

**EPPING FOREST
REGULATION 19
SUBMISSION
LOCAL PLAN
REPRESENTATIONS
SUPPORTING LAND
NORTH OF A121,
SOUTH OF WALTHAM
ABBAY**

Quality Assurance

Site name:	Land north of A121, south of Waltham Abbey
Client name:	Trinity Hall
Type of report:	Regulation 19 Submission Local Plan Representations
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SignedRedacted.....
Date	January 2018
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Date	January 2018



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EPHING FOREST DISTRICT COUNCIL GREEN BELT ASSESSMENT STAGE 1 REPORT

Appendix 2

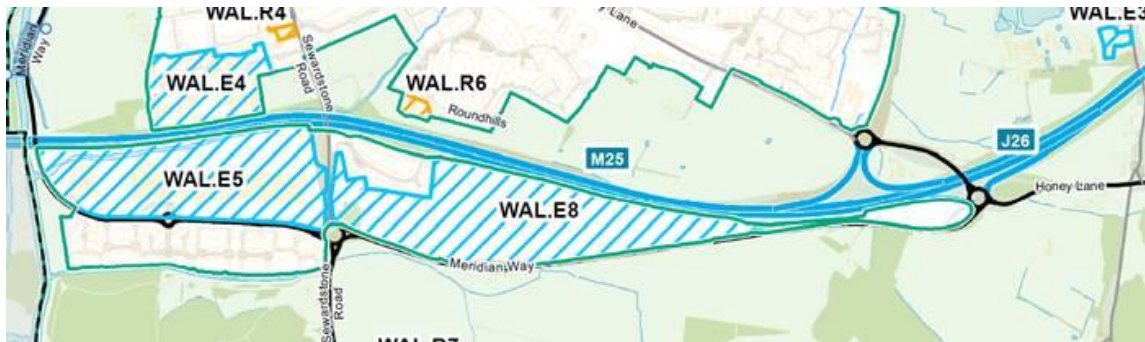
EPHING FOREST DISTRICT COUNCIL GREEN BELT ASSESSMENT STAGE 2 REPORT

1.0 Introduction

- 1.1 These representations are submitted on behalf of Trinity Hall in response to Epping Forest District Council's (hereafter referred to as "the Council") public consultation on the Regulation 19 Submission draft Local Plan (hereafter referred to as "the Submission Local Plan").
- 1.2 Trinity Hall is promoting land north of the A121, south of Waltham Abbey (hereafter referred to as "the site"), which is proposed for release from the Green Belt and allocation for B1c, B2 and B8 employment development in the Submission Local Plan under policy E1 (allocation WAL.E8).
- 1.3 The site is wholly owned and controlled by Trinity Hall except for a small section on the northern boundary owned by Epping Forest District Council. The latter is not critical to the delivery of the Local Plan's allocation.
- 1.4 Trinity Hall **strongly supports** the Local Plan's proposals for the site and is keen work to work with the Council and other stakeholders to bring it forward for development as anticipated. These representations detail further information to support the release of the site from the Green Belt and its suitability for development to endorse its inclusion in the emerging Plan's proposed employment allocations. Trinity Hall also has some comments and recommendations on the wording of allocation WAL.E8, which are set out below.

2.0 The Site

- 2.1 The site comprises approximately 27 hectares of arable farmland and scrub adjacent to the M25 to the south of Waltham Abbey. It includes the land proposed for allocation WAL.E8 by the Submission Local Plan (shown in the Proposals Map extract below) and adjoining land to the east, beyond the proposed allocation, enclosed by Dowding Way and the M25 slip road (known as the 'teardrop' site due to its shape).



- 2.2 The site is entirely enclosed by strategic roads, with the M25 along the northern boundary, the roundabout at Junction 26 of the M25 to the east and the A121 (Dowding Way) to the south. The site comprises fields of differing shapes and sizes, occasional hard standings and a small number of dilapidated former farm buildings.
- 2.3 The site lies to the east of Sainsbury's Waltham Point distribution centre located off Fleming Road. On the opposite side of the M25 to the north is a HGV stop with the Junction 26 Diner located at the centre. To the east, beyond the roundabout, within approximately 150m is the Waltham Abbey Jewish Cemetery. To the south is arable farmland with sporadic residential and small commercial properties. Further residential areas are located on the north-west boundary and to the north across the M25. Epping Forest is 450m east of the site.
- 2.4 The site is easily accessible from the local and strategic road network, with the A121 and the M25 located along the site borders.
- 2.5 The entirety of the site proposed for removal from the Green Belt in the council's emerging replacement Local Plan.

