

## Supplementary Representations on behalf of Stallan Developments Ltd (May 2018)

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### 1. Background and Introduction

- 1.1 Further to your letter provided by email on 19<sup>th</sup> April, and the covering email notifying us of the opportunity to supplement representations submitted on behalf of our client (in respect of Regulation 19 consultation), in January 2018. A copy of these representations is enclosed at **Appendix 1**.
- 1.2 In response to the provision of additional information that was not previously published, we are responding to the invitation to supplement our previous representations with the benefit of previously unseen information. This submission therefore reflects additional representations that support the allocation of Site 0160: Fernbank Nursery, at Lower Nazeing, and should be read in conjunction with this submission.

### 2. Outcome and Implications of Appeal Decision: APP/J1535/W/17/3188509

- 2.1 Previous representations, submitted in January 2018, referred to what was at the time a 'live' appeal against the refusal of outline planning permission for the redevelopment of the nursery site to provide up to 50 dwellings and means of access. These representations were made prior to the Appeal Hearing held on 15<sup>th</sup> March 2018, and the Decision dated 23<sup>rd</sup> April 2018.
- 2.2 While this appeal was ultimately dismissed, the Inspector's conclusions in their decision letter are relevant. A copy of the Decision is enclosed at **Appendix 2**.
- 2.3 Paragraph 23 of the Appeal Decision refers to Green Belt purposes. This makes reference to the 'Green Belt Report' (Epping Forest District Council Green Belt Assessment: Stage 2 Report, LUC (August 2016), which concludes that the area in which this site is located makes a 'lower' contribution to the Green Belt purposes set out in Paragraph 80 of the NPPF.
- 2.4 Paragraph 24 (Green Belt purposes), refers to the distance between neighbouring settlements. The Inspector acknowledges that as per the Green Belt Assessment: Stage 2 Report (August 2016), the contribution of this particular 'land parcel' to safeguarding the countryside from encroachment is moderate. While the Inspector ultimately concludes that the development of the site would result in Nazeing's sprawl (extending) westwards, the contribution that this site makes towards checking the unrestricted sprawl of development is regarded as 'weak'.
- 2.5 At Paragraph 19 (Site enhancement), the Inspector refers to the condition of the site and notes that its 'overall appearance is one of dereliction.' The Inspector goes on to attribute moderate weight to the visual enhancement of the site that would result from its redevelopment, and in doing so, highlights that this is consistent with Paragraph 81 of the NPPF.
- 2.6 The Inspector also concluded that there are no constraints in relation to access or the capacity of existing infrastructure or the site access, which would be significantly enhanced by the proposed development.
- 2.7 A key area of the Council's appeal case was that the condition of the site and its dereliction should not be afforded weight in assessing whether very special circumstances applied that

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would justify development in the Green Belt. Concerns were raised that this would create a precedent that could be applied to other similar sites. The Inspector ultimately afforded the benefits arising through the enhancement of the site, 'moderate weight' in determining the appeal, and this was not considered sufficient to outweigh the harm (by definition) of what was acknowledged to be inappropriate development in the Green Belt.

- 2.8 In respect of the concern about setting a precedent (a matter which the Inspector did not pass comment on), it is acknowledged that there are a number of nursery sites in the district that could be considered similar to Fernbank Nursery in terms of their horticultural use. However, as a result of its location immediately adjacent to residential areas, the current condition of the site and the fact that it is no longer in active horticultural use, this is clearly distinct from the majority of other sites in the district.
- 2.9 There are clear qualitative differences between the Fernbank Nursery site and others in the vicinity. Unlike Fernbank Nursery, the majority, if not all of the glasshouses in the Lea Valley area (both in the Epping Forest District and beyond), are either remote from existing settlements or do not immediately adjoin areas of existing housing. Many are modern, purpose-built and benefit from economies of scale as a result of their overall size and land coverage. The Lea Valley Growers Association have noted that there is a clear trend towards larger commercial horticultural operations and acknowledge that some consolidation of glasshouses would be beneficial. Achieving economies of scale is an essential part of the strategy for ensuring that the industry continues to thrive in the medium-to-longer term<sup>1</sup>.
- 2.10 Given that the Fernbank Nursery site is immediately adjacent to the existing settlement and bounded on three sides by existing areas of housing. This is to all intents and purposes, part of the contiguous built-up area of the settlement. It is not considered comparable to many of the other sites in the district where glasshouses are present. Given that this site is distinct from the majority of sites where a nursery use is or has been present. Therefore, allocating the site for alternative uses (in this case housing), would not create a precedent since any proposals would need to be considered on their individual merits.
- 2.11 Furthermore, while the derelict condition of parts of the site was not considered sufficient to represent very special circumstances that would outweigh the presumption against inappropriate development in the Green Belt, this is a factor in determining whether the site should be allocated through the development plan process. The Local Plan process therefore provides a unique opportunity to recognise the development potential of the site. The combination of its derelict condition, close proximity to the existing housing and local amenities, along with the existence of a clear housing need, all represent exceptional circumstances that justify the amendment of the Green Belt boundaries and the inclusion of this site within the defined settlement of Lower Nazeing.

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<sup>1</sup>Article by Gary Taylor, Chairman, Lea Valley Growers Association. Reference: <http://www.lvga.co.uk/lea-valley-growers-win-national-awards/the-future-of-the-lea-valley-glasshouse-industry/>

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- 2.12 It is significant that new and/or revised policy in relation to the revision of Green Belt boundaries to provide land for development appears in the Draft NPPF. The relevance of this is explored in greater detail below.

### 3. Draft NPPF (March 2018)

- 3.1 The Draft NPPF, entitled: 'National Planning Policy Framework Draft Text for Consultation' was published in March 2018. While this does not yet represent Government Policy in relation to the Green Belt, it does provide a strong indication of the 'direction of travel' in relation to some highly relevant areas of planning policy.
- 3.2 While much of the text in Chapter 13: Protecting Green Belt Land, of the Draft NPPF replicates that in the existing Framework (i.e. that published in March 2012), Paragraph 136 is a new addition that is of particular relevance. The Paragraph reads as follows:

***Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic plan-making authority should have examined fully all other reasonable options for meeting its identified need for development. This will be assessed through the examination of the plan, which will take into account the preceding paragraph, and whether the strategy;***

- a) makes as much use as possible of suitable brownfield sites and underutilised land;***
- b) optimises the density of development, including whether policies promote a significant uplift in minimum density standards in town and city centres, and other locations well served by public transport; and***
- c) has been informed by discussions with neighbouring authorities about whether they could accommodate some of the identified need for development, as demonstrated through the statement of common ground.***

- 3.3 Paragraph 136 effectively sets out a 'test' of what constitutes 'exceptional circumstances' that justify the revision of Green Belt boundaries. Part a), is particularly relevant to the Fernbank Nursery site. While it may not meet the strict definition of previously developed land due to the nature of how the existing buildings and structures have been used (i.e. as horticulture), there is no question that the land can be considered as 'underutilised'. Should the above tests become adopted as part of the revised NPPF, the need to recognise the potential of 'underutilised' sites in the Local Plan process will become firmly established as a priority for Local Planning Authorities.
- 3.4 It is also important to highlight that the 'tests' set out Paragraph 136 require that the plan-making authority should have explored whether all reasonable options have been explored to meet housing need and whether as much use as possible has been made of sites that would

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not be considered greenfield land (in the sense that this refers to land that is completely undeveloped).

- 3.5 It is clear that given its vacant condition (and given that the Council have accepted that horticultural use is no longer a viable prospect at this site), the Fernbank Nursery site is currently underutilised, and its removal from the Green Belt would be consistent with emerging policy in relation to the revision of Green Belt boundaries. The site compares favourably with other areas of Lower Nazeing where it is proposed to revise the Green Belt boundaries to exclude undeveloped, greenfield land from the Green Belt and allocate this for development.

- 3.6 The first part of Paragraph 137 of the Draft NPPF replicates Paragraph 84 of the current Framework, although this goes on to make the following statements which reinforce the conclusions set out above:

***Where it has been concluded that it is necessary to release Green Belt land for development, plans should give first consideration to land which has been previously-developed and/or is well-served by public transport. They should also set out ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land.***

- 3.7 Having established (through the Strategic Housing Market Assessment and demographic data/household projections), that it is necessary to release land from the Green Belt in order to contribute towards housing need, the above requirements must be taken into account in allocating sites.

- 3.8 The two areas of text underlined above (our underlining), reaffirm the priority that should be given to previously developed land (it is argued that this extends to all land that is not undeveloped as well as that in strict accordance with the NPPF definition), while also suggesting that sites that are well served by public transport should be afforded an appropriate level of priority when identifying land for residential development. As confirmed by the Site Suitability Assessments contained in Appendix B1.4.2 of the Site Selection Report (enclosed at **Appendix 3** of these representations), the Fernbank Nursery site is well-related to public transport links, in particular bus services that provide direct links (and a journey time of approximately 10 minutes), to Broxbourne Railway Station, with its direct links to London Liverpool Street. Its location and close proximity to local amenities and public transport links also compares favourably with those areas to the south of Lower Nazeing where it is proposed to allocated land for new housing. In this regard, it is considered that the Fernbank Nursery sites performs more strongly in terms of its sustainability and accessibility than these greenfield sites.

- 3.9 Paragraph 137 also advocates providing 'compensatory improvements to the environmental quality and accessibility', is also something that can be achieved through the allocation of the Fernbank Nursery site for development. As demonstrated by the recently-refused scheme that was the subject of appeal APP/J1535/W/17/3188509, the redevelopment of this site would both improve the quality of the environment and access to the land through the provision of

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new areas of open space. As the Inspector noted in considering the above-referenced appeal, the landscape improvements associated with redevelopment of the site to provide new housing would result in significant visual benefit when viewed from the surrounding land as well as a social benefit to those living in the area.

