

**Ongar Park Green Belt Review:
Sites and Boundaries Study**

**ONGAR PARK ESTATE
NORTH WEALD BASSETT**

Peer Group plc

Updated January 2018

Report updated January 2018

Since the report was first issued in December 2016, the following has happened or can be confirmed:

- The report was prepared to examine Green Belt issues associated with the land at Ongar Park Estate, North Weald Bassett.
- We consider this report remains valid as written.
- Since that time there have been no material changes to circumstances on site that would affect the report.
- The report was originally submitted to the Council during the Draft Local Plan consultation period, in December 2016. The Council has been invited to comment on its specific findings, at the time of writing this update no comments have been raised by EFDC.

Green Belt Review: Sites and Boundaries Study

ONGAR PARK ESTATE NORTH WEALD BASSETT

Peer Group plc

December 2016

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1 INTRODUCTION

1.1 The National Planning Policy Framework (NPPF)

1.1.1 The NPPF seeks continued protection of Green Belts and states that *‘the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open’*.

1.1.2 The NPPF states that Green Belts serve five purposes;

1. To check the unrestricted sprawl of large built-up areas;
2. To prevent neighbouring towns from 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.

1.1.3 The NPPF states;

*“Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances.”*¹ Similarly, *“Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan”*.²

1.1.4 Epping Forest District Council (EPDC) is producing a Local Plan which is in the process of Consultation between October-December 2016 which will set out the Council’s strategy and objectives for planning in the District through the period 2011-2033.

1.1.5 The NPPF confirms the approach Local Authorities should take when addressing Green Belt boundaries, in stating that, when doing so, local authorities should:

¹ NPPF Para 87

² NPPF Para 83

- Ensure consistency with the Local Plan strategy for meeting identified requirements for sustainable development;
- Not include land which it is unnecessary to keep permanently open;
- 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;
- Make clear that the safeguarded land is not allocated for development at the present time. Planning permission for the permanent development of safeguarded land should only be granted following a Local Plan review which proposes the development;
- Satisfy themselves that Green Belt boundaries will not need to be altered at the end of the development plan period; and,
- Define boundaries clearly, using physical features that are readily recognisable and likely to be permanent.

1.1.6 The NPPF encourages Local Authorities to plan positively to enhance the beneficial use of the Green Belt, by providing opportunities for access, outdoor sport and recreation, enhancing landscapes, visual amenity and biodiversity or improving damaged and derelict land. These land uses have been interpreted as exhibiting open characteristics which are an essential component of the Green Belt.

1.2 Background

1.2.1 This report assesses the parcel of land being promoted by Peer Group ('the Site', see Figure 1, Green Belt Context) using the methodology adopted in EFDC's Green Belt Assessment Stage 2.

1.2.2 The land being promoted by Peer Group forms a much smaller area than the parcels of land being considered in the various stages of EFDC's Green Belt Assessment and the Site Selection Report (Refer to Appendix A Figure 3 Green Belt Parcels Land Parcels Proposed for Release, Appendix A Environmental Issues Report Figure 10 Promoted Site/Arup Site Comparison).

- 1.2.3 For the purposes of this Sites and Boundaries Study and in line with the Site Appraisal undertaken in July 2016³, the land being promoted by Peer Group has been split into two sub-parcels: 1C and 2D (refer to Figure 1, Green Belt Context). The references '1C' and '2D' have been taken from the Allies and Morrison's 2014 North Weald Bassett Masterplanning Study (p.130) where they appeared as part of Option 1 and 2 in Scenario A⁴. Using an adapted methodology of that used for EFDC's Green Belt Assessment Stage 2. This report will make an assessment focused on the sub-parcels (1C and 2D) in regard to their contribution to the Purposes of the Green Belt.
- 1.2.4 This report also reconsiders the larger parcels of Green Belt within which this Site falls from EPDC's Stage 1 and 2 of their assessment, comprising 190ha (470 acres). In addition, it will refer to the North Weald Bassett Masterplanning Study prepared by Allies and Morrison in 2014 as this appears to have informed large parts of the EFDC's Site Selection Report (prepared by Arup in Sept 2016) which has not allocated the much smaller parcels of land being promoted by Peer Group, 15.26ha (38 acres).
- 1.2.5 During the preparation for EFDC's Local Plan 2011-2033 the Council undertook Stage 1 of its Green Belt Assessment in August 2015. It is strategic in its approach to assessment, identifying large parcels for assessment.
- 1.2.6 Stage 2 of EFDC's Green Belt Assessment was prepared by Land Use Consultants in August 2016. It comprised of a more detailed study of the sites outlined in Stage 1 and their contribution to the Purposes of the Green Belt.
- 1.2.7 Draft Policy P6 in EFDC's Draft Local Plan Consultation 2016 has omitted the larger parcels of land south east of North Weald Bassett (within which the land being promoted by Peer Group sits) in favour of allocating other sites for residential development. This outcome has been directly informed by both the Site Selection Report (Arup, September 2016) which was preceded by the North Weald Bassett Masterplanning Study (Allies and Morrison, September 2014). However, the basis for

³ North Weald, Site Appraisal July 2016, Prepared by Omega Partnership

⁴ North Weald Bassett Masterplanning Study (2014) Allies & Morrison, p.130

this decision appears to be inconsistent and not based on site specific site conditions, size, landscape value, constraints or opportunities.

- 1.2.8 The EFDC Local Plan 1998 included a chapter on Green Belt which was updated in 2006. This included policy GB18 (The Former Radio Station Site at North Weald Bassett Bassett). This policy was drawn up for an area much wider than the proposed area of development by Peer Group and extends to the south of the railway line. The policy stated that

“The Council may grant planning permission for development east of Station Road, as replacement for the former Radio Station buildings, in the context of an acceptable scheme for the whole site which satisfied criteria” (outlined in the policy)⁵.