Trinity Hall's aspirations for the site

- 2.6 There is strong demand for employment and commercial development in this location. Trinity Hall is already in confidential discussions with a third party national PLC about the development of part of the site to provide a retail storage and distribution centre to deliver on the objectives of proposed allocation WAL.E8. The development of this scheme would bring about significant employment and economic growth in Waltham Abbey in accordance with the Spatial Development Strategy and wider objectives of the Submission Local Plan.

Trinity Hall

Land north of A121, south of Waltham Abbey
January 2018

3.0 Policy Context

- 3.1 The Government requires that the National Planning Policy Framework (NPPF) is taken into account in the preparation of Local Plans. Councils are encouraged to support businesses, ensuring that there is sufficient land available and promotes mixed use development wherever possible.

- 3.2 The NPPF provides strong support for sustainable economic development, stating at paragraph 17 that LPAs should:

“Proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs. Every effort should be made objectively to identify and then meet the housing, business and other development needs of an area, and respond positively to wider opportunities for growth. Plans should take account of market signals, such as land prices and housing affordability, and set out a clear strategy for allocating sufficient land which is suitable for development in their area, taking account of the needs of the residential and business communities”

- 3.3 Paragraph 18 sets out the Government’s commitment to securing economic growth to secure jobs and prosperity. Paragraph 19 seeks to ensure that the planning system does everything it can to support sustainable economic growth, whilst Paragraph 20 states:

“To help achieve economic growth, local planning authorities should plan proactively to meet the development needs of business and support an economy fit for the 21st century”.

- 3.4 At paragraph 20 the NPPF seeks to ensure that Local Authorities proactively support the development needs of business and at Paragraph 21 advises that Local Plans should:

“support existing business sectors, taking account of whether they are expanding or contracting”

- 3.5 The NPPG advises that the policies within a Local Plan must be based on a clear and deliverable vision and ensure that the Local Plan vision for the area is realistic, reflecting market needs. The NPPG advises that draft policies should be deliverable stating:

“Development of plan policies should be iterative – with draft policies tested against evidence of the likely ability of the market to deliver the plan’s policies, and revised as part of a dynamic process”

- 3.6 In terms of land use, the NPPF therefore supports the use of the site for employment development during the lifetime of the Local Plan.

4.0 Representations on Submission Local Plan Policies

Policy SP2 (Spatial Development Strategy 2011-2033)

- 4.1 Trinity Hall **supports** policy SP2's proposed allocation of approximately 23ha of new employment land at appropriate locations across the District, as set out in detail in policy E1. The Council is right to allocate a marginally higher than the amount of land than calculated to be required by its evidence base to retain flexibility and the ability to be respond to unforeseen market conditions during the Plan period.
- 4.2 Trinity Hall also **supports** the need for employment land to be delivered in the south of the District, particularly in the vicinity of Waltham Abbey, to address the relative gap in employment opportunities in this part of the Plan area.
- 4.3 Trinity Hall is willing to bring forward its land at Waltham Abbey (allocation WAL.E8) to address this demand and can confirm strong market interest for commercial development in this location. As highlighted above, Trinity Hall is in advanced discussions with a third party about the development of a retail storage and distribution centre on its land, in accordance with the proposed allocation of the site.
- 4.4 Policy SP2's supporting text also acknowledges the importance of providing employment land in close proximity to new residential areas. The Council state that bringing forward both employment and residential uses within a reasonable distance of one another results in more desirable employment opportunities and allows a comprehensive approach to highways and transport issues related to growth. Trinity Hall **supports** this conclusion. Waltham Abbey, as one of the largest towns within the District, is proposed to accommodate a significant quantum of new housing to supplement its relatively high existing population. The WAL.E8 allocation complies with this objective of the Plan, being easily accessible from Waltham Abbey and the surrounding towns in addition to being ideally placed in relation to the strategic highway network.

Policy SP6 (Green Belt and District Open Land) and Policies Map

- 4.5 Trinity Hall **supports** the Council's conclusion that exceptional circumstances exist to justify a revision to the Green Belt boundary. The emerging Local Plan's evidence base demonstrates that there is insufficient land outside of the Green Belt to meet the objectively assessed need for new employment land established in the Functional Economic Market Area (FEMA) Assessment. A revision to the Green Belt boundary is a necessity to ensure that the Plan is able to meet identified need for employment land in Epping Forest and the wider FEMA, and to ensure sustainable patterns of development are delivered.
- 4.6 Trinity Hall supports the proposed removal of the site from the Green Belt. Removing the whole site and using the M25 and A121 to enclose the new Green Belt boundary will ensure that it is clearly defined, readily recognisable and likely to be permanent, in accordance with the requirements of paragraph 85 of the NPPF.

