

APPENDIX THREE – CRITIQUE OF EFDC GREEN BELT REVIEW STAGE ONE AND STAGE TWO

Hill House Farm, Chigwell

Critique of Epping Forest District Council
Green Belt Review Stage One and Stage Two

on behalf of

Meridian Hill (Chigwell) Limited

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Contents

- 1 Introduction
- 2 Landscape context
- 3 Critique of EFDC Green Belt Review: Methodology
- 4 Critique of EFDC Green Belt Review: Stage One
- 5 Critique of EFDC Green Belt Review: Stage Two

Figures

- 01 Site context

1 Introduction

1.1 Background

1.1.1 The National Planning Policy Framework (NPPF) provides the framework by which local planning authorities should address the Green Belt when preparing their Local Plans.

1.1.2 At para 79, the NPPF states: *"The Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence."*

1.1.3 Green Belts can serve five purposes (para 80), although not all purposes necessarily apply to all Green Belts. The five national purposes are:

- to check the unrestricted sprawl of large built up areas;
- to prevent neighbouring towns merging into one another;
- to assist in safeguarding the countryside from encroachment;
- to preserve the setting and special character of historic towns; and
- to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

1.1.4 With regard to Green Belt boundaries, the NPPF notes (para 84) that: *"Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan. At that time, authorities should consider the Green Belt boundaries having regard to their intended permanence in the long term, so that they should be capable of enduring beyond the plan period."*

1.1.5 Para 85 notes:

When defining boundaries, local planning authorities should:

- *ensure consistency with the Local Plan strategy for meeting identified requirements for sustainable development;*
- *not include land which it is unnecessary to keep permanently open;*
- *where necessary, identify in their plans areas of 'safeguarded land' between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period;*
- *make clear that the safeguarded land is not allocated for development at the present time. Planning permission for the permanent development of safeguarded land should only be granted following a Local Plan review which proposes the development;*

- *satisfy themselves that Green Belt boundaries will not need to be altered at the end of the development plan period; and*
- *define boundaries clearly, using physical features that are readily recognisable and likely to be permanent.*

1.1.6 In 2015, Epping Forest District Council (EFDC) commenced a review of the Green Belt within the district boundaries. The purpose of the review was to assess the contribution that the Green Belt made to delivering the five Green Belt purposes identified in the NPPF.

1.1.7 The Green Belt Review comprised two stages:

- Stage One was a high-level review to enable further site-specific work to be undertaken
- Stage Two was undertaken subsequent to EFDC identifying broad locations with the existing Green Belt that should be subject to further assessment.

1.1.8 The findings of the Green Belt Review were presented in were presented in three separate documents:

- Green Belt Review Methodology, August 2015
- Green Belt Review: Stage One, September 2015
- Green Belt Review: Stage 2, August 2016

1.2 Objectives of this report and the extent of the review

1.2.1 In December 2016, The Landscape Partnership (TLP) was instructed by Meridian Hill (Chigwell) Limited to undertake an independent critique of EFDC's Green Belt Review, Stages One and 2. This report considers the landscape-related findings of the Review with particular regard to a parcel of land at Hill House, Chigwell, Essex (the site). The site is located between Woodford and Chigwell, to the west of the A113 Chigwell Road/High Road, c.1.4km south-west of Chigwell in the county of Essex. It is situated between the M11 motorway and the A113. The site lies within the Metropolitan Green Belt.

1.2.2 The critique of the Green Belt Review: Stage One focuses on the findings in relation to the parcel of land with the District Site Reference DSR 36, which includes the site. The critique of Stage Two focuses on the more constrained Stage Two Parcel 36.3, which again includes the site. See Figure 01.

1.2.3 The objectives of the critique of the Stage One review were to provide commentary on:

- The principal function and the five identified Green Belt purposes.
- The methodology and the baseline information used to undertake the Stage One review.