- 3.10 As will be explored in greater detail below, the recent planning application and appeal have established that it is not viable to return the Fernbank Nursery site to its previous use as a horticultural nursery. Consideration must therefore be given to the quality of the environment that will result if it is not redeveloped, or in the event that alternative uses are introduced that may not be compatible with the areas of existing housing adjoining the site to the south and east. Since the Council have accepted that the present use is no longer viable, retaining the Green Belt designation would be illogical, given that any alternative use would result in the presence of new buildings, which would be considered inappropriate development in the Green Belt. While the appeal did not establish that housing was the only viable use, this is clearly compatible with the existing residential areas to the east and, as is explored further in Section 5 below, there is a clear and unmet need for housing which the development of this site would contribute to meeting.
- 3.11 On the subject of enhancing the environment, Paragraph 140 of the Draft NPPF, which replicates Paragraph 81 of the current version of the Framework, requires that consideration is given to enhancing the beneficial use of land within the Green Belt. Among the examples of how this can be achieved are enhancing landscapes, visual amenity and biodiversity, and the improvement of damaged and derelict land. While this has been a requirement of the NPPF since its introduction, it is a particularly pertinent consideration in the context of this site. The potential enhancements to the landscape and to the accessibility of the countryside (as per the underlined areas of new Paragraph 137 highlighted above), are clearly considerations that should be afforded significant weight in the allocation of land for housing, and which do not appear to have been accounted for in the process of identifying which sites are most suitable to provide land for new housing.
- 3.12 Having established that the site is of a low environmental quality and that there is significant scope for visual enhancement of this site and of the wider area (as per Paragraph 19 of the recent Appeal Decision), it is maintained that the development of this site would bring about environmental enhancements both in terms of the quality and appearance of buildings and in the form of the provision of open space towards the west of the site, where it can make a contribution to the enhancement of the amenity of the area as well as providing access to an area of the Green Belt where no public access is currently provided.
- 3.13 Furthermore, although the site did not progress beyond 'Stage 3' of the site assessment process, there are a number of areas of the assessment where it compares favourably to other sites in the Lower Nazeing area where it is currently proposed to allocate land for new development. This is examined in greater detail below.

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### 4. Site Suitability Assessment

- 4.1 The publication of Appendices B and C of the Site Selection Report, in March 2018 has provided some clarity as to how the decision to allocate land to the south and east of Lower Nazeing has been arrived at. However, it is not considered that a sufficiently robust justification has been provided as to why it is not currently proposed to allocate the Fernbank Nursery site (Site 0160), or why the greenfield land to the south of the settlement has been allocated ahead of this.
- 4.2 The methodology described in Appendix B1.5.1 (Ranking Sites for Further Assessment), of the Site Selection Report (a copy of which is enclosed at **Appendix 4** of this report), suggests that a ranking exercise was used to differentiate between sites. However, despite a total of 30 criteria having been used for the Stage 3 assessment, the ranking exercise was undertaken using only three areas of the assessment:
- Flood Risk;
  - Location; and
  - Agriculture.

It is unclear as to why these three factors were selected for sifting at this stage and why other factors that relate more closely to the sustainability of the location were not used.

- 4.3 This sifting process relies heavily on conclusions drawn about the relative level of harm to the Green Belt (Criterion 2.1 of the site assessment process). When examining the site assessment proformas at Appendix B1.5.1, it is noted that the Fernbank Nursery site has been assigned a negative value in relation to the Criterion 2.1 on the basis that the *“Site is within Green Belt where the level of harm caused by release of the land for development would be very low, low or medium.”*
- 4.4 In contrast, the sites to the south of Lower Nazeing (refs: SR0011, SR0300 and SR0473), have been assigned a neutral score, on the basis that they meet the following definition:
- “Site is within Green Belt, but the level of harm caused by resale of the land for development would be none.”*
- 4.5 This is the only difference in the scoring system based on the three selected criteria (Flood Risk, Location and Agriculture), between the Fernbank Nursery site and those to the south of Lower Nazeing where it is proposed to allocate greenfield land for new housing.
- 4.6 Given that this appears to be the critical factor in the assessment process undertaken at this stage, it has been necessary to examine the basis for the relative assessment of harm to the Green Belt that has led to the Fernbank Nursery site being assigned a lower ranking than these other areas of land adjacent to the settlement.
- 4.7 An insight into the ranking assessment process is provided at Appendix B1.5.2 (entitled ‘Results of Stage 3/6.3 Assessment for Residential Sites in Nazeing, Lower Nazeing, Roydon Hamlet and Tylers Cross’ enclosed at **Appendix 5** of this report), which provides some commentary in relation to the relative priority afforded to the expansion of Lower Nazeing

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based on an assessment of broad areas of land that currently adjoin the settlement boundaries. The 'Justification for Option Suitability' makes reference to the Green Belt Review: Stage 2 (2016), which has informed the conclusions drawn in relation to the relative level of harm to the Green Belt arising from the expansion of the settlement in these areas. It is noted that Appendix B1.5.2 refers to broad locations rather than individual sites. The 'Strategic option' referred to as 'Western intensification and infill' includes the Fernbank Nursery site, which the 'Southern expansion' area includes sites SR-0011, SR-0300 and SR-0473. It is interesting to note that the commentary suggests that in many respects<sup>2</sup> the 'Western intensification and infill' option is referred to more favourably than 'Southern expansion'.

- 4.8 However, the principal justification for identifying 'Southern expansion' as the preferred option is that its location to the south of the settlement would cause less harm to the Green Belt than other strategic options, as evidenced by the Green Belt Review: Stage 2 (2016), which concludes that the 'loss' of this area would have no impact upon the Green Belt.
- 4.9 It is not considered that this area of Appendix B1.5.2 provides a robust justification for the 'Southern expansion' option which currently represents the preferred option for new housing allocations at Lower Nazeing. This evidently informs the proposals for the allocation of sites 0011 ('NAZE.R1'), 0300 ('NAZE.R3') and 0473 ('NAZE.R4') in Draft Policy P10 of the Submission Draft Local Plan as currently drafted.
- 4.10 When read in full, the justification for the preferred option in full reads as follows:

***This is the preferred strategic option for more substantive outward growth of Lower Nazeing. This is because of its location to the south of the settlement, which when compared with other strategic options at the settlement level would cause less harm to the Green Belt than other strategic options as evidenced by the Green Belt Review: Stage 2 (2016) which concluded that the loss of this area (Parcels 67.4 and 67.5) would have no impact upon the Green Belt. It is also located close to existing community facilities and village centre amenities. Aside from small areas in the centre of this strategic option, which are located within Flood Zones 2 and 3, for the most part the strategic option lies within Flood Zone 1.***

***The strategic option is moderately sensitive to change in landscape terms, as are the eastern and north-eastern expansion options for Lower Nazeing as evidenced by the Settlement Edge Landscape Sensitivity Study (2010). Any development in the south of the settlement located within an area of high historic importance would need to incorporate sensitive design, reflecting the areas of high overall sensitivity to change set out in the Historic Environment Characterisation Study (2015).***

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<sup>2</sup> The commentary suggests that the loss of the area of Green Belt to the west of the settlement boundary would be less harmful to the Green Belt relative to other strategic options in the settlement, focuses development in the most sustainable development within the settlement, and minimise harm to the wider landscape around the settlement. It is also less sensitive to change in heritage terms than other strategic options around Lower Nazeing.

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- 4.11 A number of areas of text have been underlined above to highlight several key areas where the conclusions drawn in the assessment of the suitability of the locations, can be called into question, or do not represent a logical progression in terms of the findings.
- 4.12 Firstly, with the exception of the finding that there is no impact on the Green Belt, the comparison between the preferred option and the other strategic options for the expansion of Lower Nazeing provided in Appendix B1.5.2, is generally unfavourable. Indeed, the 'Western intensification and infill option' is described in the Justification for Option Suitability as being "*less harmful to the Green Belt than the other strategic options in the settlement.*" The findings of the assessment also suggest that this is a more sustainable option and that the western expansion of the settlement is less sensitive in landscape and heritage terms. The relevant section of the Justification reads as follows:

***This strategic option lies predominantly within the existing settlement boundary and encompasses a small area of Green Belt immediately to the west of Lower Nazeing. The loss of this small area would be less harmful to the Green Belt relative to other strategic options in the settlement. This is evidenced by the Green Belt Review: Stage 2 (2016) which concluded that the loss of this area would have a low impact upon the Green Belt. This strategic option would maximise opportunities to focus development in the most sustainable locations within the settlement, which are in close proximity to existing and planned community facilities, including the school and new community centre, and to use previously developed land within the settlement (where this would maintain adequate open space provision within the settlement). This strategic option would also minimise Any harm to the wider landscape around the settlement.***

***Aside from small areas in the south-west of this strategic options, which are located within Flood Zones 2 and 3, for the most part the strategic option lies within Flood Zone 1. Additionally, the strategic option is less sensitive to change in heritage terms than other strategic options around Lower Nazeing. The Historic Environment Characterisation Study (2015) concluded that the area aligned with this strategic option is of low overall sensitivity to change.***

- 4.13 The above represents a largely positive assessment of the development potential of the land immediately to the west of Lower Nazeing. It is considered to be a 'More suitable strategic option', but has ultimately not been considered the preferred option for development, and as such sites within and adjacent to the settlement boundary (including the Fernbank Nursery site), are currently proposed to remain within the Green Belt.
- 4.14 The comparative analysis between the preferred option (Southern expansion), and the other suitable strategic options for the outward expansion of Lower Nazeing suggests that there is potential for all of the sites to provide land for additional housing. However, since the Southern expansion option has been taken forward while others have not, it is necessary to critically evaluate the findings that have led to this being considered the preferred option.
- 4.15 The Justification for Option Suitability set out above suggests that the 'loss' of land in the 'Southern expansion' area would have no impact on the Green Belt. This finding appears to be



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based on the assessment of land parcels 67.4 and 67.5 in the Green Belt Review: Stage 2 (2016). However, the assessment of the site against the five<sup>3</sup> purposes of the Green Belt (as set out in Paragraph 80 of the NPPF), in fact concludes that these two land parcels both make a 'strong contribution to the third purpose of the Green Belt', which is to assist in safeguarding the countryside from encroachment. This contributes to the initial finding in the Green Belt Review that the release of the land parcels to the south of Lower Nazeing would result in a 'Very High' level of harm. By comparison, the same assessment concludes that the Western intensification and infill option would have a 'Moderate' level of harm. The findings of this assessment are presented in Table 4.1 of the Green Belt Review (enclosed at **Appendix 6**), which summarises the level of harm in relation to development in the various land parcels. The spatial distribution of the areas in the district where land parcels were assessed and assigned a value reflecting the relative level of harm to the Green Belt arising from the development, is also illustrated in Figure 4.5 (enclosed at **Appendix 7**)