- 4.7 Releasing the whole site will also provide flexibility to meet longer-term development needs stretching beyond the Plan period, without the need for further modifications to the Green Belt boundary. This will help to ensure that Green Belt boundaries will not need to be reviewed again at the end of the Plan period, also in accordance with the aspirations of the NPPF.
- 4.8 The Council's Green Belt Assessment (Stage 2 Report, August 2016) confirms that the site performs a weak or relatively weak function in respect of three out of the four purposes of the Green Belt analysed as part of the study on a site specific basis:
- To check the unrestricted sprawl of large built-up areas;
 - To prevent neighbouring towns merging into one another; and
 - To preserve the setting and special character of historic towns.
- 4.9 We support these conclusions, but challenge the Green Belt Assessment's conclusion that the site performs a 'moderate' function in respect of safeguarding the countryside from encroachment. The site is contained within the A121 and the M25 with some small dilapidated agricultural buildings existing on site. The limited contribution of the site to the countryside in light of this containment reduces the contribution of this land. Development would be unable to encroach beyond the existing infrastructure features into the wider countryside. The site is judged to make a weak contribution to this purpose. Nevertheless, we support the Council's overall conclusion that the site is suitable for Green Belt release.
- 4.10 Appendix 1 and 2 provides the extracts of the Stage 1 and 2 Green Belt Assessment Reports relevant to the site. The site is assessed in the Stage 2 report under the reference DSR 058.1.

Policy E1 Employment Sites

- 4.11 Policy E1 emphasises the Council's commitment to enhancing and intensifying existing employment uses as a priority to meet need as far as possible. 53 existing employment sites are designated for protection in the Plan to accomplish this objective. Nevertheless, the Plan acknowledges that employment needs cannot be met solely through intensification, so there is a commitment to deliver new employment sites to supplement the delivery. Trinity Hall fully **supports** the need to identify new allocations to address anticipated employment requirements.
- 4.12 The policy proposes 5 new employment allocations within the District, one of which is Land North of A121 under the reference number WAL.E8. Trinity Hall **supports** the inclusion of this site within the proposed employment allocations and, as land owner, confirms its commitment to the delivery of the site in accordance with the Local Plan's aspirations.
- 4.13 As previously confirmed, with the exception of a small parcel of land on the northern boundary which is owned by Epping Forest District Council (and which is not critical to its delivery), the land proposed for allocation is within a single land ownership and is available for development immediately. Trinity Hall is already in discussions with a national retail PLC to bring the site forward for the development of a storage and distribution centre on the land proposed for allocation WAL.E8. Trinity Hall intends to work with its commercial partners, the Council and other stakeholders to enable the delivery of the site as soon as possible.

- 4.14 The Council's employment delivery trajectory identifies that the 10 hectares of the B1c/B2/B8 development will come forward for development by 2031/32. Trinity Hall can confirm its intention to deliver the site in accordance with these expectations.
- 4.15 The Epping Forest Strategic Land Availability Assessment (SLAA - 2012) published to support the Submission Local Plan confirms that the site is available, achievable and deliverable and capable of delivering 100,000 sqm of commercial space (reference SR-0061). In terms of suitability, the only restriction for the site identified in the SLAA is its location within the Green Belt, a designation which is proposed to be removed via this Local Plan review.
- 4.16 The site is suitably located for commercial development within close proximity to Waltham Abbey and other towns housing a considerable potential workforce and it is adjacent to the M25, the A121 and the wider strategic network. The site's strategically advantageous location on the M25, close to north London and with links to the M11, A1 and M1 towards the north of the country makes it ideally placed to accommodate a proposed distribution centre. Trinity Hall considers the site to be entirely suitable for its proposed use.

Allocation WAL.E8 (Land north of the A121 – Appendix 6)

- 4.17 Trinity Hall **strongly supports** the allocation of the Site for Employment (B1c, B2 and B8 Class) Uses and supports the wording of the relevant allocation in general.
- 4.18 Whilst there is no intention to seek an increase over and above the 10 hectares proposed in this Plan period, it is considered that there will be significant demand for more than 10 hectares to come forward during the Plan period. The results of the various economic and employment studies which were carried out to inform the Plan demonstrate that there is a huge demand for employment floorspace in the District and in the wider Functional Economic Market Area.
- 4.19 Trinity Hall fully supports the release of the site from the Green Belt and the allocation of the Site for Class B1c, B2 and B8 uses. It agrees that transport and access matters will be the key consideration when developing this site and support the proposed access point off Dowding Way which will serve both the eastern and western sides of the site. However, there are drafting issues which could prevent or hinder employment development from being delivered. The wording of the allocation requires clarity around the inclusion of future mezzanine floorspace and assurance that future occupiers will benefit from 24/7 deliveries and servicing. These matters of clarification are outlined below.

