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Epping Forest District Green Belt Assessment: Stage 2

Stage 2 Report
Prepared by LUC
August 2016



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Planning & EIA
Design
Landscape Planning
Landscape Management
Ecology
Mapping & Visualisation

LUC LONDON
43 Chalton Street
London
NW1 1JD
T +44 (0)20 7383 5784
london@landuse.co.uk

Offices also in:
Bristol
Glasgow
Edinburgh



Land Use Consultants Ltd
Registered in England
Registered number: 2549296
Registered Office:
43 Chalton Street
London NW1 1JD
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Executive summary

Epping Forest District is mainly rural, with 92.4% of the District designated as Green Belt. The need to review the Green Belt and potentially release some Green Belt land around settlements to accommodate new development was recognised in a 2012 consultation document on the new Local Plan.

LUC was appointed by Epping Forest District Council (EFDC) in October 2015 to undertake a 'Stage 2' study of the Green Belt within the District. The main aim of the study was to undertake an assessment of the areas immediately adjacent to the District's 22 existing settlements, to identify:

- areas where the Green Belt policy designation should remain;
- any historic anomalies in the existing boundaries; and
- areas where development would be least harmful in Green Belt terms.

A secondary consideration was to identify recommendations for beneficial uses in the Green Belt, such that the Council could create or capitalise on them in due course if appropriate.

This followed a more strategic 'Stage 1' Green Belt study which concluded that all the parcels make a 'relatively strong' or 'strong' contribution against at least one purpose of the Green Belt.

The Stage 2 study involved:

- defining Green Belt parcels for assessment, based on recommendations in the Stage1 Report;
- assessing the parcels against the five purposes of Green Belts;
- identifying small and more significant 'anomalies' in the Green Belt
- checking with neighbouring authorities' Green Belt assessments.

Engagement with Duty to Co-operate partners in Stage 2 took the form of a workshop and feedback on the methodology and key factors affecting the performance of Green Belt land. Engagement with EFDC Elected Members also involved a workshop, following an initial briefing with EFDC Cabinet and a further meeting to discuss the draft findings.

The assessment findings are presented in the **Technical Annex** on a settlement by settlement basis. Each Stage 2 assessment consists of:

- the parcel reference, name and land area (in hectares);
- a conclusion on harm to the Green Belt if land within that parcel were to be released through the Local Plan to accommodate new development, following the framework in Table 3.4 in the main report.
- a summary of the ratings for contribution to Green Belt purposes 1-4 (with colour-coding to aid in easy identification of different levels of rating), noting any significant difference from the Stage 1 findings.
- notes on any potential alternative new Green Belt boundaries within the parcel if a decision were made to release part rather than the entire parcel.

Figure 4.5 indicates the potential level of harm to the Green Belt associated with release of each parcel, taking account of Green Belt purposes 1, 2, 3 and 4. Figure 4.5 shows parcels with moderate to low, very low, or no contribution ratings in or around a number of settlements. In a number of cases the parcels identified as having these levels of potential harm are very small. Some larger parcels around other settlements are identified as making a lower contribution to Green Belt purposes, and these include:

- Three large parcels to the south of Waltham Abbey around the M25, with a further large parcel to the east of the town. This parcel to the east is separated from the existing edge of Waltham Abbey by a different parcel of land
- Two parcels to the immediate west of Lower Nazeing, with a further smaller parcel to the east
- Two parcels to the north and east of Thornwood Common
- Three large parcels to the north, west and south east of North Weald Bassett, with a further parcel to the east of Tylers Green

A total of 34 parcels fall into this category (moderate, low, very low, or no contribution) and these cover a total area of 6.96 km² (which amounts to 2.1% of the District's total area¹).

Given the rural nature of the District, the majority of the District's Green Belt performs strongly against purpose 3 ('to assist in safeguarding the countryside from encroachment'). It is therefore helpful to undertake some 'sensitivity testing' - to look at how the Green Belt performs if purpose 3 is removed from the assessment (and therefore parcels are assessed against purposes 1, 2 and 4 only).

This scenario is illustrated in Figure 4.6. It shows that, in the absence of assessment against purpose 3, more significant parts of the Green Belt are found to make a moderate, low, very low, or no contribution to the Green Belt. A total of 89 parcels fall into this category (moderate, low, very low, or no harm) and these cover a total area of 56.38km² Hectares (which amounts to 16.6% of the District's total area).

Notable changes as a result of the sensitivity testing include:

- All parcels abutting Roydon, Lower Nazing and North Weald fall within moderate, low, very low, or no harm categories
- 8 of 9 parcels around Waltham Abbey fall within low or very low harm categories, compared with a much more varied assessment under purposes 1-4
- However, there are a number of settlements where the sensitivity testing makes very little difference. These include:
 - Harlow, where all but one of the parcels immediately to the west of the town still fall within very high or high harm categories. Only one parcel immediately adjoins the HDC boundary, but in this location links to woodland/open space.
 - Chigwell, where most parcels still fall with the very high or high harm categories, although some smaller parcels on the eastern side of the village now fall within the moderate harm category.

Interestingly, a number of entire small villages and hamlets are identified as making 'very low or no contribution' to Green Belt purposes 1, 2, and 4, including Epping Green, Sheering, Matching, Moreton, Fyfield and Willingale. However, such areas are in very rural locations and other evidence is likely to point to the disbenefits of removing the Green Belt designation from these areas.

This analysis provides a more nuanced picture of how Green Belt performs across the District. As such, it may provide the Council with a better tool and evidence base upon which to make decisions about the performance of Green Belt across the District and those locations where Green Belt release may be more appropriate. However, separate evidence on landscape character and quality will be particularly important – in order to distinguish between areas that are more and less sensitive to development in landscape terms.

A number of minor anomalies were identified; mainly due to extension of gardens / grounds into the Green Belt, which means that the boundary is not always readily recognisable on the ground (as the end of the garden has moved). The presence of these minor anomalies causes no harm to the Green Belt and there is no imperative for the Council to change the boundaries. Indeed, any changes to the boundaries, either to increase or decrease the area of the Green Belt, would require demonstration of 'exceptional circumstances'.

¹ 338.99 km²

Some more significant anomalies, where there is development in the Green Belt that detracts significantly from the purposes of the designation, were also identified.

Almost all land within the District's Green Belt is positively used for agriculture or recreation. The Lee Valley Regional Park, managed by the Lea Valley Regional Park Authority, and Epping Forest, managed by the City of London Corporation, play an important role in maintaining and enhancing positive use of the District's Green Belt.

Government policy requires changes to the Green Belt to be made through the Local Plan process. This should include:

- demonstration of exceptional circumstances, such as unmet housing or employment land needs, that cannot be met elsewhere; and
- consideration of the need to promote sustainable patterns of development, considering a range of local, regional and national issues such as economic growth, health and wellbeing, accessibility and biodiversity, cultural heritage and climate change resilience, as well as an assessment against Green Belt purposes.

The report therefore recommends that EFDC continues to cooperate with neighbouring authorities in considering these points, as part of the Local Plan preparation process. It highlights that Green Belt release, as opposed to a larger number of smaller urban sites, can provide an opportunity for infrastructure provision, including the transport, open space and green infrastructure. It also recommends that the Council prepares outline master plans for areas to be released from the Green Belt, as this would help to engender public confidence and support, as well as mitigate harm to the remaining Green Belt.

The report recommends that no action is taken with regard to the minor anomalies on the basis that making changes to the boundary poses a greater risk of harming the Green Belt than leaving the boundaries as they are. With regard to the major anomalies, it recommends that the Council decides on a case by case basis whether the land should be removed from the Green Belt, taking account of our comments and recommendations in this report.

With regards to increasing positive use of land in the Green Belt, the report recommends that the 'Green Arc' provides a strong strategic context and evidence base and that the Council revisits this draft plan for the Green Arc in the District.

On the basis of current trends, there are likely to be unmet housing needs beyond the plan period. The report therefore recommends that EFDC considers the need for 'safeguarded land'. Where areas of the Green Belt are identified as being suitable for release in this plan period, parts of them may be retained as safeguarded land. The location of such areas should be informed by this study and other evidence.

1 Introduction

Background and study aims

- 1.1 LUC was appointed by Epping Forest District Council (EFDC) in October 2015 to undertake a 'Stage 2' study of the Green Belt within the District. The study was overseen by a Steering Group comprising EFDC planning officers.
- 1.2 The Stage 1 study was undertaken by EFDC officers and the study report was approved as part of the Local Plan evidence base by EFDC Members at a Cabinet meeting on 3 September 2015. The stage 1 study provided a strategic assessment of all of the Green Belt land within the District. Broad parcels of Green Belt land were defined and then assessed against the purposes of Green Belts, as set out in the National Planning Policy Framework (NPPF). The Stage 1 study concluded that all the parcels make a 'relatively strong' or 'strong' contribution against at least one purpose of the Green Belt.
- 1.3 The main aim of the Stage 2 study was to undertake an assessment of the areas immediately adjacent to the District's 22 existing settlements, to identify:
 - areas where the Green Belt policy designation should remain;
 - any historic anomalies in the existing boundaries; and
 - areas where development would be least harmful in Green Belt terms.
- 1.4 Its aim was not to identify land for removal from or addition to the Green Belt. Such decisions will need to be taken in the context of wider Local Plan evidence relating to exceptional circumstances for removing land from the Green Belt (or adding land to it) and the sustainability of spatial development options. It is anticipated that the relative performance of land in Green Belt terms will form part of such a review.
- 1.5 A secondary consideration was to identify recommendations for beneficial uses in the Green Belt, such that the Council could create or capitalise on them in due course if appropriate.
- 1.6 Further information on the background to the study is provided in **Section 2**. A more detailed description of the objectives is set out in **Section 3**.

Meeting the Duty to Cooperate

- 1.7 Section 110 of the Localism Act (2011) describes English Local Authorities' 'duty to co-operate'. The duty:
 - Relates to sustainable development or use of land that would have a significant impact on at least two local planning areas.
 - Requires that councils and public bodies '*engage constructively, actively and on an on-going basis*' to develop strategic policies to address such issues.
 - Requires councils to consider joint approaches to plan making.
- 1.8 Paragraph 156 of the NPPF sets out the strategic issues where co-operation might be appropriate, and includes a number of cross boundary issues that are closely linked to Green Belt.
- 1.9 Both the Stage 1 and Stage 2 studies involved extensive collaboration and engagement with neighbouring authorities. The Stage 2 study included a workshop with officers on the methodology and initial findings, and an additional meeting with Harlow District Council officers.

Structure and content of this report

- 1.10 Section 2 sets out the context for the study, in terms of the national policy context and the evolution and character of the Green Belt in Epping Forest District. It also provides further information on the methodology and findings of the Stage 1 study.
- 1.11 Section 3 describes the study methodology and identifies the parcels of land assessed.
- 1.12 Section 4 summarises out the study findings. The full assessment findings in relation to the performance of Green Belt parcels against the purposes of Green Belts can be found in the **Technical Annex** to this report².
- 1.13 Finally, Section 5 draws overall conclusions and makes recommendations on the next steps.
- 1.14 Where appropriate the report cross refers to the Stage 1 Green Belt study report; this current report should therefore be read alongside the Stage 1 report, as well as the Technical Annex.

² Epping Forest District Green Belt Study Stage 2: Technical Annex, July 2016.

2 Context

National policy on Green Belt land

- 2.1 The NPPF attaches great importance to Green Belts and stresses that their essential characteristics are openness and permanence. It also advises that, once established, Green Belt boundaries should only be altered in exceptional circumstances through the preparation or review of a local plan.
- 2.2 Green Belts serve five purposes, as set out in paragraph 80 of the NPPF:
1. to check the unrestricted sprawl of large built-up areas;
 2. to prevent neighbouring towns merging into one another;
 3. to assist in safeguarding the countryside from encroachment;
 4. to preserve the setting and special character of historic towns; and
 5. to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.
- 2.3 Current guidance therefore makes it clear that the Green Belt is a strategic planning tool designed primarily to prevent the spread of development and the coalescence of urban areas. To this end, land should be designated because of its position, rather than its landscape quality or recreational use. However, the NPPF states *"local planning authorities should plan positively to enhance the beneficial use of the Green Belt, such as looking for opportunities to provide access; to provide opportunities for outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity; or to improve damaged and derelict land"* (Paragraph 81).
- 2.4 It is important to note, however, that these positive roles should be sought for Green Belt, once designated. The lack of a positive role, or the poor condition of Green Belt land, does not necessarily undermine its fundamental role to prevent urban sprawl by being kept permanently open. Openness is not synonymous with landscape character or quality.

The Green Belt in Epping Forest District and the Local Plan

- 2.5 Situated to the northeast of Greater London, Epping Forest District lies at the western side of Essex and abuts the county of Hertfordshire. The District therefore has boundaries with authorities in Hertfordshire (Broxbourne and East Hertfordshire) and London Boroughs of Enfield, Waltham Forest, Redbridge and Havering, as well as its neighbours within Essex (Harlow, Brentwood, Chelmsford and Uttlesford).
- 2.6 Epping Forest District is mainly rural, with 92.4% of the District designated as Green Belt. The majority of residents live in the south west of the District, closer to London, where the settlements include Loughton/Debden, Buckhurst Hill, and Chigwell. Much of the rest of the population is located in the towns north of the M25, including Epping, Waltham Abbey and Chipping Ongar. There are several villages and smaller rural settlements, predominantly towards the north of the District.
- 2.7 The current Epping Forest District Green Belt boundaries were established in the 1980s in the Council's first three local plans. The 1998 Local Plan only introduced very minor changes to the Green Belt. The 2006 Alterations Plan did not make changes to the Green Belt; however it stated the Council's commitment to undertake a comprehensive review of the Green Belt when next preparing a Local Plan to ensure that the long-term development needs within the District are met.

- 2.8 EFDC is currently preparing a new Local Plan for the District, which will have a time horizon for the period up to 2033, and the Council is aiming to publish a Draft Local Plan document for consultation in the autumn of 2016. A number of other technical evidence studies have been carried out or are underway, which will also inform the preparation of the Draft Local Plan that is to be consulted on.
- 2.9 As part of the new Local Plan preparation, consultation on an initial Issues and Options style document known as 'Community Choices' was undertaken in 2012. This document had a section dedicated to the Green Belt and natural/built heritage of the District which highlighted the key issues for consideration with respect to the Green Belt as follows:
- Current Green Belt boundaries were effectively established in the 1980s in the Council's first three Local Plans. The 1998 Local Plan only introduced very minor changes. There will have to be release of some Green Belt land adjoining settlements to meet the needs for housing and employment growth in the period up to 2033.
 - Settlement edge development will change local landscape character.
 - Potential pressure for development of urban green spaces to protect the Green Belt.
- 2.10 Therefore, the need to review the Green Belt and potentially release some Green Belt land around settlements to accommodate new development was recognised in the early consultation document. EFDC's summary report of the consultation³ states that over 6,000 responses were received, and that at the top of the list of most frequently mentioned and important issues raised in the consultation responses were:
- Continuing to protect the Green Belt.
 - Using "brownfield" (i.e. previously developed land) before releasing any Green Belt land for development.
 - Preventing London from sprawling into the District and preventing larger urban areas (e.g. Harlow) from merging with nearby villages (e.g. Roydon).
- 2.11 In relation to the issue of releasing Green Belt land, EFDC's consultation report⁴ noted that a large number of respondents made reference to a need to undertake a "Brownfield Land Review", prior to considering any Green Belt land for development purposes. Paragraph 21 of the consultation report notes that, while EFDC would prefer to use brownfield land first, it is highly likely that some Green Belt land will have to be released to accommodate development needs over the next twenty years. The report states that the Council is committed to minimising the amount of Green Belt land required, and that it would undertake a full and robust review of the Green Belt to ensure that this evidence is available to aid in the eventual selection of development sites.

Summary of the Stage 1 Green Belt study

- 2.12 The Stage 1 Green Belt study provided a strategic appraisal of all of the Green Belt land within the District. Sixty one Green Belt parcels were defined, based on readily recognisable features on the ground and taking account of the District's Landscape Character Assessment (2010) (see **Figure 2.1**).
- 2.13 The contribution of the parcels to the first four Green Belt purposes in the NPPF was then assessed. The fifth purpose *to assist in urban regeneration* was not assessed by EFDC on a parcel by parcel basis in the Stage 1 Review as all parcels were considered to perform equally against this purpose.
- 2.14 The Stage 1 study concluded that all the parcels make a 'relatively strong' or 'strong' contribution against at least one purpose of the Green Belt.

³ <http://www.eppingforestdc.gov.uk/index.php/home/file-store/category/395-community-choices-cabinet-report-summary>

⁴ <http://www.eppingforestdc.gov.uk/index.php/home/file-store/category/394-community-choices-cabinet-report-and-appendix>

Identification of areas for further assessment

- 2.15 As noted above, all parcels at Stage 1 were assessed as making a ‘relatively strong’ or ‘strong’ contribution to at least one Green Belt purpose. However, the Stage 1 analysis identified 18 parcels which were considered not to make a contribution to any Green Belt purposes other than Purpose 3: “to assist in safeguarding the countryside from encroachment”, and stated that these should be investigated in more detail (in whole or in part, as appropriate) at Stage 2. These parcels are listed in **Table 2.1** below (taken from paragraph 5.37 of the Stage 1 review).

Table 2.1 Stage 1 parcels only making a contribution to Purpose 3

DSR005 – North of Sheering
DSR006 – North of Matching Tye
DSR014 – West of Shelley
DSR017 – North East of High Ongar
DSR018 – North of Norton Heath
DSR020 – North and West of Willingale
DSR021 – The Rodings
DSR022 – Nine Ashes
DSR025 – South East of North Weald Bassett
DSR026 – South and North of North Weald Bassett
DSR027 – South of North Weald Bassett
DSR029 – North East of M11/M25 interchange
DSR030 – North and West of Abridge
DSR045 – South East of Epping
DSR046 – East of Epping
DSR047 – Mill Mound East of Epping
DSR048 – East of Coopersale
DSR050 – North, East and South of Thornwood

- 2.16 The Stage 1 report also listed a number of parcels where part of the parcel performed “less well” than the rest of the parcel, and therefore warranting further analysis at Stage 2. These areas are listed in **Table 2.2** below (taken from paragraph 5.38 of the Stage 1 review).

