

Land at the Former North Weald Golf Course

Revised Green Belt Assessment



Report for




Main contributors

Robert Deanwood
Jen Neal
Graham Lee

Issued by

.....
Robert Deanwood

Approved by


.....
Graham Lee

Amec Foster Wheeler



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1. Purpose

This report sets out a revised assessment of the contribution to Green Belt purposes of land at the former North Weald Golf Course. The analysis establishes that:

- ▶ the Green Belt Assessment commissioned by Epping Forest District Council is flawed in respect the specification of parcels for assessment and an inconsistent analysis of the contribution of land to Green Belt purposes.
- ▶ a revised analysis of the contribution of the land to the Green Belt reveals that land to the south of the A414 makes a more moderate contribution to the Green Belt than concluded by the Council's assessment.
- ▶ site-specific testing of the qualities of the land suggests that development could be readily accommodated on land to the south of the A414, with a more cautious approach on land to the north of the A414.

2. Flawed EFDC Green Belt Assessment

There are two significant flaws in the Council's assessment of the contribution of the Green Belt in this locality. Together these render the evidence unreliable as a basis for plan-making and decision taking in respect of the area's suitability as a location for development. The flaws relate to: the illogical definition of parcel boundaries as the basis for assessment, and an inconsistent analysis of the meeting of Green Belt purposes.

2.1 Illogical Boundary Definition

- ▶ The Stage 1 Assessment uses the A414 as a clear boundary between parcels DSR-008 (covering land to the north the A414) and DSR-010 (covering land between North Weald Bassett and the M11).
- ▶ By contrast, the Stage 2 Assessment, published in August 2016, chooses to ignore the A414 as a significant boundary feature, extending parcel DSR-008 southwards to the less substantial boundaries of Rayley Lane and Vicarage Lane.
- ▶ The Stage 2 Assessment offers no explanation for this change.
- ▶ The implications of this boundary shift for the assessment of the fulfilment of Green Belt purposes of parcel DSR-008 are significant.

2.2 Inconsistent Analysis of the Meeting of Green Belt purposes

- ▶ The analysis of the extent to which parcel DSR-008 meets Green Belt purposes is confused in two respects: first, in respect of the separation function (Purpose 2), and second in respect of the prevention of encroachment function (Purpose 3).
- ▶ Purpose 2 - Prevent neighbouring towns¹ from merging. The following analysis is offered: "*in this large area of gentle, north and west-facing slopes would extend the settlement edge significantly closer to Harlow. A broad area of high ground to the south of Harlow, in which the wooded areas of Harlow Park, Mark Bushes and Latton Bushes are very prominent, creates strong visual separation, but to the south of Hastingwood a very broad, shallow valley provides long views so there would be a perception of settlement expansion from some distance north of the parcel. To the east the parcel accounts for about one third of the 4km gap between North Weald Bassett and Chipping Ongar, so the gap experienced in travelling along the A414 would be reduced noticeably, but Chipping Ongar lies in a valley and has no intervisibility to this distance.*"

¹ The Assessment defines towns as: London, Harlow, Cheshunt, Hoddesdon, Epping, Waltham Abbey, Loughton / Debden, Chigwell, Buckhurst Hill, Chipping Ongar, North Weald Bassett, Theydon Bois, Roydon and Lower Nazeing)