- The judgements made regarding the contribution that parcel DSR36 (which encompasses the site) makes to the Green Belt purposes.
- 1.2.4 The objectives of the critique of the Stage Two review were to provide commentary on:
- The methodology and the baseline information used to undertake the Stage Two review.
 - The judgements made about the contribution that Parcel 36.3 makes to the Green Belt purposes.
 - The role the site, as a sub-portion of Parcel 36.3, plays in delivering the Green Belt purposes.
- 1.2.5 Meridian Hill (Chigwell) Limited proposes to develop part of the site for residential and care home uses. In undertaking this critique, the following broad assumptions were made in regard to the manner in which the site might be developed in the future:
- The footprint of any development would be restricted to the south-eastern portion of the site, south-east of a line that approximates to the limit of development within the adjacent residential of Waltham Road.
 - Development would be residential in nature, and include a care home. It would be a maximum of three storeys in height.
 - The landform in the centre of the site would be retained.
 - The landform on the north-western boundary of the site would be retained and would be extended in a south-westerly direction to the site boundary.
 - Wherever possible, all vegetation within the north-western portion of the site would be retained.
- 1.2.6 The critique of the Green Belt Review was undertaken by Simon Neesam, a Technical Director of The Landscape Partnership. He viewed the site on a field visit in March 2017, on a bright but overcast day from adjacent land, public right of ways and other publicly-accessible locations (e.g. areas with open recreational access).
- 1.2.7 Simon is a Chartered Landscape Architect with 25 years' experience. He holds a degree and a post graduate diploma in Landscape Architecture, and became a fully qualified Chartered Member of the Landscape Institute in 1994. Simon has a wide range of experience in landscape architecture and landscape planning, and has undertaken projects for private clients as well as national, regional, and local public sector bodies throughout the UK. He has carried out strategic and site-specific landscape assessments, visual impact assessments, and acted as expert witness for a variety of projects including major out-of-town retail facilities, highway schemes, renewable energy developments, landfill and mineral schemes, flood

alleviations schemes, and new housing, often within sensitive landscapes or at potentially contentious locations.

1.3 Structure of the critique

1.3.1 This report comprises the following elements:

- Chapter 1: introduction to commission and objectives of the critique.
- Chapter 2: a summary of the landscape context of the site and its environs.
- Chapter 3: a critique of the EFDC Green Belt Review Methodology, August 2015.
- Chapter 4: a critique of the EFDC Green Belt Review: Stage One, September 2015.
- Chapter 5: a critique of the EFDC Green Belt Review: Stage Two, September 2016.

1.3.2 The components of the EFDC Green Belt Review are referred to variously as Stage One, Stage 1, Stage Two and Stage 2, and Green Belt Review and Green Belt Assessment; for the purposes of consistency, they are referenced in this report as Stage One and Stage Two, and as Green Belt Review.

1.3.3 TLP emphasis within quotations is highlighted as *example*.

2 Landscape context

2.1 Site location

2.1.1 The following paragraphs provide a summary of the landscape context of the site and its environs. The site is located between Woodford and Chigwell, to the west of the A113 Chigwell Road/High Road, approximately 1.4km south-west of Chigwell in the county of Essex and within Epping Forest District Council. The boundary of the London Borough of Redbridge follows the south-western boundary of the site.

2.1.2 The site is situated within a finger of the Metropolitan Green Belt that follows the corridor of the River Roding and extends south-westwards between Chigwell and Buckhurst Hill, through Woodford to Wanstead. In the vicinity of the site, the Green Belt boundary is commensurate with the site's south-eastern boundary (Chigwell Road/High Road) and south-western boundary (rear gardens of properties fronting Meadgate Avenue). A wedge of Green Belt land encompassing Chigwell Golf Club extends eastwards of High Road, to the north-east of the site, to separate Woodford Bridge from Chigwell village, and a further wedge encompassing Repton Park and Hospital Hill extends eastwards to the south of the site to separate Woodford Bridge from Clayhall.

2.1.3 The Roding Valley also accommodates the M11 motorway corridor, which follows the site's north-western boundary. The site is approximately 17km north-east of the centre of London. See also Figure 01: Site context.

Site features and characteristics

- 2.1.4 The 14.64ha Hill House site is broadly rectangular with large mounds of over-tipping that are vegetated with areas of unmaintained scrub, grass and woodland. The north-eastern corner of the site includes the remnants of a smallholding with dilapidated stables, paddock and remains of an orchard and flower and vegetable growing areas.

Boundaries

- 2.1.5 The site is bordered to the north-west by the M11 motorway and to the south-east by the A113 Chigwell/High Road. To the south-west, the site abuts the rear gardens of residential properties fronting Meadgate Avenue and, further to the north-west, Ashton Playing Fields. The north-eastern edge of the site borders the playing fields and grounds of West Hatch High School, with a spur of unmanaged land extending beyond the site between the M11 and the school grounds.
- 2.1.6 The site is currently accessible from the A113 via a double vehicle gate in the southern corner of the site and a pedestrian gate about 45m to the north-east. At the northern corner of the site there is a track leading from the A113 along the north-eastern boundary giving access to properties to the north of the site and to the stable area within the site. There is a double vehicular gate 18m from the A113 and a number of vehicle gates opening to the north and south of this track.
- 2.1.7 The site boundaries are marked by a variety of fencing types, including railings and chain link fence that mark the boundary along A113 whilst post and rail, post and wire, and timber close board and panel fences make up the remainder. Where the site is adjacent to residential properties the boundary is in places marked by walls. At the southern corner of the site some of the properties within The Childers have walls at their boundary as does the property fronting the A113 at the north-eastern corner of the site.