Table 2.2 Stage 1 parcels containing areas that perform less well than the parcel as a whole

DSR011 (East of North Weald Bassett)	The residential development of Tempest Mead is currently located in the Green Belt.
DSR016 (North East of Chipping Ongar)	Residential development appears to have slightly breached the existing Green Belt boundary around the Ongar Leisure Centre. The Fyfield Business and Research Park east of Fyfield Road has also been developed in the Green Belt.
DSR023 (East of Chipping Ongar)	This is a large parcel which stretches from the east of Chipping Ongar to High Ongar and further beyond. The area to the east of High Ongar does not contribute to the fourth purpose of the Green Belt and this parcel should be considered in closer detail in the Stage 2 Review.
DSR034 (North of Hainault Forest)	Abridge Park, which is a residential development south of London Road at the west of Abridge which occurred prior to 1986. It is located within the existing Green Belt boundary and therefore does not contribute to the purposes of the Green Belt.

DSR043 (North of Theydon Bois)	The 'triangular' area east of Dukes Avenue, Theydon Bois and west of the railway line (but south of the visually significant slope) performs very poorly against the second purpose.
DSR044 (South West of Epping)	Although the overall parcel scored 'relatively strong' in relation to the fourth purpose the area South of Ivy Chimneys Road is considered to make 'no contribution' to the fourth purpose.
DSR053 (South of Harlow Common)	Although the parcel was appraised as making a 'moderate' contribution' to the third purpose of the Green Belt the parcel has been encroached by built development (the petrol station off the A414) with other potential existing encroachment at the northwest (housing) and western boundaries (pub, car dealership) which should be considered further in the Stage 2 Review.
DSR057 (Epping Forest – West of Epping Road)	The Green Belt has been encroached towards the north-western boundary (north of the A121, south of the M25 and west of Woodbine Close Park) particularly where a caravan park is in the Green Belt. This area of the parcel makes 'no contribution' to the purposes of the Green Belt.
DSR060 (South of Waltham Abbey)	The overall parcel was appraised as making a 'relatively weak' contribution to the fourth purpose due to the western section of the parcel (Town Mead, Waltham Abbey) which is in close proximity to the historic town however for the southern and eastern section are considered to make 'no contribution' to this purpose.
DSR069 (East of Waltham Abbey & West of Epping)	There is a particularly heavy concentration of encroachment west of Woodgreen Road and east of Waltham Abbey in the form of offices, storage, housing and equestrian related businesses. This area of the parcel performs considerably less well than the rest of the parcel for the third purpose.

- 2.17 In addition to those areas identified in Tables 2.1 and 2.2 above, the Stage 1 review determined a need, in accordance with the NPPF (paragraph 84), to assess in greater detail land with a direct relationship to existing settlements. It was recognised that the analysis at Stage 1 was necessarily strategic and may therefore have disguised smaller areas within the larger parcel which perform differently to the larger parcel overall. As explained further in **Section 3**, the areas recommended in the Stage 1 study for more detailed assessment therefore include:
- Defined zones around all towns, villages and small villages (taking account of the Settlement Hierarchy Technical Paper), amounting to 19 settlements in all.
 - Six selected hamlets.
- 2.18 Areas identified as remote from services and facilities were excluded from further assessment, as described in paragraph 6.5 of the Stage 1 review, because they were considered not to be the most sustainable locations for future development. These were generally areas over 2km from a town, 1km from a large village and 0.5km from a small village (drawn from town centres, local shopping parades and transport nodes). In identifying areas for inclusion in Stage 2, account was also taken of accessibility, based on the Central Line stations (8) and main line rail stations (2) where they exist, as well as bus stops within existing settlements, as identified by the Essex County Council Accessibility Assessment.
- 2.19 Six hamlets were identified for inclusion, as exceptions to this general principle, because:
- Known development management concerns exist around the potential erosion of Green Belt policy (High Beach); or
 - The hamlet is within an area of the District that is in close proximity to a large built up area, where detailed assessment is necessary (Lower Sheering, Epping Green, Sewardstone); or

- The Green Belt currently “washes over” a settlement where the continued designation should be assessed for suitability (Moreton and Willingale).

2.20 Areas of environmental constraint (listed in paragraph 6.3 of the Stage 1 review) were mapped and excluded from further consideration, on the basis that these areas are protected from development as a matter of law, policy or land ownership:

- Strategic Flood Risk Assessment (April 2015) – showing zones 2, 3a and 3b (Zone 1 applies to all land outside of zones 2, 3a and 3b)⁵
- Special Protection Areas (SPA)
- Special Areas of Conservation (SAC)
- Sites of Special Scientific Interest (SSSI)
- Local Nature Reserves (LNR)
- City of London Corporation Epping Forest Buffer land (land owned and managed by the City of London Corporation, which although not a formal part of the Forest, is not available for development).

2.21 The areas identified for further assessment are illustrated in **Figure 2.1**, and the associated settlements are listed in **Table 2.3**.⁶

Table 2.3 Broad locations for further assessment in Stage 2

Settlement	Description
Harlow	2km buffer taken from the District boundary, as to take this from the Town Centre and the stations would not provide a sufficient area of search around Harlow. The identified area is extended to join the area around Lower Sheering, Roydon, Thornwood and Epping Upland to ensure a continuous assessment of the land between settlements. The M11 provides a strong defensible boundary, therefore land to the east of the motorway is not included.
Town	For all towns, 2km buffer from town centre boundaries, Central Line/rail stations (where appropriate) and bus stops within the existing settlement boundaries.
Chipping Ongar	The Green Belt land within the defined buffer is restricted by absolute constraints to the east and north west. The remaining land aligns with Church Lane, Ongar Road (B184) and Herons Lane to the south; and Mutton Row and a watercourse to the west.
Epping	The Green Belt land within the defined buffer is bounded by the M11 to the east, the M25 to the south and absolute constraints to the north and west. The identified area is extended to join the area around Coopersale and Thornwood to ensure a continuous assessment of the land between settlements.
Loughton/Debden	There is a limited amount of land remaining outside of the areas covered by absolute constraints. Given the continuous built nature of Loughton/ Debden and Buckhurst Hill, all land in the Green Belt within the defined buffer has been included for further assessment. The identified area is extended to join the area around Theydon Bois to ensure a continuous assessment of the land between settlements.

⁵ It should be noted that the Environment Agency is reviewing climate change allowances for flood risk and therefore areas constrained by flood risk are likely to increase in size in the future.

⁶ This is reproduced from Figure 17 in the Stage 1 review.

Settlement	Description
Waltham Abbey	The Green Belt land within the defined buffer is bounded by absolute constraints to the north, east, west and south west. Dowding Way (A121) provides a strong defensible boundary; therefore land south of Dowding Way (A121) is not included.
Large Village	For all large villages, 1km buffer from town centre/local shopping parade boundaries, Central Line/rail stations (where appropriate) and bus stops within the existing settlement boundaries.
Buckhurst Hill	There is little land remaining outside of the areas covered by absolute constraints. Given the continuous built nature of Buckhurst Hill and Loughton/ Debden, all land in the Green Belt within the defined buffer has been included for further assessment.
Chigwell	The Green Belt land within the defined buffer extends to Chigwell Lane, Abridge Road, Pudding Lane, Gravel Lane and Miller's Lane to the north east, the M11 to the north west and the District boundary to the south. The identified area joins the area around Chigwell Row and Buckhurst Hill to ensure a continuous assessment of the land between settlements.
North Weald	The identified land is bounded by absolute constraints to the north, the M11 to the west and the Epping to Ongar Heritage railway track to the south. The remaining land to the east is defined by the 1km buffer and tracks.
Theydon Bois	The Green Belt land within the defined buffer is bounded by the M11 to the east, the M25 the north and absolute constraints to the north and west. The identified area is extended to join the area around Loughton and Epping to ensure a continuous assessment of the land between settlements.
Small Village	For all small villages, 0.5km buffer from local shopping parade boundaries, Central Line/rail stations (where appropriate) and bus stops within the existing settlement boundaries.
Abridge	The identified area is restricted by absolute constraints to the north west. The remaining land is defined by the 0.5km buffer.
Chigwell Row	The identified area is extended to join the area around Chigwell to ensure a continuous assessment of the land between settlements.
Coopersale	The identified area is extended to join the area around Epping to ensure a continuous assessment of the land between settlements.
Fyfield	The identified area is defined by the 0.5km buffer and Norwood End to the North. The area has been extended to include existing development along Ongar Road and Willingale Road.
High Ongar	The identified area is defined by absolute constraints to the west and Chelmsford Road to the north.
Lower Nazeing	The identified area is defined by absolute constraints to the west, Laundry Lane, Cemetery Lane and Perry Hill to the south. The area has been extended to join the area around Harlow and Roydon to the south, to ensure a continuous assessment of the land between settlements.

Settlement	Description
Matching	The identified area is defined by the 0.5km buffer around Matching Green, Matching Tye and Matching. The identified area has been extended to include the land between Matching Green, Matching Tye and Matching to ensure a continuous assessment of the land between settlements.
Roydon	The identified area is extended to join the area around Harlow and Lower Nazeing to ensure a continuous assessment of the land between settlements.
Sheering	The identified area is defined by the District boundary to the east, the M11 to the west and by the 0.5km buffer to the north and south.
Stapleford Abbots	The identified area is defined by the 0.5km buffer and the District boundary to the south.
Thornwood	The Green Belt land within the defined buffer is bounded by the M11 to the east and absolute constraints to the south. The remaining land is extended to join the area around Epping and Harlow to ensure a continuous assessment of the land between settlements.
Hamlet	No uniform buffer created for the smallest settlements, where it is necessary to use a buffer the 0.5km buffer is used as being most appropriate to the size of settlement.
Epping Green	The identified area is extended to join the area around Harlow and Epping to ensure the continuous assessment of the land between settlements.
High Beach	The identified area is restricted by absolute constraints to the west and to the east. The remaining land is defined by the 0.5km buffer.
Moreton	The identified area is defined by the 0.5km buffer and North Lane Track to the north east.
Lower Sheering	The identified area is extended to join the area around Harlow to ensure a continuous assessment of the land between settlements.
Sewardstone	The Green Belt land within the defined buffer by Hawes Lane and Sewardstone Road to the north, tracks to the east and absolute constraints to the south and to the west. The identified area is extended to join Gilwell Hill and the District boundary to the south, to ensure a continuous assessment of the land between settlements.
Willingale	The identified area is defined by Shellow Road to the north, Fyfield Road, Wood Lane and tracks to the south. The remaining land is defined by the 0.5km buffer.

Figure 2.1: Strategic parcel boundaries in Stage 1 Green Belt review

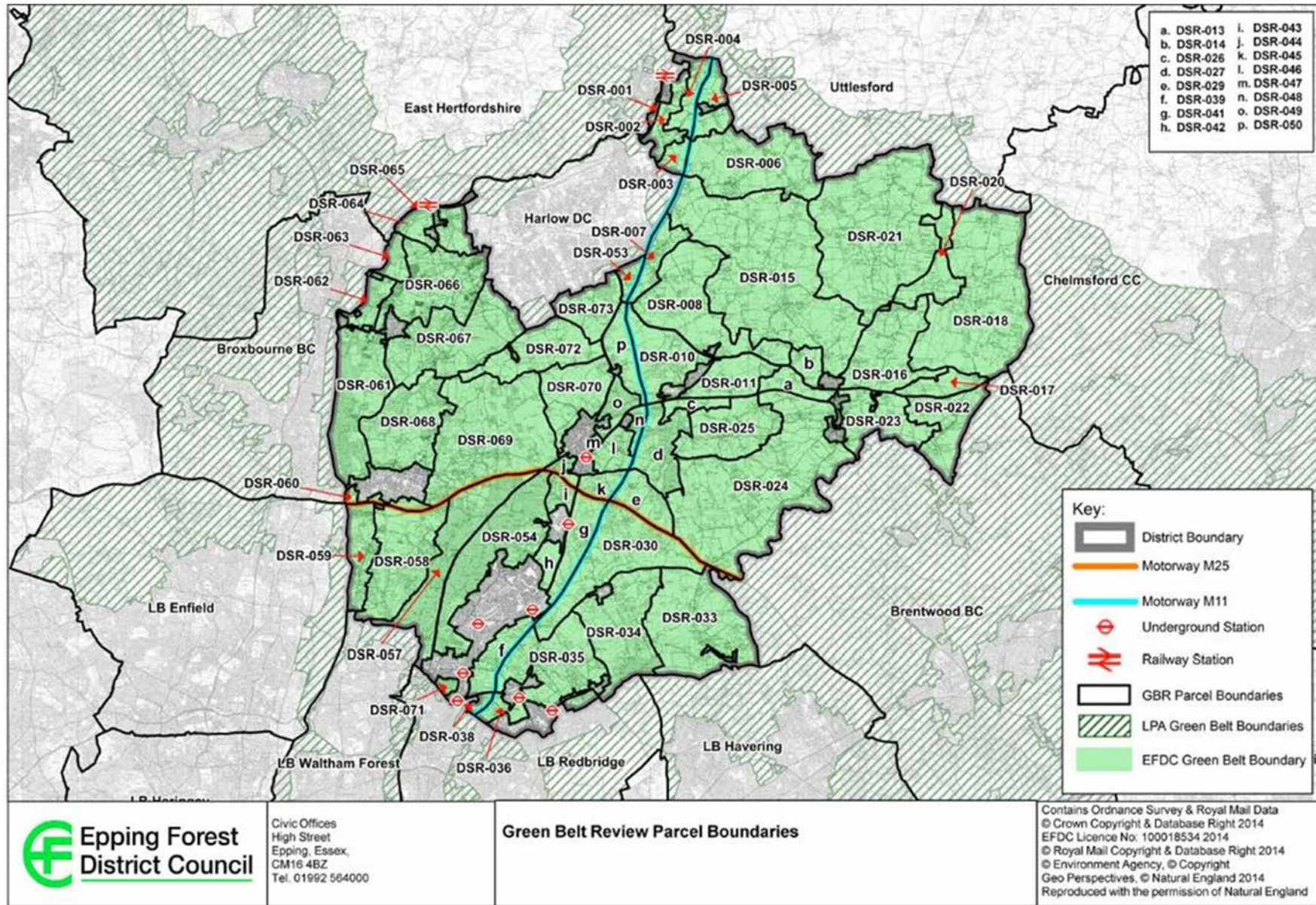
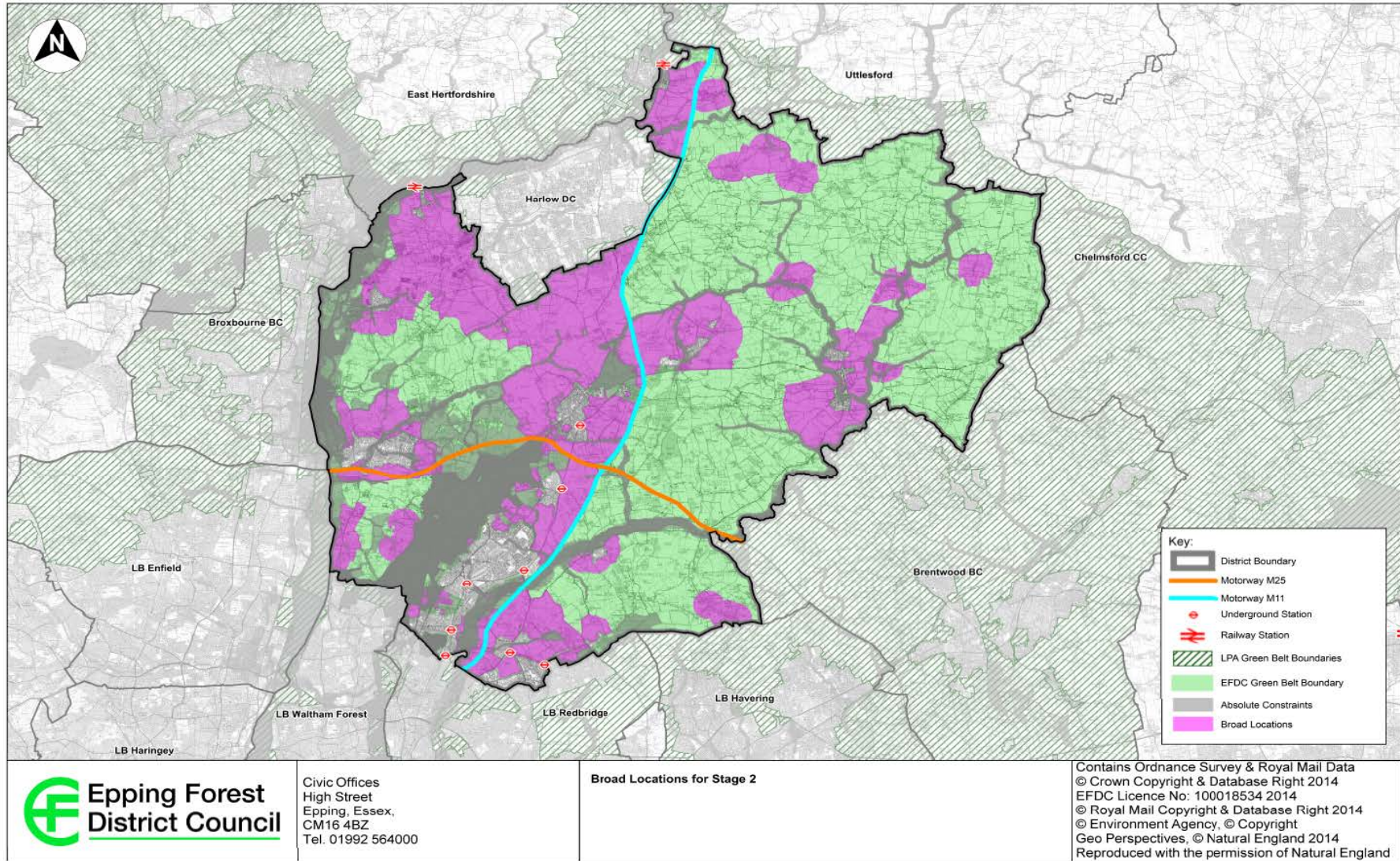


Figure 2.2: Broad locations for further assessment identified in the Stage 1 Green Belt review



3 Method

General approach to the Stage 2 study

- 3.1 The aim of the Stage 2 study was to assess the areas immediately adjacent to the District's existing settlements, to identify:
- areas where the Green Belt policy designation should remain;
 - any historic anomalies in the existing boundaries; and
 - areas where development would be least harmful in Green Belt terms.
- 3.2 The key stages of work are described below, but generally the Stage 2 study involved:
- an assessment of the areas (identified in the Stage 1 review) against Green Belt purposes;
 - an assessment of the harm to the Green Belt if land within those areas were to be released through the Local Plan to accommodate new development, considering potential effects on openness; and
 - an appraisal of physical features which are readily recognisable and likely to be permanent that could form clear defensible Green Belt boundaries.
- 3.3 The Stage 2 study also recognised the importance of 'barrier' features within or bordering parcels in determining performance against Green Belt purposes.