- North Weald Bassett is not a town (indeed the Stage 2 Assessment labels the settlement type as a 'Large Village') and therefore cannot be used as the basis for the assessment of Purpose 2.
- The analysis conflates physical and perceptual assessment, the latter more properly the concern of landscape sensitivity and capacity assessment.
- The conclusions on Purpose 2 are therefore neither not logical nor valid in terms of the assessment of the strategic role of the Green Belt.
- ▶ Purpose 3 – Assist in Safeguarding the Countryside from Encroachment'. The analysis states that:
"North Weald Golf Course occupies the western third of this area but the remainder is mostly arable farmland, centred on the farm at Wyldingtree. The parcel forms the southern slopes of a very broad, exposed and rural valley (along which Cripsey Brook flows). The settlement edge at Tyler's Green is contained by a strong hedgerow and the eastern and western parts of the parcel are more remote from the inset settlement. Development along Vicarage Lane West is not urbanising in character. There are no significant barrier features separating the parcel from the wider countryside.
- The analysis appears to relate solely to land to the north of the A414, failing to consider the significant area south of the A414 which has been included in the Stage 2 Assessment, notwithstanding the statement in the Assessment that: *"The A414 could form a strong parcel boundary, but this would not alter the assessment findings."*
- The illogical boundaries of parcel 008.2 render the analysis of the Stage 2 wholly unreliable in relation to Purpose 3, with no specific analysis of land to the south of the A414.
- The analysis of parcel DSR-010 in the Stage 1 Assessment (which contains land to the south of the A414) concludes that the parcel performs strongly in respect of preventing encroachment into open countryside. *(12) The parcel is largely dominated by the airfield, the associated roadways and control tower. The airfield is surrounded by large slightly sloping arable fields that provide panoramic views of North Weald Bassett. It is unlikely that the topography and location prevent encroachment of development, given the proximity to North Weald Bassett and the open landscape. Therefore, the Green Belt designation safeguards the countryside from encroachment. (13) The parcel has not been encroached by built development or other urbanising elements.*
- Given the extent of urbanising uses associated with the North Weald Airfield and its periphery and land off Vicarage Lane (notably at Chase Farm), the statement at (13) cannot be relied upon as a fair analysis of the true contribution of the land to Green Belt purposes and consequently the effect of introducing development.

3. Results of a Revised Stage 2 Green Belt Assessment

The Council's Stage 2 Assessment states that: *“The A414 could form a strong parcel boundary, but this would not alter the assessment findings.”* No further evidence for this conclusion is offered. In reality, re-assessment of a revised parcel, bounded by Vicarage Lane, Rayley lane and the A414, and a corrected assessment of Purpose 2, yields different results to those of the Parcel 008.2 as presented by the Council's evidence. Table 3.1 Sets out the results of the re-assessment of land parcels comprising the former North Weald Golf Course.

Table 3.1 Assessment of Land Comprising the former North Weald Golf Course

Green Belt Purpose	EFDC Stage 2 Assessment for Parcel 008.2	Assessment for Land to the South of the A414	Assessment for Land to the North of the A414
<p>1. To check the unrestricted sprawl of large built-up areas</p> <p>Guide Question (Wood E&I): <i>What is the role of the parcel in preventing the extension of an existing development into open land beyond established limits, in light of the presence of significant boundaries?</i></p>	<p>No Contribution</p> <p>The edge of Harlow is a little over 3km 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 inter-visibility. Land closer to Harlow is considered to play a strong role in preventing potential sprawl.</p> <p>The higher rating given to Stage One parcel DSR-008 reflects that parcel's inclusion of land closer to the large built-up area of Harlow.</p>	<p>No Contribution</p> <p>This assessment also aligns with the EFDC Stage 2 Assessment for Parcel 008.2 in relation to this purpose.</p> <p>The parcel is surrounded on all sides by the significant boundaries of Rayley Lane to the west, Vicarage Lane West to the south, the linear belt of trees and shrubs between the parcel and the nursery to the east, and the A414 to the North. All these can be regarded as strong boundaries, comprising prominent physical features.</p> <p>Furthermore, the site does not adjoin a large built up area nor does it support Green Belt which does.</p>	<p>No Contribution</p> <p>This assessment also aligns with the EFDC Stage 2 Assessment for Parcel 008.2 in relation to this purpose.</p> <p>The parcel is surrounded on all sides by the significant boundaries of Cripsey Brook, with its associated riparian vegetation to the north and north east, and an established hedgerow to the to the east (both of which separate the parcel from the surrounding Arable land), and the A414 to the south. These boundaries can be regarded as moderately strong, comprising physical features.</p> <p>Furthermore, the site does not adjoin a large built up area nor does it support Green Belt which does.</p>
<p>2. To prevent neighbouring towns from merging</p> <p>Guide Question (Wood E&I): <i>What is the role of the parcel in preventing the merger of settlements which might occur through a reduction in the distance between them?</i></p>	<p>Moderate</p> <p>Development in this large area of gentle, north and west-facing slopes would extend the settlement edge significantly closer to Harlow.</p> <p>A broad area of high ground to the south of Harlow, in which the wooded areas of Harlow Park, Mark Bushes and Latton Bushes are very prominent, creates strong visual separation, but to</p>	<p>No Contribution</p> <p>Although development in this area of gentle, north and west-facing slopes would locally create a settlement edge which is closer to Harlow, the distance is a significant 3.2km, and the substantial built feature of the M11 motorway also runs between the two.</p> <p>Furthermore, North Weald Bassett itself is not a town and therefore cannot be</p>	<p>No Contribution</p> <p>Although development in this area of gentle, north and west-facing slopes would locally create a settlement edge which is closer to Harlow, North Weald Bassett itself is not a town and therefore cannot be used as the basis for the assessment of Purpose 2.</p> <p>In addition, the development parcel is not located within a strategic gap between towns.</p>