Topography

- 2.1.8 The site is situated on the lower valley slopes of the River Roding with land rising from c.15m AOD in the western corner of the site to 30m AOD in the eastern corner. Within the site there are a number of raised landforms that are understood to have been created from rubble arising from the clearance of WW2 bomb damage in central London, over-tip and excavations from the construction of the M11. At the south-east of the site the land rises from the boundary (with Meadgate Avenue/Ashton Playing Fields) to a terrace level that sits c.5m above adjacent ground, this slope is densely wooded.
- 2.1.9 On the north-western boundary, the ground rises by approximately 10m from the fence line of the M11 to create a raised mound approximately 150m wide (at its base) that follows a line south-west to north-east parallel to the motorway. This mound does not extend the full length of the southern boundary of the site; instead in the western corner there is an area of lower lying land at the boundary with Ashton Playing fields. To the centre of the site there is

a roughly triangular shaped mound approximately 8m higher than the surrounding land. The banks of the mound are vegetated and the central area of the mound forms a plateau of rough grass at the highest point on the site. Between these two raised areas there is a narrow valley of land at grade marking the location of an underlying gas main.

Vegetation

- 2.1.10 The Site is heavily vegetated, most of it overgrown and unmanaged with developing scrub and areas of rough grassland on the top of the mounded areas.
- 2.1.11 Most of the site's boundaries have belts of young and maturing deciduous trees which provide significant screening. There are a number of mature trees (horse chestnut, ash, sycamore, willow, oak) within the boundary planting that provide significant amenity; however, many are of poor condition due to a lack of management. The ground level planting along the boundary is fairly dense, unmanaged and overgrown giving an unkempt appearance from the highway.
- 2.1.12 The embankment following the line of the M11 has a densely-planted block of field maple; the remainder of this north-western boundary is planted and self-seeded with mixed deciduous trees which, along with the change of level, provide the centre of the site with screening from the sight and sound of the motorway.
- 2.1.13 The banks of the central raised mound are planted with mixed deciduous woodland (field maple, hawthorn, ash and blackthorn) with much self-seeding of trees. The top of the mound is a more open area with long grass with a few self-seeded trees and an area of brambles.
- 2.1.14 There is a small area of woodland in the eastern corner of the site with many mature trees (field maple, hawthorn, ash, sycamore) and many self-seeded trees. The unmanaged nature of this woodland has resulted in a closed canopy and reduced quality.
- 2.1.15 A provisional Tree Protection Order (TPO) was placed on all the trees on site on 15 May 2013 by EFDC. The provisional TPO was confirmed in November 2013.

Features and elements

- 2.1.16 There are a number of small outbuildings and stables with associated areas of hardstanding in the eastern corner of the site. This includes the remains of polytunnels and flower and vegetable beds as well as a small pond. This part of the site is associated with the original Hill House Farm and is accessed from a track leading from Chigwell Road and is separated from the remainder of the site with chain link and post and rail fencing. Between the road and the outbuildings is an area that may once have been an orchard, beyond the stables there is a grazing/paddock area.
- 2.1.17 There are two watercourses on site. Ashton Brook follows a line along the south-eastern edge of the site, entering the site in a culvert from the A113 and continuing to the south. It then enters a second culvert passing underneath the track leading from the vehicle entrance and

reappearing as an open stream at the southern corner of the site before following the site boundary towards the M11 and the River Roding. Surrounding vegetation is overgrowing the watercourse and it appears to be unmanaged. The second watercourse enters the site from the boundary with West Hatch High School and follows a line north-west along the boundary for a distance of around 100m.

- 2.1.18 The site is private land to which there is no right of public access. There is some evidence of trespass via a pedestrian track from the A113 (although this is not a formal public right of way) and this dirt path is well trodden and not too overgrown. There are a number of worn tracks across the site, the most well-defined of which are the loops around the plateaux on top of the two main raised mounds from which, at localised points where foreground vegetation allows, there are wide and open views across the Roding Valley and more distant landscapes. Smaller tracks cross and follow the valley between the two mounds and along the top and bottom of the bank to the south of the site. The site appears to be currently used for informal recreation and dog walking. Public access to the site is prohibited and there are signs at the entrance notifying that the site is a former over-tip site and warning that access is at "user's own risk".

2.2 Visual context

- 2.2.1 The site is located on the lower valley sides of the River Roding as it rises from the floodplain. Visibility of the site from the wider area is relatively low due to the presence of mature vegetation on and around the site. There are views across the valley from the opposite valley sides but once sufficient elevation has been reached to enable views back into the site, these views are rather distant and are likely to only be obtained from upper floor windows of properties on the valley slopes. Where views to the site are available, they are limited by the landform on the north-western boundary and associated vegetation. No points were identified at street level that afforded views across the valley into the site area beyond the landform. At closer range, from the low-lying land surrounding the M11 and river it is difficult to see onto the site due to its (locally) elevated position and the screening provided by trees.