Engagement with Duty to Co-operate partners and Elected Members

- 3.4 The Duty to Co-operate partners were closely involved in the Stage 1 study and endorsed its findings. District elected Members and Parish and Town Council representatives also had the opportunity to comment on the Stage 1 work before it was finalised. Engagement with Duty to Co-operate partners in Stage 2 took the form of a workshop on 2 February 2016 at which LUC presented the assessment methodology, the assessment parcels and the initial (desk-based) findings. The following specific questions were addressed at the workshop:
- Q1: Any comments on the methodology used at Stage 2?
 - Q2: Any comments/queries on the initial, draft findings (as presented on the maps)?
 - Q3: Are there any parcel-specific cross-boundary Green Belt issues? (e.g. potential inconsistencies with Green Belt review methodologies used by neighbouring authorities).
 - Q4: How would you like LUC/EFDC to engage with you to share findings on parcels adjoining/crossing boundaries so that there is a consistent approach?
 - Q5: Any comments on proposed approach to defining 'degrees of harm' to the Green Belt?
- 3.5 Comments received in relation to Q1 and Q5, together with LUC's responses, are set out in **Appendix 1**. Comments in relation to Qs 2 and 3 have been reflected in the parcel assessments in the Technical Annex to this Stage 2 report. In relation to Q4, LUC has checked the consistency of neighbouring authorities' assessment and this is reported in Section 4.
- 3.6 Engagement with EFDC Elected Members also involved a workshop (on 25 February 2016), following an initial briefing with EFDC Cabinet (on 16 February 2016). The aim of the workshop, to which Town and Parish Council representatives were also invited, was to obtain Members' local knowledge on features of relevance to the assessment of the Green Belt. Comments on individual parcels were received both at the workshop and subsequently in writing.
- 3.7 All comments received from Elected Members and Parish and Town Councils were considered in the final assessment. A summary of the issues raised and LUC's responses is set out in **Appendix 2**.

Green Belt adjoining the district boundary

- 3.8 Assessments of parcels adjoining the District boundary considered the land on the other side of the boundary within the adjacent district. Where any parcels straddled the boundary, the whole of the parcel was assessed but a note was recorded that only part of it is within EFDC's jurisdiction.

Definition of parcel boundaries

- 3.9 The sub-division of the study area into smaller parcels of land provided a pragmatic framework for the more detailed assessment of the Green Belt against the NPPF purposes. The sub-division of parcels was informed by initial desk study and refined (altered, merged or further sub-divided), if necessary, following field work (e.g. where a more obvious boundary was visible on the ground).
- 3.10 In practice, the broad locations for further assessment identified in the Stage 1 review on the basis of distance from settlements also cover the areas identified in Tables 1.1 and 1.2 on the basis of the Stage 1 parcel analysis. The broad locations are shown on **Figure 2.2**.
- 3.11 The outer edges of the defined broad locations, i.e. those furthest away from the settlements which they surround, were recognised in the Stage 1 review as being indicative, so precise Stage 2 parcel boundaries were defined with reference to existing features on the ground or topographical features, as described below.
- 3.12 Working out from each identified settlement listed in Table 2.3, potential boundary features were assessed for suitability as Stage 2 parcel edges. As far as possible, the boundaries of each of the sub-parcels were defined using physical features that are readily recognisable and likely to be permanent, and which could therefore potentially act as a basis for establishing a future Green Belt boundary should the Council decide to release a parcel (or combination of parcels) from the Green Belt⁷. Other factors such as land ownership and proposed development sites did not inform the process for defining parcels.
- 3.13 The preferred features used for the parcel boundaries were those considered to form a 'strong' boundary. Strong boundaries are usually physical or topographical features, often visually distinctive and may also be consistent with a change in land use or visual characteristics. However, in some cases it was necessary to use weaker boundary features to define parcels that would be small enough to reflect likely differences in the relationship between a settlement and the countryside. In such instances, consideration may need to be given to strengthening boundaries (e.g. by woodland planting), were the parcel in other respects to be judged to have potential for release from the Green Belt. Features that were considered to form stronger and weaker boundaries are listed in **Table 3.1**.
- 3.14 Stage 2 parcels generally exclude areas identified as having absolute constraints to development, but in some cases, typically flood zones, there may not be a distinct feature on the ground that corresponds to the edge of the constraint. In these situations the nearest suitable feature is used to define the parcel boundary, so the parcel may include an area of constraint.

Table 3.1 Features used to define parcel boundaries

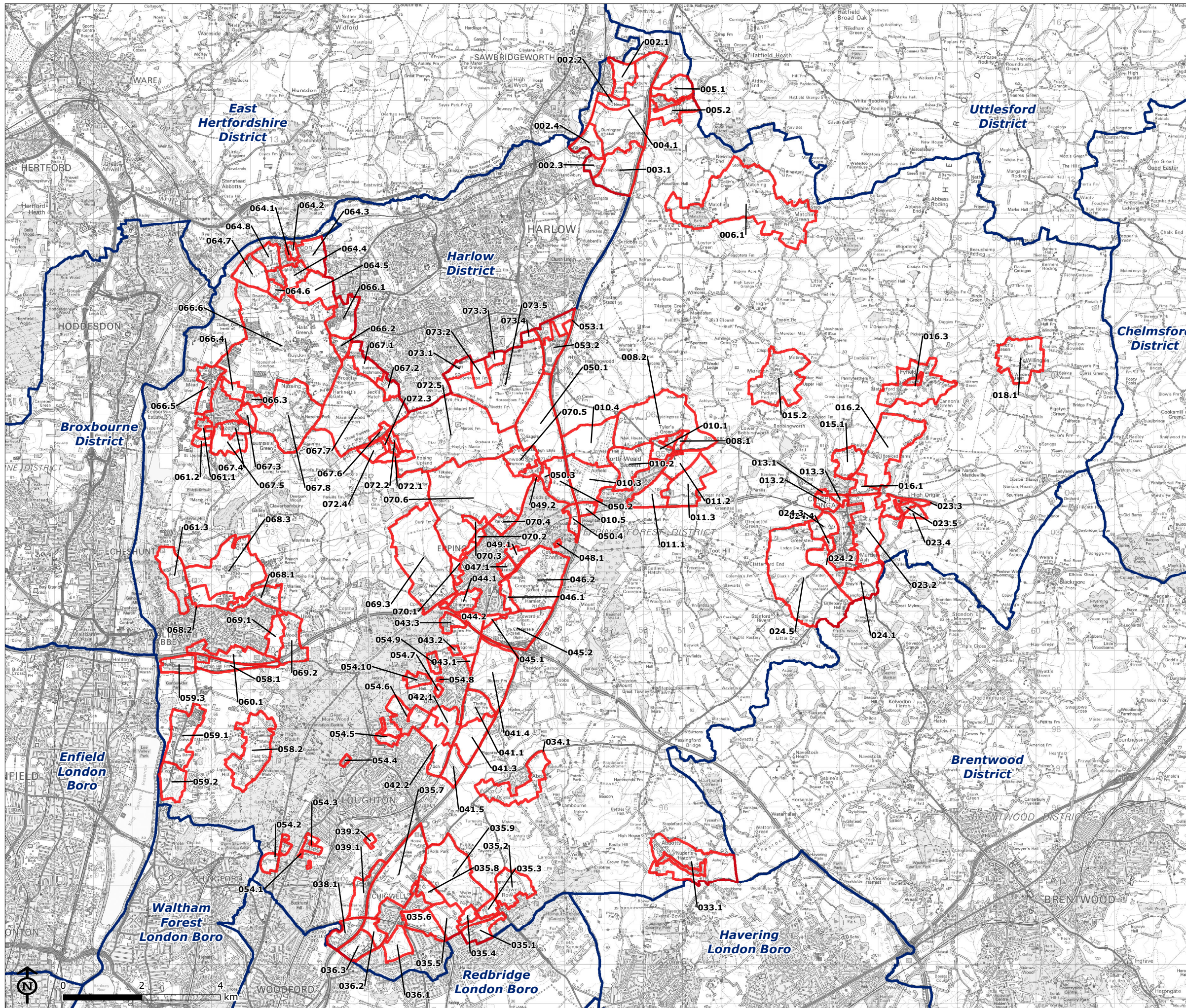
Features considered to form stronger boundaries	Features considered to form weaker boundaries
Roads	Fence lines
Railways	Private or unmade roads
Watercourses	Pathways
Woodlands	Development with inconsistent boundaries
Strong tree belts	Power lines
Intact/ dense hedgerows	Field boundaries

⁷ NPPF paragraph 85 requires Local Planning Authorities to "define boundaries clearly, using physical features that are readily recognisable and likely to be permanent"

Features considered to form stronger boundaries	Features considered to form weaker boundaries
Clear existing building line	Weak or hedgerows with gaps
Prominent physical features such as ridgelines or strong slopes	

- 3.15 Parcels were identified within the Stage 1 parcels where possible; the only exceptions being where the presence of stronger boundaries beyond a Stage 1 parcel boundary resulted in a more logical boundary.

To provide evidence to support the decisions made in identifying parcels for the Stage 2 Green Belt Study, the assessment output includes, for each parcel, brief text to describe the boundary features and includes explanation of the weaker boundary features where relevant. The reasons for choosing weaker boundaries in preference to stronger ones typically relate to proximity of alternative boundary features, the size of the resulting parcel and its relationship with adjacent parcels. Stage 2 parcels are shown on **Figure 3.1**.



Epping Forest Green Belt Study

Figure 3.1
Stage 2 Assessment Parcels

- District boundary
- Stage 2 parcel

Map Scale @ A3: 1:95,000



Assessing the Stage 2 parcels

- 3.16 Each of the Stage 2 parcels was assessed in terms of its contribution to Green Belt purposes 1 to 4. For the reasons set out below, individual parcels of land were not assessed against Purpose 5 (*assisting urban regeneration*).
- 3.17 Stage 2 provides a more detailed assessment of the parcels considered in Stage 1. The definition of parcels and the assessment involved a combination of desk top review of maps and aerial photographs and site visits. All parcels were visited by LUC in the period January to March 2016.
- 3.18 At Stage 1, all areas were considered to contribute equally to Purpose 5 and the value of land parcels was found not to be distinguishable on the basis of this purpose. It was therefore not helpful in terms of assessing the relative value of land parcels to the Green Belt. Purpose 5 focuses on assisting urban regeneration through the recycling of derelict and other urban land. The exclusion of consideration of individual parcels against Purpose 5 is reinforced by the decision by EFDC to commission evidence on the capacity of existing settlements to accommodate new development. This will identify the availability of derelict and other land within settlements that could be recycled to deliver regeneration and development during the plan period up to 2033.
- 3.19 Where significant differences in ratings occurred between Stage 1 and Stage 2, this is explained within the commentary on the performance of individual parcels (see **Technical Annex**).

Definition and application of assessment criteria

- 3.20 The Stage 1 assessment methodology, for each Green Belt purpose in turn (with the exception of the 5th purpose), used a series of questions in order to identify key characteristics which, considered in combination, produced a rating for the level of contribution to each purpose. While these criteria were broadly applicable at Stage 2, it was necessary to amend the interpretation of the criteria to make them more appropriate to the smaller Stage 2 parcels. It was judged inappropriate to provide assessments in relation to individual criteria as the criteria overlap to some extent and there is no satisfactory way of aggregating these separate assessments into an overall rating against a Green Belt purpose. An element of professional judgement was therefore required to reach an overall rating for each purpose. This is described in **Table 3.2** below.
- 3.21 Barrier features were referred to in the Stage 2 assessments in relation to two roles: containing potential future development; and creating a defined edge between existing settlement and countryside. Barrier features at the outer edge of the parcel could be considered to form a strong boundary which would provide containment to future development within the parcel if it was released from the Green Belt. These parcels were typically assessed as performing less well in Green Belt terms, because future development within the parcel could potentially occur without causing harm to the wider Green Belt. In relation to Purpose 3, if features which form the existing Green Belt boundary are strong and form a clear distinction between the settlement and countryside, the parcel on the whole, was assessed as performing better, because the existing settlement edge is likely to be perceived as well-contained. A parcel judged to be both separate from the settlement and contained from the wider countryside, or conversely to lack separation from the settlement but also be uncontained from the wider countryside, would be expected to make a more moderate contribution to Purpose 3.
- 3.22 Typically the Stage 2 parcelling approach described above resulted in belts of smaller parcels adjacent or near to settlements and a belt of larger parcels surrounding those. When assessing parcels that are not adjacent to the settlement edge it was assumed that development in these areas would only take place if the parcel(s) 'inside' it (i.e. parcels closer to the settlement) were also being developed; therefore the assessment of parcels proceeded in a cumulative manner. This approach reflected the emerging strategy for sustainable development in the District which favours development adjacent to existing settlements. The report's interpretation of assessment results underlines this assumption.

Table 3.2 Stage 2 Assessment: Description of criteria

EFDC Stage 1 assessment criteria	Interpretation of criteria for Stage 2 assessment
Purpose 1: Check the unrestricted sprawl of large built up areas (large built up areas are: London, Harlow, Cheshunt and Hoddesdon)	
1) Does the parcel act, in itself, as an effective barrier against sprawl from large built-up areas outside of the study area, specifically London and Harlow, Cheshunt and Hoddesdon?	<p>This criterion relates to the role of the designated parcel, rather than any barrier features that might form its boundaries, or lie within it. To act in itself as an effective barrier a parcel will need to be of a size and in a location that is significant in relation to a large built-up area. This location would need to be adjacent to the large built-up area.</p> <p>It is not necessary to consider the extent to which sprawl has already occurred, as this will be addressed in terms of the role of the parcel as part of the gap between the large built-up area and the settlement to which the parcel being assessed attaches (Purpose 2).</p>
2) Does the parcel contribute, as part of a wider network of parcels, to a strategic barrier against the sprawl of these built-up areas?	<p>If a parcel is adjacent to a large built-up area but in itself would be unlikely to prevent sprawl it can be considered to contribute as part of a wider network, assuming it is adjacent to other parcels.</p> <p>If it is judged that parcels adjacent to a large built-up area are not in themselves sufficient to prevent sprawl, taking into consideration their breadth, the presence of barrier features, the presence of routes which could facilitate sprawl and the presence of existing development which is considered to constitute sprawl, then parcels which are not adjacent to the large built-up area may also be assessed as making a contribution.</p>
3) Are there any defensible boundaries within the parcel (see definition for defensible boundary) which act as an effective barrier against sprawl from large-built-up areas outside of the study area specifically London, Harlow Cheshunt and Hoddesdon?	<p>Barrier features either within or outside of the parcel in question (but still in the Green Belt) may play a role in reducing the likelihood of sprawl, and thus diminishing the role of the Green Belt designation with respect to Purpose 1 within the parcel (or that area of it which lies within the protection of the barrier).</p> <p>In assessing the strength of a barrier feature, consideration need to be given to whether it has been breached, allowing or potentially allowing sprawl to still occur.</p>
Purpose 2: Prevent neighbouring towns from merging (for the purposes of this study towns within the District are considered to be: Epping, Waltham Abbey, Loughton / Debden, Chigwell, Buckhurst Hill, Chipping Ongar, North Weald Bassett, Theydon Bois, Roydon and Lower Nazeing)	
<p>The Stage 2 assessments consider the separation of the Large Built Up Areas as well as the towns for this Purpose. This helps to add additional detail on the relationships between all of the larger settlements with regards to the separation between them.</p> <p>It is also noted that, whilst not directly assessed in terms of settlement gaps, villages can contribute to the perception of a settlement gap. Loss of space between villages that lie between towns can reduce the perception of a gap between those towns.</p>	
4) Does the parcel itself provide, or form part of, a gap or space between towns?	Judgement of what constitutes a gap requires consideration of distance (Q6).
5) Are there any defensible boundaries within the parcel (see definition for defensible boundary) which prevent neighbouring towns from merging?	The perception of the extent of gap, and potential for coalescence, is influenced by the presence of barrier features. However, the role of a barrier feature in reducing the role of a gap should not be overstated: a barrier may prevent settlements from physically merging but it is likely that some form of distance gap will also be required to prevent the perception of loss of separation. The role of the barrier feature in affecting views (see Q8) will affect this.
6) What is the distance (km) of the gap between the towns?	This will be a consideration in general terms in the assessment but as it is only one of a number of factors affecting separation, no cut-off distances relating to different levels of performance against Purpose 2 are defined.
7) Is there evidence of ribbon development on	This is a consideration in terms of perception of a

EFDC Stage 1 assessment criteria	Interpretation of criteria for Stage 2 assessment
well used thoroughfares between towns (B roads and larger)?	settlement gap.
8) What is the visual perception of the gap between the towns' well used thoroughfares?	This is a consideration in terms of perception of a settlement gap, influenced by landscape/townscape characteristics.
9) Would a reduction in the gap compromise the separation of towns in physical terms?	This relates to the consideration of distance between towns in relation to the extent of the parcel in question.
10) Would a reduction in the gap compromise the separation of towns and the overall openness of the parcel visually?	This is a consideration in terms of perception of a settlement gap, influenced by landscape/townscape characteristics.
Purpose 3: Assist in Safeguarding the Countryside from Encroachment	
Countryside is defined in the Stage 1 glossary as "the land and scenery of a rural area".	
11) Does the Green Belt designation in this land parcel protect countryside that is in use for agriculture, forestry, outdoor sport and recreation, cemeteries and local transport infrastructure (certain other forms of development are also not inappropriate development based on NPPF paragraph 89, bullets 1 and 2, and paragraph 90, bullet 3)?	The Stage 2 assessments aimed to discern more subtle differences in the performance of the parcels against Purpose 3. As part of this, the assessments considered a more detailed interpretation of 'countryside' to differentiate between landscape which is undeveloped (i.e. open) and countryside which contains development. The amount and character of development in terms of whether the development is considered to have an 'urbanising' influence is considered under criterion 13.
12) Having regard to the topography of land and location relative to existing development, does the Green Belt designation in this land parcel prevent encroachment, or in some other way assist in safeguarding the countryside from encroachment?	<p>Q12 at Stage 1 related to the barrier/boundary function that topography can sometimes have, but was a narrower assessment of the role of barriers than was applied to Purposes 1 and 2. A strong barrier, of which topography is one form, may mark a clear distinction between land which is influenced by an adjacent settlement (i.e. a settlement fringe) and countryside which is free from urbanising characteristics, thus reducing the contribution made by land contained within it in to the safeguarding of countryside beyond it.</p> <p>Q12 is therefore amended for Stage 2 to: " Having regard to any barrier features and location relative to existing development, does the Green Belt designation in this land parcel prevent encroachment, or in some other way assist in safeguarding the countryside from encroachment?"</p>
13) Has there already been any significant encroachment by built development or other urbanising elements?	<p>This criterion involves a judgement on the extent to which a parcel represents "countryside". In addition to built development and associated features, this question is considered to be applicable to types of development listed under Q11 which, whilst deemed by the NPPF to be "not inappropriate" in the Green Belt, may nevertheless exhibit characteristics which are perceived as urbanising. Conversely, certain other forms of limited development may be considered to retain openness and to therefore not constitute encroachment or urbanisation.</p> <p>A note will be made of urbanising features within the assessment against Purpose 3. Following the review, this information could be used by the Council to identify locations where developer contributions could be used to enhance the openness of the Green Belt.</p>
Purpose 4: Preserve the setting and special character of historic towns (historic towns are defined in accordance with Essex County Council's Historic Towns Assessment Report: Chipping Ongar, Waltham Abbey, and Epping. Sawbridgeworth, which is located in East Herts, was also included as an historic town due to its proximity to Epping Forest District) ⁸	
14) Are there any historic towns (Chipping Ongar, Waltham Abbey, Epping and Sawbridgeworth) within or adjacent to the	A piece of land may still be within the 'setting' of an historic town whether or not it is directly adjacent to it, so consideration of Purpose 4 is slightly amended for Stage 2 when considering smaller parcels in more detail than in

⁸ Essex County Council Archaeological Department (now Essex County Council Historic Environment Branch) launched the Essex Historical Towns Survey in 1995 and completed it in 1999. Between 1995 and 1999 thirty-two towns were surveyed in Essex.

