction with the new hospital and not for any other purpose without consultation and should be given the status as an area of special restraint

Signature: David Weaver Date:  
19/09/2021