Floorspace Quantum

- 4.20 The allocation sets out an approximate net capacity of 40,000 square metres, which equates to a plot ratio of 0.4. This does not take into account the likelihood of mezzanines being installed in the future.
- 4.21 This will increase the net capacity of the Site, without increasing the plot ratio. However as currently worded, the policy suggests a maximum of 40,000 sq.m should come forward, which may prevent additional mezzanine space in the future. To remove any ambiguity, we therefore request that this section of the policy is reworded to state (with new text in red):

“Approximate Net Capacity (GEA) 40,000 sq.m excluding any mezzanine floorspace”

- 4.22 This additional text will remove any confusion on the maximum floorspace that will be permitted on the Site.

Design and Layout

- 4.23 The Site is not allocated for sensitive land use types. The Site is clearly allocated for B1(c), B2 and B8 uses which are considered to be appropriate for this location. However, the policy states:

“Development proposals should be subject to careful design and layout and ensure that where sensitive Land Use Types are proposed they accord with the requirements set out in the HSE’s Land Use Planning Methodology”

- 4.24 This text is unnecessary as the site is not allocated for any sensitive land use types. The text should therefore be **deleted**.

Deliveries and Servicing

- 4.25 The Site is allocated for Class B1c, B2 and B8 uses. Businesses of this kind require 24/7 operation, and they particularly require flexibility in delivery and servicing hours. As such, the following text must be **deleted** from the allocation to ensure that businesses are not discouraged from occupying the Site:

“As part of the Routing Management Plan the need to restrict the hours of operation for heavy goods vehicles to avoid the critical peak network periods should be considered.”

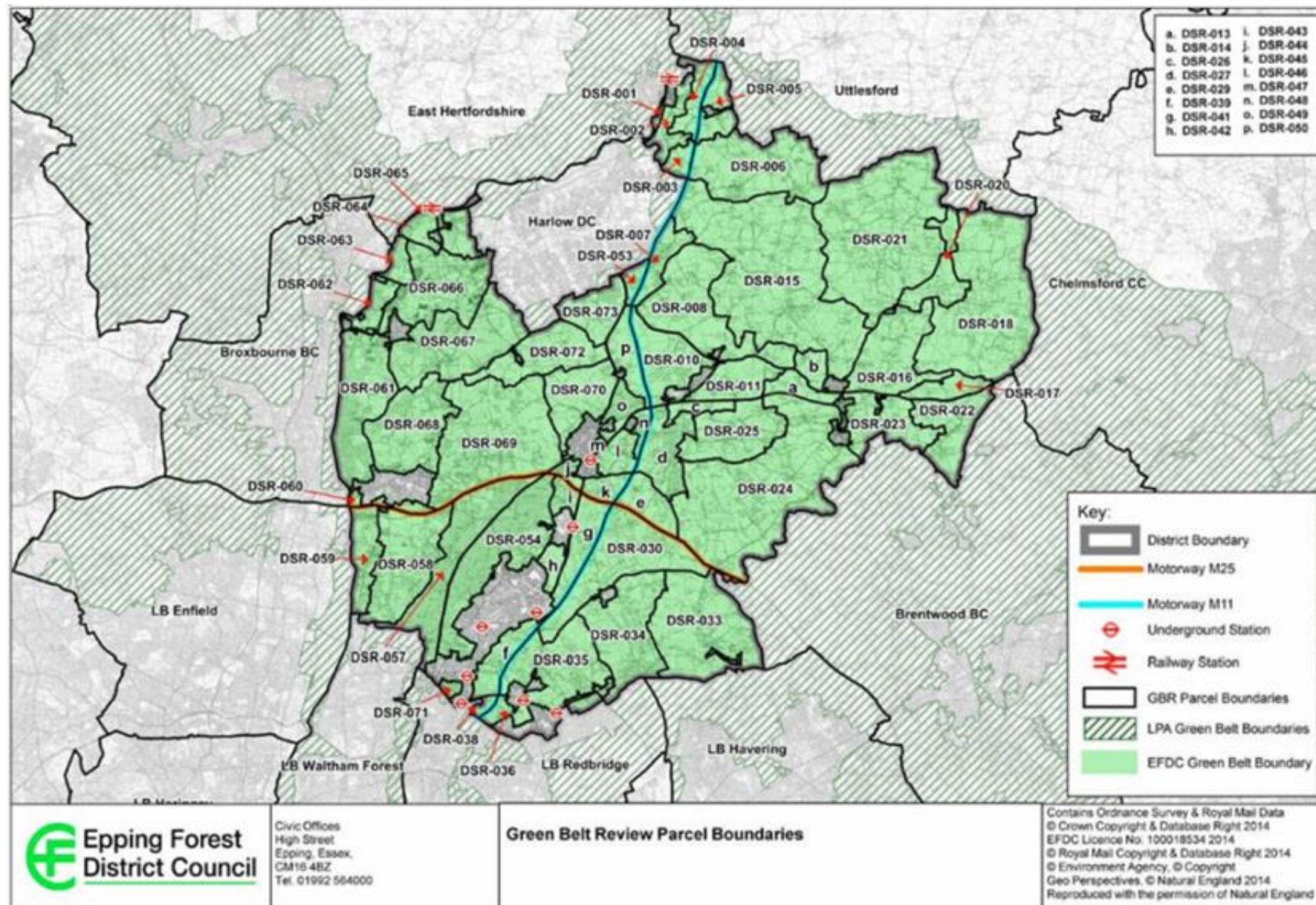
- 4.26 Matters such as this can be dealt during the determination of a planning application and such a blanket restriction on HGV use will be considered onerous to future occupiers, particularly distribution (Class B8) businesses. The allocation confirms that the site is suitable for businesses of this kind and their operational needs must therefore be prioritised.
- 4.27 The current wording may reduce demand for units on the site once it is developed and should be deleted from the allocation.