EFDC Stage 1 assessment criteria	Interpretation of criteria for Stage 2 assessment
parcel?	Stage 1.
15) To what extent is Green Belt land within the setting of the historic towns and/ or any heritage assets within those towns, especially those closest to the settlement boundary?	There should generally be sufficient information within the Phase 1 assessment and the Essex County Council Historic Towns SPG (1999) to inform the Stage 2 assessments.
16) Does the open character of the Green Belt land contribute positively to the historic significance of the town and/or heritage assets within the town?	This will be addressed.
17) Would the removal of the Green Belt designation and consequent loss of openness from urbanising development on that land, cause harm to the setting and significance of the historic town and heritage assets?	This will reflect the extent to which the parcel contributes positively, as addressed in Q16.
Purpose 5: to assist in urban regeneration, by encouraging the recycling of derelict and other urban land	
Not assessed for individual parcels as all parcels were considered to contribute equally.	Green Belt has the potential to make a strategic contribution to urban regeneration by restricting the land available for development and encouraging developers to seek out and recycle derelict / urban sites. It is considered that it is not possible to distinguish the extent to which each Green Belt parcels delivers against this purpose and therefore the parcels have not been individually assessed against Purpose 5.

Rating contribution to Green Belt purposes

- 3.23 The definitions used for rating the contribution to Green Belt purposes – from ‘strong’ to ‘no contribution’ – at Stage 1 remained largely valid for Stage 2, but with some minor amendments. These related principally to the function of ‘barrier features’, a term which was used in preference to ‘defensible boundary’ because such a feature need not be a Green Belt boundary (a barrier feature may also be a wide rather than linear landscape element, such as a wood or an area of ‘difficult’ terrain). The revised definitions are set out in Table 3.3 below, with principal changes from the Stage 1 definitions underlined.

Table 3.3 Definitions for Stage 2 assessment ratings

Purpose 1: Check the unrestricted sprawl of large built-up areas
<p>‘Strong Contribution’ where the parcel acts itself, and as part of a wider network of parcels, as an effective barrier against the sprawl from large built-up areas and is <u>not contained by features</u> which act as an effective barrier against sprawl. There is a strong reliance upon the Green Belt Policy designation to prevent sprawl from large built-up areas in these parcels.</p> <p>‘Moderate Contribution’ where it does not act itself as an effective barrier against sprawl, but may form part of a wider network of parcels to act as a strategic barrier to sprawl. Defensible boundaries may be present which are effective in the prevention of sprawl.</p> <p>‘Weak Contribution’ where the parcel is within reasonable distance to one of the defined ‘large built-up areas’ however makes very little contribution to the prevention of its sprawl.</p> <p>‘No Contribution’ where the parcel is of such a distance from the built-up areas, or <u>protected by a defensible</u> barrier to such an extent, that the parcel does not play a role in the prevention of sprawl.</p>
Purpose 2: Prevent neighbouring towns from merging
<p>‘Strong Contribution’ where the parcel is considered to serve as a critical gap /space between the identified towns with no <u>significant barrier</u> features to prevent their merger. There is no or very little evidence of ribbon development on well used thoroughfares between towns and visual perception of the gap between the towns along such thoroughfares is one of openness. A reduction in the gap would compromise</p>

the separation of the towns physically and visually.

'Moderate Contribution' where the parcel forms part of a gap / space between the identified towns but it is not of critical importance due to perceived distance between the settlements and/or the presence of barrier features to preserve separation. There may be evidence of ribbon development on well-used thoroughfares indicating the Green Belt designation has not been particularly successful in preventing development which could result in the coalescence of towns. A reduction in the gap is not likely to compromise the separation of the towns physically or visually.

'Weak Contribution' where the parcel is located (or partially located) in a gap / space between the identified towns however they are of such a considerable distance apart that its contribution to this purpose is negligible.

'No Contribution' where the parcel does not form part of a gap / space between the identified towns or the towns are of such a considerable distance that the gap is not relevant to the Review.

Purpose 3: Assist in safeguarding the countryside from encroachment

'Strong Contribution' where the vast majority of the parcel contains countryside (in use for agriculture, outdoor sport and recreation, cemeteries and local transport infrastructure: uses that are not considered inappropriate in the Green Belt) and those uses do not represent an urbanising influence. The parcel is not separated from the wider countryside by significant barrier features.

'Moderate Contribution' to the Green Belt where the parcel consists predominantly of countryside (in use for agriculture, outdoor sport and recreation, cemeteries and local transport infrastructure) but these uses may be associated with some urbanising influence. The parcel is contained by significant barrier features which may help safeguard the countryside from encroachment.

'Weak Contribution' where the parcel contains some countryside, but the uses within it represent a distinct urbanising influence and it is separated from the wider countryside by significant barrier features.

'No Contribution' where the parcel contains little or no countryside because urbanising influences are dominant.

Purpose 4: Preserve the setting and special character of historic towns

'Strong Contribution' where a significant portion of the parcel is within the setting of an historic town and/or any heritage assets within that town, especially those closest to the settlement boundary. The Green Belt contributes positively to the historic significance of the town and/or heritage assets within the town and the removal of the Green Belt here is likely to cause harm to the setting and significance of the historic town and its heritage assets.

'Moderate Contribution' where a significant portion of the parcel is within the setting of an historic town and/or any heritage assets within that town, especially those closest to the settlement boundary. The Green Belt provides a moderate contribution to the historic significance of the town and/or heritage assets within the town and the removal of the Green Belt here is unlikely to cause considerable harm to the setting and significance of the historic town and its heritage assets.

'Weak Contribution' where only a small portion of the parcel is within the setting of the historic towns and/or any heritage assets within those towns. The Green Belt makes little or no contribution to the historic significance of the town and/or heritage assets within the town and the removal of the Green Belt here is unlikely to cause harm to the setting and significance of the historic town and its heritage assets.

'No Contribution' where the parcel does not form part of the setting of any historic town.

Assessment of harm to Green Belt purposes

- 3.24 A key aim of the study was to identify areas that would be least harmful in Green Belt terms were they to be released for development.
- 3.25 As agreed with the project Steering Group, there is a direct relationship between the contribution of a parcel to Green Belt purposes and the extent of harm to the Green Belt that would be caused by its release. In other words, if a parcel achieves a higher rating against a particular purpose, this implies greater harm to the Green Belt should the land be released. The framework shown in **Table 3.4** was used to reach a conclusion for each Stage 2 parcel on the degree of harm to the

Green Belt purposes if land within that parcel were to be released through the Local Plan so as to potentially accommodate new development.

Table 3.4 Framework for assessing harm

Stage 2 assessment of parcels	Potential harm caused by release of parcel
Makes a STRONG contribution to one or more GB purposes.	Very high
Makes a RELATIVELY STRONG contribution to one or more GB purposes. No strong contribution to any purpose.	High
Makes a MODERATE contribution to one or more GB purposes. No strong or relatively strong contribution to any purpose.	Moderate
Makes a RELATIVELY WEAK contribution to one or more GB purposes. No strong, relatively strong or moderate contribution to any purpose.	Low
Makes a WEAK contribution to one or more GB purposes. No strong, relatively strong, moderate or relatively weak contribution to any purpose.	Very low
Makes NO contribution to any GB purposes. No strong, relatively strong, moderate, relatively weak or weak contribution to any purpose.	None

Identification of potential 'anomalies'

- 3.26 Also by means of desk study and site visits, the Stage 2 study identified potential minor and major 'anomalies' in the Green Belt.
- 3.27 Minor anomalies refer to relatively small scale instances where the current Green Belt boundary does not follow any recognisable feature on the ground and is therefore difficult to enforce. These were identified by checking that the Green Belt boundary follows a recognisable feature on the ground. Examples of minor anomalies include where the Green Belt boundary passes through the middle of gardens, which have been extended.
- 3.28 A potential major anomaly was defined as significant built development which, as a result of its scale, form and density, detracts from land's contribution to Green Belt purposes. In most cases this relates to the loss of 'openness' resulting from the development – the key characteristic of Green Belts. Such inappropriate developments have most likely occurred as a result of 'special circumstances' being demonstrated as part of a planning application or planning appeal. It may have included 'replacement' development, with some of the buildings being replaced pre-dating the Green Belt designation.
- 3.29 They are described as *potential* major anomalies, because there may be sound planning reasons for retaining these areas within the Green Belt. The commentaries in Appendix 1, however, draw conclusions on whether the land associated with potential anomalies is meeting Green Belt purposes. The decision to exclude them from the Green Belt is a policy decision for EFDC, on a case by case basis, and this goes beyond the scope of this Study.

Checking consistency with neighbouring authorities' Green Belt assessments

- 3.30 Green Belt assessments undertaken by the neighbouring authorities were reviewed to ensure that there were no significant differences in the assessment of parcels that meet or cross the shared boundary.

4 Findings

Assessment of Green Belt parcels

- 4.1 The assessment findings are presented in the **Technical Annex** on a settlement by settlement basis. Where larger parcels were considered not to relate strongly to any specific settlement they were considered to represent 'broad areas' of Green Belt, and are named to reflect this.
- 4.2 For each settlement a map (1:25,000 OS base) is provided to show the Stage 2 parcels and any areas of primary constraint excluded from the Stage 2 broad areas. This is followed by the description of the broad assessment area for the settlement that was produced as an output from the Stage 1 review, then a table naming and referencing each parcel, and describing the boundary features identified for each in terms of their strength. Where weaker boundaries have been used in preference to stronger ones, reasons are given.
- 4.3 For each Stage 1 parcel associated with the settlement in question, the Stage 1 assessment findings are presented, followed by the assessment for each Stage 2 parcel falling within that Stage 1 parcel.
- 4.4 Each Stage 2 assessment consists of:
- A heading with parcel reference, name and land area (in hectares);
 - A conclusion on harm to the Green Belt if land within that parcel were to be released through the Local Plan to accommodate new development, following the framework in Table 3.4.
 - A summary of the ratings for contribution to Green Belt purposes 1-4 (with colour-coding to aid in easy identification of different levels of rating);
 - A heading for each Green Belt purpose followed by text which addresses the criteria/questions set out in Table 3.2, as relevant, and noting any significant difference from the Stage 1 findings.
 - A note of any potential alternative new Green Belt boundaries within the parcel if a decision were made to release part rather than the entire parcel.

Summary of assessment ratings

- 4.5 **Table 4.1** lists the parcels associated with each settlement, the ratings given against each of the Green Belt purposes and the assessed level of harm to the Green Belt that would result were the parcel to be released for development. This is supplemented by maps, **Figures 4.1 to 4.4**, which use depth of shading to indicate the level of contribution made by each parcel to each of the Green Belt purposes 1-4.

Table 4.1: Summary of assessment ratings

Name	Settlement	Purpose 1 Rating	Purpose 2 Rating	Purpose 3 Rating	Purpose 4 Rating	Summary of Harm
034.1	Abridge	No Contribution	Relatively Weak	Strong	No Contribution	Very High
016.2	Broad Area DSR - 016	No Contribution	No Contribution	Strong	Weak	Very High
050.1	Broad Area DSR - 050	Moderate	Moderate	Strong	No Contribution	Very High
050.4	Broad Area DSR - 050	No Contribution	Moderate	Moderate	No Contribution	Moderate
066.6	Broad Area DSR - 066	Moderate	Strong	Relatively Strong	No Contribution	Very High

Name	Settlement	Purpose 1 Rating	Purpose 2 Rating	Purpose 3 Rating	Purpose 4 Rating	Summary of Harm
067.7	Broad Area DSR - 067	Relatively Weak	Moderate	Strong	No Contribution	Very High
067.8	Broad Area DSR - 067	No Contribution	Moderate	Strong	No Contribution	Very High
070.6	Broad Area DSR - 070	No Contribution	Moderate	Strong	Relatively Strong	Very High
072.5	Broad Area DSR - 072	Weak	Moderate	Strong	Relatively Weak	Very High
073.5	Broad Area DSR - 073	Relatively Weak	Moderate	Strong	Weak	Very High
004.1	Broad Area DSR-004	Moderate	Relatively Strong	Strong	Moderate	Very High
054.1	Buckhurst Hill	No Contribution	Strong	Moderate	No Contribution	Very High
054.11	Buckhurst Hill	No Contribution	No Contribution	Weak	No Contribution	Very Low
054.2	Buckhurst Hill	Weak	Moderate	Moderate	No Contribution	Moderate
035.5	Chigwell	Strong	Strong	Strong	No Contribution	Very High
035.6	Chigwell	Strong	Strong	Strong	No Contribution	Very High
035.7	Chigwell	Moderate	Strong	Strong	No Contribution	Very High
035.8	Chigwell	Moderate	Relatively Weak	Strong	No Contribution	Very High
035.9	Chigwell	Moderate	Relatively Strong	Strong	No Contribution	Very High
036.1	Chigwell	Strong	Strong	Weak	No Contribution	Very High
036.2	Chigwell	Strong	Strong	Moderate	No Contribution	Very High
036.3	Chigwell	Strong	Strong	Moderate	No Contribution	Very High
038.1	Chigwell	Relatively Strong	Strong	Relatively Strong	No Contribution	Very High
039.1	Chigwell	Moderate	Strong	Strong	No Contribution	Very High
035.1	Chigwell Row	Strong	Moderate	Relatively Strong	No Contribution	Very High
035.2	Chigwell Row	Moderate	No Contribution	Strong	No Contribution	Very High
035.3	Chigwell Row	Moderate	No Contribution	Relatively Strong	No Contribution	High
035.4	Chigwell Row	Moderate	Weak	Strong	No Contribution	Very High
013.1	Chipping Ongar	No Contribution	No Contribution	Relatively Weak	Relatively Weak	Low
013.2	Chipping Ongar	No Contribution	Weak	Relatively Strong	Relatively Strong	High
013.3	Chipping Ongar	No Contribution	No Contribution	Relatively Weak	Relatively Strong	High

Name	Settlement	Purpose 1 Rating	Purpose 2 Rating	Purpose 3 Rating	Purpose 4 Rating	Summary of Harm
015.1	Chipping Ongar	No Contribution	No Contribution	Strong	Weak	Very High
016.1	Chipping Ongar	No Contribution	No Contribution	Moderate	Relatively Strong	High
023.2	Chipping Ongar	No Contribution	No Contribution	Strong	Strong	Very High
024.1	Chipping Ongar	No Contribution	No Contribution	Strong	Moderate	Very High
024.2	Chipping Ongar	No Contribution	Weak	Strong	Relatively Weak	Very High
024.3	Chipping Ongar	No Contribution	Weak	Strong	Strong	Very High
024.4	Chipping Ongar	No Contribution	Weak	Moderate	Relatively Strong	High
024.5	Chipping Ongar	No Contribution	Weak	Strong	Moderate	Very High
048.1	Coopersale	No Contribution	No Contribution	Relatively Weak	No Contribution	Low
044.1	Epping	No Contribution	Weak	Moderate	Strong	Very High
044.2	Epping	No Contribution	Moderate	Strong	Relatively Strong	Very High
045.1	Epping	No Contribution	Relatively Weak	Strong	Relatively Weak	Very High
045.2	Epping	No Contribution	Moderate	Strong	Relatively Strong	Very High
046.1	Epping	No Contribution	Weak	Relatively Strong	Moderate	High
046.2	Epping	No Contribution	Weak	Strong	Weak	Very High
047.1	Epping	No Contribution	Weak	Relatively Strong	Weak	High
049.1	Epping	No Contribution	Relatively Weak	Relatively Strong	Moderate	High
069.3	Epping	No Contribution	Moderate	Strong	Relatively Strong	Very High
070.1	Epping	No Contribution	No Contribution	Weak	Weak	Very Low
070.2	Epping	No Contribution	No Contribution	Moderate	Relatively Weak	Moderate
070.3	Epping	No Contribution	Weak	Relatively Strong	Relatively Strong	High
070.4	Epping	No Contribution	Weak	Relatively Strong	Relatively Strong	High
067.6	Epping Green	Weak	No Contribution	Strong	No Contribution	Very High
072.1	Epping Green	No Contribution	No Contribution	Relatively Strong	Weak	High
072.2	Epping Green	No Contribution	No Contribution	Moderate	Weak	Moderate
072.3	Epping Green	No Contribution	No Contribution	Moderate	No Contribution	Moderate