- 4.16 However, further reference to the Green Belt Review reveals that a further analysis was undertaken after it was evident that the majority of the land parcels including those to the south of Lower Nazeing, were found to have a 'Very High' level of harm when assessed against purpose 3 ('to assist in safeguarding the countryside from encroachment'). The consultants undertaking the study then considered it helpful to undertake 'sensitivity testing' - to look at how the Green Belt performs if purpose 3 is removed from the assessment (and in light of the previous omission of 'purpose 5'), the parcels are assessed against purposes 1, 2 and 4 only).
- 4.17 The results of the 'sensitivity testing' resulted in a significantly different findings in relation to the anticipated levels of harm associated with the release of some sites in the district. The outcome in relation to Land Parcel 066.5 (west of Lower Nazeing, and including Fernbank Nursery), is that the level of harm is reduced from 'Moderate' to 'Low'. More significantly, the level of harm attributed to Land Parcels 067.4 and 067.5 (south of Lower Nazeing), is reduced from 'Very High' to 'None'. These conclusions are reflected in the spatial distribution shown in Figure 4.6 of the Green Belt Review, which is enclosed at **Appendix 8** of these representations.
- 4.18 Notwithstanding the point raised above that it is incorrect that development at any Green Belt site to be considered as resulting in 'no harm', the extent of the change in the conclusions relating to the two land parcels south of Lower Nazeing is striking. It is concerning that there has been little justification or explanation as to why purpose 3 has been removed completely from the assessment at this stage, and that these findings have subsequently been used to inform the selection of preferred locations for development.
- 4.19 It is therefore considered that this aspect of the process is highly flawed. With the fifth purpose of the Green Belt already omitted from the assessment, the findings presented in Figure 4.6 are the result of an assessment of harm based on just three of the five purposes of the Green Belt and this does not therefore represent a sufficiently robust assessment. Contrary to the report authors' claim that this represents a 'more nuanced' approach, it is

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<sup>3</sup> The Methodology for the Green Belt Review highlights that this does not include an assessment against the fifth purpose of the Green Belt (i.e. to assist in urban regeneration, by encouraging the recycling of derelict and other urban land).

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evident that this process has skewed the outcome of the Green Belt assessment and resulted in one of the key considerations (i.e. encroachment into the countryside), from being completely discounted. While it suggested that the rural nature of the district means that discounting this factor helps to differentiate between land parcels, it is maintained that this approach has failed to present an accurate picture of the merits or otherwise of excluding areas of land from the Green Belt to enable it to come forward for development.

- 4.20 Furthermore, the original findings, presented in Figure 4.1 and 4.5 are considered to represent a clearer representation of where the least sensitive areas of the Green Belt in the district are located. Notwithstanding the fact that it identifies a large area of the district as performing an important role in preventing encroachment into the countryside, it is considered that these initial findings represent a more complete picture of the relative harm to the Green Belt that would arise as a result of housing development in these areas. Indeed, the distribution shown in Figure 4.5 clearly reveals where there is the greatest scope to accommodate new development, as opposed to Figure 4.6, where discounting the harm arising to the countryside has caused isolated areas (including for example Land Parcels 015.2 and 018.1), being identified as having no harm to the Green Belt.
- 4.21 Moreover, it is not considered appropriate to completely discount one of the key purposes of the Green Belt when assessing either the relative or absolute level of harm arising from new development in parts of the district. As outlined above, this is considered to be an overly-simplistic and flawed process which has resulted in some areas of land (such as the Southern expansion area at Lower Nazeing), being identified as having an artificially-low level of harm to the Green Belt. The inaccuracies that this represents have been carried forward and are reflected in the Site Selection Report (most notably Appendix B1.5.2), where the findings have been used to justify the preferred option for expansion to the south of Lower Nazeing. In reality these areas where the omission from the assessment of any consideration against 'purpose 3' of the Green Belt, are areas of greenfield land which perform an important function in protecting the countryside from encroachment.
- 4.22 Therefore, on the basis that the 'Southern expansion' option at Lower Nazeing has primarily been justified on the basis that it has 'no impact' on the Green Belt, it is not considered that this represents a robust basis for prioritising the release of land in this area of the settlement, or its identification as the favoured location for the release of land from the Green Belt. The relative priority given to allocating land to the south of Lower Nazeing is therefore considered to be based on a flawed assessment of its suitability which is reflected by the fact that it was initially deemed it to have a 'Very High' level of harm to the Green Belt. To reiterate the points raised above, the output of the Green Belt Review, and in particular Figure 4.6, is potentially misleading in that the assignment of the relative level of harm is not based on a full consideration against all of the five purposes of the Green Belt.

## 5. Meeting Housing Needs

- 5.1 Notwithstanding the above analysis of the process through which strategic priorities for the expansion of settlements have been arrived at, the level of undersupply in the district and indeed within the wider Housing Market Area (HMA), is such that there remains a requirement

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for additional land to be released from the Green Belt and allocated for housing in order to effectively contribute to meeting objectively assessed needs during the plan period. It is clear that there has been a persistent under-delivery of housing in relation to objectively assessed need in recent years, and despite the limited number of sites that the Submission Draft Local Plan (December 2017), seeks to allocate for housing at Lower Nazeing, it is considered that for the plan to be considered sound additional sites should be provided for and allocated through the revision of Green Belt boundaries to enable these to come forward for development during the plan period.

- 5.2 Notwithstanding the fact that the basis for allocating the 'Southern expansion' area may have been flawed, this now represents the preferred option for accommodating new housing of a sufficient scale to make an effective contribution towards meeting identification of housing need. However, despite the combination of the three sites (which are evidently in separate ownerships), comprising a relatively unconstrained area of greenfield land, there remain land assembly and infrastructure issues that could prevent the bulk of any housing proposed in this area from being delivered until later in the plan period.
- 5.3 It is therefore considered that there is scope for the Fernbank Nursery site to be redeveloped for housing alongside the proposed allocations in the 'Southern expansion' area. It has been acknowledged (as part of Policy P 10), that there is a requirement for land adjoining Lower Nazeing to be released in order to facilitate some growth that is proportional to the scale and function of the settlement. While Draft Policy P 10 of the Submission Draft Local Plan seeks only to allocate land for the physical expansion of the settlement and consolidation of the residential areas towards the south of the settlement, there is clearly scope for additional land to be provided where this can be accommodated whilst minimising harm to the Green Belt and the five purposes of including land within it.
- 5.4 At the district-wide level, the Local Planning Authority have stated (during the course of the recent appeal), that it is only possible to demonstrate 1.35 years' supply of deliverable sites for housing relative to objectively assessed need. There has been persistent under delivery against this target over the past five years, with only 50% of the required number of dwellings having been provided between 2011 and 2016. With a significant overall in terms of both market and affordable housing, there are clearly risks associated with a reliance on a single site (only one site of any significant scale is currently proposed to be allocated at Lower Nazeing). Should this, and other strategic sites elsewhere in the district, not come forward as anticipated (as past trends suggest may be the case), a shortfall in the supply of housing would exacerbate the issues associated with constrained supply.
- 5.5 While the Local Plan seeks to allocate land for 9,816 dwellings. This represents a shortfall of 1,584 dwellings against the current target of 11,400 set out in Draft Policy P 02. This suggests that there is a requirement for additional land to be allocated in order to provide for the objectively assessed need (adjusted downwards from 12,573 as identified in the SHMA in 2015), for the district. There is also an assumption that 385 dwellings will come forward as windfalls during the plan period.
- 5.6 In light of past under-delivery and the uncertainty that the overall dwelling provision target can be met using this approach, there is a strong case that additional sites should be allocated

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where it has been found that the development of these for housing would not result in high levels of harm to the Green Belt. In addition, where there is potential to enhance the visual appearance of the land and increase access to the countryside (as was confirmed would be the case at Fernbank Nursery had the recent appeal been allowed), land should be removed from the Green Belt to facilitate its development. As per the approach in the Draft NPPF (March 2018), underutilised land as well as previously developed sites should be used effectively in order to minimise the need for greenfield land to be built on where the extent of harm (by reason of loss of openness), would be greatest.

- 5.7 In light of the limited supply of housing sites within or adjoining settlements where there is actually potential to enhance the appearance and return the sites to active use, there can be no justification for retaining the Green Belt designation at sites which, regardless of how any dereliction may have come about and what the buildings and structures may have been used for in the past, have become and are currently in a derelict state. The use of sites such as Fernbank Nursery to provide new housing would therefore result in benefits through the provision of new housing, enhancement of the site, minimising any physical encroachment into the countryside and any reduction in the openness of the Green Belt. This site should therefore be prioritised (ahead of greenfield sites), as a source of land for the provision of new housing that is consistent with the overall strategy guiding development in the district, in order to meet an identified housing need, and reduce the risk of the site remaining vacant in the medium-to-longer term. However, it may also come forward alongside other proposed allocations if there is insufficient land currently allocated to meet objectively assessed needs during the plan period.

## 6. Summary and Conclusions

- 6.1 Having assessed the recently-published and additional evidence that has informed and been used as a basis for justifying the proposed housing allocations in Epping Forest district, along with other recent developments that are pertinent considerations, we are firmly of the view that the Fernbank Nursery site should be removed from the Green Belt and allocated for residential development.
- 6.2 While the recent appeal against the refusal of planning permission for the redevelopment of the site to provide 50 dwellings was dismissed, the Decision issued by the Inspector on 23<sup>rd</sup> April 2018, has served to clarify several matters. This has reaffirmed previous assertions that new housing at this site can be provided without resulting in harm to neighbouring properties, and that a suitable access can be provided. It also confirms that residential development would result in significant visual enhancements to the site, and that the present (or most recent use), as a horticultural nursey is no longer viable.
- 6.3 The NPPF Consultation (March 2018), contains new paragraphs and additions to the existing policy text that set out more clearly what would constitute the exceptional circumstances that would justify changes to Green Belt boundaries. Most notably, it requires that as much use as possible is made of brownfield land and underutilised land, while also making efficient use of land in the most sustainable locations. Along with the current requirement that the

**Supplementary Representations on behalf of Stallan Developments Ltd (May 2018)**

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appearance and accessibility of Green Belt land should be enhanced where there is the opportunity to do so, the draft NPPF also promotes compensatory improvements to environmental quality and accessibility of Green Belt land, alongside or as part of development proposals. As evidenced by the recent application and appeal at the Fernbank Nursery site, these objectives would all be achieved if it were to be redeveloped for the provision of new housing.