5.0 Conclusion

- 5.1 Trinity Hall **strongly supports** the proposed allocation of site WAL.E8 for B1c/B2/B8 employment uses. The site represents an excellent opportunity for employment and commercial uses given its proximity to Waltham Abbey and the ease of access to the strategic road network consisting of the M25, A121, M1 and M11 linking it to London and the wider country.
- 5.2 Trinity Hall is in support of the Council's proposal to remove the site in its entirety from the Green Belt. The site makes a weak contribution to the purposes of including land within the Green Belt and the new Green Belt boundary proposed by the Council is clear, defensible and likely to endure beyond the Plan period as required by the NPPF. It will also provide flexibility for the future supply of further employment land.
- 5.3 Trinity Hall supports Submission Local Plan policies SP2 and E1, where they consider Waltham Abbey to be a suitable location for employment and commercial uses. Trinity Hall strongly supports the allocation of site WAL.E8, subject to the recommendations set out within this report. The land within Trinity Hall ownership is highlighted as available, achievable and deliverable.
- 5.4 The wording of policy applicable to allocation WAL.E8 should ensure clarity with regard to mezzanine floorspace and consider future occupiers by allowing 24/7 deliveries and servicing including during peak hours. Failure to do so will hinder the deliverability of future employment development on the site.
- 5.5 We trust that these representations will be of assistance and that the Council will take heed of the recommendations within it. Should the Inspector wish to discuss this in more detail at the Examination in Public, we would be happy to attend.

APPENDIX 1

EPHING FOREST DISTRICT COUNCIL GREEN BELT ASSESSMENT STAGE 1 REPORT



Parcel DSR 058 - (High Beach and Sewardstonebury)		
Parcel Size: 811.20 hectares		
Summary of Assessment		
Parcel's Contribution to the Purposes of the Green Belt		
1st GB Purpose	Moderate	3
2nd GB Purpose	Weak	1
3rd GB Purpose	Strong	5
4th GB Purpose	No Contribution	0
Total		9
1. Check the unrestricted sprawl of large built-up areas		Moderate – 3
<p>(1) The parcel adjoins the built up areas of London - LB Waltham Forest (Chingford) in the southwest corner of the parcel.</p> <p>(2) The parcel contributes, as part of a wider network of parcels (adjoining DSR-059 and DSR-057), acting as a strategic barrier against the sprawl of London.</p> <p>(3) Yardley wood (southwest corner of this parcel) and woodland to the east within adjoining parcel DSR-057) in places provides a strong natural southern barrier preventing the northern sprawl of London.</p>		
2. Prevent neighbouring towns merging into one another		Weak – 1
<p>(4) The parcel forms part of the gap between the Waltham Abbey and Buckhurst Hill and Waltham Abbey and Loughton and Debden.</p> <p>(5) Strong defensible boundary in the northern section of the parcel created by the M25 and A121 However this had been breached to the north of parcel at Beechfields Walk/Lodge Lane. East and south boundary created by Epping Forest creating a strong natural barrier.</p> <p>(6) The distance between the towns Loughton/Debden – Waltham Abbey is 4.8 km. The distance between the towns Buckhurst Hill – Waltham Abbey is 5.4 km.</p> <p>(7) Some evidence of ribbon development toward the west of the site notably along Wellington Hill and Mott Street (High Beech area) and to the south along Bury Road to the north of Sewardstonebury.</p> <p>(8) Epping Forest is situated between the settlements therefore the visual perception is one of forest.</p> <p>(9) A reduction in the gap is unlikely to compromise the physical separation of the towns as Epping Forest is situated between the towns.</p> <p>(10) A reduction in the gap is unlikely to compromise the separation of the towns visually due to Epping Forest however it is likely to compromise the openness of the gap.</p>		
3. Assist in safeguarding the countryside from encroachment		Strong – 5
<p>(11) The parcel contains a number of 'countryside uses'. A significant amount of the parcel is used for agricultural purposes; predominately arable farmland with some large commercial nurseries towards the north- western boundary. The parcel also includes Gilwell Park scouting HQ and activity centre, West Essex Golf Club and High Beech Golf Club, Waltham Abbey Jewish Cemetery, High Beech Cricket Ground, a long distance walking route (London Orbital walk traverses part of parcel to south – Yeats Meadow), numerous and public rights of way.</p> <p>(12) The topography of this area encompasses a series of pronounced hills, to the north east, in an otherwise gently undulating landform. The topography in the area does not prevent</p>		