2.3 Landscape-related designations

Conservation Areas

- 2.3.1 Conservation Areas are defined by the 1990 Planning Act as "*areas of special architectural or historic interest, the character or appearance of which it is desirable to preserve or enhance*". Published Conservation Area Appraisals provide an overview of the existing character that should be preserved, as well as possible areas for future enhancement.
- 2.3.2 The site lies beyond and c.20m to the north of the Woodford Bridge Conservation Area, separated by built development. The Conservation Area is described by the London Borough of Redbridge on its planning portal as: "*An area of early settlement rich in historic and*

architectural interest. The earliest settlement of Woodford, east of the Roding, from where the manor house was later removed.”

Listed Buildings

- 2.3.3 Buildings or structures may be listed under the Planning (Listed Buildings and Conservation Areas) Act 1990 and included on the Statutory List of Buildings of Special Architectural or Historic Interest, as maintained in England by Historic England.
- 2.3.4 There are no listed buildings within or adjoining the site. The nearest, Thurlby House (Grade II), is located c. 150m to the south of the site and is set within intervening built form.

Registered Parks and Gardens

- 2.3.5 The Register of Parks and Gardens of Special Historic Interests in England serves to ensure that the features and qualities that make these landscapes of national importance can be safeguarded. There are no such parks or gardens in the vicinity of the site.

Green Corridors

- 2.3.6 This is a local designation relevant in this study to the London Borough of Redbridge Authority Area only. The designation is referred to under the Nature Conservation Policy E2 of the LDF and refers to relatively continuous areas of open space leading through the built environment, which may be linked but are not necessarily publicly accessible. They may allow animals and plants to travel further into the built-up area than would otherwise be the case and provide an extension to the habitats of the sites they join.
- 2.3.7 A Green Corridor lies to the immediate west of the site and is associated with the River Roding, the embankments of the M11 motorway and the Ashton Playing Fields.

2.4 Landscape typology

- 2.4.1 Landscape character assessments enable landscapes to be described and understood by mapping natural, physical and cultural features in order to define different landscapes and demonstrate what makes them special. Landscape character types share similar characteristics, such as underlying geology, soil type, topography and landform, the pattern and type of land/field enclosure, historic land use, the pattern of settlements and types of building that these comprise, tree and woodland cover and the general visual experience of the area. Landscape character areas are specific geographic areas that exhibit a particular landscape character type. Landscape character assessments can be undertaken at a range of scales. Boundaries are only indicative of the change between areas and therefore when working at a site scale, especially close to boundaries between landscape character types or character areas; users should carefully identify which landscape the land parcel belongs to, based on its specific characteristics. In addition, it is important to note that while drawn with a line on a map, areas close to boundaries often may be better thought of as an area of

transition and may display some of the characteristics and sensitivities of both character areas.

- 2.4.2 There are four landscape character assessments that encompass the site. These are at the national level (National Character Areas), the county level (Essex Landscape Character Assessment), and the district level (Epping Forest District Council Landscape Character Assessment and Epping Forest District Council Settlement Edge Landscape Sensitivity Study).

National level

- 2.4.3 In the mid-1990s, English Nature and the Countryside Commission jointly produced The Character Map of England – a single map that identified and described 159 Joint Character Areas (JCA) covering the whole of England. (The Landscape Partnership undertook the mapping and character assessment work on behalf of Natural England for the east of England). Each distinct area was defined following consideration of its landscape, biodiversity, geodiversity, and cultural and economic activity. The boundaries of the areas followed natural rather than administrative boundaries. The various volumes of the Map were published between 1998 and 2000.
- 2.4.4 More recently, Natural England has undertaken a review of the JCAs in order to fulfil, in part, responsibilities set out in the Natural Environment White Paper 2011, Biodiversity 2020, and the European Landscape Convention 2007, creating National Character Area (NCA) profiles that are based on the original JCA profiles.
- 2.4.5 The site is located towards the centre of NCA 111: Northern Thames Basin, which wraps around the north of Greater London extending from Hertfordshire in the west to the Essex coast in the east. The NCA comprises a variety of different settlements from north London suburbs, historic towns and cities such as St. Albans and Colchester, new towns such as Hatfield and Welwyn Garden City as well as more isolated and rural villages and towns.
- 2.4.6 The Northern Thames Basin contains a mix of diverse landscapes from the river valleys and wooded plateaux of Hertfordshire in the west to the arable open landscape of Essex heathlands in the east. A range of semi-natural habitats are found in the area but many are fragmented by urbanisation and associated infrastructure which is a feature of this area due to its close proximity to London. Parts of Hertfordshire and Essex however still retain tranquil areas with dispersed settlements between arable land and semi-natural habitats. The NCA includes many sites with international and national environmental designations such as SSSIs, Ramsar sites, SACs and NNRs, the majority of which are estuaries and woodlands. There is a long history of coppicing and pollarding maintenance of the ancient woodlands.
- 2.4.7 Within the Northern Thames Basin NCA (published by Natural England 2013) four distinct landscape areas are identified - Hertfordshire plateaux and river valleys; Essex wooded hills

and ridges; London Clay lowlands and Essex heathlands. Chigwell and the Site are located centrally within the NCA, to the north of London between the North Circular and the M25.