Name	Settlement	Purpose 1 Rating	Purpose 2 Rating	Purpose 3 Rating	Purpose 4 Rating	Summary of Harm
072.4	Epping Green	No Contribution	No Contribution	Relatively Strong	Weak	High
016.3	Fyfield	No Contribution	No Contribution	Strong	No Contribution	Very High
002.3	Harlow - East	Strong	Relatively Weak	Relatively Strong	No Contribution	Very High
002.4	Harlow - East	Relatively Strong	Relatively Strong	Strong	No Contribution	Very High
003.1	Harlow - East	Strong	Relatively Weak	Strong	No Contribution	Very High
053.1	Harlow - South	Strong	No Contribution	Moderate	No Contribution	Very High
053.2	Harlow - South	Relatively Strong	Relatively Weak	Strong	Weak	Very High
073.1	Harlow - South	Strong	No Contribution	Moderate	No Contribution	Very High
073.2	Harlow - South	Strong	No Contribution	Moderate	No Contribution	Very High
073.3	Harlow - South	Relatively Strong	No Contribution	Moderate	No Contribution	High
073.4	Harlow - South	Relatively Strong	No Contribution	Relatively Strong	No Contribution	High
064.3	Harlow - West	Strong	Strong	Strong	No Contribution	Very High
064.5	Harlow - West	Strong	Relatively Strong	Strong	No Contribution	Very High
066.1	Harlow - West	Relatively Strong	Weak	Relatively Strong	No Contribution	High
066.2	Harlow - West	Relatively Strong	Weak	Relatively Strong	No Contribution	High
067.1	Harlow - West	Relatively Strong	Relatively Weak	Strong	No Contribution	Very High
067.2	Harlow - West	Relatively Strong	Relatively Weak	Moderate	No Contribution	High
058.2	High Beach	Weak	Relatively Weak	Strong	No Contribution	Very High
023.3	High Ongar	No Contribution	No Contribution	Relatively Strong	Relatively Strong	High
023.4	High Ongar	No Contribution	No Contribution	Strong	No Contribution	Very High
023.5	High Ongar	No Contribution	No Contribution	Weak	No Contribution	Very Low
039.2	Loughton and Debden	No Contribution	No Contribution	Weak	No Contribution	Very Low
041.5	Loughton and Debden	No Contribution	Strong	Relatively Strong	No Contribution	Very High
042.2	Loughton and Debden	No Contribution	Strong	Strong	No Contribution	Very High
054.3	Loughton and Debden	No Contribution	Strong	Moderate	No Contribution	Very High
054.4	Loughton and Debden	No Contribution	Weak	Relatively Weak	No Contribution	Low

Name	Settlement	Purpose 1 Rating	Purpose 2 Rating	Purpose 3 Rating	Purpose 4 Rating	Summary of Harm
054.5	Loughton and Debden	No Contribution	Moderate	Relatively Strong	No Contribution	High
054.6	Loughton and Debden	No Contribution	Relatively Strong	Moderate	No Contribution	High
061.1	Lower Nazeing	Weak	Relatively Weak	Moderate	No Contribution	Moderate
061.2	Lower Nazeing	Weak	Relatively Weak	Strong	No Contribution	Very High
066.3	Lower Nazeing	No Contribution	Weak	Moderate	No Contribution	Moderate
066.4	Lower Nazeing	No Contribution	Relatively Weak	Strong	No Contribution	Very High
066.5	Lower Nazeing	Weak	Relatively Weak	Moderate	No Contribution	Moderate
067.3	Lower Nazeing	No Contribution	No Contribution	Relatively Strong	No Contribution	High
067.4	Lower Nazeing	No Contribution	No Contribution	Strong	No Contribution	Very High
067.5	Lower Nazeing	No Contribution	No Contribution	Strong	No Contribution	Very High
002.1	Lower Sheering	No Contribution	No Contribution	Relatively Strong	Relatively Strong	High
002.2	Lower Sheering	No Contribution	Relatively Weak	Relatively Strong	Relatively Weak	High
006.1	Matching	No Contribution	No Contribution	Strong	No Contribution	Very High
015.2	Moreton	No Contribution	No Contribution	Strong	No Contribution	Very High
008.1	North Weald Bassett	No Contribution	No Contribution	Moderate	No Contribution	Moderate
008.2	North Weald Bassett	No Contribution	Moderate	Strong	No Contribution	Very High
010.1	North Weald Bassett	No Contribution	No Contribution	Relatively Weak	No Contribution	Low
010.2	North Weald Bassett	No Contribution	Moderate	Moderate	No Contribution	Moderate
010.3	North Weald Bassett	No Contribution	Moderate	Relatively Strong	No Contribution	High
010.4	North Weald Bassett	No Contribution	Moderate	Relatively Strong	No Contribution	High
010.5	North Weald Bassett	No Contribution	Weak	Moderate	No Contribution	Moderate
011.1	North Weald Bassett	No Contribution	Weak	Moderate	No Contribution	Moderate
011.2	North Weald Bassett	No Contribution	Relatively Weak	Relatively Strong	No Contribution	High
011.3	North Weald Bassett	No Contribution	Relatively Weak	Strong	No Contribution	Very High
064.1	Roydon	No Contribution	Weak	Relatively Weak	No Contribution	Low
064.2	Roydon	Relatively Weak	Moderate	Moderate	No Contribution	Moderate

Name	Settlement	Purpose 1 Rating	Purpose 2 Rating	Purpose 3 Rating	Purpose 4 Rating	Summary of Harm
064.4	Roydon	No Contribution	Relatively Weak	Relatively Strong	No Contribution	High
064.6	Roydon	No Contribution	No Contribution	Moderate	No Contribution	Moderate
064.7	Roydon	Relatively Weak	Moderate	Strong	No Contribution	Very High
064.8	Roydon	No Contribution	Weak	Relatively Strong	No Contribution	High
059.1	Sewardstone	Strong	Moderate	Moderate	No Contribution	Very High
059.2	Sewardstone	Strong	Strong	Strong	No Contribution	Very High
005.1	Sheering	No Contribution	No Contribution	Relatively Strong	No Contribution	High
005.2	Sheering	No Contribution	No Contribution	Strong	No Contribution	Very High
033.1	Stapleford Abbots	Relatively Strong	No Contribution	Relatively Strong	No Contribution	High
041.1	Theydon Bois	No Contribution	Relatively Weak	Relatively Strong	No Contribution	High
041.3	Theydon Bois	No Contribution	Relatively Strong	Strong	No Contribution	Very High
041.4	Theydon Bois	No Contribution	Moderate	Strong	No Contribution	Very High
042.1	Theydon Bois	No Contribution	Strong	Strong	No Contribution	Very High
043.1	Theydon Bois	No Contribution	Moderate	Strong	No Contribution	Very High
043.2	Theydon Bois	No Contribution	Moderate	Relatively Strong	No Contribution	High
043.3	Theydon Bois	No Contribution	Relatively Strong	Moderate	No Contribution	High
054.10	Theydon Bois	No Contribution	Weak	Relatively Weak	No Contribution	Low
054.7	Theydon Bois	No Contribution	No Contribution	Weak	No Contribution	Very Low
054.8	Theydon Bois	No Contribution	No Contribution	Weak	No Contribution	Very Low
054.9	Theydon Bois	No Contribution	Moderate	Moderate	No Contribution	Moderate
049.2	Thornwood	No Contribution	No Contribution	Relatively Weak	No Contribution	Low
050.2	Thornwood	Weak	Moderate	Relatively Strong	No Contribution	High
050.3	Thornwood	No Contribution	Moderate	Moderate	No Contribution	Moderate
070.5	Thornwood	No Contribution	Relatively Weak	Relatively Weak	No Contribution	Low
058.1	Waltham Abbey	Weak	Relatively Weak	Moderate	Weak	Moderate
059.3	Waltham Abbey	Weak	Weak	Weak	Weak	Very Low

Name	Settlement	Purpose 1 Rating	Purpose 2 Rating	Purpose 3 Rating	Purpose 4 Rating	Summary of Harm
060.1	Waltham Abbey	Relatively Weak	Weak	Moderate	Relatively Weak	Moderate
061.3	Waltham Abbey	Moderate	Moderate	Strong	Strong	Very High
068.1	Waltham Abbey	No Contribution	Weak	Strong	Weak	Very High
068.2	Waltham Abbey	No Contribution	Weak	Relatively Strong	Weak	High
068.3	Waltham Abbey	No Contribution	Weak	Strong	Weak	Very High
069.1	Waltham Abbey	No Contribution	Relatively Weak	Relatively Strong	Weak	High
069.2	Waltham Abbey	No Contribution	Relatively Weak	Moderate	Weak	Moderate
018.1	Willingale	No Contribution	No Contribution	Strong	No Contribution	Very High

Interpretation and analysis of assessment findings

- 4.6 **Figure 4.5** indicates the potential level of harm to the Green Belt associated with release of each parcel, taking account of Green Belt purposes 1, 2, 3 and 4. This has been prepared in accordance with the framework for assessing harm presented in Table 3.4 in Section 3 of this report.
- 4.7 Figure 4.5 shows parcels with moderate to low, very low, or no contribution ratings in or around a number of settlements. In a number of cases the parcels identified as having these levels of potential harm are very small. These include:
- Two very small parcels around Loughton, one to the north adjoining Epping Forest, and one to the south adjoining the Roding Valley
 - Two small parcels immediately adjoining the east and south-west of Roydon
 - Two small parcels to the west of Epping
 - One very small site immediately to the north of the A414, to the west of Chipping Ongar
- 4.8 Some larger parcels around other settlements are identified as making a lower contribution to Green Belt purposes, and these include:
- Three large parcels to the south of Waltham Abbey around the M25, with a further large parcel to the east of the town. This parcel to the east is separated from the existing edge of Waltham Abbey by a different parcel of land
 - Two parcels to the immediate west of Lower Nazeing, with a further smaller parcel to the east
 - Two parcels to the north and east of Thornwood Common
 - Three large parcels to the north, west and south east of North Weald Bassett, with a further parcel to the east of Tylers Green
- 4.9 A total of 34 parcels fall into this category (moderate, low, very low, or no contribution) and these cover a total area of 6.96 km² (which amounts to 2.1% of the District's total area⁹).

Sensitivity testing of the findings

- 4.10 **Figure 4.6** shows the potential level of harm to the Green Belt associated with release of each parcel, taking account of Green Belt purposes 1, 2, and 4 (i.e. excluding purpose 3, namely 'to assist in safeguarding the countryside from encroachment').
- 4.11 Given the rural nature of the District, the majority of the District's Green Belt performs strongly against purpose 3. It is therefore helpful to undertake some 'sensitivity testing' - to look at how

⁹ 338.99 km²

the Green Belt performs if purpose 3 is removed from the assessment (and therefore parcels are assessed against purposes 1, 2 and 4 only)..

- 4.12 This scenario is illustrated in Figure 4.6. It shows that, in the absence of assessment against purpose 3, more significant parts of the Green Belt are found to make a moderate, low, very low, or no contribution to the Green Belt. A total of 89 parcels fall into this category (moderate, low, very low, or no harm) and these cover a total area of 56.38km² Hectares (which amounts to 16.6% of the District's total area).
- 4.13 These parcels are principally around the settlements listed in paragraphs 4.7 and 4.8 above, but include a larger number of parcels around these settlements. Notable changes as a result of the sensitivity testing include:
- All parcels abutting Roydon, Lower Nazing and North Weald fall within moderate, low, very low, or no harm categories
 - 8 of 9 parcels around Waltham Abbey fall within low or very low harm categories, compared with a much more varied assessment under purposes 1-4
- 4.14 However, there are a number of settlements where the sensitivity testing makes very little difference. These include:
- Harlow, where all but one of the parcels immediately to the west of the town still fall within very high or high harm categories. Only one parcel (O67.7) immediately adjoins the HDC boundary, but in this location links to woodland/open space.
 - Chigwell, where most parcels still fall with the very high or high harm categories, although some smaller parcels on the eastern side of the village now fall within the moderate harm category.
- 4.15 Figure 4.6 also shows a number of parcels defined as 'broad areas' which achieve only a moderate rating when purpose 3 is removed. These areas form the 'main body' of the Green Belt and, although not strictly a matter for a Green Belt assessment, they contain important areas of countryside which characterise the District.
- 4.16 Interestingly, a number of entire small villages and hamlets are identified as making 'very low or no contribution' to Green Belt purposes 1, 2, and 4, including Epping Green, Sheering, Matching, Moreton, Fyfield and Willingale. However, such areas are in very rural locations and other evidence is likely to point to the disbenefits of removing the Green Belt designation from these areas.
- 4.17 This analysis provides a more nuanced picture of how Green Belt performs across the District. As such, it may provide the Council with a better tool and evidence base upon which to make decisions about the performance of Green Belt across the District and those locations where Green Belt release may be more appropriate. However, separate evidence on landscape character and quality will be particularly important – in order to distinguish between areas that are more and less sensitive to development in landscape terms.

Consistency with neighbouring authorities' Green Belt assessments

- 4.18 The assessment findings of parcels lying at the edge of the District are broadly consistent with the assessments undertaken by neighbouring authorities. Further detail is provided in **Table 4.2**, below.

Table 4.2: Commentary on consistency with neighbouring authorities' Green Belt assessments

District	Relationship	Comparison (undertaken in May 2016)
Uttlesford (draft)	Epping Forest District parcels are overlapped by Uttlesford parcels in the area between Sheering and Hatfield Heath	Three Epping Forest District assessment parcels in the vicinity of Sheering and Matching are overlapped by parcels defined in the Uttlesford assessment, and a fourth, at Lower Sheering, lies adjacent to at Uttlesford parcel. There is no significant difference between the draft findings of the Uttlesford review and those of the Epping Forest District review. It is noted that the villages of Hatfield Heath and Sheering are both defined in the Uttlesford review as 'towns' for the purposes of the assessment of contribution to preventing merger of towns (Purpose 2), whereas neither is

District	Relationship	Comparison (undertaken in May 2016)
		treated as such in the Epping Forest District review; however in both reviews the parcels in question were judged to make a higher contribution to safeguarding against countryside encroachment (Purpose 3).
Harlow (draft)	Epping Forest District parcels abut Harlow parcels along much of the boundary between the two districts	Whilst there are differences in assessment methodology between the two studies, this does not result in any issues of inconsistency in terms of assessment results. Epping Forest District parcels are typically judged to make a higher contribution to Green belt purposes, but this reflects a greater separation from the edge of the large built-up area. Green Belt Purpose 4 has been applied in the Harlow assessment, to reflect both the presence of listed buildings and the planned origins of the town, in which green wedges provide links through to the surrounding countryside. The Epping Forest District assessment does not treat Harlow as a historic settlement in terms of Purpose 4, but nonetheless takes into consideration the relationship between green wedges and the surrounding countryside in the one case where an Epping Forest District parcel (72.5) abuts a green wedge.
Redbridge (2010)	A Redbridge parcel abuts two Epping Forest District parcels near Chigwell; elsewhere parcels in the two districts are separated by areas excluded at Stage 2 (Hainault Forest and Whitehall Plain)	Ratings in the adjacent parcels are similar: the Redbridge study recommends retention in the Green Belt whilst the Epping Forest District study assesses harm resulting from release as 'very high'.
East Herts (2015)	An East Herts parcel abuts an Epping Forest District Parcel near Lower Sheering. Between Lower Sheering and Harlow parcels are separated by the Stort Valley, which was excluded from the Stage 2 Epping Study	There is no significant difference in the identified highest level of contribution to GB purposes.
Broxbourne (2008)	No parcels close to district boundary in Epping Forest District Stage 2 assessment, due to Lea Valley floodplain constraint	Both assessments recognise the role of the Lea Valley parcels in preventing sprawl and separating settlements.
Enfield (2011 + 2013 detailed alterations assessment)	No parcels close to district boundary in Epping Forest District Stage 2 assessment, due to Lea Valley floodplain constraint	No Green Belt changes are proposed along eastern edge of Enfield. The assessment recognises the strong defensibility of the Lea Valley.

District	Relationship	Comparison (undertaken in May 2016)
Waltham Forest (2015)	One Waltham Forest District parcel has a slight overlap with an Epping Forest District parcel between Chingford and Sewardstone	There is no significant difference in the assessment, with the ratings of adjacent parcels being similar.
Havering	One Epping Forest District parcel, to the south of Stapleford Abbots, abuts the district boundary	Havering has no Green Belt review. The local plan process included the submission of a number of potential development sites in the Green Belt; no assessment of these has been published, but none abuts the district boundary.
Brentwood	One Epping Forest District parcel, south of Chipping Ongar, abuts the district boundary	No Green Belt review has been carried out.
Chelmsford	No Stage 2 Epping Forest District parcels were defined close to the district boundary	No Green Belt review has been carried out.

Minor anomalies

- 4.19 As shown on **Figure 4.7**, a total of 36 minor anomalies were identified. Figure 4.7 is supported by a series of inset maps in the **Technical Annex** showing the detail of these minor anomalies.
- 4.20 The minor anomalies are due to extension of gardens / grounds into the Green Belt, which means that the boundary is not always readily recognisable on the ground (as the end of the garden has moved).
- 4.21 The anomalies were identified by means of aerial photographic interpretation against the 'digital' boundary of the Green Belt.
- 4.22 The presence of these anomalies causes no harm to the Green Belt and there is no imperative for the Council to change the boundaries. Indeed, any changes to the boundaries, either to increase or decrease the area of the Green Belt, would require demonstration of 'exceptional circumstances'.

More significant potential anomalies

- 4.23 Figure 4.8 illustrates the locations of identified more significant potential Green Belt anomalies within the District.