- 6.4 The publication of Appendices B and C of the Site Selection Report has revealed that the preferred option for the expansion of Lower Nazeing (i.e. in the 'Southern expansion' area), has been justified on the basis that the Green Belt Review: Stage 2 (2016), has been found to result in no harm to the Green Belt. This is an unusual finding in itself given that any new buildings on Green Belt land which (as would be the case to the south of Lower Nazeing), have not previously been occupied by permanent buildings or structures, would be both harmful to openness and to the purposes of including land within the Green Belt.
- 6.5 Having examined the methodology and findings of the Green Belt Review, it is evident that the conclusion that no harm would arise through the development of land to the south of Lower Nazeing was based on an exercise that involved the removal of any assessment of the impact of encroachment into the countryside. Although this was considered by the report's authors to represent 'sensitivity testing' and a 'more nuanced approach' than the previous findings (based on an assessment of land parcels against four of the five purposes of the Green Belt), it is considered that completely discounting this important factor has skewed the results of the assessment to the extent that the release of land to the south of Lower Nazeing that was previously considered to have a very high level of harm, was subsequently found to have no harm. Given the extent of the change to the findings of this assessment as a result of the alteration to the methodology, and the somewhat confusing picture that it results in across the district, it is highly questionable what basis there was for discounting completely this aspect of the Green Belt assessment.
- 6.6 It is very concerning that the skewed assessment of land parcels identified above, has clearly been reflected in and used in the site assessment process that was undertaken at Stage 3 of the Site Selection Report. As reported in Appendix B1.5.2, the preferred strategic option for the expansion of Lower Nazeing (i.e. the 'Southern expansion' option), is justified on the basis that the location to the south of the settlement, when compared with other strategic options, would cause there to be no harm to the Green Belt. The positive locational characteristics of the 'Southern expansion' area (based on this flawed finding that there would be no harm to the Green Belt as a result of development in this area), have been used in the ranking of other potential development sites, which have scored less favourably following the application of the skewed locational findings.
- 6.7 Based on the locational rating arrived at through an assessment against the strategic option, and a limited number of selected criteria (i.e. flood risk, relative harm to the Green Belt, and the condition of agricultural land), none of which relate to the sustainability of the location, the environmental quality of the site, or the potential for enhancement, a number of sites, including Fernbank Nursery were discounted. Since this was based on the flawed findings (of the 'sensitivity testing' undertaken in the Green Belt Review), and a sifting process (Stage 3

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and 6.3 Assessment), which did not represent a full or sufficiently-well-rounded assessment of development potential, it is considered that the omission of this site from those proposed to be allocated for housing at this stage of the process has not been adequately justified.

- 6.8 While it remains our position that the Fernbank Nursery site is more suitable for development and better located than others at Lower Nazeing and elsewhere that are currently proposed for residential development, the extent of the shortfall in housing provision in Epping Forest and across the wider housing market area is such, that there is scope for this to come forward in addition to rather than instead of proposals to allocate land to the south of the village. It is acknowledged that regardless of how its relative impact on the Green Belt has been assessed, this now forms part of a strategic allocation for the expansion of Lower Nazeing along with associated infrastructure. However, given its close proximity to public transport links (including railway stations located outside of the district), it is considered there is also scope for additional land, including that currently designated as Green Belt, to be allocated for a higher number of homes at Lower Nazeing than the 122 dwellings currently anticipated as coming forward during the Local Plan process.
- 6.9 The scale of the proposed allocations in the district is not considered sufficient to account for the current level of housing need and to fully address the issues arising through the underprovision of housing in recent years. Given that it would contribute towards meeting housing need and its development would not significantly compromise the openness of the Green Belt or the purposes of including land within it, it is considered that the Fernbank Nursery site should be excluded from the Green Belt and allocated for residential development to ensure that sufficient land is identified in the Local Plan to meet the objectively assessed needs that are not currently provided for. The site is considered deliverable, self-contained and with clear, defensible boundaries, and subject to the removal of the Green Belt designation, it is considered to be entirely appropriate site for redevelopment as housing.

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**APPENDICES**

- Appendix 1: Representations Submitted in January 2018**
- Appendix 2: Appeal Decision issued in relation to case reference: APP/J1535/W/17/3188509 (dated 23<sup>rd</sup> April 2018)**
- Appendix 3: Extract from Site Selection Report (Appendix B1.4.2: Site Suitability Assessment), published March 2018, relating to Site: SR-0160: Fernbank Nursery**
- Appendix 4: Appendix B1.5.1 (Ranking Sites for Further Assessment)**
- Appendix 5: Appendix B1.5.2 (entitled 'Results of Stage 3/6.3 Assessment for Residential Sites in Nazeing, Lower Nazeing, Roydon Hamlet and Tylers Cross')**
- Appendix 6: Green Belt Review: Stage 2 (2016) Table 4.1**
- Appendix 7: Green Belt Review: Stage 2 (2016) Figure 4.5**
- Appendix 8: Green Belt Review: Stage 2 (2016) Figure 4.6**

**Appendix 1:**  
**Representations Submitted in January 2018**



## **Epping Forest Local Plan – Representations on Behalf of Stallan Developments Ltd (January 2018)**

### **Response to Draft Policy P 10**

- 1.1 We act for a Stallan Nazeing Ltd who have an interest in Fernbank Nursery, Nazeing Road, Lower Nazeing, Essex, EN9 2JN. This site extends to an area of approximately 3.03 hectares and is broadly rectangular in shape, with vehicular access being provided to Nazeing Road to the south (please see attached site location plan under Appendix 1 and Site Layout Plan, Indicative Streetscene, Topographical Survey Plan and Access Arrangement Plan under Appendix 2).
- 1.2 An outline planning application for 50 dwellings, including means of access, was submitted in November 2016 and was refused on 28 July 2017 (EFDC Ref: EPF/3062/19. The application was refused for a single reason i.e. *“The proposal represents inappropriate development in the Metropolitan Green Belt which, by definition, is harmful to the objectives of including land in the Green Belt and is therefore at odds with Government advice contained in the National Planning Policy Framework, and policy GB2A of the adopted Local Plan and Alterations for which no very special circumstances sufficient to outweigh this harm to the Green Belt have been demonstrated.”*
- 1.3 Whilst the application was refused given its Green Belt designation, as part of the assessment of the application the Council accept that there are no constraints that would prevent the delivery of the development on this site i.e. highways, landscape, flood risk, archaeology, ecology, trees, contamination, listed buildings or residential and visual amenity.
- 1.4 We note that Draft Policy SP 2 confirms the future housing provision over the plan period of 11,400 new homes and at least 122 units will be accommodated in Nazeing. Draft Policy P 10 confirms the Council’s ‘preferred’ residential site allocations for Nazeing (as well as employment sites and infrastructure requirements), all of which are currently designated as Green Belt.
- 1.5 We also note that the ‘Report on Site Selection’ prepared by Arup (September 2016) informed the draft site allocations across the district, including those at Nazeing. We note that a further report has been published ‘Report on Site Selection’ (Issue v2) with Appendices A and D (December 2017). We note that ‘Appendix B Assessment of Residential Sites’ is not publicly available and we have been advised this would be finalised and published once the Local Plan Submission Version consultation event had been completed.

- 1.6 The 2016 'Report on Site Selection' (by Arup) included a 'Site Suitability Assessment' of the Fernbank Nursery site (Site 0160), as well as the sites being proposed for allocation (please see attached extracts under Appendix 3). This assessment provided a score against numerous criteria and this included "3.1" to "3.7" which relates to distances to rail station, bus stop, employment locations, local amenities, primary and secondary schools, and GP surgery.
- 1.7 The Fernbank site (0160) was given positive scores in respect of distance to bus stop (on Nazeing Road – 200m from the site), employment locations (Hillgrove Business Park – 700m to the west) local amenities (shops on Nazeing Road – 100m to the south), primary school (Nazeing County – 550m to the south east) and GP surgery (Nazeing Valley Health Centre – 800m to the north). It was been given a neutral score in terms of distance from rail station (closest of which is Broxbourne – 2.5km to the west) and a negative score in terms of distance to nearest secondary school (closest of which is Stewards Academy – 8.6km to the north east). The Site Suitability Assessment prepared by Arup confirms that the Fernbank site (0160) is more accessible than each of the 4 sites being put forward for residential allocation in the draft Local Plan (i.e. NAZE.R1 to R4).
- 1.8 As outlined above, all the sites being put forward for allocation, as well the Fernbank Nursery site (0160), are currently designated as Green Belt. We note that the Fernbank Nursery site was assessed as part of a larger parcel of land within the Epping Forest District Green Belt Assessment: Stage 2 (August 2016). An extract from the Stage 2 assessment is attached to this note which relates to 'Parcel 066.5'. This includes the Fernbank site, along with land to the west and north. Whilst this assessment covers a larger area, the results of the assessment remain relevant to identifying the harm arising from the release of the site for development.
- 1.9 The Stage 2 assessment includes a summary of parcels contribution to the 'Purposes of Green Belt' (note it specifically excludes purpose 5 i.e. to assist in urban regeneration, by encouraging the recycling of derelict and other urban land). This confirms the parcel's contribution:
- **"Weak"** contribution towards the 1<sup>st</sup> Green Belt Purpose (*"to check the unrestricted sprawl of large built-up area"*). The assessment confirms that the parcel of land is close to Hoddesdon but is separated by the Lee Valley and any development within the parcel would not be perceived as sprawl from Lower Nazeing.
  - **"Relatively Weak"** contribution towards the 2<sup>nd</sup> Green Belt Purpose (*"to prevent neighbouring towns merging into one another is"*). The assessment confirms that the

parcel of land is close to Hoddesdon but ribbon development along Nazeing Road already extends out across much of the settlement gap. Again, the separation as a result of the Lee Valley would mean that broad coalescence would not occur.