encroachment of development. Therefore, the Green Belt designation safeguards the countryside from encroachment	
(13) There is no evidence of encroachment or other urbanising elements within the parcel.	
4. To preserve the special character of historic towns	No Contribution – 0
(14) The historic town of Waltham Abbey located adjacent to northern boundary formed by the M25 motorway.	
(15) Some views of Waltham Abbey and church tower, from the hill to the north of the parcel, east of Lord Padgets Wood/south of A121. Given the separation provided by M25, and the urban context provided by the relatively recent development to the south of the motorway, the impact of development within the parcel upon the historic significance Waltham Abbey town is considered to be negligible.	
(16) Please see Q15 - negligible impact on historic significance of Waltham Abbey.	
(17) Please see Q15 - negligible impact on historic significance of Waltham Abbey	

APPENDIX 2

EPPING FOREST DISTRICT COUNCIL GREEN BELT ASSESSMENT STAGE 2 REPORT

Settlement: **Waltham Abbey**

Settlement Type: **Town**

Stage 1 Assessment

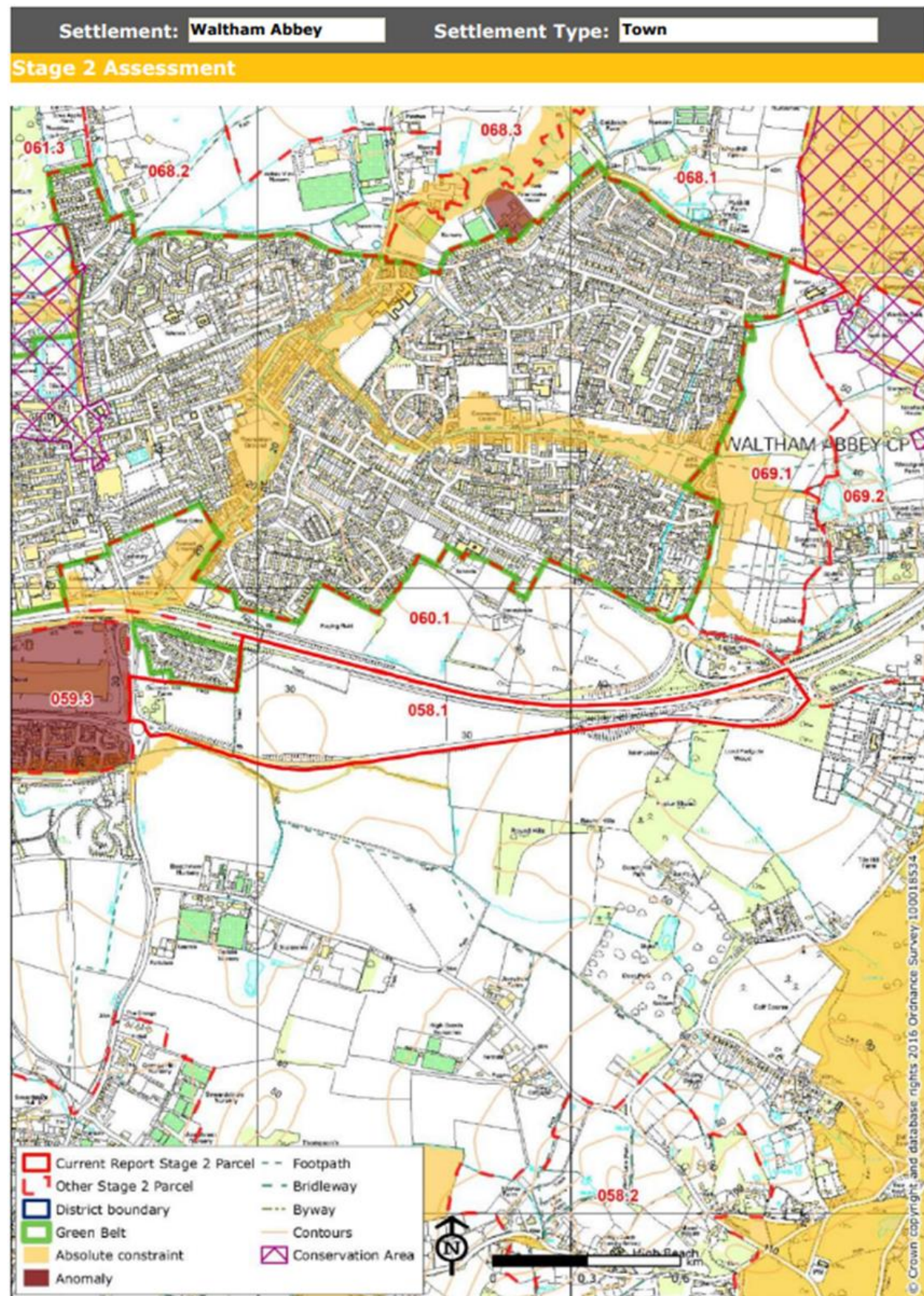
Parcel DSR 058 - High Beach and Sewardstonebury