Table 4.3: More significant potential Green Belt anomalies

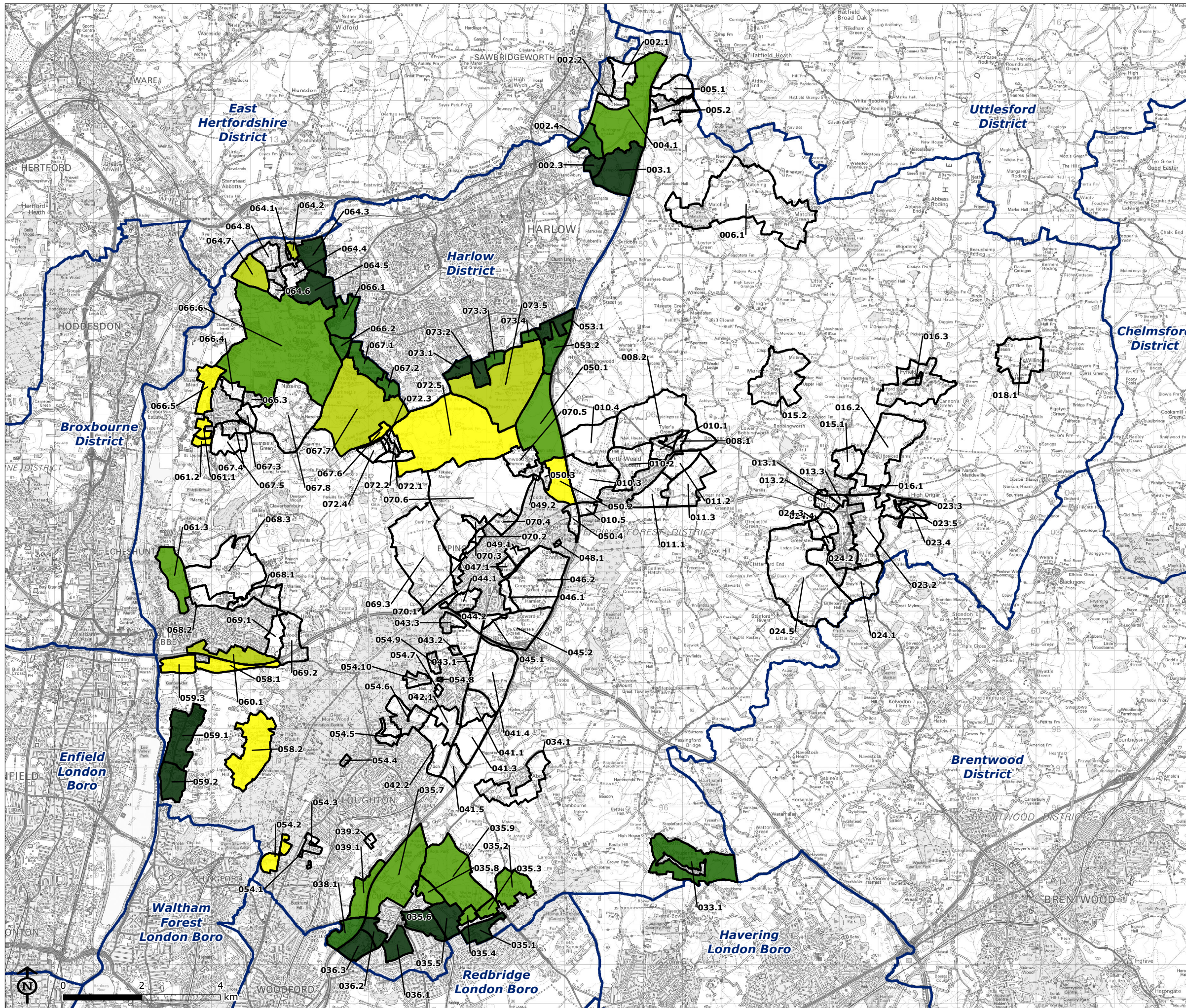
Location	Parcel ref.	Commentary
Tempest Mead, North Weald	11.1	The modern (c.2000) development at Tempest Mead, on the western edge of the parcel, can be considered an anomaly which should be excluded from the Green Belt. The railway line to the south and hedgerow to the east would form strong boundaries. The small, isolated area of open land between Tempest Mead and the B181 High Road is considered to make little contribution to Green Belt purposes.
The Gables, Ongar	16.1	The residential development at The Gables to the west of the parcel is a developed area with a similar pattern, form and character to the adjoining settlement to the west. It therefore performs weakly against the Purposes of Green Belt and lacks openness, and should therefore be considered as a potential anomaly. The road which provides access to these dwellings, an extension of The Gables, separates the built development from an area of public recreational open space, and marks a stronger distinction between developed and open space than the hedgerow that separates it from sports pitches to the east.
Mill Grove, High Ongar	23.5	The residential development along Mill Grove contains houses and roads of a similar form and density to the existing settlement. This area lacks openness and performs weakly against Green Belt Purposes. It should therefore be considered as a potential anomaly. The edges of gardens on the eastern side of the development follow the pre-existing boundary to an open, grassland field. The southern limit of the development is dictated by floodplain, but hedgerow alongside a tributary of the River Roding forms the nearest distinct boundary.
Kensington Park, Stapleford Abbotts	33.1	Potential anomaly at Kensington Park (recent housing development) which is adjoined to the main settlement and extends development away from the main road (the B175 Oak Hill Road) in what is currently a very linear settlement. It may create a stronger Green Belt boundary if the boundary was drawn around the edge of the development, however, the dwellings along Kensington Park are set in large grounds and so do create more of a transition to the countryside rather than having urban character.
Grange Manor, Adj Grange Station, Chigwell	35.6	The Grange Hill station / Froghall Lane area is a developed area, but the pattern of development is distinct from residential development to the south and west, and is separated from the former by Manor Road and the latter by a belt of woodland alongside the railway line. Well-defined vegetation along Froghall Lane defines the developed area to the east edge and a hedgerow contains it to the north, but it sits within a larger field bounded by hedgerow which would be weakened as Green Belt should the existing boundary be moved north of Manor Road.
Debden Park High School, Loughton	42.2	Debden Park High School in the south western corner of the parcel is a developed area adjacent to the existing settlement edge. The school building lacks openness and lies adjacent to the built-up area, but is separated from it by a well-treed stream which also marks the settlement edge to the north. The school playing fields have a reasonably strong hedgeline boundary, but adjusting the Green Belt edge to exclude both the school and its playing fields would affect an area which does make some contribution to Green Belt purposes.
Fallow Fields (Gated Community), Buckhurst Hill / Loughton	54.3	The Fallow Fields residential estate to the south of Loughton/ Debden is a developed area with a similar density and form to the main settlement. Its character and lack of openness represent urbanising elements which do not meet the Purposes of Green Belt and it should therefore be considered as a potential anomaly. However its physical separation from both Buckhurst Hill and Loughton, and containment by tree belts, mean that any amendment to the Green Belt would either be isolated or would require release of open land which makes some contribution to

Location	Parcel ref.	Commentary
		Green Belt purposes.
Davenant Foundation School, Loughton	54.6	The Davenant Foundation School buildings in the north western corner of the parcel constitute a developed area adjacent to the existing settlement edge, lacking in openness. A hedgerow creates some separation from the settlement but Debden Lane to the north of the school forms a stronger boundary. The school playing fields, subdivided by hedgerows, retain openness and make some contribution to Green Belt purposes. An access road, with adjacent parking areas, separates the school from the playing fields to the south-east, and a treed hedgerow separates it from the fields to the north-east.
Gilwell Hill, Chingford	59.2	The developed area at Gilwell Hill is of a density and pattern such that it is related to the adjacent settlement to the south rather than the countryside. The lack of openness means that it should be considered as a potential anomaly. A hedgerow forms a clear boundary between this and the lakes and grasslands of Picks Cottage Fishery to the north.
Sainsburys Depot & Housing, Waltham Abbey	59.3	The parcel contains the large Sainsburys depot building, associated car/ lorry parking and residential development. Although separated from the rest of Waltham Abbey by the M25, the built development lacks openness and the parking areas are too contained by development to retain any open relationship with the countryside. It should therefore be considered as a potential anomaly. Strong boundaries define this area: the M25 to the north, the A4112 Sewardstone Road to the east, the River Lea to the west and Gunpowder Park to the south.
Little Brook Rd Housing, Roydon	64.3	Houses along Little Brook Road are of an age, density and form that is considered to represent an anomaly in Green Belt terms. There is only a short physical distance between the potential anomaly area and the existing inset boundary of Roydon, but a strong belt of trees creates some separation and in visual terms they have a contained setting, with reasonably strong tree cover on all sides. Although perception of housing in this area is limited, extending the Green Belt boundary to include it would reduce the defined gap between the built-up areas of Roydon and Harlow. It would also lengthen the already long Green Belt boundary around Roydon, which is weakened by number of turns it makes to follow the settlement form, and create a new edge adjacent to further dwellings to both the east and north (across Harlow Road), raising the question of whether those houses ought also to be considered anomalous. This would also call into question the status of houses along the southern half of Grange Lane (in parcel 64.4 to the west). On balance the woodland between Little Brook Road and the built-up area as defined at present is probably a stronger boundary than that which would be created were Little Brook Road to be released from the Green Belt.
Paternoster House (Care Home), Waltham Abbey	68.1	The Paternoster Care Home is a developed area adjoined to the existing settlement. The highlighted area does not retain a distinction between settlement and countryside, and the built form does not maintain openness. Strong hedgerows separate this area from commercial uses within the Green Belt off Galley Hill Road, a block of scrub woodland lies to the east and the access road to a large glasshouse defines the western edge. This area can therefore be considered a potential anomaly.
St John's School, Epping	70.1	The buildings of St Johns School in the area between Bury Lane and Tower Road/ Lower Swaines Road constitute development that abuts the built-up area edge on two sides, although hedgerows retain some separation. The open playing fields to the

Location	Parcel ref.	Commentary
		north can still be considered to make some contribution to Green Belt purposes, but have strong outer boundaries creating separation from the wider countryside. There are no natural features to define a boundary between the new school buildings and the playing fields.
Teazle Mead, Thornwood	70.5	The residential development at Teazle Mead to the east of Thornwood is highlighted as an anomaly because the density and character of development in this location and its relationship to the adjacent settlement means that it is perceived as part of the settlement. It is contained by hedgerows.

Positive use of land in the Green Belt

- 4.24 Almost all land within the District's Green Belt is positively used for agriculture or recreation. The Lee Valley Regional Park, managed by the Lea Valley Regional Park Authority, and Epping Forest, managed by the City of London Corporation, play an important role in maintaining and enhancing positive use of the District's Green Belt.
- 4.25 To this extent the District Council, together with partners, is meeting the NPPF requirement (paragraph 81) to plan positively to enhance the beneficial use of the Green Belt.
- 4.26 There remains scope, however, to increase the 'functionality' of the land as green infrastructure; for example through enhancing public access for informal recreation. There is also potential to improve the landscape within and around the glass house areas in the north west of the District.



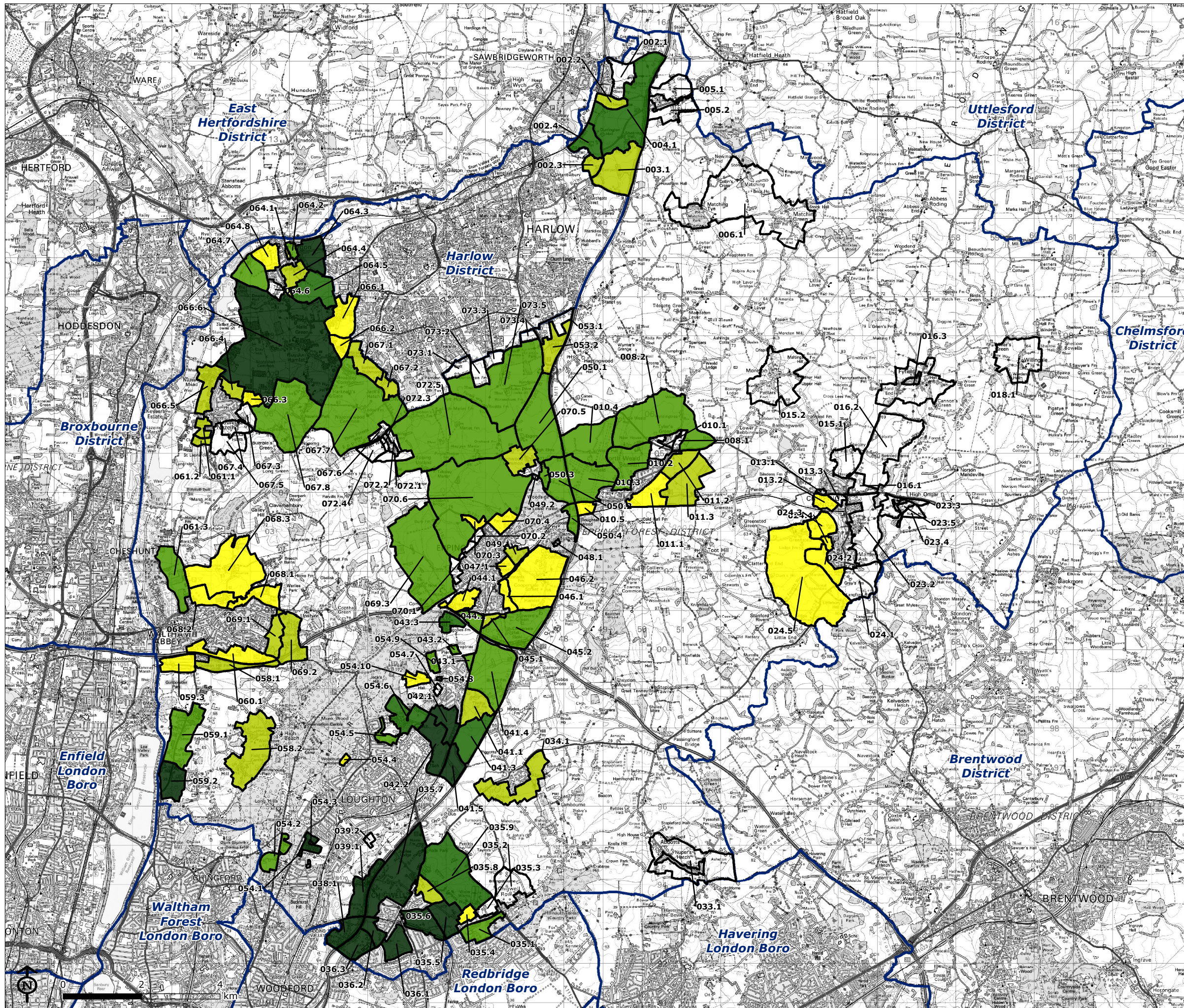
**Epping Forest District
Green Belt Study**

Figure 4.1
Performance Against Green Belt Purpose 1 - Check the Unrestricted Sprawl of Large Built-up Areas

- District boundary
- Performance**
- Strong
- Relatively Strong
- Moderate
- Relatively Weak
- Weak
- No Contribution








Map Scale @ A3: 1:95,000





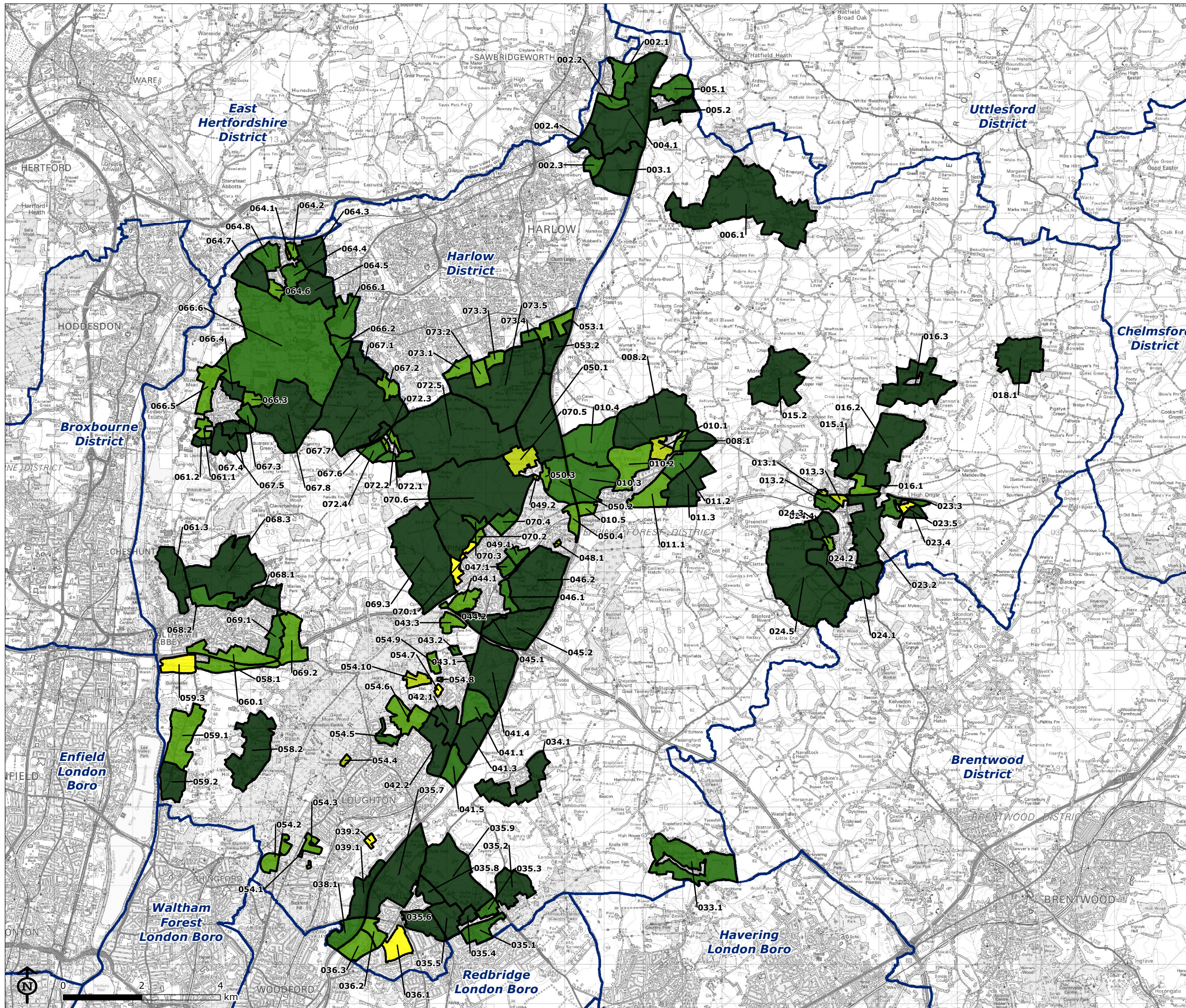
**Epping Forest District
Green Belt Study**

Figure 4.2
Performance Against Green Belt Purpose 2 - Prevent Neighbouring Towns from Merging

-  District boundary
- Performance**
-  Strong
-  Relatively Strong
-  Moderate
-  Relatively Weak
-  Weak
-  No Contribution