- 1.2.9 Since policy GB18 was introduced a small development, Tempest Mead, was built circa year 2000 to the east of Station Road. The existing Green Belt boundary includes development that has taken place within it since the 1998 Local Plan. The Green Belt Assessment Stage 2 refers to these developments as ‘anomalies’. Tempest Mead is being considered for removal from the Green Belt in the Draft Local Plan 2016. However, it should be noted that the Tempest Mead development was built on land that was within the Green Belt and lies relatively close to the current Site being promoted and is of similar size and scale.

1.3 Images EFDC Stage 1 Green Belt Assessment

- 1.3.1 The EFDC Stage 1 Green Belt Assessment (August 2015) undertakes a high level review of Green Belt land across the District to identify the contribution to the Green Belt towards national Green Belt purposes as set out in the NPPF (see paragraph 1.1.2 above). It does not determine whether or not the land should remain in, or be excluded from, the Green Belt. Stage 1 is very strategic in its approach, identifying large parcels for assessment.

⁵ Epping Forest District Council Local Plan 1998, 2006 updated chapter, Chapter 5 Green Belt, p.51.

1.3.2 It only assessed land against four of the NPPF purposes, excluding purpose five: *“To assist in urban regeneration, by encouraging the recycling of derelict and other urban land”*. It was excluded from the assessment by EFDC on the grounds that it, *“is considered to be more complex to assess than the other four purposes at a local/parcel level because the relationship between the Green Belt and recycling of urban land can be influenced by a range of factors including local plan policies, brownfield land availability and the land/development market and cannot practically be assessed on a parcel by parcel basis.”* It was therefore considered that *“the Green Belt as a whole has uniformly fulfilled this purpose.”*⁶

1.3.3 However, the exclusion of Purpose 5 from the assessment was misjudged. It is incorrect to suggest that all Green Belt land can fulfil this policy ‘uniformly’, since land is fundamentally either green field or brown field and land use can be determined on a parcel basis, particularly if the parcel area sizes are appropriately determined at the outset. This erroneous methodology was then carried forward into Stage 2.

1.4 EFDC Green Belt Assessment (LUC) Stage 2

1.4.1 EFDC commissioned Land Use Consultants (LUC) to undertake the Stage 2 Green Belt Assessment, which was released in August 2016. The study’s main aims were 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.”*⁷

1.4.2 The strategic areas identified in Stage 1 were carried forward for more detailed assessment in Stage 2 where they were separated into smaller parcels. However, in respect of the land being promoted by Peer Group, the parcels used in the Stage 2 assessment remain much larger areas of study than the land actually being proposed

⁶ EFDC Green Belt Review Methodology, August 2015, p. 12

⁷ EFDC Green Belt Assessment Stage 2, prepared by LUC, p. 4

by Peer Group and do not therefore represent correctly or realistically the areas of land being promoted.

1.5 Liz Lake Associates Green Belt Sites and Boundaries Study

1.5.1 The findings of the Liz Lake Associates Green Belt Sites and Boundaries Study will inform the current Local Plan Consultation (Oct-Dec 2016) and assist the Council in its responsibility under Regulation 18 to reconsider the correctly identified Site (Refer to Figure 1 Green Belt Context) for inclusion in Draft Policy P6 for residential development.

1.5.2 The main objectives of this Green Belt Sites and Boundaries Study are to:

- Identify potential sites (with boundary lines) to the southeast of North Weald Bassett, within the parcels (identified in the EFDC Green Belt Assessment Stage 2 by LUC) for potential release from the Green Belt for future development;
- Estimate the potential development capacity of each site; and,
- Rank the sites in terms of their suitability for potential Green Belt release.

1.5.3 The larger strategic areas identified in the EFDC Green Belt Assessment Stage 1, which were recommended for further assessment, do not fall within the scope of this Sites and Boundaries Study. This study, prepared by Liz Lake Associates, only addresses the smaller parcels identified in EFDC Green Belt Assessment Stage 2 by LUC and, of greater relevance, the sites identified as suitable for development by the Allies and Morrison Masterplanning Study 2014 (1C and 2D).

1.5.4 The EFDC Green Belt Assessment Stage 2 by LUC states;

“The analysis provides a more nuanced picture of how Green Belt performs across the District... However, separate evidence on landscape character and quality will be particularly important – in order to distinguish between areas that are more or less sensitive to development in landscape terms.”⁸

⁸ EFDC Green Belt Assessment Stage 2 by LUC, paragraph 4.17, p.32

2

METHODOLOGY

2.1 North Weald Bassett Parcels 1C and 2D

- 2.1.1 The EFDC Green Belt Assessment Stage 2 identified parcels 011.1 (53.88ha) and 011.2 (37.23) (Refer to Figure 3 Green Belt Land Parcels Proposed for Release). As previously highlighted, these cover much wider areas (approximately 91ha) than the Site being promoted by Peer Group that form much smaller portions of land (15.26ha) within those parcels.
- 2.1.2 This report will focus on two smaller sub-parcels (1C and 2D), as shown on Figure 3 (Green Belt Land Parcels Proposed for Release) that together make up the entirety of the single Site being promoted by Peer Group. The Site was identified in two parts (1C and 2D) in the North Weald Bassett Masterplanning Study (Allies and Morrison, 2014) and, because they lie within the two different parcels (011.1 and 011.2) in the Green Belt assessment, Liz Lake Associates have undertaken separate assessments on each parcel.
- 2.1.3 Liz Lake Associates have carried out this Site and Boundaries Study for Parcels 1C and 2D following the methodology used in the EFDC Green Belt Assessment Stage 2 by LUC, but Liz Lake Associates have included Purpose 5, which was omitted by LUC in error. It will also include the “missing” evidence from the Council’s Evidence Base in respect of landscape character, condition and quality, together with an assessment of the settlement edge landscape sensitivity, historic environment characterisation, land use and agricultural land classification to inform the assessment.
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3 **REVIEW OF EFDC'S STAGE 2 GB ASSESSMENT: 011.1 AND 011.2, GREEN BELT LAND SOUTH EAST OF NORTH WEALD BASSETT**

3.1 **Context and Contribution towards Green Belt Purposes**

3.1.1 Parcel 011.1 is located south east of North Weald Bassett and aligns with the eastern edge of Station Road, the northern edge of the Epping Ongar Railway and around the south, west and northern boundary of Ongar Redoubt (refer to Figure 3, Green Belt Land Parcels Proposed for Release). It is 53.88ha in size.