Parcel Size (Ha) - 813.85

Summary of Assessment - Parcel's Contribution to the Purposes of Green Belt

1st Green Belt Purpose	Moderate	3
2nd Green Belt Purpose	Weak	1
3rd Green Belt Purpose	Strong	5
4th Green Belt Purpose	No Contribution	0
Total		9

1. Check the unrestricted sprawl of large built-up areas	Moderate - 3
<p>(1) The parcel adjoins the built up areas of London - LB Waltham Forest (Chingford) in the southwest corner of the parcel.</p> <p>(2) The parcel contributes, as part of a wider network of parcels (adjoining DSR-059 and DSR-057), acting as a strategic barrier against the sprawl of London.</p> <p>(3) Yardley wood (southwest corner of this parcel) and woodland to the east within adjoining parcel DSR-057) in places provides a strong natural southern barrier preventing the northern sprawl of London.</p>	
2. Prevent neighbouring towns from merging into one another	Weak - 1
<p>(1) The parcel forms part of the gap between the Waltham Abbey and Buckhurst Hill and Waltham Abbey and Loughton and Debden.</p> <p>(2) Strong defensible boundary in the northern section of the parcel created by the M25 and A121 However this had been breached to the north of parcel at Beechfields Walk/Lodge Lane. East and south boundary created by Epping Forest creating a strong natural barrier.</p> <p>(3) The distance between the towns Loughton/Debden - Waltham Abbey is 4.8 km. The distance between the towns Buckhurst Hill - Waltham Abbey is 5.4 km.</p> <p>(4) Some evidence of ribbon development toward the west of the site notably along Wellington Hill and Mott Street (High Beech area) and to the south along Bury Road to the north of Sewardstonebury.</p> <p>(5) Epping Forest is situated between the settlements therefore the visual perception is one of forest.</p> <p>(6) A reduction in the gap is unlikely to compromise the physical separation of the towns as Epping Forest is situated between the towns.</p> <p>(7) A reduction in the gap is unlikely to compromise the separation of the towns visually due to Epping Forest however it is likely to compromise the openness of the gap.</p>	
3. Assist in safeguarding the countryside from encroachment	Strong - 5
<p>(11) The parcel contains a number of 'countryside uses'. A significant amount of the parcel is used for agricultural purposes; predominately arable farmland with some large commercial nurseries towards the north- western boundary. The parcel also includes Gilwell Park scouting HQ and activity centre, West Essex Golf Club and High Beech Golf Club, Waltham Abbey Jewish Cemetery, High Beech Cricket Ground, a long distance walking route (London Orbital walk traverses part of parcel to south - Yeats Meadow), numerous and public rights of way.</p> <p>(12) The topography of this area encompasses a series of pronounced hills, to the north east, in an otherwise gently undulating landform. The topography in the area does not prevent encroachment of development. Therefore, the Green Belt designation safeguards the countryside from encroachment</p> <p>(13) There is no evidence of encroachment or other urbanising elements within the parcel.</p>	
4. To preserve the special character of historic towns	No Contribution - 0
<p>(14) The historic town of Waltham Abbey located adjacent to northern boundary formed by the M25 motorway.</p> <p>(15) Some views of Waltham Abbey and church tower, from the hill to the north of the parcel, east of Lord Padgets Wood/south of A121. Given the separation provided by M25, and the urban context provided by the relatively recent development to the south of the motorway, the impact of development within the parcel upon the historic significance Waltham Abbey town is considered to be negligible.</p> <p>(16) Please see Q15 - negligible impact on historic significance of Waltham Abbey.</p> <p>(17) Please see Q15 - negligible impact on historic significance of Waltham Abbey</p>	