- ***“Moderate”*** contribution towards the 3<sup>rd</sup> Green Belt Purpose (*“to assist in safeguarding the countryside from encroachment”*). The assessment confirms that much of the parcel is covered by glasshouses, with associated residential, but open fields to the western half to the south of Nursery Road. It confirms that the houses at the southern end of Nursery Road and Nazeing Road limit the extent to which the area is perceived as countryside. Furthermore it concludes that the eastern half of the parcel (*which we note would include the Fernbank site*), on sloping ground has more relationship with the settlement than the flatter fields to the west and can be considered to make a relatively weak contribution to this purpose.
- ***“No Contribution”*** towards the 4<sup>th</sup> Green Belt Purpose (*“to preserve the setting and special character of historic towns”*). The assessment confirms that there is no relationship between the parcel and any historic town.

1.10 Therefore based on the Epping Forest District Green Belt Assessment it is clear that the Fernbank site provides a ‘weak’ or ‘relatively weak’ contribution to the 4 assessed Green Belt Purposes. In respect of the 5th purpose, i.e. to assist in urban regeneration, by encouraging the recycling of derelict and other urban land, we note that this was not assessed as part of the Council’s assessment. We are not aware of any derelict and / or other urban land in need of recycling. In fact there is clear evidence of the need to consider expansion into the Green Belt in order to maintain housing land supply, as confirmed by the draft Local Plan. Therefore we consider that the application site provides ‘no contribution’ to the 5th Green Belt Purpose.

1.11 We also note that the ‘Report on Site Selection’ (by Arup) provided a score against criteria ‘2.1 Level of harm to Green Belt’. The assessment confirmed:

*“Site is within Green Belt, where the level of harm caused by release of the land for development would be very low, low or medium”*

1.12 Whilst the site maybe defined as ‘greenfield’ due to the nature of the former agricultural use, the site contains significant areas of hardstanding, buildings and other structures. We consider that its release for development will not materially harm on the openness of the Green Belt. We consider it will result in a positive impact, as confirmed by the recently submitted planning application. The

submitted outline application / indicative scheme confirms that the level of built footprint will reduce by up to 80% and the building volume by up to 50%. Furthermore the indicative scheme includes a significant area of open space along the western boundary, beyond which is open fields. It is clear that the proposals will therefore result in an increase in openness of this part of the Green Belt by removing the existing glasshouses and hardstanding and provision of significant areas of open space / landscaping and new residential development

- 1.13 We have reviewed Arup's 'Site Suitability Assessment' in relation to sites 0011 (i.e. NAZE.R1), 0300 (i.e. NAZE.R3) and 0473 (i.e. NAZE.R4) (please see attached extracts). We note that under '*2.1 Level of harm to Green Belt*' this concludes that the level of harm caused by the release of these sites would be 'none'. We note that these sites were also assessed as part of a larger parcel of land within the Epping Forest District Green Belt Assessment: Stage 2 (August 2016). A further extract from the Stage 2 assessment is attached to this note which relates to 'Parcel 067.5' and 'Parcel 067.4' (as per attached), which includes sites 0011 ('NAZE.R1'), 0300 ('NAZE.R3) and 0473 ('NAZE.R4'). Whilst this assessment covers a larger area, the results of the assessment remain relevant to identifying the harm arising from the release of such sites.
- 1.14 As outlined above, the Stage 2 assessment includes a summary of parcels contribution to the 'Purposes of Green Belt' (note it specifically excludes purpose 5 i.e. to assist in urban regeneration, by encouraging the recycling of derelict and other urban land). This confirms the two parcel's made 'no contribution' to purposes 1, 2 and 4, however they made a '**strong contribution**' to purpose 3 ("*to assist in safeguarding the countryside from encroachment*"). In light of this it is unclear how the release of any of these sites from the Green Belt will result in 'no harm', as per the conclusion of the Arup's 'Site Suitability Assessment', carried out on behalf of Epping Forest DC.
- 1.15 We note from the above and attached extract from the 'Report on Site Selection' that despite its scoring it was determined that it '*should not proceed for further testing*' after Stage 3 of Arup's assessment (please see attached extract). We note that the difference between site 0160 and those suggested for allocation (in particular sites 0011 ('NAZE.R1'), 0300 ('NAZE.R3) and 0473 ('NAZE.R4') appears to relate to the 'Location' ranking. Site 0160 scored 5 (i.e. 'of greater value to the Green Belt if the land meets other suitable criteria for development') and the others scored 4 (i.e. 'of least value to the Green Belt if the land meets other suitable criteria for development'). We are unclear as to how Arup reached this conclusion and request that EFDC clarify how the 'Location' ranking was arrived at Stage 3. We have previously sought clarification from EFDC however no response has been provided.

- 1.16 In light of the above and attached, we are concerned that the assessments carried out by Arup and used to inform the current Local Plan site allocations under Draft Policy P 10 Nazeing are not robust. Furthermore, we consider that the release of our client's site at Fernbank Nursery (Site 0160) will result in limited harm to the green belt, in fact we consider that it will result in a positive impact due to the resulting enhancement and increase in openness of this part of the Green Belt. By comparison the proposed 'Residential Sites' 0011 ('NAZE.R1'), 0300 ('NAZE.R3) and 0473 ('NAZE.R4') provide a greater contribution towards Green Belt objectives (i.e. purposes 1 and 3) and are therefore of greater value to the Green Belt than our clients site at Fernbank Nursery.
- 1.17 Furthermore, as part the recent application assessment the Council have confirmed that there are no site constraints preventing the delivery of the Fernbank Nursery site for housing (i.e. highways, landscape, flood risk, archaeology, ecology, trees, contamination, listed buildings or residential and visual amenity). By comparison the development of sites 0011 ('NAZE.R1'), 0300 ('NAZE.R3) and 0473 ('NAZE.R4') falls partially within Flood Zone 3, the Council have confirmed that it may affect a Protected Species (Great Crested Newts) and a vehicular access solution for all three sites is yet to be determined / agreed. We are of the view that all three of the proposed residential allocations are outperformed by Fernbank Nursery in respect of its suitability and accessibility.
- 1.18 We do not consider that the draft Local Plan 'Justified'. The Council's decision to allocate the referenced residential sites (in particular NAZE.R1, R3 and R4) under draft 'Policy P 10 Nazeing' is not the most appropriate strategy and we highlight some clear concerns about the robustness and credibility of the evidence base which has informed this decision.
- 1.19 In response to Question 7 of the attached 'representation form', we consider that our client's site at Fernbank Nursery should be allocated for residential development under draft Policy P 10 as it is the most appropriate residential site when considered against those sites being put forward for allocation by the Council i.e. sites 0011 ('NAZE.R1'), 0300 ('NAZE.R3) and 0473 ('NAZE.R4') and will therefore ensure that the Submission Local Plan and is 'sound'.

**Appendix 2:**

**Appeal Decision issued in relation to case reference:**

**APP/J1535/W/17/3188509 (dated 23<sup>rd</sup> April 2018)**

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## Appeal Decision

Hearing Held on 15 March 2018

Site visit made on 15 March 2018

**by Patrick Whelan BA(Hons) Dip Arch MA MSc ARB RIBA RTPI**

**an Inspector appointed by the Secretary of State**

**Decision date: 23<sup>rd</sup> April 2018**

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**Appeal Ref: APP/J1535/W/17/3188509**

**Fernbank Nursery, Nazeing Road, Nazeing, Waltham Abbey EN9 2JN**

- The appeal is made under section 78 of the Town and Country Planning Act 1990 against a refusal to grant outline planning permission.
  - The appeal is made by Stallan Nazeing Limited against the decision of Epping Forest District Council.
  - The application Ref EPF/3062/16, dated 17 November 2016, was refused by notice dated 28 July 2017.
  - The development proposed is an outline application for the redevelopment of nursery to provide up to 50 dwelling houses including means of access.
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### Decision

1. The appeal is dismissed.

### Preliminary Matters

2. The planning application which led to this appeal was made in outline with all matters, with the exception of access, reserved for future consideration. Apart from the access, indicated from Nazeing Road, the plans were submitted as illustrative material.
3. The Council has been preparing a new Local Plan. It has reached the stage where it will shortly be submitted for public examination. While I have had regard to the emerging Local Plan (eLP), because it has not yet been independently tested, and its contents are subject to change, the weight I can accord its policies is limited.

### Background and Main Issues

4. The appeal concerns a large, rectangular, horticultural nursery site occupied largely by glass houses, ancillary buildings and hardstanding. Located in the Metropolitan Green Belt, two of its sides are bordered by the housing of Nazeing, with the other two sides bordered by more open land and the Lee Valley Regional Park.
  5. Saved policy GB2A of the Epping Forest District Local Plan 1998 (LP), concerns the Green Belt. While it is not entirely consistent with the National Planning Policy Framework (the Framework) which it substantially predates, I share the view of both parties that there is no material conflict between its approach and the Framework in the application of Green Belt policy in respect of this proposal.
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6. Paragraph 89 of the Framework indicates that the construction of new buildings should be regarded as inappropriate development in the Green Belt. It sets out a number of exceptions to this presumption, the criteria for which, it is common ground, the proposal would not meet. I have no reason to conclude differently.
7. The proposed development would therefore be inappropriate development in the Green Belt which is, by definition, harmful, and should not be approved except in very special circumstances. Accordingly, the main issues are:
  - i) the effect of the proposal on the openness of the Green Belt; and,
  - ii) whether the harm by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations, so as to amount to the very special circumstances necessary to justify the development.

## **Reasons**

### Effect on openness

8. It is undisputed that a scheme for 50 dwellings would reduce the built footprint on the site by around 80% and would reduce the volume of buildings by around 50%. In superficial terms, the effect of the proposal on openness would be less than the present collection of buildings.
9. The indicative drawings show a low-density, Essex Design Guide inspired housing scheme arranged with its grain dissipating towards the open fields. The housing would be concentrated towards the back gardens of the houses in North Street and on the existing areas of hardstanding. A large area of public open space would form the edge to the field to the north. An arrangement following this illustration would reduce the spatial effect of the housing scheme on openness.
10. Notwithstanding these positive aspects, the buffer of public open space in the proposal would be broadly comparable to the area of undeveloped land on site today. The indicative scheme is suggested as being 2-storeys high with back gardens, garages and parking courts and access roads. Many of the glass houses are more akin in height to bungalows than 2-storey houses. This would off-set to a degree the volumetric gain. While the removal of the fly-tipping and the suggested landscape enhancements would benefit the appearance of this edge of the site, the gain in terms of openness would be insubstantial.
11. Most significantly, compared to the sub-divided land, the houses upon it, their individual gardens and the access roads illustrated in the proposal, the glass houses and the hardstandings between them are relatively innocuous. The clear glazing of the glass houses diminishes their presence compared to the more solid enclosures of houses. The glass houses enclose much of the activity on site within single volumes; they do not have the trappings which accompany domestic occupation such as parking courts, washing lines and the more intense activity of the comings and goings of 50 households. While I give weight to the reduction in building footprint and volume that could be achieved in a detailed scheme, I conclude that overall, the proposal would have a greater impact on the openness of the Green Belt than the present development.