3.1.2 Parcel 011.2 is also located south east of North Weald Bassett and aligns with the southern edge of High Road (A414), the eastern edge of the existing residences along High Road (B181) and its south western boundary aligns with the access road to Kerr's Cottages with its south eastern boundary crossing Blakes Golf Course following the hedgerow that runs across the course. It is 37.23ha in size.

3.1.3 Both parcels fall in the F5 North Weald Landscape Character Area (Part of the F:Ridges and Valleys LCA), the key characteristics of which are stated to include:

- *“Mature trees and hedgerows at field boundaries (of low to medium height)*
- *Overall sense of tranquillity is disturbed in the west by proximity to the noise of traffic on the M11 road corridor*
- *A small-scale settlement pattern of scattered farmsteads and occasional nurseries, other than the large linear settlement of North Weald Bassett towards the centre of the area*
- *Rural road corridors lined with verges and mature deciduous trees*
- *Mature field trees and hedgerow trees are key landscape features*
- *Copses of mature deciduous woodland contribute to a sense of enclosure.”*⁹

Liz Lake Associates consider that whilst Parcel 011.1 displays some of these characteristics its immediate proximity to the abrupt settlement edge of North Weald

⁹ EFDC Landscape Character Assessment, Chris Blandford Associates, January 2010, P.146

Bassett means that it displays no “small-scale settlement pattern”. Parcel 011.2 only displays some mature trees and hedgerows and no other characteristics of the LCA due to its function being a golf course and is therefore a completely engineered landform and topography that contributes little to the surrounding landscape character.

- 3.1.4 Both parcels 011.1 and 011.2 fall within Landscape Setting Area 4 in the EFDC Settlement Edge Landscape Sensitivity Study (Appendix C). It is assessed in that report as having “High Sensitivity”¹⁰. However, the landscape setting area in that report is vast and encompasses all the land to the south east of North Weald Bassett extending south beyond the Epping Ongar heritage railway and east beyond the boundary of Blakes Golf Course. The outcome from the EFDC Settlement Edge Landscape Sensitivity Study is not therefore relevant to the much smaller sites which are being advanced for development.
- 3.1.5 Parcel 011.1 contains the so-called ‘anomaly’ housing development to the east of Station Road (Tempest Mead), built following the Local Plan 1998 - Policy GB18 which outlined the possibility for development to the east of Station Road within the Green Belt based on certain criteria. The larger proportion of that parcel contains arable fields.
- 3.1.6 Parcel 011.2 contains the gardens of residential properties along High Road (B181) and those along the southern edge of High Road (A414) with the remaining majority of the parcel containing approximately half of Blakes Golf Course.

***Review of EFDC Green Belt Assessment Stage 2 Green Belt purposes /
Justification of identification of sub-areas***

- 3.1.7 The conclusions of the EFDC Green Belt Assessment Stage 2 for Parcel 011.1 were as follows;

Parcel 011.1 is assessed to result in “moderate” harm to the Green Belt if released. It was assessed as having “no contribution” to NPPF purposes 1 and 4. In addition, it

¹⁰ Epping Forest District Settlement Edge Landscape Sensitivity Study, Chris Blandford Associates, p.94.

was assessed as having a “weak” contribution to Purpose 2 of the NPPF Green Belt purposes and a “moderate” contribution to purpose 3. However, it should be noted that under the notes in the Stage 2 assessment for purpose 3 it is stated that *“the eastern fringe of the parcel, close to the ridge line, is more distinct from the setting of the settlement and so makes a higher contribution [to Green Belt]”*¹¹. This suggests that this was a key contribution towards the assessment of Parcel 011.1 as having a “moderate” contribution to Purpose 3. The smaller parcel (1C) forming part of the parcel promoted by Peer Group forms only approximately 15% of parcel 011.1 and sits immediately adjacent to the western edge (the existing settlement edge) of the parcel, not near the ‘eastern fringe’. Therefore, as the small parcel (1C) is not part of the “eastern fringe” it should be considered as having a “relatively weak” contribution to purpose 3, not “moderate” (as might have been applicable to the much larger site). Purpose 5 was also not assessed which is a flaw in the Stage 2 assessment, as explained in paragraph 1.3.3. All this taken into account, a reassessment of Parcel 1C has been undertaken using the correct methodology as explained above, in order to consider it for release from the Green Belt for the purposes of residential development (this assessment in Section 4.1).