2.4.8 Key characteristics of the NCA of relevance to the site are:

- The south of the NCA has an urban character which intensifies towards the Inner London NCA.
- Varied landform with a wide plateau divided by a series of river valleys: Ver, Colne, Lea, Stour & Roman.
- Heavy acidic soils produced from the area's characteristic thick layer of Clay have resulted in the retention of considerable areas of ancient woodland.
- There is a varied pattern of woodland across the NCA from heavily wooded areas in Hertfordshire and Essex to more open character of the Essex heathlands.
- Mixed farming with arable predominates in the Hertfordshire plateaux and occurs in parts of the London Clay lowlands and Essex heathlands.
- Important habitats are provided for species such as great crested newt, water voles, otters and dormice by the range of semi-natural habits; ancient woodland, lowland heath and floodplain grazing marsh.
- A central character of parts of Hertfordshire & Essex is the medieval pattern of dispersed farming settlements and small villages.

County level

2.4.9 The Essex Landscape Character Assessment was prepared for Essex County Council and Southend on Sea Borough Council by Chris Blandford Associates in 2002. The Assessment identified seven generic landscape divisions known as Landscape Character Types within the county. The Character Types are subdivided into thirty-five Landscape Character Areas, geographically specific areas with their own particular identity (sense of place). The site is within Character Type C: River Valley Landscapes and Character Area C4: Roding Valley, a narrow area following the River Roding and A113 road from Chigwell (and the county border) in the south to Chipping Ongar and Miller's Green in the north.

2.4.10 Roding Valley is characterised as a broad and gentle valley, deepening in the south where a number of tributary valleys join to create a more complex landform of low rounded hills at right angles to the main valley. To the south, the M11 is visually prominent in the valley bottom as are the railways and M25 traversing the valley. The valley side arable fields are typically enclosed by wide hedgerows with frequent trees, sometimes woodland. At the valley floor the meandering river passes through meadows with only a few riverside trees. Densely urban at Loughton, the valley is sparsely settled elsewhere.

2.4.11 Key Characteristics of the Roding Valley:

- Broad valley, deep and wide at south, narrow and shallow in the north. Gentle to moderately undulating valley sides dissected by smaller tributary valleys.
- Semi-natural vegetation of hay meadows, flood meadows, marsh, unimproved grassland.
- Typical field enclosure pattern is of small fields bounded by hedges or ditches on the valley floor with a varied pattern of irregular and regular small, medium and large hedged fields on the valley sides. Farming is mainly arable with some pasture at the valley floor.
- Woodland/tree cover is typically scattered small woods, copses and tree belts with hedgerow oak/ash.
- Settlement pattern is of sparsely located small villages/hamlets and isolated farmsteads on the valley sides with an absence of settlement on the valley floor. Loughton and Chigwell in the south have a suburban character. Local vernacular is of colourwash plaster in the north, weatherboarding and brick in the south.

District level

2.4.12 There are two district level landscape character studies that encompass the site; the Epping Forest District Council Landscape Character Assessment and the Epping Forest District Council Settlement Edge Landscape Sensitivity Study. Both studies were commissioned by EFDC and produced by Chris Blandford Associates in 2010 to inform the policies within the Local Development Framework.

2.4.13 The district level landscape character assessment identified seven different Landscape Character Types which were further subdivided into Landscape Areas. The site is located in Character Type G – Wooded Ridges and Valleys, and in particular Landscape Area G3 Chigwell. The site is at the southernmost tip of Landscape Area G3.

2.4.14 The key features and characteristics identified in the assessment with relevance to the site and its immediate surroundings are summarised below:

- Patchwork of gently undulating, mostly arable, fields delineated with mature hedgerows.
- Hedgerows often contain mature trees which are key landscape features within views across the area.
- The characteristic open and framed views across the area are considered sensitive to new development "*particularly large-scale or tall vertical elements*".