12. While the loss of openness would be limited it adds to the harm to the Green Belt by reason of inappropriateness. It would also conflict with the fundamental aim of Green Belt policy which is to prevent urban sprawl by keeping land permanently open. Paragraph 88 of the Framework states that in considering a planning application, substantial weight should be given to any harm to the Green Belt.

#### Other considerations

##### *Housing supply and affordable housing*

13. During the 5 years 2011 to 2016 the Council met less than 50% of its housing requirement. It agrees that it presently has only 1.35 years of deliverable housing sites. While the Council's Housing Implementation Strategy addresses the housing situation, it relies on the adoption of the eLP which will be subject to public examination later this year and therefore subject to change; it may be some years before the undersupply is resolved.
14. The appellant draws my attention to the Framework's presumption in favour of sustainable development<sup>1</sup> in circumstances where the LP is out-of-date. However, this does not apply where specific policies, such as those relating to land in the Green Belt, indicate that development should be restricted.
15. While the proposal would contribute to meeting the under supply of housing sites, the Planning Practice Guidance<sup>2</sup> advises *that an unmet need for housing is unlikely to outweigh the harm to the Green Belt and other harm to constitute the 'very special circumstances' justifying inappropriate development on a site within the Green Belt*. This limits the weight I can accord this benefit.
16. The number of affordable housing completions between 2011 and 2015 amounted to 185 against a requirement of 572 for the same period. The proposal would provide 40% of the housing as affordable. Whilst this is no more than that required by LP policies H6A and H7A, the Council described the challenge of meeting the target where so much of the Borough is in Green Belt and many sites are below the threshold requiring affordable housing. Given this, and the shortfall over recent years, and subject to the submission of an executed unilateral undertaking (UU), the provision of affordable housing would be a benefit to which I attach moderate weight.

##### *Site enhancement*

17. The proposal includes substantial areas of public open space where presently there are none. This would be in excess of the requirements in the Local Plan. Moreover, the illustrative layout shows the bulk of the open space being located against the edge beside the neighbouring, open field and extending deep into the site beside the housing.
18. While views of the site from the west are limited, the suggested layout shows the opportunity for landscape improvements that would provide a significant visual benefit when viewed from surrounding land, as well as a social benefit to those living in the area.
19. Some of the glass houses have begun to collapse, the boiler houses have suffered weather damage and there are many piles of fly-tipped rubbish around

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<sup>1</sup> National Planning Policy Framework paragraphs 14 & 49

<sup>2</sup> Planning Practice Guidance paragraph 3-034-201410-6

the site. The overall appearance is one of dereliction. The Framework<sup>3</sup> encourages the improvement of derelict land in the Green Belt. The Council suggests that very limited/no weight be given to derelict sites because of the precedent this may set for similar sites. However, the Council has accepted that the present use is no longer viable. In these circumstances, the visual enhancement under the proposed alternative use would be a benefit to which I attribute moderate weight.

*Alternative use, services and New Homes Bonus*

20. The Council accepts that the site is no longer viable for use as a horticultural nursery. However, the appellant's brief dismissal of alternative uses is not convincing. While he has provided unchallenged evidence on decontamination and demolition costs, there is no evidence of marketing for alternative uses for the site or any financial evaluation of them, even taking into account extraordinary costs. This does not make a compelling case that housing is the only viable, alternative use for this site.
21. Similarly, while the occupiers of the proposed development would support the local shops and other local services, which is an economic and social benefit, there is no evidence that they are not already well-supported. The New Homes Bonus is an incentive for Councils to provide housing on suitable sites. There is no evidence of a direct benefit from the bonus to the site or the immediate area.
22. The unviability of any use for the site other than housing, the additional support for local facilities and services from the development and the benefit from the New Homes Bonus to the Council are factors to which I attribute little weight.

*Green Belt purposes*

23. As part of preparing the eLP, the site was identified in a Green Belt Report<sup>4</sup> as part of a larger parcel of land which makes a 'lower' contribution to Green Belt purposes. The assessment concludes against the five purposes set out in the Framework. It was agreed at the Hearing that the land does not relate to the setting and special character of a historic town and cannot therefore serve the purpose of preserving it. This purpose of the Green Belt does not apply. The Council has permitted development on brownfield land and is likely to continue to do so. It was therefore agreed that the purpose of encouraging the recycling of derelict and other urban land is being fulfilled, at least to some degree.
24. Because of the scale and distance between neighbouring settlements, the purpose of preventing neighbouring towns from merging is less relevant. However, the Green Belt Report concludes that the parcel's contribution to safeguarding the countryside from encroachment is moderate. This suggests that it successfully contributes to the third purpose of the Green Belt, albeit to a moderate degree. While I note its assessment of the purpose of checking the unrestricted sprawl of large built-up areas as weak, presumably because of the containment of the Park, however the development would nonetheless result in Nazeing's sprawl westwards.

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<sup>3</sup> National Planning Policy Framework paragraph 81

<sup>4</sup> Epping Forest District Council Green Belt Assessment: Stage 2 Report, LUC (August 2016)

25. The conclusion in the Report<sup>5</sup> on site selection on harm to the Green Belt is drawn widely attributing harm ranging from very low to medium. This suggests the prospect of harm to the Green Belt. In the context of the openness of the land to the west and the tightly confined boundary around this part of Nazeing's built-up area, I consider the horticultural use and glasshouses on the site make a strong contribution to safeguarding the countryside from encroachment and to preventing urban sprawl.
26. In any event, while the Council has freed some land from the Green Belt for development in the eLP, the appeal site did not meet its criteria for release, so it remains as Green Belt in the eLP. More decisively, the adopted LP designates the site as Green Belt. The proposal would result in the sprawl westwards of Nazeing and an encroachment into the countryside.
27. Looking at the case as a whole, I find that the other considerations do not clearly outweigh the harm that I have identified. Consequently, the very special circumstances necessary to justify the development do not exist. The proposal would be contrary to LP policy GB2A and the requirements of the Framework.

### **Other Matters**

28. I understand the concerns of neighbours regarding a housing development and the potential for harm to their living conditions. However, the layout and heights of the housing are only illustrative at this stage. There is no evidence that a final layout could not safeguard the living conditions of surrounding occupiers.
29. I have noted the comments of neighbours and Nazeing Parish Council and experienced the constraints of the existing access road in terms of its surfacing and its layout. However, the scheme includes for the reconfiguration of the junction of the access road and Nazeing Road to make it easier to turn into and out of. It would also realign the footway and provide a shared surface close to the site entrance. These proposals follow a safety audit of the access road. Their implementation would improve the present access sufficiently to accommodate the traffic predicted to enter and leave the development.
30. There are objections from neighbours and Nazeing Parish Council to the proposal as well as support. While I note the comments about the volume of traffic on Nazeing Road, there is no substantive evidence to contradict the traffic analysis which concluded that there would be only a very small additional demand for capacity at the junction of Langley Green and Nazeing Road. The additional number of trips from the proposal would have no discernible effect on the traffic on surrounding roads. I note that the highways authority did not object to the proposal.
31. The UU would secure the provision of affordable housing against which potential benefit I have already concluded, as well as financial contributions towards meeting the need for additional facilities and services arising from the development. The contributions towards early years places and additional places at Nazeing Primary School and towards the cost of transporting pupils to a secondary school are in accordance with the County Council's Developers' Guide to Infrastructure Contributions. The Council has justified the various sums sought with the most recent data available.

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<sup>5</sup> Site Suitability Assessment SR-0160 by ARUP

32. I consider that the measures in the UU are necessary, related directly to the development and fairly related in scale and kind. As such they would accord with the provisions of Regulation 122 of the Community Infrastructure Levy Regulations 2010 and the tests for planning obligations set out in the Framework.

### **Conclusion**

33. Both parties agree the proposal is inappropriate development, which is by definition, harmful to the Green Belt. In addition, I have found that there would also be harm through loss of openness, albeit limited, as well as encroachment into the countryside.

34. Against this, I have considered the other considerations cited in support of the proposal. However, they do not amount to the very special circumstances needed to outweigh the harm to the Green Belt. For the reasons above, and having regard to all other matters raised, the proposal is in conflict with the development plan and the Framework and there are no material considerations which outweigh that conflict. The appeal is therefore dismissed.