¹¹ EFDC Green Belt Assessment Stage 2, Technical Annex: Detailed Assessment Findings

Parcel 011.1 (EFDC's Assessment Table from Stage 2 Report) ¹²		
Purpose	Contribution	Notes
1: To Check the unrestricted sprawl of large built-up areas	No Contribution	(Large built-up areas area: London, Harlow, Cheshunt and Hoddesdon) The edge of Harlow is over 4.5km to the north-west and separated from this parcel by the M11 motorway, which follows (in cutting) a ridge of higher ground that prevents any intervisibility. Land closer to Harlow is considered to play a strong role in preventing potential sprawl.
2: To prevent neighbouring towns from merging	Weak	(Towns are: London, Harlow, Cheshunt, Hoddesdon, Epping, Waltham Abbey, Loughton/Debden, Chigwell, Buckhurst Hill, Chipping Ongar, North Weald Bassett, Theydon Bois, Roydon and Lower Nazeing) The parcel lies between North Weald Bassett and Chipping Ongar, and development here would reduce the physical gap to just over 3km (as the crow flies), but there would be no intervisibility as Chipping Ongar has a fairly contained valley setting. There may be some limited perception of a reduced gap in views from the A414, which joins the northern ends of the two settlements. The Epping Ongar heritage railway line provides a direct link adjacent to the southern edge of the parcel, but runs through a tree-lined cutting for most of its length.
3: To assist in safeguarding the countryside from encroachment	Moderate	Much of this parcel is former arable land now scrubbed over. The remains of North Weald Redoubt, one of London's late Victorian mobilisation centres (and a Scheduled Ancient Monument), lie on a ridge just beyond the eastern edge to the north and the west, and there are two small floodplain areas (forming the Weald Common Local Nature Reserve) on the former edge, but the southern/western end of North Weald Bassett is on land rising uphill to the west and is very visible from the high boundary, screening views from the upland plateau to the south. The majority of the parcel is considered to make a moderate contribution

¹²EFDC Green Belt Assessment Stage 2, Technical Annex: Detailed Assessment Findings

Parcel 011.1 (EFDC's Assessment Table from Stage 2 Report) ¹²		
Purpose	Contribution	Notes
		to this Green Belt purpose, but the eastern fringe of the parcel, close to the ridge line, is more distinct from the setting of the settlement so makes a higher contribution. Stage One parcel DSR-011 was given a higher rating because it included land more remote from the settlement edge.
4: To preserve the setting and special character of historic towns	No Contribution	(Historic towns are: Chipping Ongar, Waltham Abbey, Epping and Sawbridgeworth) There is no relationship between the parcel and any historic town.
5: To assist in urban regeneration, by encouraging the recycling of derelict and other urban land	Not assessed	Not assessed at individual parcel level, as explained in "Methodology" section of [Stage 1] report.

3.1.8

The conclusions of the EFDC Green Belt Assessment Stage 2 for Parcel 011.2 were as follows;

Parcel 011.2 is assessed to result in "high" harm to the Green Belt if released. However, it was assessed by EFDC as having "no contribution" to NPPF Purposes 1 and 4. In addition, it was assessed as having a "relatively weak" contribution to Purpose 2 of the NPPF Green Belt purposes and a "relatively strong" contribution to Purpose 3. However, it should be noted that under the notes in the Stage 2 assessment for Purpose 3 it is stated:

"this is high ground with long views over a rural landscape, so despite the artificial undulations of the golf course and the exposed nature of the settlement edge on the

B181 it has a strong relationship with the wider countryside, and no sense of containment.”¹³.

Whilst it is acknowledged that parts of the golf course are on relatively high ground in comparison to the wider landscape, those parts of the golf course are to the east, beyond a ridge. The smaller parcel (2D) forming part of the parcel proposed for development by Peer Group is to the west of that ridge, on lower ground, and forms only approximately 20% of parcel 011.2. The proposed site also sits immediately adjacent to the south eastern edge of the settlement of North Weald Bassett.

3.1.9

There are limited views onto the Site from the surrounding countryside (see Photo Location 14 in Figures 8 and 9 in Appendix A of the Environmental Issues Report also prepared by Liz Lake Associates). The nature of the proposed development (low-rise, low-density residential dwellings) is entirely consistent with the residences that make up the existing settlement edge backing onto the golf course. The parcel is also well contained by thick hedgerows and benefits from undulations which help to reduce the consistency of any views in or out. Therefore the limited views which exist at present would not be significantly altered if parcel 2D were released from the Green Belt for residential development. All this taken into account, an assessment of Parcel 2D has been undertaken using the methodology from Stage 2 in order to consider it for removal from the Green Belt (this assessment is in Section 4.2).

Parcel 011.2 (EFDC's Assessment from Stage 2 Report) ¹⁴		
Purpose	Contribution	Notes
1: To Check the unrestricted sprawl of large built-up areas	No Contribution	(Large built-up areas area: London, Harlow, Cheshunt and Hoddesdon) The edge of Harlow is over 4.5km to the north-west and separated from this parcel by the M11 motorway, which follows (in cutting) a ridge of higher ground that prevents any intervisibility. Land closer to Harlow is considered to play a strong role in preventing potential sprawl.

¹³ EFDC Green Belt Assessment Stage 2, Technical Annex: Detailed Assessment Findings

¹⁴ EFDC Green Belt Assessment Stage 2, Technical Annex: Detailed Assessment Findings

Parcel 011.2 (EFDC's Assessment from Stage 2 Report) ¹⁴		
Purpose	Contribution	Notes
2: To prevent neighbouring towns from merging	Relatively Weak	<p>(Towns are: London, Harlow, Cheshunt, Hoddesdon, Epping, Waltham Abbey, Loughton/Debden, Chigwell, Buckhurst Hill, Chipping Ongar, North Weald Bassett, Theydon Bois, Roydon and Lower Nazeing)</p> <p>The parcel lies between North Weald Bassett and Chipping Ongar, and development here would reduce the physical gap to just over 3km (as the crow flies). There would be no intervisibility, as Chipping Ongar has a fairly contained valley setting, but the gap as perceived along the A414, which passes through an open, arable landscape between the two settlements, would potentially be reduced.</p>
3: To assist in safeguarding the countryside from encroachment	Relatively Strong	<p>This parcel comprises part of a golf course, Blakes Golf Course, along with several houses on the settlement edge, the extended gardens of houses along the B181 (High Road) and a few isolated houses by the track along the southern edge of the parcel, near the golf clubhouse. This is high ground with long views over a rural landscape, so despite the artificial undulations of the golf course and the exposed nature of the settlement edge on the B181 it has a strong relationship with the wider countryside, and no sense of containment.</p>
4: To preserve the setting and special character of historic towns	No Contribution	<p>(Historic towns are: Chipping Ongar, Waltham Abbey, Epping and Sawbridgeworth)</p> <p>There is no relationship between the parcel and any historic town.</p>
5: To assist in urban regeneration, by encouraging the recycling of derelict and other urban land	Not assessed	<p>Not assessed at individual parcel level, as explained in Methodology section of [Stage 1] report.</p>