- Open views across patchwork of small fields are framed by pockets of deciduous woodland.
 - Edges of Hainault and Grange Hill provide a strong urban character to the south of the area.
 - The settlement pattern of the area is also influenced by the large nucleated settlement of Chigwell.
 - Views towards these urban edges contribute to recognisable sense of place.
 - Within the wider Landscape Area there is a strong historic field pattern (although no longer visible/relevant to the site).
- 2.4.15 The Settlement Edge Landscape Sensitivity Study (SELSS) was produced as part of the evidence base for future Green Belt review and to inform land allocations in the EFDC Local Development Framework. Building on the district-wide Landscape Character Assessment the study identified the sensitivities of landscape and environmental features around the edges of the principal settlements of the District. The study also assessed how the landscape character areas and environmental features contribute to the structure, character and setting of the settlements.
- 2.4.16 The SELSS grouped the principal settlements within the District into sixteen discrete zones; the site was located within the Chigwell/Chigwell Row settlement area. The study reviewed each settlement area and identified key characteristics and attributes that contributed to local variations in the overall landscape character of the settlement area. This was used to define more discrete 'landscape setting areas' within the Chigwell/Chigwell Row area. The study also analysed historic landscape character, designated environmental constraints and identified the inherent landscape and visual sensitivities of the area.
- 2.4.17 The key characteristics and attributes, as relevant to the site, identified in the SELSS include:
- Settlement edges are lined with mature hedgerows or trees creating a soft green edge.
 - Chigwell has no harsh urban edges.
 - Urban greenspaces encompassing school and sports fields are present on the fringes of the village.
 - Urban gateway closest to Hill House site marks the transition to the adjacent urban area, Grange Hill.
 - Chigwell has no significant landmarks.
 - No key short distance views identified; mature hedgerows and trees limit views of the villages from within close proximity.

- Field pattern / land use: concentration of modern fields (post 1950) along the M11 corridor, with several fields having suffered post 1950s boundary loss.
 - River Roding floodplain runs northwest-southeast on the west side of Chigwell but is separated from the settlement edge by the M11.
 - Parts of the Roding Valley are designated Local Wildlife Site and Local Nature Reserve.
- 2.4.18 Landscape Setting Area 1 (within which the site was located) was judged to have a 'Moderate' overall sensitivity to change based on its role in contributing to the structure, character and setting of the settlement. Further assessment of site-specific landscape and visual sensitivities was recommended by the study to examine areas as opportunities for growth.
- 2.4.19 The study also evaluated the contribution that each landscape setting area identified within the Chigwell/Chigwell Row settlement area made to the purpose of including land within the Green Belt. Landscape Setting Area 1 was considered to provide a 'Moderate' contribution to the openness of the green belt and 'Moderate' contribution to meeting all but one of the Green Belt purposes.

3 Critique of EFDC Green Belt Review: Methodology

3.1 Background

- 3.1.1 As noted above, in 2015, EFDC commenced a review of the Green Belt within the district boundaries. The purpose of the Review was to assess the contribution that the Green Belt made to delivering the five Green Belt purposes identified in the NPPF. The methodology for Stage One was contained in Green Belt Review Methodology, dated August 2015. This document also included an outline methodology for the Stage Two Review.
- 3.1.2 Para 10 of the Methodology, notes that the Review also took *"into account physical constraints to accommodate further development"*. The Review was undertaken independently of the Local Plan Sustainability Appraisal and other evidence base work assessing potential development options. It is also noted (para 10) that the Review: *"does not seek to balance Green Belt purposes with other sustainability objectives - the Council will undertake this balancing exercise as part of its decision-taking when preparing the Local Plan"*.

3.2 General comments

- 3.2.1 The following observations are made:
- The methodology used for the Review is brief and in many places written such that there is some ambiguity as to its application.
- 3.2.2 The following paragraphs consider the stages of assessment used to undertake the Green Belt Review.

3.3 Stage One

Phase 1: Understand the context of the Green Belt Review

- 3.3.1 Includes the identification of exceptional circumstances that may justify alteration of Green Belt boundary. At the time of preparation of the methodology, no formal decision had been made as to what these might be. It was noted that they might include unavailability of sufficient land outside the Green Belt to meet the objectively assessed development needs.

Phase 2: Appraising the current status of Green Belt land within the District

- 3.3.2 The identification and definition of Green Belt parcels. No specification is provided as to how these parcels should be identified, e.g. their size, the factors that would separate one tract of land from another.
- Are they developed from those used in previous studies?
 - Does the land within have common land uses, and so have a reasonably uniform potential for development?
 - Does the land within have common landscape characteristics or qualities, and so likely to make a united contribution to the Green Belt purposes?
- 3.3.3 The site falls within parcel DSR 36. The parcel extends north-eastwards from the site, following the south-eastern edge of the M11, and then south-eastwards across the A113 to encompasses the Chigwell Golf Club course (bound by Manor Road to the south and Hainault Road to the east).
- 3.3.4 An initial observation of Parcel DSR 36 shows that it encompasses a disparate number of land uses, including agricultural land, a school and playing fields, over-tipping, horticultural uses and a golf course.
- 3.3.5 It is not clear what is meant by *"Identification and definition of Green Belt parcels for appraisal and assessing whether and to what extent it is necessary to adjust the Green Belt parcels to ensure the robustness of the evidence produced by the appraisal"* [TLP emphasis]. This is ambiguous and could suggest boundaries altered to suit the results.
- 3.3.6 A summary of the scoring system is outlined. It is noted that: *"Not every parcel is likely to fall neatly into the scoring described below therefore a considerable amount of judgement is required to arrive at scores which consider the whole parcel's contribution to each purpose"*. [TLP emphasis].
- 3.3.7 Having assessed each parcel as a whole, the council should explore whether within the individual parcel there are smaller units of land that make a lesser contribution (or greater) contribution to the Green Belt purposes and/or which could be more appropriate accommodate development.