*Patrick Whelan*

INSPECTOR

### **Appearances**

#### **FOR THE APPELLANT:**

Mr Ed Kemsley  
Mr Simon Quinton-Smith

Director, Peacock and Smith  
Director, Quinton Edwards

#### **FOR THE LOCAL PLANNING AUTHORITY:**

Ms Jill Shingler

Principal Planning Officer  
Epping Forest District Council

#### **INTERESTED PERSONS:**

Ms Sue Clarke  
Mr Harry Mann  
Ms Karen Thorne

Local Resident  
Local Resident  
Local Resident

### **Documents submitted at the Hearing**

By the appellant:

1. Copy of unilateral undertaking previously submitted, partly signed

### **Documents submitted after the Hearing**

By the appellant:

1. Unilateral Undertaking signed by the other parties
2. Counterpart Unilateral Undertaking signed by National Westminster Bank Plc
3. Copy of covering letter from National Westminster Bank Plc, 29 March 2018
4. Official copy of register of title EX224927, edition date 06.04.2018

**Appendix 3:**

**Extract from Site Selection Report (Appendix B1.4.2: Site Suitability  
Assessment), published March 2018, relating to**

**Site: SR-0160: Fernbank Nursery**

Site Suitability Assessment

**Site Reference:** SR-0160  
**Parish:** Nazeing  
**Size (ha):** 3.04  
**Address:** Fernbank Nursery, Nazeing Road, Nazeing, Essex

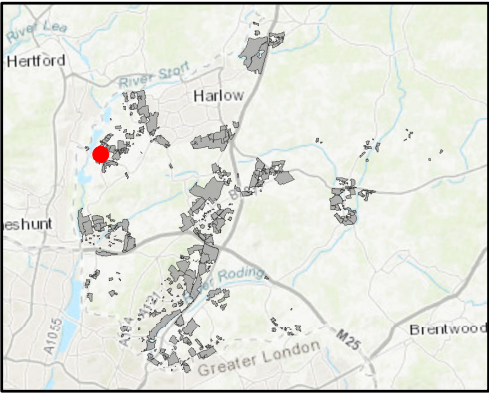
**Primary use:** Residential  
**Site notes:** Nursery

**Baseline yield:** 73 - 122 dwellings  
**Source for baseline yield:** Indicated in Call for Sites

**Site constraints:** None


**Site selection adjustment:** None

**Community feedback:** The Council did not consult on a growth location which covers or is near to this site.  
**Dwellings:** 73



Client  
**Epping Forest District Council**  
Job Title  
**Epping Forest District Local Plan**  
Drawing Status  
**Issue**  
Date  
**March 2018**  
Drawing No  
**SR-0160**  
Issue  
**Rev 2**

ARUP

Epping Forest District Council  
[www.eppingforestdc.gov.uk](http://www.eppingforestdc.gov.uk)

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Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community



Criteria	Score		Qualitative Assessment
1.1 Impact on Internationally Protected Sites	0	Effects of allocating site for the proposed use do not undermine conservation objectives (alone or in combination with other sites).	
1.2 Impact on Nationally Protected sites	0	Based on the Impact Risk Zones there is no requirement to consult Natural England because the proposed development is unlikely to pose a risk to SSSIs.	
1.3a Impact on Ancient Woodland	0	Site is not located within or adjacent to Ancient Woodland.	
1.3b Impact on Ancient/Veteran Trees outside of Ancient Woodland	0	No Ancient or Veteran trees are located within the site.	
1.4 Impact on Epping Forest Buffer Land	0	Site is unlikely to impact on Epping Forest Buffer Land.	
1.5 Impact on BAP Priority Species or Habitats	0	No effect as features and species could be retained or due to distance of BAP priority habitats from site.	The site is adjacent to a Coastal Floodplain Grazing Marsh habitat and is within four buffer zones. The site may indirectly affect the habitats, but mitigation can be implemented to address this.
1.6 Impact on Local Wildlife Sites	0	Site has no effect as features and species could be retained or due to distance of local wildlife sites from site.	The site is within the 250m buffer for the Lee Valley Central LWS. The site is unlikely to affect the features and species of the LWS.
1.7 Flood risk	(++)	Site within Flood Zone 1.	
1.8a Impact on heritage assets	(+)	Site is not likely to affect heritage assets due to their distance from the site.	Unlikely to impact on setting of Conservation Area due to distance.
1.8b Impact on archaeology	0	There is a medium likelihood that further archaeological assets may be discovered on the site, but potential is unknown as a result of previous lack of investigation.	
1.9 Impact of air quality	0	Site lies outside of areas identified as being at risk of poor air quality.	
2.1 Level of harm to Green Belt	(-)	Site is within Green Belt, where the level of harm caused by release of the land for development would be very low, low or medium.	
3.1 Distance to the nearest rail/tube station	0	Site is between 1000m and 4000m from the nearest rail or tube station.	
3.2 Distance to nearest bus stop	(+)	Site is within 400m of a bus stop.	
3.3 Distance to employment locations	(+)	Site is within 1600m of an employment site/location.	
3.4 Distance to local amenities	(+)	Site is less than 1000m from nearest town, large village or small village.	
3.5 Distance to nearest infant/primary school	(+)	Site is less than 1000m from the nearest infant/primary school.	
3.6 Distance to nearest secondary school	(-)	Site is more than 4000m from the nearest secondary school.	
3.7 Distance to nearest GP surgery	(+)	Site is less than 1000m from the nearest GP surgery.	
3.8 Access to Strategic Road Network		Not applicable.	
4.1 Brownfield and Greenfield Land	(-)	Majority of the site is greenfield land adjacent to a settlement.	100% greenfield site, adjacent to an existing settlement (Lower Nazeing).
4.2 Impact on agricultural land	(--)	Development of the site would involve the loss of the best and most versatile agricultural land (grades 1-3).	
4.3 Capacity to improve access to open space	0	Development unlikely to involve the loss of public open space.	
5.1 Landscape sensitivity	0	Site falls within an area of low landscape sensitivity - characteristics of the landscape are able to accommodate development without significant character change.	
5.2 Settlement character sensitivity	0	Development is unlikely to have an effect on settlement character.	Site is identified as a potential opportunity area. It is located on the edge of the existing settlement. However, low density development is proposed which reflects the character of the area.
6.1 Topography constraints	0	No topography constraints are identified in the site.	
6.2a Distance to gas and oil pipelines	0	Gas or oil pipelines do not pose any constraint to the site.	
6.2b Distance to power lines	0	Power lines do not pose a constraint to the site.	
6.3 Impact on Tree Preservation Order (TPO)	0	The intensity of site development would not be constrained by the presence of protected trees either on or adjacent to the site.	
6.4 Access to site	(+)	Suitable access to site already exists.	Existing access by Nazeingbury Parade.
6.5 Contamination constraints	(-)	Potential contamination on site, which could be mitigated.	Potential contamination (Horticultural Nursery, Infilled Gravel Pit and within 250m of landfill site). Potential adverse impact that could be mitigated.
6.6 Traffic impact	0	Area around the site expected to be uncongested at peak time.	B434

## **Appendix 4:**

### **Appendix B1.5.1 (Ranking Sites for Further Assessment)**

## B1.5 Stages 3 and 6.3 Assessment

### B1.5.1 Ranking Sites for Further Assessment

To determine which of the sites identified as likely or possibly suitable for allocation should be taken forward for further assessment, each site has been given a ranking in terms of preference under three categories:

- Flood risk
- Location (encompassing greenfield/brownfield and urban/Green Belt)
- Agriculture

The sequential approach set in paragraphs 4.26 (Stage 3) and 4.71 (Stage 6.3) of the SSM was applied as detailed below:

- The sequential flood risk assessment – proposing land in Flood Zone 2 and 3 only where need cannot be met in Flood Zone 1: **Zone 1 = Ranking 1, Zone 2 = Ranking 2, Zone 3 = Ranking 3.**
- Sites located on previously developed land within settlements; **Ranking 1 (4.1 scores ++ and 2.1 scores +)**
- Urban greenfield sites located within settlements (including both designated and non-designated open spaces). **Ranking 2 (4.1 scores + and 2.1 scores +)**
- Previously developed land within the Green Belt (in anticipation of the NPPF being updated to take account of the proposed changes published in December 2015). **Ranking 3 (4.1 scores ++ or 0 and 2.1 does NOT score +)**
- Greenfield land adjacent to settlements:
  - Of least value to the Green Belt if the land meets other suitable criteria for development. **Ranking 4 (4.1 scores – and 2.1 scores 0)**
  - Of greater value to the Green Belt if the land meets other suitable criteria for development. **Ranking 5 (4.1 scores – and 2.1 scores -)**
  - Of most value to the Green Belt if the land meets other suitable criteria for development. **Ranking 6 (4.1 scores – and 2.1 scores --)**
- **Ranking 7 - ALL OTHER SITES (ie. Green Belt sites not adjacent to settlements)**
- Agricultural land: **4.2 Score 0 (No loss of agricultural land) = Ranking 1, 4.2 Score (-) (Loss of Grade 4-5 agricultural land) = Ranking 2, 4.2 Score (--) (Loss of Grades 1-3 agricultural land) = Ranking 3**

Where sites were initially identified as Location Ranking 7, a qualitative sense check was undertaken to identify instances: where sites were intrinsically connected to, or would support the development of, adjacent sites that ranked 4, 5 or 6; or where sites would support stated growth aspirations for larger scale



settlement extensions, for example at Waltham Abbey and Harlow. In such instances, ‘clusters’ of sites were identified for further testing at Stages 3 and 6.3 by adjusting the Location Ranking as appropriate, with this exception being noted qualitatively in Appendix B1.5.2.

For reference, the below table sets out the criteria referred to previously:

Ref.	Criteria	Score				
		(++)	(+)	0	(-)	(--)
2.1	Level of harm to Green Belt	Site provides opportunities to assist in the active use of Green Belt without any loss.	Site is not located in the Green Belt.	Site is within Green Belt, but the level of harm caused by release of the land for development would be none.	Site is within Green Belt, where the level of harm caused by release of the land for development would be very low, low or medium.	Site is within Green Belt, where the level of harm caused by release of the land for development would be high or very high.
4.1	Brownfield and Greenfield Land	Majority of the site is previously developed land within or adjacent to a settlement	Majority of the site is greenfield land within a settlement	Majority of the site is previously developed land that is neither within nor adjacent to a settlement	Majority of the site is greenfield land adjacent to a settlement	Majority of the site is greenfield land that is neither within nor adjacent to a settlement
4.2	Impact on agricultural land			Development of the site would not result in the loss of agricultural land	Development of the site would result in the loss of poorer quality agricultural land (grade 4-5)	Development of the site would involve loss of the best and most versatile agricultural land (grades 1-3)

**Appendix 5:**

**Appendix B1.5.2 (entitled 'Results of Stage 3/6.3 Assessment  
for Residential Sites in Nazeing, Lower Nazeing,  
Roydon Hamlet and Tylers Cross')**



Appendix B1.5.2  
Results of Stage 3/6.3 Assessment for Residential Sites in  
Nazeing, Lower Nazeing, Roydon Hamlet and Tylers Cross