3.1.10

For the purposes of this assessment the Site being promoted by Peer Group has been split into two sub-parcels, 1C and 2D. 1C lies within Stage 2 parcel O11.1 and a small section of 2D lies within Stage 2 parcel O11.2. Together 1C and 2D form the entirety of the Site being promoted by Peer Group (refer to Figure 1, Green Belt Context).

LIZ LAKE - GREEN BELT ASSESSMENT OF SUB PARCELS 1C AND 2D.

4.1 Assessment of Land Parcel 1C

- 4.1.1 Parcel 1C is located immediately southeast of North Weald Bassett (Refer to Figure 3 Green Belt Parcels Proposed for Release) and comprises land within the EFDC Stage 2 Parcel 011.1 and a small section of Stage 2 Parcel 011.2. It lies within Landscape Character Area F5 North Weald (Part of the F: Ridges and Valleys LCA).¹⁵ The land is deemed 'other land predominantly non-agricultural use'¹⁶ and is currently scrubbed over and unused for any economic benefit. It has some semi-urban influences such as Ongar Redoubt near to the south eastern boundary and Blakes Golf Club just the other side of the northern boundary. The setting of the Redoubt is addressed in the separate Peter Stewart Consultancy report (December 2016). The indivisibility of residential development along the western boundary of 1C adds to its urban edge character.
- 4.1.2 Parcel 1C is enclosed by the dense scrub that has grown on it and is well-contained from the wider countryside to the south and east of Ongar Redoubt by the major woodland block that has grown up around the Redoubt and former Ongar Radio Station and the ridgeline of higher ground to the east (Refer to Figure 4 Topography).
- 4.1.3 Parcel 1C makes no contribution towards checking unrestricted sprawl of large built up areas because it is located away from large built-up areas of London, Harlow, Cheshunt and Hoddesdon. It does not form a connection with a wider network of parcels to restrict sprawl.
- 4.1.4 Parcel 1C would have little impact on the overall role of the Green Belt preventing neighbouring towns from merging. The existing gap between the two settlements at its narrowest point is approximately 3.6km measured from the eastern edge of North Weald Bassett at Marconi Bungalows on the A414. The gap between Chipping Ongar

¹⁵ EFDC Landscape Character Assessment, Chris Blandford Associates, January 2010.

¹⁶ Natural England, Agricultural Land Classification Maps, <http://publications.naturalengland.org.uk/category/5954148537204736>, last accessed 07/12/2016

and any potential development on the land being promoted by Peer Group would be approximately 3.8km, which is still wider than the narrowest gap between North Weald Bassett and Chipping Ongar. The physical containment of Parcel 1C by the adjacent vegetation and woodland around Ongar Redoubt and topography would also assist in safeguarding the countryside from encroachment as it creates a natural boundary for 1C and provides visual containment.

- 4.1.5 Parcel 1C makes a relatively weak contribution to Purpose 3: assist in safeguarding the countryside from encroachment. The Parcel is only approximately 15% of the size of Stage 2 Parcel O11.1 and lies on its far western boundary. Parcel O11.1 was assessed as having a 'moderate' contribution towards this Purpose due to the eastern fringe of the parcel being close to the ridge line where the Ongar Redoubt sits. Parcel 1C sits adjacent to the settlement boundary on southwest facing landform and the boundary of the Redoubt is approximately 180m from its eastern edge. Due to the "scrubby" character of Parcel 1C and the dense woodland that has grown up around Ongar Redoubt there is little visual connection with the wider countryside.
- 4.1.6 Parcel 1C makes no contribution to preserving the setting and special character of historic towns.
- 4.1.7 Parcel 1C makes no contribution to Purpose 5, assisting in urban regeneration by encouraging the recycling of derelict and other urban land. The Parcel is part of the wider Ongar Park Estate that was formerly developed when it was home to the North Weald Bassett radio station and radio masts. The Parcel therefore makes no contribution to Purpose 5.

Sub-parcel 1C		
Purpose	Contribution	Notes
1: To Check the unrestricted sprawl of large built-up areas	No Contribution	(Large built-up areas area: London, Harlow, Cheshunt and Hoddesdon) It is located away from large built-up areas of London, Harlow, Cheshunt and Hoddesdon. It does not form a connection with a wider network of parcels to restrict sprawl.
2: To prevent neighbouring towns from merging	No Contribution	(Towns are: London, Harlow, Cheshunt, Hoddesdon, Epping, Waltham Abbey, Loughton/Debden, Chigwell, Buckhurst Hill, Chipping Ongar, North Weald Bassett, Theydon Bois, Roydon and Lower Nazeing) The parcel lies between North Weald Bassett and Chipping Ongar. The existing gap between the two settlements at its narrowest point is approximately 3.6km measured from the eastern edge of North Weald Bassett at Marconi Bungalows on the A414. If Parcel 1C were developed the gap between 1C and Chipping Ongar would be approximately 3.8km.
3: To assist in safeguarding the countryside from encroachment	Relatively Weak	Parcel 1C sits adjacent to the settlement boundary and the boundary of Ongar Redoubt is approximately 180m from its eastern edge. Due to the scrubby character of Parcel 1C and the dense woodland that has grown up around Ongar Redoubt there is little visual connection with the countryside and little physical connection due to the character of the landscape which only becomes more rural beyond the Epping Ongar Railway to the south, far beyond the boundaries of this Parcel.
4: To preserve the setting and special character of historic towns	No Contribution	(Historic towns are: Chipping Ongar, Waltham Abbey, Epping and Sawbridgeworth) There is no relationship between the parcel and any historic town.
5: To assist in urban regeneration, by encouraging the recycling of derelict and other urban land	No Contribution	The Parcel is part of the wider Ongar Park Estate that was formerly developed when it was home to the North Weald radio station and radio masts. The Parcel has now scrubbed over. The Parcel therefore makes no contribution to Purpose 5.