Map Scale @ A3: 1:95,000





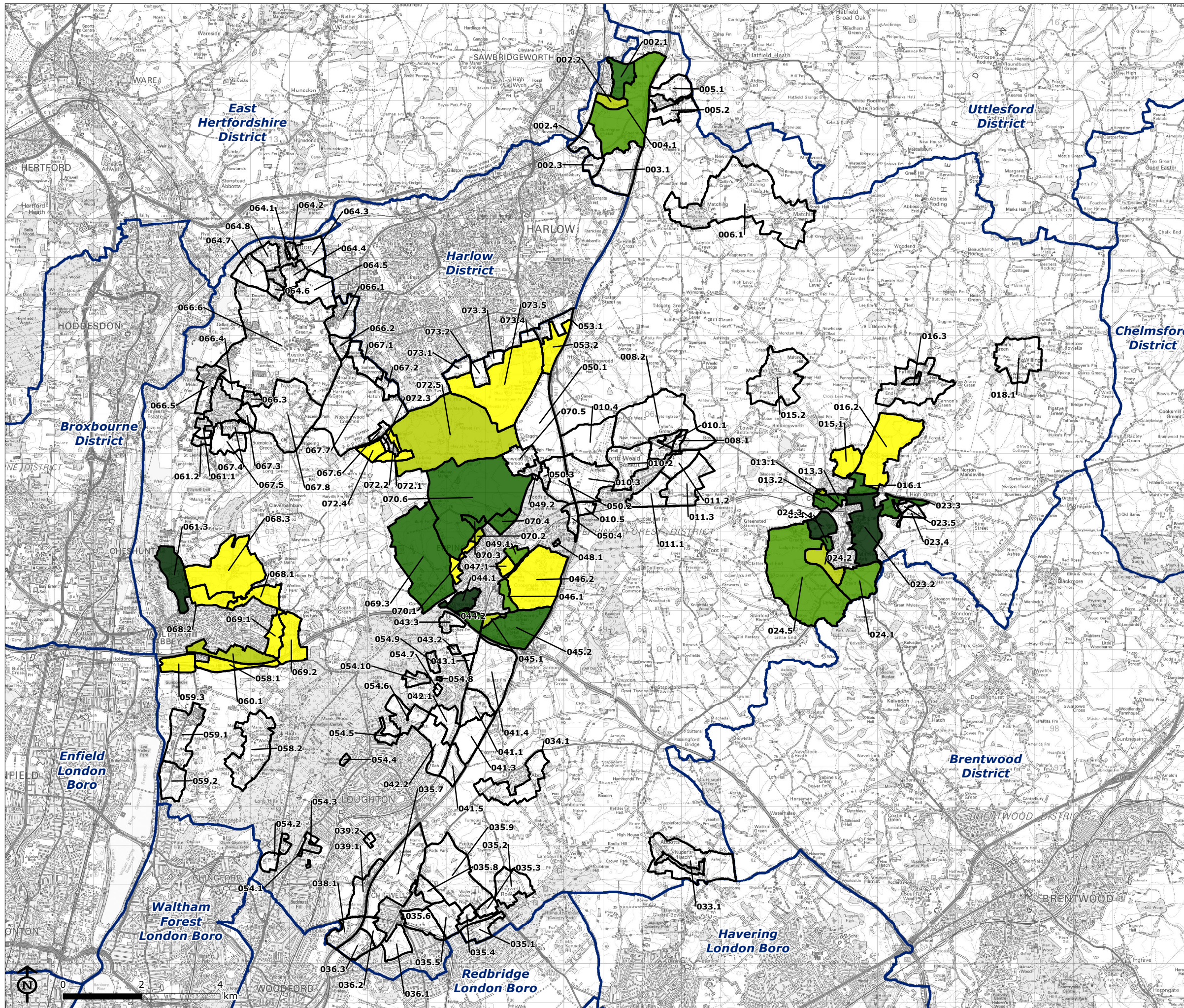
Epping Forest District Green Belt Study

Figure 4.3
Performance Against Green Belt Purpose 3 - Assist in Safeguarding the Countryside from Encroachment

- District boundary
- Performance**
- Strong
- Relatively Strong
- Moderate
- Relatively Weak
- Weak
- No Contribution

Map Scale @ A3: 1:95,000





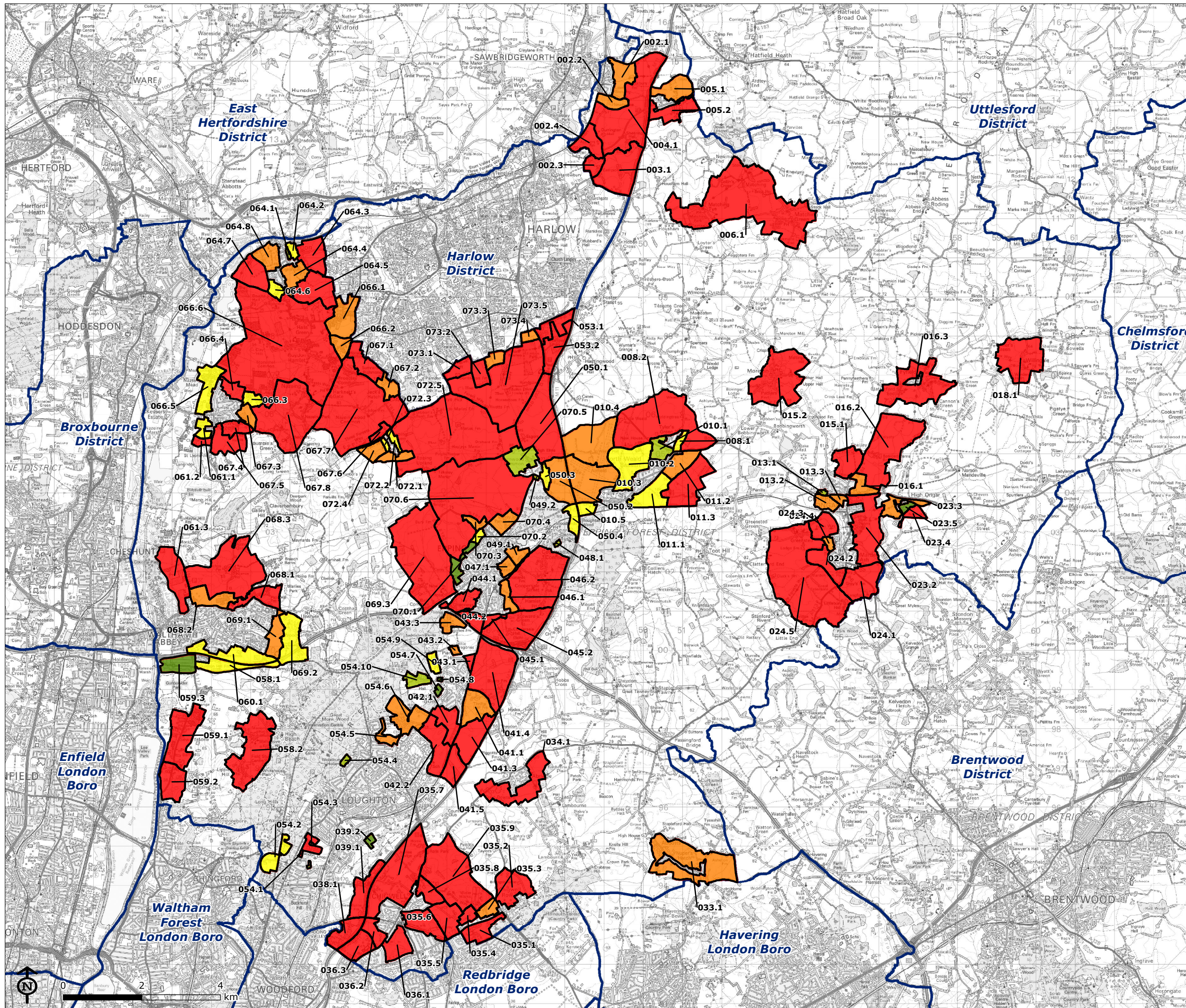
Epping Forest District Green Belt Study

Figure 4.4
Performance Against Green Belt Purpose 4 - To Preserve the Setting and Special Character of Historic Towns

- District boundary
- Performance**
- Strong
- Relatively Strong
- Moderate
- Relatively Weak
- Weak
- No Contribution

Map Scale @ A3: 1:95,000





Epping Forest District Green Belt Study

Figure 4.5
Potential level of harm to the Green Belt associated with release of parcels (purposes 1, 2, 3 and 4)

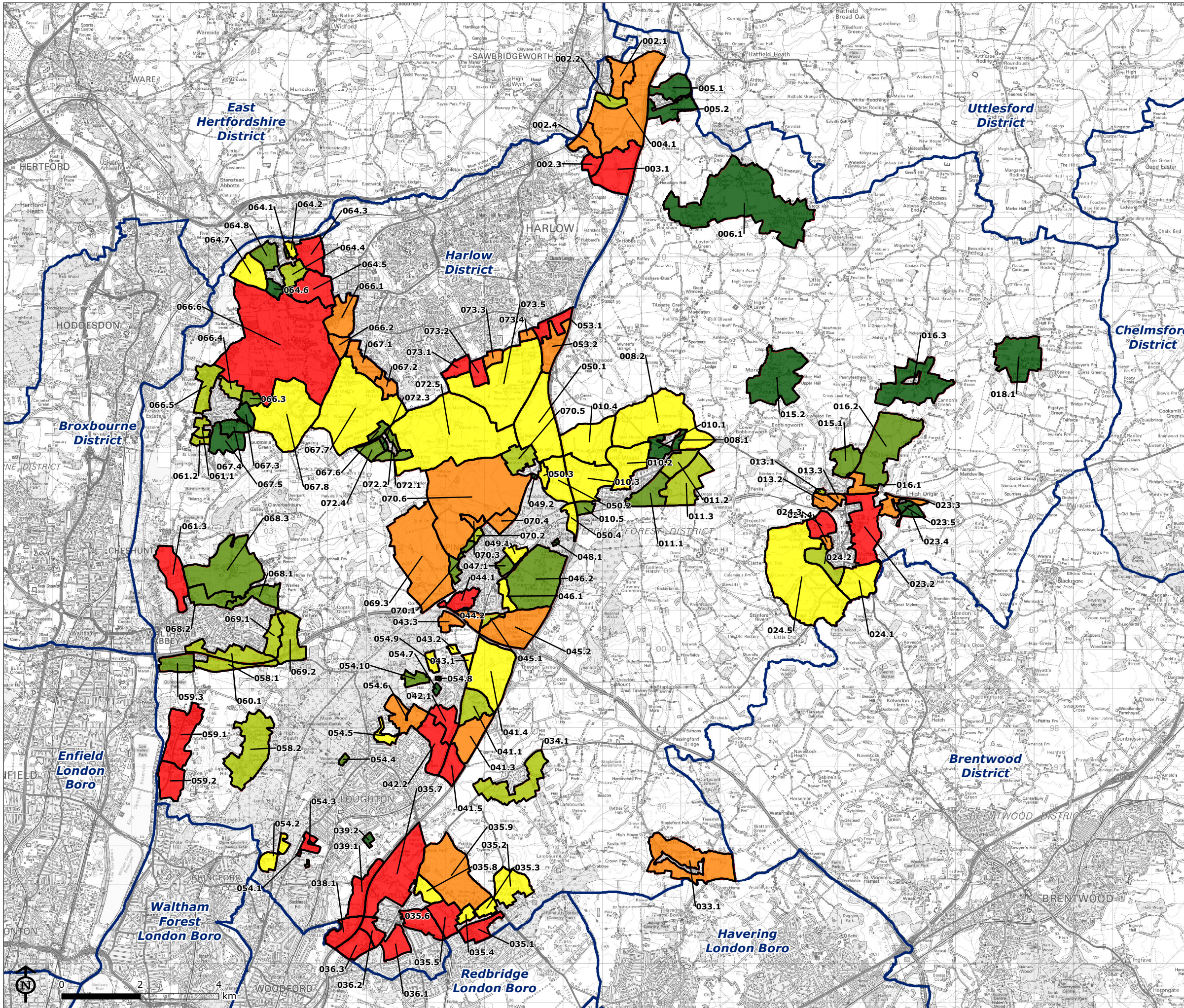
District boundary

Level of harm caused by release of parcel

- Very High
- High
- Moderate
- Low
- Very Low
- None

Map Scale @ A3: 1:95,000





Epping Forest District Green Belt Study

Figure 4.6
Potential level of harm to the Green Belt associated with release of parcels (excluding purpose 3)

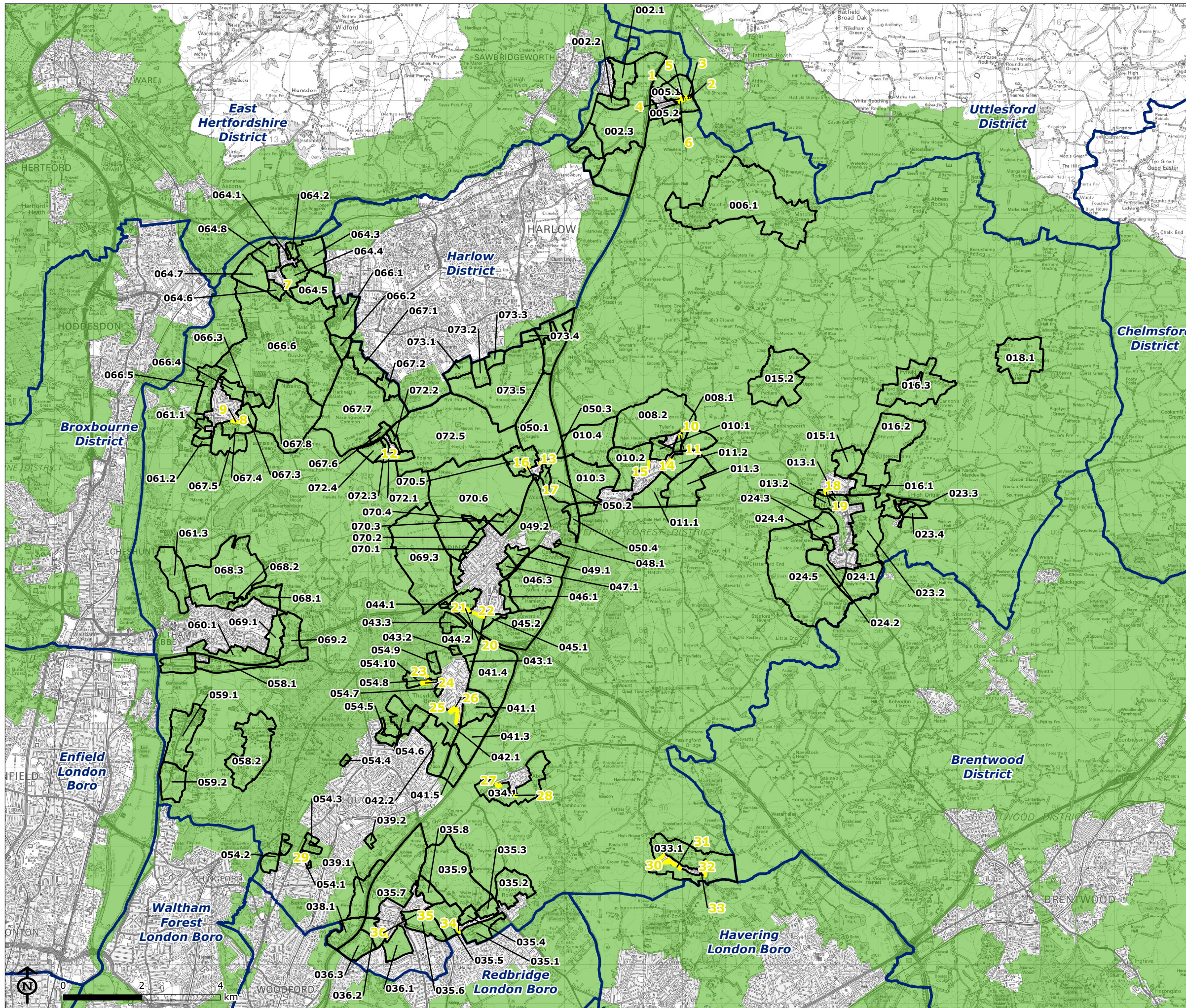
District boundary

Level of harm caused by release of parcel

- Very High
- High
- Moderate
- Low
- Very Low
- None

Map Scale @ A3: 1:95,000





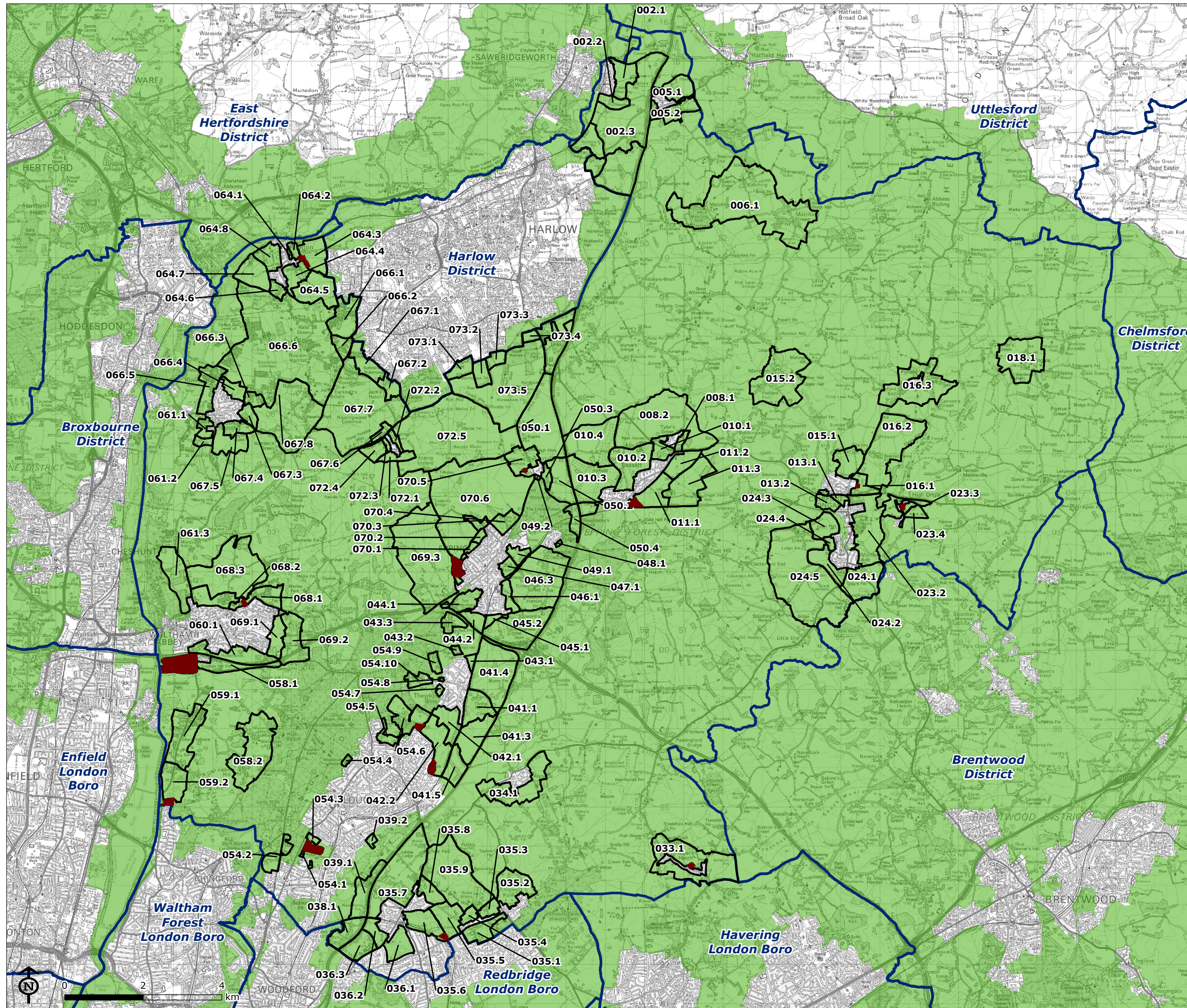
Epping Forest Green Belt Study

Figure 4.7
Index of Minor Anomalies

- District boundary
- Green belt
- Green belt parcel
- Minor Anomaly

Map Scale @ A3: 1:95,000





**Epping Forest District
Green Belt Study**

**Figure 4.8
More Significant Anomalies
(Significant built
development which detracts
from contribution to Green
Belt purposes)**

- District boundary
- Green belt
- Green belt parcel
- Potential major anomalies

Map Scale @ A3: 1:95,000



5 Conclusions and recommendations

- 5.1 This final Section draws overall conclusions from the study and suggests some next steps, in terms of how EFDC might use the findings in the Local Plan preparation process.