Green Belt Purpose	EFDC Stage 2 Assessment for Parcel 008.2	Assessment for Land to the South of the A414	Assessment for Land to the North of the A414
	<p>the south of Hastingwood a very broad, shallow valley provides long views so there would be a perception of settlement expansion from some distance north of the parcel.</p> <p>To the east the parcel accounts for about one third of the 4km gap between North Weald Bassett and Chipping Ongar, so the gapping experienced in travelling along the A414 would be reduced noticeably, but Chipping Ongar lies in a valley and has no inter-visibility to this distance.</p>	<p>used as the basis for the assessment of Purpose 2.</p> <p>In addition, the development parcel is not located within a strategic gap between towns.</p>	
<p>3. To assist in safeguarding the countryside from encroachment</p> <p>Guide Question (Wood E&I): <i>What is the role of the parcel in maintaining a sense of openness, particularly in light of proximity to a settlement edge?</i></p>	<p>Strong</p> <p>North Weald Golf Course occupies the western third of this area but the remainder is mostly arable farmland, centred on the farm at Wyldingtree.</p> <p>The parcel forms the southern slopes of a very broad, exposed and rural valley (along which Cripsey Brook flows).</p> <p>The settlement edge at Tyler's Green is contained by a strong hedgerow and the eastern and western parts of the parcel are more remote from the inset settlement. Development along Vicarage Lane West is not urbanising in character. There are no significant barrier features separating the parcel from the wider countryside.</p>	<p>Moderate</p> <p>North Weald Golf Course occupies the majority of the area, the former golf club buildings (including the former club house, which benefits from a planning permission for a change of use to residential development) and the North Weald Health and Leisure Centre sit to the north and there is development along the Vicarage Lane West boundary to the south. Therefore, encroachment into this land has already to an extent compromised the Green Belt.</p> <p>The A414 which is buffered by substantial hedgerows, separates the land from the northern portion of the former golf course, which is accessed via an underpass. Rayley Lane borders the land to the west, beyond which is the northern section of the main runway of North Weald Airfield.</p> <p>Within the parcel the land is undulating and from the elevated vantage point at the top of the undulations there are views out to surrounding countryside. However, there is no direct relationship with open countryside and a high degree of enclosure exists</p>	<p>Strong</p> <p>The North Weald Golf Course occupies the whole of the area.</p> <p>The A414 which is buffered by substantial hedgerows, separates the land from the southern half of the north weald golf course, which is accessed via an underpass.</p> <p>The land to the north and east is separated by hedgerows and is arable farmland.</p> <p>Within the site the landscape is undulating and from the elevated vantage point at the top of the undulations there are views out to surrounding countryside.</p>

Green Belt Purpose	EFDC Stage 2 Assessment for Parcel 008.2	Assessment for Land to the South of the A414	Assessment for Land to the North of the A414
		due to the parcel being contained by physical boundaries and substantial vegetation to all sides.	
<p>4. To preserve the setting and special character of historic towns</p> <p>Guide Question (Wood E&I): <i>What is the role of the parcel in respect of the proximity to, and degree of intervisibility with, the core (such as a Conservation Area) of an historic town or settlement?</i></p>	<p>No Contribution</p> <p>There is no relationship between the parcel and any historic town. (Historic towns are: Chipping Ongar, Waltham Abbey, Epping and Sawbridgeworth)</p>	<p>No Contribution</p> <p>This assessment aligns with the EFDC Stage 2 Assessment for Parcel 008.2 in relation to this purpose.</p>	<p>No Contribution</p> <p>This assessment aligns with the EFDC Stage 2 Assessment for Parcel 008.2 in relation to this purpose.</p>