- 4.1.8 Stage 2 Parcel 011.1 was assessed overall by EFDC to cause **'moderate'** resultant harm to the green belt if released. For the reasons outlined above, Parcel 1C is assessed by Liz Lake Associates to cause **'relatively weak'** resultant harm to the green belt if it were released for residential development.
- 4.1.9 Land parcel 1C is well contained by the adjacent scrubland and woodland around Ongar Redoubt and the adjacent settlement.

4.2 Assessment of Land Parcel 2D

- 4.2.1 Parcel 2D is located immediately southeast of North Weald Bassett and comprises of land within EFDC Stage 2 Parcel 011.2. It lies within Landscape Character Area F5 North Weald (Part of the F: Ridges and Valleys LCA).¹⁷ The land is deemed 'other land predominantly non-agricultural use'¹⁸ and is currently in use as a Golf Course which contributes to it having a somewhat semi-rural character. Its indivisibility from the residential development along its western boundary adds to its urban edge character.
- 4.2.2 Parcel 2D lies entirely within the existing Golf Club grounds. Its western boundary is adjacent to residential properties along the High Road (B181).
- 4.2.3 Parcel 2D makes no contribution towards checking unrestricted sprawl of large built up areas because it is located away from large built-up areas of London, Harlow, Cheshunt and Hoddesdon. It does not form a connection with a wider network of parcels to restrict sprawl.
- 4.2.4 Parcel 2D would have little impact on the overall role of the Green Belt preventing neighbouring towns from merging. The EFDC assessment of Parcel 011.2 in Stage 2 assessed that: "the development here would reduce the physical gap to just over 3km (as the crow flies)" between North Weald Bassett and Chipping Ongar. This led to Parcel 011.2 in Stage 2 assessed as having a 'relatively weak' contribution to Purpose 2. On further investigation this is actually incorrect. The existing gap between the two settlements at its narrowest point is approximately 3.6km measured from the

¹⁷ EFDC Landscape Character Assessment, Chris Blandford Associates, January 2010.

¹⁸ Regional Agricultural Land Classification Maps, Natural England, accessed at: <http://publications.naturalengland.org.uk/category/5954148537204736>, last accessed, 21/11/16.

eastern edge of North Weald Bassett at Marconi Bungalows on the A414. If Parcel 2D were developed the gap between 2D and Chipping Ongar would remain at approximately 3.6km, with no overall change in the narrowest gap between North Weald Bassett and Chipping Ongar.

4.2.5

Parcel 2D makes a moderate contribution to Purpose 3: assist in safeguarding the countryside from encroachment. In the EFDC Stage 2 assessment Parcel 011.2 was assessed as having a 'relatively strong' contribution to Purpose 3. Under the notes in the Stage 2 assessment for purpose 3 it is stated that: "this is high ground with long views over a rural landscape, so despite the artificial undulations of the golf course and the exposed nature of the settlement edge on the B181 it has a strong relationship with the wider countryside, and no sense of containment."¹⁹. Whilst it is acknowledged that the eastern part of golf course is on relatively high ground in comparison to the wider landscape, the smaller parcel (2D) forming part of the proposed site for development by Peer Group is to the west of the ridgeline (Refer to Figure 4 Topography) and forms only approximately 20% of parcel 011.2 and sits immediately adjacent to the southeast edge of North Weald Bassett. The views from the surrounding countryside towards parcel 2D are therefore very limited and are immediately towards the existing urban edge of the settlement. Photo Location 14 (Refer to Figures 8 and 9, Appendix A of Environmental Issues Report prepared by Liz Lake Associates) represents the only viewpoint in the surrounding area where the Site can be seen from. The parcel is also visually contained by thick hedgerows when seen from this viewpoint. The nature of the proposed development (low-rise, low-density residential dwellings) is entirely consistent with the existing residences that make up the settlement edge backing onto the golf course. Therefore this view would not be drastically altered if parcel 2D were released from Green Belt for low-rise, low-density residential development.

¹⁹ EFDC Green Belt Assessment Stage 2, Technical Annex: Detailed Assessment Findings

4.2.6 Parcel 2D makes no contribution to preserving the setting and special character of historic towns.

4.2.7 Parcel 2D makes a weak contribution to Purpose 5, assisting in urban regeneration by encouraging the recycling of derelict and other urban land. Its current use as a Golf Course contributes to it having a somewhat semi-rural character but its indivisibility from the residential development along its western boundary add to its urban edge character. It constitutes formerly undeveloped land due to its semi-rural character but does not constitute green field land.