Settlement: **Waltham Abbey**

Settlement Type: **Town**

Stage 2 Assessment

Parcel 058.1

Parcel Size (Ha) - 39.83

Summary of Assessment - Parcel's Contribution to the Purposes of Green Belt

1st Green Belt Purpose	Weak
2nd Green Belt Purpose	Relatively Weak
3rd Green Belt Purpose	Moderate
4th Green Belt Purpose	Weak
5th Green Belt Purpose	Not Assessed

Summary of Assessment

Resultant harm to the Green Belt purposes if parcel released from the Green Belt: **Moderate**

Purpose 1. Check the unrestricted sprawl of large built-up areas	Weak
(Large built-up areas are: London, Harlow, Cheshunt and Hodddesdon)	
The parcel does not lie adjacent to a large built-up area. It lies to the south of Waltham Abbey, separated from the settlement edge by the M25 and parcel 060.1. The parcel contributes to the prevention of sprawl to a small degree, as part of wider Green Belt land to the west and south west around Cheshunt and London, but intervening land and barriers (the A112, Old River Lee and Lee River Navigation to the west, and the wider Green Belt land in the south and south west of the wider Stage One parcel 058) fulfil this purpose to a much greater degree.	
Purpose 2. Prevent neighbouring towns from merging	Relatively Weak
(Towns are: London, Harlow, Cheshunt, Hodddesdon, Epping, Waltham Abbey, Loughton / Debden, Chigwell, Buckhurst Hill, Chipping Ongar, North Weald Bassett, Theydon Bois, Roydon and Lower Nazeing)	
The parcel has a relationship with Cheshunt to the west and London to the south west, but does not lie directly between the towns. Development within the parcel may reduce the gap between Waltham Abbey and the settlement of Sewardstone to a small degree but this is not likely to affect the perception of the gap between the towns of Waltham Abbey and London (Chingford). Epping Forest creates a strong barrier between the towns of Waltham Abbey and Loughton/ Debden and Waltham Abbey and Buckhurst Hill such that the parcel does not contribute to the separation of any of these towns.	
The higher rating given to Stage One parcel DSR-058 reflects that parcel's inclusion of land adjacent to the large built-up area of London.	
Purpose 3. Assist in safeguarding the countryside from encroachment	Moderate
The parcel consists of agricultural fields sandwiched between the busy main roads of the A121 and M25, but contains no other development except for a single farm. The outer parcel boundary is formed by the A121 - this provides a strong barrier in places, although in other places where the road is at grade and trees are sparse, there is strong intervisibility with the wider countryside to the south. Therefore, if the parcel was developed it is likely to be visible in the wider countryside and the outer boundary would require strengthening. The extent of surrounding development in relation to the parcel consists of a large Sainsbury's to the west of the parcel and residential development at Beechfield Walk to the north west of the parcel, south of the M25. Any new development that took place within the parcel would potentially relate to these existing developments to some extent, thereby reducing the performance of the parcel slightly in relation to Stage One.	
Purpose 4. To preserve the setting and special character of historic towns	Weak
(Historic towns are: Chipping Ongar, Waltham Abbey, Epping and Sawbridgeworth)	
The parcel lies within approximately 1km of the Waltham Abbey Conservation Area, and within 1.5km of the Royal Gunpowder Factory Conservation Area - both to the north west of the parcel. The parcel does not lie immediately adjacent to the historic town of Waltham Abbey, although it lies within approximately 0.5km of the Historic Urban Area as identified in the Essex Historic Towns - Supplementary Planning Guidance (1999). It is, however, physically and visually separated from the Historic Urban Area by development that occurred during the 20th century and therefore, it is not likely that the openness of the parcel contributes positively to the setting of the historic town. Consequently, it is unlikely that development within the parcel would cause harm to the setting and significance of the historic town of Waltham Abbey.	
Purpose 5. To assist in urban regeneration, by encouraging the recycling of derelict and other urban land	Not Assessed
Not assessed at individual parcel level, as explained in Methodology section of report.	
Consideration of alternative parcel boundaries	
No reasonable alternative boundaries which would significantly alter the assessment have been identified.	
Potential anomalies identified for consideration by EFDC	
None identified.	