3.1 Commentary

The revised assessment demonstrates that the land south of the A414 should reasonably be regarded as a distinct parcel both from the wider EFDC Parcel of 008.2 and land to the north of the A414. Land to the south of the A414 clearly makes less of a contribution to Green Belt purposes than purported by the Council's evidence-base studies, reflecting the high degree of physical enclosure of the land, physically and visually, and its separation from the wider open countryside to the north and the west.

4. Site-Specific Testing

Determination of the likely impact of development on Green Belt purposes requires assessment of the likely impacts on the strategic role of the Green Belt and the potential for amelioration of those impacts. Table 4.1 details the performance of the North Weald Golf Course site, split between land to the south of the A414 and land to the north, using the following assessment questions²:

- ▶ What is the likely nature and extent of the harm to the Green Belt of removing the site from it?
- ▶ To what extent could the consequent impacts on the purposes of the Green Belt be ameliorated or reduced to the lowest reasonably practicable extent?
- ▶ If this site were to be developed as proposed, would the adjacent Green Belt continue to serve at least one of the five purposes of Green Belts, or would the Green Belt function be undermined by the site's allocation?
- ▶ Can the Green Belt boundary around the site be defined clearly, using physical features that are readily recognisable and likely to be permanent? Does it avoid including land which it is necessary to keep permanently open?

Table 4.1 Site-Specific Testing of North Weald Golf Course Land to the North and South of the A414

Assessment Question	Land to the south of the A414	Land to the north of the A414
What is the likely nature and extent of the harm to the Green Belt of removing the site from it?	<p>As per Part 2, the site makes no contribution in checking the unrestricted sprawl of large built-up areas, in preventing neighbouring towns from merging (it is not regarded as relevant in this regard), nor preserving the setting and special character of historic towns.</p> <p>However, the land does make a moderate contribution in assisting in safeguarding the countryside from encroachment.</p> <p>Therefore, there will be the corresponding moderate adverse effect on the Green Belt resulting from the removal of this moderate contribution.</p>	<p>As per Part 2, the site makes no contribution in checking the unrestricted sprawl of large built-up areas, in preventing neighbouring towns from merging (it is not regarded as relevant in this regard), nor preserving the setting and special character of historic towns.</p> <p>However, it does make a strong contribution in assisting in safeguarding the countryside from encroachment.</p> <p>Therefore, there will be the corresponding strong adverse effect on the Green Belt resulting from the removal of this strong contribution.</p>
To what extent could the consequent impacts on the purposes of the Green Belt be ameliorated or reduced to the lowest reasonably practicable extent?	<p>There are opportunities to strengthen boundaries with additional planting to further enhance the inherently contained nature of the site.</p> <p>In addition, the design of the proposed development can take account of natural features such as watercourses to enhance ecological connectivity, and substantial buffers could be provided to</p>	<p>There are opportunities to strengthen boundaries with additional planting to further enhance the contained nature of the site.</p> <p>The design of the proposed development can take account of natural features such as watercourses to enhance ecological connectivity, and substantial buffers could be provided to existing public rights of way to maintain access to the countryside for people.</p>

² Adapted from: *Calverton Parish Council v Nottingham City Council, Broxtowe Borough Council and Gedling Borough Council* [2015] EWHC 1078 (Admin), Jay J