Overall performance of the Green Belt

- 5.2 This Stage 2 study has demonstrated that the majority of the Green Belt in the study area serves its purposes very well. In particular it helps to maintain the openness of the countryside and protect the separate identity of settlements.
- 5.3 As set out in Section 4, there are variations in the contribution that different parts of the study area make to Green Belt purposes 1, 2, 3 and 4. In terms of purpose 5 (encouraging the recycling of urban land), it is concluded that the entire Green Belt has helped to meet this purpose historically and will continue to do so.
- 5.4 The results of the assessment against purposes 1, 2 and 4 (i.e. excluding purpose 3), illustrated in Figure 4.6, provide a more nuanced picture of how Green Belt performs across the District. This may provide the Council with a better tool and evidence base upon which to make decisions about the performance of Green Belt across the District and those locations where Green Belt release may be more appropriate. However, if the council decides to use these findings, we recommend that separate evidence on landscape character and quality should be applied – in order to distinguish between areas that are more and less sensitive to development in landscape terms.

Making changes to the Green Belt

Helping to meet development requirements

- 5.5 As noted in Section 2, the NPPF requires changes to the Green Belt to be made through the Local Plan process. This should include:
- i. demonstration of exceptional circumstances, such as unmet housing or employment land needs, that cannot be met elsewhere; and
 - ii. consideration of the need to promote sustainable patterns of development, considering a range of local, regional and national issues such as economic growth, health and wellbeing, accessibility and biodiversity, cultural heritage and climate change resilience, as well as an assessment against Green Belt purposes.
- 5.6 A common interpretation of the policy position is that, where necessitated by development requirements, plans should identify the most sustainable locations, unless outweighed by adverse effects on the overall integrity of the Green Belt according to an assessment of the whole of the Green Belt based around the five purposes¹⁰.
- 5.7 In other words, the relatively poor performance of the land against Green Belt purposes is not, of itself, an exceptional circumstance that would justify release of the land from the Green Belt.

¹⁰ Planning on the Doorstep: The Big Issues – Green Belt, Planning Advisory Service (PAS), 2015: <http://www.pas.gov.uk/documents/332612/1099309/Planning+on+Your+Doorstep+-+-+The+Big+Issues+Green+Belt.pdf/bb5fcd90-fa29-42a0-9dd9-82b27a43f72f>

- 5.8 We therefore recommend that EFDC continues to cooperate with neighbouring authorities in considering points i) and ii) above as part of the Local Plan preparation process.
- 5.9 A key advantage of more significant Green Belt release as opposed to a larger number of smaller urban sites is that it provides an opportunity for infrastructure provision, including the transport, open space and green infrastructure.
- 5.10 Should the District decide to release land from the Green Belt, we recommend that outline masterplans are prepared as part of the Local Plan process. These would indicate development areas, new defensible Green Belt boundaries (existing or new features). Such an approach, together with specific policies for the development of the land, would help to engender public confidence and support, as well as mitigate harm to the remaining Green Belt.

Addressing anomalies

- 5.11 We recommend that no action is taken with regard to the minor anomalies on the basis that making changes to the boundary poses a greater risk of harming the Green Belt than leaving the boundaries as they are.
- 5.12 With regard to the major anomalies, we recommend that the Council decides on a case by case basis whether the land should be removed from the Green Belt, taking account of our comments and recommendations in **Table 4.3** of this report. It would not be appropriate to make firm recommendations for all parcels in this report, as there are other planning factors that come into play when releasing small areas of Green Belt.

Encouraging positive use of land in the Green Belt

- 5.13 The 'Green Arc' provides a strategic context for increasing positive use of the District's Green Belt. A District-level green infrastructure plan should be prepared, with corresponding policies in the Local Plan that recognise and support the role of the Green Belt as green infrastructure. In this way developer contributions could be sought to take forward specific initiatives.
- 5.14 The Green Arc's Vision is to 'bring the big outdoors closer to everyone' and its strategic objectives are:
- To promote positive uses that realise the potential to improve the quality and accessibility of the land whilst maintaining the purposes of the Green Belt
 - To improve the quality of life of Londoners, local residents and visitors through enhanced access to the countryside
 - To conserve and enhance the biodiversity value
 - To improve the linkages between existing and potential accessible open land for people and wildlife
 - To create attractive destinations for daytrips and holidays, for visitors, tourists and the local population
 - To support initiatives that contribute to sustainable development, including renewable energy, floodwater retention and water gathering areas
 - To provide burial space for 'green' or 'woodland' burials in natural environments
- 5.15 In May 2006 LUC prepared a draft Green Arc Plan for EFDC, which included a number of specific proposals that remain relevant today. We recommend that the Council revisits this draft plan and the recommendations it contains about next steps towards implementation.

Safeguarded land

- 5.16 Paragraph 85 of the NPPF indicates that, when defining Green Belt boundaries, local planning authorities should, where necessary, identify areas of 'safeguarded land' between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period. No further guidance is provided on the circumstances where safeguarded land may be necessary
- 5.17 On the basis of current trends, there are likely to be unmet housing needs beyond the plan period. We therefore recommend that EFDC considers the need for safeguarded land. Where areas of the Green Belt are identified as being suitable for release in this plan period, parts of them may be retained as safeguarded land. The location of such areas should be informed by this study and other evidence.

Appendix 1: Duty to Cooperate Workshop 2 February 2016

Attendance

Alison Blom-Cooper	EFDC Planning Policy
Amanda Thorn	EFDC Planning Policy
Adele Niinema	EFDC Planning Policy
Hassan Ahmed	EFDC Planning Policy
Kevin Twomey	EFDC Planning Policy
Philip Smith	LUC
Jonathan Pearson	LUC
Zhanine Smith	Essex County Council Planning
David Sprunt	Essex County Council Transportation Strategy
Andrew Taylor	Uttlesford District Council
Richard Fox	Uttlesford District Council
Vicky Forgione	Harlow District Council
David Watts	Harlow District Council
Jenny Pierce	East Herts District Council
Claire Stuckey	Chelmsford City Council
Lukas van de Steen	London Borough of Havering
Ismail Mulla	London Borough of Enfield
Katherine Pelton	London Borough of Enfield
Laura Bage	Basildon Borough Council
Jeremy Dagley	City of London Corporation
Claire Martin	Lee Valley Regional Park Authority

Comments received and responses and changes made

Comments	Responses and changes made
The methodology is transparent and robust.	None.
How do you deal with purpose 3 as virtually all the Green Belt can be described as 'countryside', with limited urbanising influences.	The assessment findings have been presented without and without purpose 3 findings, so that this sensitivity testing can be carried out.
Chigwell can't be both a town and a large village.	The Settlement Hierarchy defines Chigwell as a large village, but for assessment against GB purposes which only mentions "towns", it is defined as a "town" for this study.
Harlow should be considered as both a large built up area and a town, as this would allow for assessment of parcels adjacent to Harlow to be assessed against Green Belt purpose 1, as well as purpose 2.	Harlow has been considered as both a large built up area and a town.
Brownfield land within Green Belt may contribute differently to Green Belt purposes.	Agreed that brownfield land may influence the overall spatial strategy, but land quality is not a factor in the Stage 2 study. In so far as built structure on brownfield land are present, these have been taken into account in the assessment of openness etc.
Do any sites have the ability to mitigate further damage?	Most likely, but potential for mitigation is not a factor in the Stage 2 study.
Have future likely infrastructure developments been considered.	No, this is not a factor in the Stage 2 study.
Are smaller parcels of land more vulnerable to development pressures (?)?	Smaller parcels of land at settlement edges will have more potential to make a lower contribution to Green Belt purposes than larger parcels. This does not necessarily make them more 'vulnerable' to development.
Methodology – results potentially narrowing/reducing Council's options and lead in the wrong direction or not help with the allocations. Land that was looked at reduced by brief - areas discounted in beginning.	The Council decided on a sequential approach, with Stages 1 and 2. The Green Belt Review is only part of the evidence that will be used to determine the most appropriate policies and allocations in the Local Plan.
Did methodology take into account Regional Park?	The LVRP was not regarded as a constraint in the Stage 1 or Stage 2 studies. Consideration will be given to the Park if the Local Plan proposes any development within it.

Comments	Responses and changes made
<p>What are the reasons for Stage 2 parcels being different from Stage 1 parcels?</p>	<p>The sub-division of the study area into smaller parcels of land provided a pragmatic framework for the more detailed assessment of the Green Belt against the NPPF purposes. The sub division of parcels was informed by initial desk study and refined (altered, merged or further sub-divided), if necessary, following field work (e.g. where a more obvious boundary was visible on the ground).</p> <p>The outer edges of the defined broad locations, i.e. those furthest away from the settlements which they surround, were recognised in the Stage 1 review as being indicative, so precise Stage 2 parcel boundaries were defined with reference to existing features on the ground or topographical features, as described below.</p>

Appendix 2: Elected Members' workshop on 25 February 2016

Attendance

Enid Walsh	Loughton Town Council	Clerk
Kay White	Chigwell Parish Council	Clerk
Sue Latchford	Epping Town Council	Clerk
Janet Whybrow	Roydon Parish Council	Clerk
Kathryn Richmond	Waltham Abbey Town Council	Clerk
Susan DeLuca	North Weald Parish Council	Clerk
Terry Blanks	North Weald Parish Council	Councillor
Adriana Jones	North Weald Parish Council / Stanford Rivers Parish Council	Clerk
Jayne Jackson	Stapleford Abbots Parish Council	Councillor
David Wixley	EFDC Loughton Fairmead	Councillor
Maggie McEwen	EFDC High Ongar, Willingale and the Rodings	Councillor
Gary Waller	EFDC Lower Sheering	Councillor
Sam Kane	EFDC Waltham Abbey Honey Lane	Councillor
Helen Kane	EFDC Waltham Abbey South West	Councillor
Glynis Shiell	EFDC Waltham Abbey Honey Lane	Councillor
Richard Bassett	EFDC Lower Nazeing	Councillor
Caroline Pond	EFDC Loughton Broadway	Councillor
Chris Pond	EFDC Loughton St John's	Councillor
Chris Whitbread	EFDC Epping Lindsey & Thornwood Common	Councillor
Lesley Wagland	EFDC Chigwell Village	Councillor
Kewal Chana	EFDC Grange Hill	Councillor
Alan Lion	EFDC Grange Hill	Councillor
Jon Whitehouse	EFDC Epping Hemnall	Councillor
Brian Surtees	EFDC Chipping Ongar, Greensted & Marden Ash	Councillor
Anne Grigg	EFDC North Weald Bassett	Councillor
Syd Stavrou	EFDC Waltham Abbey High Beach	Councillor
Mary Sartin	EFDC Roydon	Councillor
John Philip	EFDC Theydon Bois	Councillor
Janet Whitehouse	EFDC Epping Hemnall	Councillor

Comments received and responses and changes made

Topic	Comments	Response
Contribution of parcels to Green Belt purposes	Various comments suggesting level of contribution	All relevant comments have been read and taken into consideration when arriving at judgements regarding contribution to Green Belt purposes.
Historic or ecological value of land in parcels	Importance of particular parcels with regard to settings of conservation areas, schedules ancient monuments and listed buildings, historical field patterns, ecological sensitivity and presence of ancient woodland	<p>Protection of cultural heritage is not a Green Belt purpose, but will be an important consideration in local plan preparation. At paragraph 86 the NPPF notes that the Green Belt designation should not be used to protect areas that are already protected through conservation area status.</p> <p>For a certain limited number of historic towns, which have a special character or distinctive landscape setting that could be affected by development, the location of conservation areas or particular monuments or buildings can influence the contribution made by a parcel of land to the Green Belt (purpose 4), but equally it may be undesignated elements of the landscape that contribute to this purpose, and listed buildings may have no relationship with the surrounding countryside.</p> <p>Ecological value similarly is a consideration when addressing the development potential of land, but is not a factor that affects contribution to Green Belt purposes. However, the distinctiveness of certain habitats, such as woodlands, will affect the extent to which they relate to the countryside rather than to built-up areas, and so has affected our assessment of the contribution to preventing encroachment of the countryside (purpose 3).</p> <p>Areas subject to constraints that would preclude development from taking place without need for further analysis or assessment, e.g. functional floodplains or SSSIs, were excluded from the Stage 2 assessment (other than smaller areas of constraint are included in order that the parcel edge could follow an appropriate boundary feature).</p>

Topic	Comments	Response
Agricultural value of land in parcels	Importance of particular parcels with regard to agricultural land value	Protection of the 'best and most versatile' agricultural land is not a Green Belt purpose, but may be a consideration in preparing the local plan.
Presence of contaminated land	Noted as a potential constraint on development	Contaminated land could potentially be a constraint to development, but is not considered a 'primary' constraint that can be taken as a reason not to assess land at Stage 2. It is likely to influence any decisions regarding release of land from the Green Belt.
Landscape or visual value of land in parcels	Importance of particular parcels with regard to landscape or visual sensitivity	Protection of the landscape or visual value of land, whether relating to the scenic attributes of that land or the presence of 'visual receptors', e.g. users of a public right of way, is not a Green Belt purpose. It should be noted, however, that landscape factors which make a particular parcel stand out as valuable may also reflect a distinction between countryside within the parcel and adjacent settlement, and this distinction would be reflected in the parcel's contribution to preventing encroachment on the countryside (Green Belt purpose 3). Landscape and visual impact will be an important consideration in determining whether land should be released for development purposes.
Recreational value of land in parcels	Importance of particular parcels with regard to recreational use	Recreational requirements are an important consideration when determining whether a particular area of land should be released for development, and the potential for beneficial use of Green Belt land should be a consideration. Recreational benefit is not, however, a purpose of the Green Belt, and so does not influence the assessment of contribution to Green Belt purposes.
Sustainability of development in particular parcels	Issue identified regarding flood risk, traffic problems, absence of access roads	Achieving sustainable development is not a purpose of the Green Belt, and so does not influence the assessment of contribution to Green Belt purposes, but the NPPF specifically requires sustainability issues to be considered when considering the alteration of Green Belt boundaries (paragraph 84), so such issues would

Topic	Comments	Response
		need to be addressed prior to any release of land.
Linear development constraints	Example of high pressure gas main noted	Linear constraints such as a high pressure gas main will affect the feasibility of development in certain locations, and so will affect decision-making on release of Green Belt land, but are not 'area' constraints features that have influenced the designation of Stage 2 parcels, and being below-ground features they do not function as 'barrier' features in terms of affecting the relationship between settlement and countryside.
Selection of settlements considered against purpose 1 (sprawl of large built-up areas), purpose 2 (prevention of merger of towns) and purpose 4 (setting and special character of historic towns)	That land around certain settlements should be considered to contribute to these purposes.	<p>The Stage 1 Green Belt Study determined which settlements to should be considered 'large built-up areas' or 'towns' with regard to Green Belt purposes. Several additions were made at Stage 2, but fundamental changes in interpretation were not made.</p> <p>Whilst the decision as to which settlements to include inevitably has some impact on assessment outcomes, it should be noted that the assessment is not a cumulative one, in which ratings against different purposes are summed to give a total score, and a parcel need only be rated highly against one purpose to be considered to make a strong contribution to Green Belt. Thus, for example, many villages with a strong historic character will make no contribution to purpose 4 (setting and special character of historic towns) but will make a strong contribution to purpose 3 (prevention of countryside encroachment).</p> <p>With regard to purpose 2, preventing the merger of towns, it should be noted that whilst gaps between smaller settlements not deemed to be towns might not in themselves be considered relevant to this purpose, they may nonetheless be recognised as contributing to the overall gaps between larger settlements that are classified as towns.</p>
Parcel sizes	Certain parcels considered to be too large, either in relation to size of adjacent settlements or in terms of	Parcel sizes weren't intended to suggest areas of potential development, but areas which were

Topic	Comments	Response
	failing to reflect variations in character	<p>judged to be likely to make a similar contribution in terms of Green Belt purposes.</p> <p>It was recognised that a large parcel will contain areas of varying landscape character, but at a strategic level the contribution made to Green Belt purposes was not felt to be likely to vary significantly. Where significant differences were identified, this was noted in the assessment text and, if necessary, separate parcels were defined.</p> <p>There will in some situations be potential to identify small areas that would, by virtue of their limited size, have only limited potential for significant effects on the Green Belt were development take place; however such assessment falls outside the scope of this strategic scale study.</p>