Green Belt Purpose 1: Check the unrestricted sprawl of large built up areas.

Does the parcel act, in itself, as an effective barrier against sprawl from large built-up areas outside of the study area, specifically London and Harlow, Cheshunt and Hoddesdon?

3.3.8 Commentary:

- The Review defines large built up areas as London, Harlow, Cheshunt and Hoddesdon. No mapping is provided as to the assumed geographical extent of the large built up areas.
- What are the bounds of 'London'?
- What is the exact boundary that is being protected from sprawl? Without a mapped boundary, it is difficult to see how a justified appraisal of the purpose can be made.
- The assessment judges the parcel's contribution as a barrier against sprawl [defined in the accompanying Glossary as: "*Spread out over a large area in an untidy or irregular way*"], either on its own or as part of a wider area.

Does the parcel contribute, as part of a wider network of parcels, to a strategic barrier against the sprawl of these built-up areas?

3.3.9 Commentary:

- The assessment judges the parcel's contribution, as part of a wide network of parcels, as a barrier against sprawl [defined in the Glossary as "*Spread out over a large area in an untidy or irregular way*"], either on its own or as part of a wider area.

Are there any defensible boundaries within the parcel (see definition for defensible boundary) which act as an effective barrier against sprawl from large-built-up areas outside of the study area specifically London, Harlow, Cheshunt and Hoddesdon?

3.3.10 Commentary:

- Defensible barriers are defined in the Glossary as: "*A physical feature which is readily recognisable marking the limit or dividing line of an area which is likely to be permanent. ... Such features include a wall, woodland, watercourse, body of water, main roads or other significant piece of infrastructure.*"

Green Belt Purpose 2: Prevent Neighbouring Towns from Merging.

Does the parcel itself provide, or form part of, a gap or space between towns?

3.3.11 Commentary:

- For the purposes of the Review, "*towns*" are deemed to include Chigwell, as well as Epping, Waltham Abbey, Loughton/Debden, Buckhurst Hill, Chipping Ongar, North Weald Bassett, Theydon Bois, Roydon and Lower Nazeing. This is based on the findings

of EFDC's Settlement Hierarchy Technical Paper – the Review groups the towns and Large Villages noted in Table 4 of the Technical Paper together as "Towns", No mapping is provided to confirm the edges of such settlements. For example, is 'Chigwell' considered to be the area to the north of the B173 Manor Road or does it include the Grange Hill area to the south of Manor Road (all within the Chigwell parish boundary).

- Since no mapping is provided it is difficult to ascertain exactly which town(s) a parcel is forming part of a gap between.
- Likewise, whether a parcel is forming part of a gap between two towns or an open space between two parts of single towns; i.e. is it helping to protect the separate identity of two towns by preventing their merging, or helping to safeguard the setting or characteristics of a single town.

Are there any defensible boundaries within the parcel (see definition for defensible boundary) which prevent neighbouring towns from merging?

3.3.12 Commentary:

- See also above for commentary on defensible barriers.
- With regard to 'merging', the Glossary notes: *"This can be by way of general sprawl ... or ribbon development ..."*
- Again, the exact boundaries are important.

What is the distance (km) of the gap between the towns?

3.3.13 Commentary:

- No specification is provided as to what different distances might mean, or where it is to be measured from. Assumed to be a worst-case scenario (e.g. narrowest gap).

Is there evidence of ribbon development on well used thoroughfares between towns (B roads and larger)?

3.3.14 Commentary:

- Ribbon development is defined in the Glossary as: *"The building of houses along a main road, especially one leading out of a town or village. ... This includes historical patterns of, or current pressures for, the spread of all forms of development along movement corridors, particularly major roads."*
- Thoroughfares are defined as: *"A road or path forming a route between two places (Oxford Dictionary online). B roads higher classification will be considered."* It is not clear what the second sentence means.

- No guidance is provided as to whether the nature, scale or value of the thoroughfare should be reflected in the assessment.

What is the visual perception of the gap between the towns' well used thoroughfares?

3.3.15 Commentary:

- No guidance is provided as to whether the nature, scale or value of the thoroughfare should be reflected in the assessment.