Assessment Question	Land to the south of the A414	Land to the north of the A414
	<p>existing public rights of way to maintain access to the countryside.</p>	<p>In addition, the northern boundary along Cripsey Brook can act as a flood risk buffer.</p> <p>The boundary of the Green Belt in this instance could be offset within the site to provide a stronger boundary for the development and, in turn, this would provide a significant area for flood risk mitigation.</p> <p>Similarly, the same Green Belt boundary offset treatment could be applied to the southeast boundary to safeguard the countryside from encroachment, due to the proximity of the site in this location to New House Farm.</p>
<p>If this site were to be developed as proposed, would the adjacent Green Belt continue to serve at least one of the five purposes of Green Belts, or would the Green Belt function be undermined by the site's allocation?</p>	<p>The adjacent Green Belt will continue to serve the purpose of safeguarding the countryside from encroachment, and its function is unlikely to be undermined by the site's allocation.</p>	<p>The adjacent Green Belt will continue to serve the purpose of safeguarding the countryside from encroachment. However, unless the Green Belt boundary is offset within the site on the northern and eastern boundaries, its function is likely to be undermined by the site's allocation.</p>
<p>Can the Green Belt boundary around the site be defined clearly, using physical features that are readily recognisable and likely to be permanent? Does it avoid including land which it is necessary to keep permanently open?</p>	<p>The site has clearly defined boundaries comprising both vegetation and built form which are likely to remain permanent.</p> <p>The quality of the boundaries is strong and include the prominent physical features of the A414 to the northeast, Vicarage Lane to the south with the church and residential buildings, and Rayley Lane to the west with the North Weald Pre-School & Day Nursery, all roads being bounded with significant vegetation. In addition, there is an established linear belt of trees and shrubs forming the eastern boundary of the site with the Art Nursery and Garden Centre.</p> <p>The site is of mixed physical openness, with some built form as described above. However, this is not a defining feature.</p> <p>The site is of mixed visual openness and is partially enclosed by the gently undulating landform, the established boundary hedgerows and linear belt of trees and shrubs, with some views in and out of the site.</p> <p>The site does not include land which is necessary to be kept permanently open.</p>	<p>The site has clearly defined boundaries comprising both vegetation and built form which are likely to remain permanent.</p> <p>The quality of the boundaries is moderate and include the physical features of Cripsey Brook to the north with its associated vegetation, the A414 to the south with a linear belt of trees and shrubs, and a hedgerow to the east separating the site from the adjacent arable fields.</p> <p>The site is of high physical openness, with the only built form being the A414 to the south, and with very limited urbanising influences, the closest being New House Farm, approx. 150m to the southeast of the site.</p> <p>The site is of high visual openness, especially when viewed from the countryside to the north. It is partially enclosed by the gently undulating landform, the established boundary hedgerows and linear belt of trees and shrubs, with some views in and out of the site, some of which are clear long-distance views over the surrounding landscape, e.g. the northern view from the bridleway where it joins the Stort Valley Way at the northern boundary of the site.</p> <p>The site includes some land which is necessary to be kept permanently open, e.g. in the southeast.</p>



4.1 Commentary

The testing of the likely impact of development on the Green Belt at North Weald Golf Course reveals that neither the openness nor the permanence of the Green Belt will be undermined to any significant degree through the development of land to the south of the A414. This reflects the high degree of physical and visual enclosure of this land. Land to the north of the A414 is more sensitive in terms of both physical and visual openness, but the analysis reveals that appropriate development could be accommodated through careful masterplanning which makes best use of existing boundary features, in turn not undermining the wider role of the Green Belt in this location.

5. Overall Conclusion

Scrutiny of the approach to, and results of, the Council's assessment of the Green Belt to the northwest of North Weald Bassett has revealed significant flaws which unfairly disadvantage the promotion of land at the former North Weald Golf Course. The analysis presented above clearly demonstrates that a sequence of misjudgements and the inconsistent application of study methodology have combined to result in the premature and unfounded discounting of the potential for land at the North Weald Golf Course to accommodate development without significant harm to the form and function of the Green Belt in this locality.

A revised assessment of the contribution to Green Belt purposes, based on the proper division of land to the south and north of the A414, clearly reveals that land to the south of the A414, in particular, makes a modest contribution to Green Belt purposes and is therefore suitable for consideration for development as part of wider change to the south of Vicarage Lane. Land to the north of the A414, although clearly more sensitive in Green Belt terms, holds potential for further consideration of development potential as part of careful masterplanning which makes best use of existing boundaries to contain development.



6. Appendix A – Viewpoint Location Plan and Views