Sub-parcel 2D		
Purpose	Contribution	Notes
1: To Check the unrestricted sprawl of large built-up areas	No Contribution	(Large built-up areas area: London, Harlow, Cheshunt and Hoddesdon) It is located away from large built-up areas of London, Harlow, Cheshunt and Hoddesdon. It does not form a connection with a wider network of parcels to restrict sprawl.
2: To prevent neighbouring towns from merging	No Contribution	(Towns are: London, Harlow, Cheshunt, Hoddesdon, Epping, Waltham Abbey, Loughton/Debden, Chigwell, Buckhurst Hill, Chipping Ongar, North Weald Bassett, Theydon Bois, Roydon and Lower Nazeing) The parcel lies between North Weald Bassett and Chipping Ongar. The existing gap between the two settlements at its narrowest point is approximately 3.6km. If Parcel 2D were developed the gap between 2D and Chipping Ongar would remain at approximately 3.6km with no overall change in the narrowest gap between North Weald Bassett and Chipping Ongar.
3: To assist in safeguarding the countryside from encroachment	Moderate	Parcel 2D sits adjacent to the settlement boundary where residential dwellings along High Road (B181) and covers only a portion of the existing Blake Golf Club course. The view of the Parcel from the surrounding countryside is limited and the thick hedgerows that lie to the south of the south eastern boundary of parcel 2D partially screen the existing settlement edge.

4: To preserve the setting and special character of historic towns	No Contribution	(Historic towns are: Chipping Ongar, Waltham Abbey, Epping and Sawbridgeworth) There is no relationship between the parcel and any historic town.
5: To assist in urban regeneration, by encouraging the recycling of derelict and other urban land	Weak	The current use of 2D as a Golf Course contributes to it having a somewhat semi-rural character but its indivisibility from the residential development along its western boundary add to its urban edge character.

4.2.8 Parcel 011.2 was assessed overall by EFDC to cause ‘high’ resultant harm to the green belt if released. For reasons outlined above, Parcel 2D is assessed by Liz Lake Associates to cause ‘moderate’ resultant harm to the green belt if it were released for residential development.

4.2.9 The settlement edge character of the parcel as a whole (1C and 2D) and the respective EFDC Stage 2 Green Belt Assessment, (being parcels which lie within 011.1 and 011.2), was noted in the EFDC Assessment. The third Parcel adjacent to these to the east, 011.3, is far larger and extends out to the east beyond the boundary of Blakes Golf Club and to the east of Ongar Park Hall and to the south at Ongar Heritage Railway (Refer to Figure 3 Green Belt Land Parcels Proposed for Release). It was assessed as resulting in ‘**very high**’ harm to the green belt if released. This decision was made on the basis of it scoring a ‘**strong**’ contribution to Purpose 3 of the Green Belt because of it being “*remote from the settlement edge*”²⁰. Parcels 011.1 and 011.2 were not deemed as such because of their position adjacent to the settlement edge. This further demonstrates the fact that the smaller parcels (sites 1C and 2D) being promoted by Peer Group plc are even closer to the settlement edge than the wider areas of Parcels 011.1 and 011.2.

²⁰ EFDC Green Belt Assessment Stage 2, Technical Annex: Detailed Assessment Findings, Parcel 011.3.

Summary

- 4.2.10 From the site specific assessments made by Liz Lake Associates in this report, the Site as a whole (1C and 2D) would not cause significant harm to the Green Belt should it be released for low-rise, low-density residential development as proposed. It should be noted, that the North Weald Bassett Masterplanning Study (2014) referred to the linear character of North Weald Bassett. Due to the location of the proposed site (being 1C and 2D from the Allies and Morrison Masterplanning Study 2014) immediately adjacent to the settlement edge of North Weald Bassett and following the rectilinear nature of the village, parcels 1C and 2D together would provide a very logical and sustainable extension to the village.
- 4.2.11 The EFDC Stage 2 Green Belt Assessment also provided Figures 4.1-4.6 (Appendix D) showing the results of the assessment against purpose 1, 2 and 4 (excluding purpose 3) and stated that it provides: *“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.”* The report goes on to state: *“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.”*²¹
- 4.2.12 As illustrated by the table below the information from the maps in the EFDC Stage 2 Report, confirms that the potential harm to the Green Belt (excluding purpose 3) was deemed to be **‘very low’** and **‘low’** for Parcels 011.1 and 011.2 respectively (refer to Figure 3 Green Belt Land Parcels Proposed for Release). These results are lower in comparison with the parcels to the west of the village by the airfield (Parcels 010.1, 010.2, 008.1 and 008.2) of which the two larger parcels (010.2 and 008.2) scored **‘moderate’** in this figure. Therefore, in assessing potential harm to the Green Belt, the land to the southeast of the village (Parcels 011.1 and 011.2) was assessed to cause less harm (excluding Purpose 3) than sites to the northwest of the village.

²¹ EFDC Green Belt Assessment Stage 2, Main Report, p.46, paragraph 5.4.

Liz Lake Associates has demonstrated that Purpose 3 was incorrectly assessed by EFDC for the reasons stated in paragraph 4.2.5 above and the assessment for Parcels 011.1 and 011.2 should both be **'Moderate'** not **'Moderate'** and **'Relatively Strong'**. Parcels 010.1, 010.2, 008.1 and 008.2 were assessed for Purpose 3 as **'Relatively Weak'**, **'Moderate'**, **'Moderate'** and **'Strong'** respectively (refer to Table 1).

4.2.13

On further review of landscape character and quality (following the recommendation in EFDC Stage 2 Green Belt Assessment to qualify the Green Belt review with further evidence, referenced above) a Landscape Sensitivity and Capacity Study and Environmental Issues Report has also been prepared by Liz Lake Associates, which provides evidence that parcels 1C and 2D (which lie within parcels 011.1 and 011.2 of the Stage 2 Assessment) are better options for release from the Green Belt than the parcels to the west of the village, particularly those on high quality agricultural land and those in close proximity to the airfield.