Strategic Option	Settlement	Option Suitability	Justification for Option Suitability
Western intensification and infill	Lower Nazeing	More suitable strategic option	<p>This strategic option lies predominantly within the existing settlement boundary and encompasses a small area of Green Belt immediately to the west of Lower Nazeing. The loss of this small area would be less harmful to the Green Belt relative to other strategic options in the settlement. This is evidenced by the Green Belt Review: Stage 2 (2016) which concluded that the loss of this area would have a low impact upon the Green Belt. This strategic option would maximise opportunities to focus development in the most sustainable locations within the settlement, which are in close proximity to existing and planned community facilities, including the school and new community centre, and to use previously developed land within the settlement (where this would maintain adequate open space provision within the settlement). This strategic option would also minimise any harm to the wider landscape around the settlement.</p> <p>Aside from small areas in the south-west of this strategic option, which are located within Flood Zones 2 and 3, for the most part the strategic option lies within Flood Zone 1. Additionally, the strategic option is less sensitive to change in heritage terms than other strategic options around Lower Nazeing. The Historic Environment Characterisation Study (2015) concluded that the area aligned with this strategic option is of low overall sensitivity to change.</p>
Eastern/north-eastern infill and expansion	Lower Nazeing	More suitable strategic option	<p>This strategic option is less harmful to the Green Belt relative to the other strategic options identified adjacent to Lower Nazeing. This is evidenced by the Green Belt Review: Stage 2 (2016) which concluded that the loss of this area, comprising Green Belt parcels 066.4 and 067.3 would have low or no impact upon the Green Belt. This strategic option is moderately sensitive to change in landscape terms, as are other strategic options to the south, east and north of Lower Nazeing. The Settlement Edge Landscape Sensitivity Study (2010) concluded that all outward strategic options around Lower Nazeing are moderately sensitive to change. Furthermore, the strategic option is moderately sensitive to change in heritage terms, equally or less sensitive than other strategic options around Lower Nazeing.</p> <p>On balance, while this strategic option is overall considered to be suitable, it is less preferable at the settlement level compared to the western intensification and infill and southern expansion strategic options, primarily a result of its location relative to existing community facilities and village centre amenities.</p>
Eastern expansion	Lower Nazeing	Less suitable strategic option	<p>This strategic option is more harmful to the Green Belt relative to the other strategic options identified adjacent to Lower Nazeing. This is evidenced by the Green Belt Review: Stage 2 (2016) which concluded that the loss of this area would have a very high impact upon the Green Belt. The strategic option encompasses parcel 066.6 which meets Purpose 2 strongly, preventing coalescence between Harlow, Lower Nazeing and Roydon. In addition, as a result of its location some distance to the east of the settlement, it is the furthest from existing and planned community facilities compared with other strategic options around Lower Nazeing. This strategic option is moderately sensitive to change in landscape terms, as are other strategic options around Lower Nazeing. The Settlement Edge Landscape Sensitivity Study (2010) concluded that outward strategic options to the south, east and north-east of Lower Nazeing are moderately sensitive to change.</p> <p>Aside from small areas in the south of this strategic option which are located within Flood Zone 2, for the most part the strategic option lies within Flood Zone 1. However, it is considered that the harm identified to the Green Belt and the distance from existing and planned community facilities would, at the settlement level, outweigh any positive factors associated with this strategic option.</p>
Northern expansion	Lower Nazeing	Less suitable strategic option	<p>This strategic option would result in unsustainable development patterns, encouraging ribbon development to the north of Lower Nazeing and a further elongation of the settlement. Furthermore, this strategic option is more harmful to the Green Belt relative to other strategic options in the settlement. This is evidenced by the Green Belt Review: Stage 2 (2016) which concluded that the loss of this area would have a very high impact upon the Green Belt. The strategic option incorporates parcel 066.6 which strongly meets Purpose 2, preventing coalescence between Harlow, Lower Nazeing and Roydon. In addition, as a result of its location some distance to the north of the settlement, it is the furthest from existing and planned community facilities compared with other strategic options around Lower Nazeing.</p> <p>This strategic option is less sensitive to change in landscape terms, as evidenced by the Settlement Edge Landscape Sensitivity Study (2010), which concluded that the landscape to the north of Lower Nazeing has a lower sensitivity to change. Additionally, aside from small areas in the west of this strategic option which are located within Flood Zone 2, for the most part the strategic option lies within Flood Zone 1. However, it is considered that the harm identified to the Green Belt, impact upon the settlement pattern and the distance from existing and planned community facilities would, at the settlement level, outweigh any positive factors associated with this strategic option.</p>
Southern expansion	Lower Nazeing	More suitable strategic option	<p>This is the preferred strategic option for more substantive outward growth of Lower Nazeing. This is because of its location to the south of the settlement, which when compared with other strategic options at the settlement level would cause less harm to the Green Belt than other strategic options as evidenced by the Green Belt Review: Stage 2 (2016) which concluded that the loss of this area (parcels 67.4 and 67.5) would have no impact upon the Green Belt. It is also located close to existing community facilities and village centre amenities. Aside from small areas in the centre of this strategic option, which are located within Flood Zones 2 and 3, for the most part the strategic option lies within Flood Zone 1.</p> <p>This strategic option is moderately sensitive to change in landscape terms, as are the eastern and north-eastern expansion options for Lower Nazeing as evidenced by the Settlement Edge Landscape Sensitivity Study (2010). Any development in the south of the settlement located within an area of high historic importance would need to incorporate sensitive design, reflecting the areas of high overall sensitivity to change set out in the Historic Environment Characterisation Study (2015).</p>
Intensification	Nazeing	N/A	No spatial options were identified in Nazeing given the small scale of this settlement and the small number of sites. The suitability of sites was therefore assessed on a case by case basis.
Intensification	Roydon Hamlet	N/A	No spatial options were identified in Roydon Hamlet given the small scale of this settlement and the dispersed nature of the residential sites. The suitability of sites was therefore assessed on a case by case basis.
Intensification	Tylers Cross	N/A	No spatial options were identified in Tylers Cross given the small scale of this settlement and the dispersed nature of the residential sites. The suitability of sites was therefore assessed on a case by case basis.

**Appendix 6:**  
**Green Belt Review: Stage 2 (2016) Table 4.1**

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

**Appendix 7:**

**Green Belt Review: Stage 2 (2016) Figure 4.5**



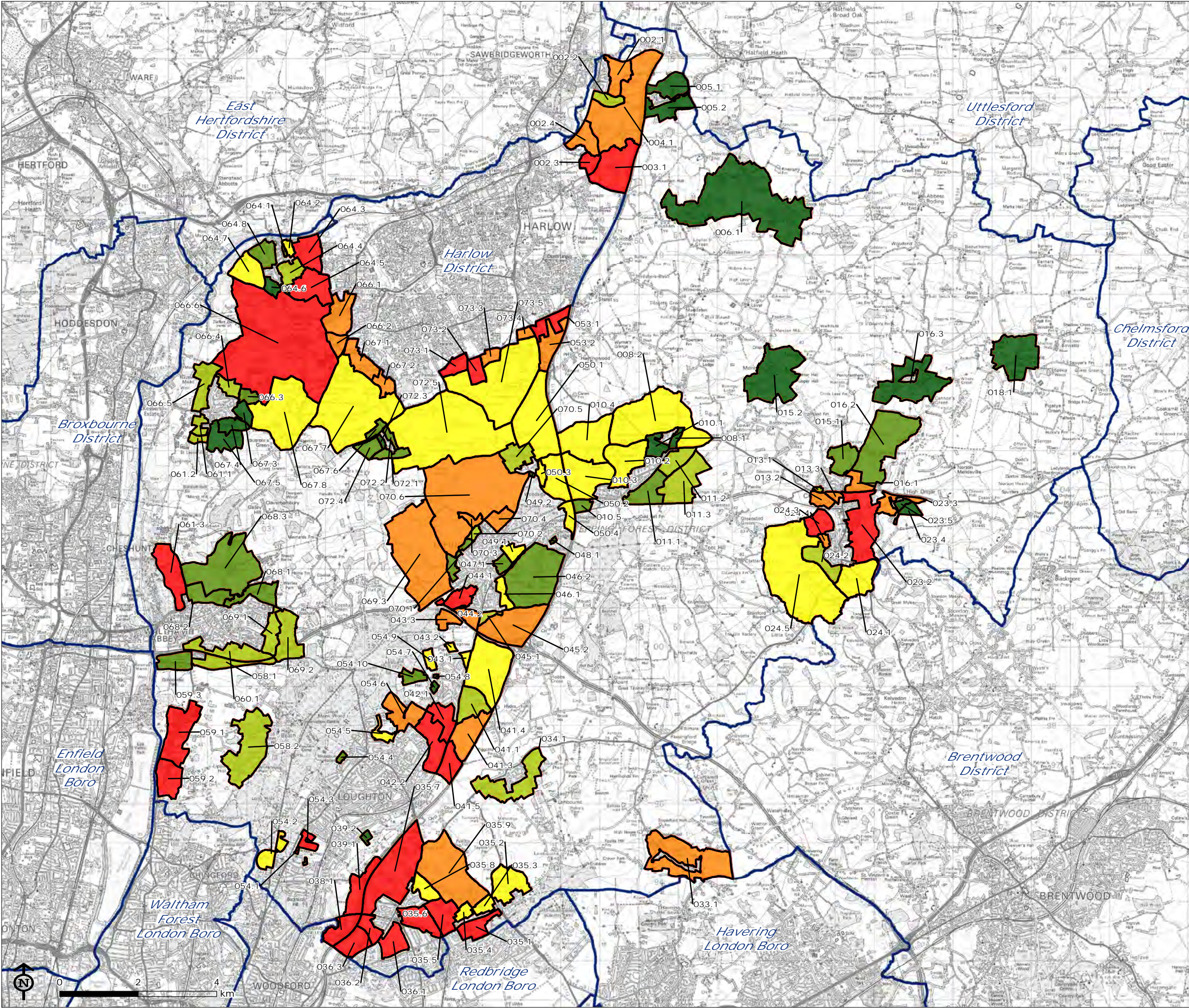




**Appendix 8:**

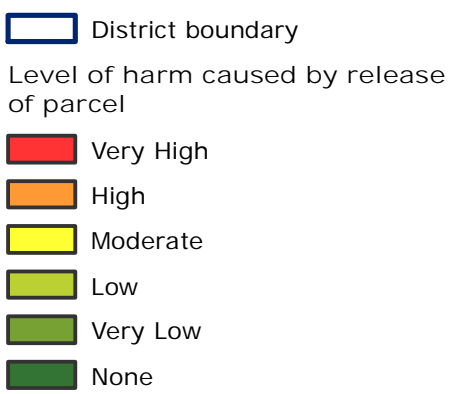
**Green Belt Review: Stage 2 (2016) Figure 4.6**





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)



Map Scale @ A3: 1:95,000