TABLE 1 - Table showing assessment results from Figures 4.1-4.6 in EFDC Stage 2 Green Belt Assessment Report²²

	Purpose 1	Purpose 2	Purpose 3	Purpose 4	Potential level of harm to the GB associated with release of Parcels (Purpose 1-4)	Potential level of harm to the GB associated with release of Parcels (Excluding Purpose 3)
011.1	No Contribution	Weak	Moderate	No Contribution	Moderate	Very Low
011.2	No Contribution	Relatively Weak	Relatively Strong	No Contribution	High	Low
011.3	No Contribution	Relatively Weak	Strong	No Contribution	Very High	Low
010.1	No Contribution	No Contribution	Relatively Weak	No Contribution	Low	None
010.2	No Contribution	Moderate	Moderate	No Contribution	Moderate	Moderate
008.1	No Contribution	No Contribution	Moderate	No Contribution	Moderate	None
008.2	No Contribution	Moderate	Strong	No Contribution	Very High	Moderate

²² All information from EFDC Stage 2 Green Belt Assessment Report, prepared by LUC

Planning History

- 4.2.14 In 2012, SLAA maps prepared by NLP concluded that the Parcel s of land including the Site promoted by Peer Group was “suitable”²³ for development. They were also deemed ‘suitable’ by the SLAA 2016 and the Stage 1 of the Site Selection Process²⁴.
- 4.2.15 Further to this report Liz Lake Associates has been instructed to prepare a Landscape Sensitivity and Capacity Study which will be submitted to Epping Forest District Council along with an Environmental Issues report and this report.
- 4.2.16 The EFDC Stage 1 Green Belt Assessment (2015) “determined that it would not be reasonable to continue to detailed assessment of areas of the District that are remote from services and facilities... buffers defined by distance from key services have been applied to each settlement type”²⁵. North Weald Bassett was identified as a ‘large village’ which was allocated a buffer of 1km. The land identified around North Weald Bassett in the Stage 1 report “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.”²⁶. Both 1C and 2D lie within this 1km buffer as illustrated in Figure 18 (Broad locations for further assessment) in the Stage 1 report.

4.3 Constraints

A summary of environmental, historic and other constraints within the Site (1C and 2D) are set out below;

Environmental and Historic Features

- 4.3.1 Parcel 1C and 2D do not contain, adjoin or include any statutory designated sites of ecological interest, such as Sites of Special Scientific Interest (SSSI), National Nature Reserves, Special Protection Areas (SPAs) or other sites designated under UK or European Directives.
- 4.3.2 There is one area of Ancient Replanted Woodland to the northeast of the northern Site boundary across the A416 at Tyler’s Green. It is a Local Wildlife Site: Reynkyns Wood (Ep145). This is not affected by the proposed development.

²³ Strategic Land Availability Assessment: Suitability – Epping, Epping Green, North Weald Bassett, Thornwood & Toot Hill, appendix 5.

²⁴ Site Selection Report 2016, Arup.

²⁵ EFDC Green Belt Assessment Stage 1 report, p.40.

²⁶ EFDC Green Belt Assessment Stage 1 report, p.42.

- 4.3.3 The ancient monument North Weald Bassett Redoubt lies to the south of the Site boundary (list entry number: 1018456). A separate report which assesses the setting of the Redoubt has been prepared by Peter Stewart Consultancy and will be submitted as part of these Regulation 18 representations.

Other potential constraints / features

- 4.3.4 Bridleway 201_85 crosses the Site at the middle and Footpath 201_35 passes along the north eastern boundary. These will not be affected by the proposed development.
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CONCLUSION

- 5.1.1 The Allies and Morrison Masterplanning Study 2014 commissioned by EFDC identified two Sub-Parcels, 1C and 2D, located to the south east of North Weald Bassett. Peer Group accepted the Allies and Morrison study and has, since 2014, promoted these two areas (as a single conjoined site) for residential development.
- 5.1.2 Together the two Sub Parcels make up the entirety of the Parcel of land being promoted by Peer Group for residential development. 1C and 2D are Sub-Parcels within Parcels 011.1 and 011.2 of the EFDC's Stage 2 Green Belt Assessment. Sub-Parcels 1C and 2D have been assessed by Liz Lake Associates against all 5 purposes of Green Belt as described within the NPPF. Parcel 1C was assessed to cause '**relatively weak**' resultant harm to the green belt if it were released for residential development. Parcel 2D was assessed to cause '**moderate**' resultant harm to the green belt if it were released for residential development. This would be less harm than sites to the northwest of North Weald Bassett, which have been proposed by EFDC for allocation.
- 5.1.3 Further review of planning history identified that the Site lies within land that is deemed as 'suitable' for development in the SLAA report (2016) and also lies within the 1km zone in the EFDC Stage 1 Green Belt Assessment for green belt land around large villages that is deemed to be within range of services and facilities.
- 5.1.4 The North Weald Bassett Masterplanning Study (2014) noted the linearity of the village of North Weald Bassett and an objective to make the village more walkable. Parcels 1C and 2D would make a logical and sustainable extension to the village in this regard as they would maintain the linearity of the village and not extend the existing village boundary to the same extent as other potential sites, to the northwest of the village.
- 5.1.5 The gap between North Weald Bassett and Chipping Ongar would not be significantly compromised as a result of releasing parcels 1C and 2D from the Green Belt and the fairly contained valley setting of Chipping Ongar would mean there would be little or no intervisibility between the settlements.

- 5.1.6 The release of parcels 1C and 2D from the Green Belt for low-rise low-density, residential development would benefit from existing defensible green belt boundaries surrounding the two parcels and significant scope to improve these over time.
- 5.1.7 Liz Lake Associates have prepared a Landscape and Biodiversity Opportunities plan for the land being promoted by Peer Group in Appendix C of the Ecological Review and includes further Green Infrastructure opportunities for enhancing the Green Belt Boundary surrounding the Site.
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