Would a reduction in the gap compromise the separation of towns in physical terms?

3.3.16 Commentary:

- No guidance is provided as to what percentage or distance in reduction would constitute as compromising the separation.

Would a reduction in the gap compromise the separation of towns and the overall openness of the parcel visually?

3.3.17 Commentary:

- No guidance is provided as to what percentage or distance in reduction would constitute as compromising the separation.

3.3.18 With regard to the assessment of a parcel's contribution to Purpose 2, it is noted that:

The parcel will be scored as making a 'Moderate Contribution' where the parcel forms part of a gap / space between the identified towns however it is not of critical importance and there are defensible boundaries present to prevent their merger. There may be evidence of ribbon development on well used thoroughfares indicating the Green Belt designation has not been particularly successful in preventing development which could result in the coalescence of towns. A reduction in the gap is not likely to compromise the separation of the towns physically or visually.

3.3.19 This seems quite a high threshold to cross, and consideration should be given as to whether a piece of land that is not of critical importance to forming a gap, that has defensible boundaries present, and that could accommodate some development without compromising the physical or visual separation of towns could really be considered to make a Moderate contribution to this Green Belt purpose.

Green Belt Purpose 3: Assist in Safeguarding the Countryside from Encroachment.

Does the Green Belt designation in this land parcel protect countryside that is in use for agriculture, forestry, outdoor sport and recreation, cemeteries and local transport infrastructure (uses that constitute appropriate development based on NPPF paragraph 89, bullets 1 and 2, and paragraph 90, bullet 3)?

3.3.20 Commentary:

- The Glossary defines countryside as: *"The land and scenery of a rural area"*.
Having regard to the topography of land and location relative to existing development, does the Green Belt designation in this land parcel prevent encroachment, or in some other way assist in safeguarding the countryside from encroachment?

3.3.21 Commentary:

- The Glossary defines countryside as: *"The land and scenery of a rural area"*.
Encroachment as: *"A gradual advance beyond usual or acceptable limits"*.
- The methodology refers to the presence or otherwise of 'visually significant slopes' (as identified in the Settlement Edge Landscape Sensitivity Study, January 2010), the presence of which may help safeguard the countryside from encroachment.
Has there already been any significant encroachment by built development or other urbanising elements?

3.3.22 Commentary:

- The accompanying text notes that this is reference to encroachment that has taken place within the parcel since the previous amendment to the Green Belt in 1986.

Green Belt Purpose 4: Preserve the Setting and special Character of Historic Towns.

Are there any historic towns (Chipping Ongar, Waltham Abbey, Epping and Sawbridgeworth) within or adjacent to the parcel?

3.3.23 Commentary:

- The methodology does not consider Chigwell to constitute an historic town, so Purpose 4 is not relevant to parcel DSR 36 including the site.
- It is not clear how *"historic"* towns have been defined.
- Sawbridgeworth, in East Herts, is included due to its proximity to EFDC.
- It is noted that the towns listed are some distance from the site.

To what extent is Green Belt land within the setting of the historic towns and/ or any heritage assets within those towns, especially those closest to the settlement boundary?

3.3.24 Commentary:

- No comment as not relevant to parcel DSR 36 including the site.

To what extent is Green Belt land within the setting of the historic towns and/ or any heritage assets within those towns, especially those closest to the settlement boundary?

3.3.25 Commentary:

- No comment as not relevant to parcel DSR 36 including the site.

Does the open character of the Green Belt land contribute positively to the historic significance of the town and/or heritage assets within the town?

3.3.26 Commentary:

- No comment as not relevant to parcel DSR 36 including the site.

Would the removal of the Green Belt designation and consequent loss of openness from urbanising development on that land, cause harm to the setting and significance of the historic town and heritage assets?

3.3.27 Commentary:

- No comment as not relevant to parcel DSR 36 including the site.

Green Belt Purpose 5: Assist in urban regeneration, by encouraging the recycling of derelict and other land located within existing urban areas.

3.3.28 With regard to the fifth Green Belt Purpose (to assist in urban regeneration, by encouraging the recycling of derelict and other urban land) it was considered that this purpose was *"more complex to assess than the other four purposes at a local/parcel level because the relationship between the Green Belt and recycling of urban land can be influenced by a range of factors including local plan policies, brownfield land availability and the land/development market and cannot practically be assessed on a parcel by parcel basis"*. As such, the view was taken that: *"the Green Belt as a whole has uniformly fulfilled this purpose and the fifth purpose is not factored into the detailed assessment of sites for this reason"*.

3.3.29 The land uses present at the site: redundant smallholding, evidence of previous engineering works, spoil heaps, over-tipping, etc. are likely to have a significant influence in any drill down of parcel DSR 36's contribution to delivering Purpose 5.

Phase 3: Analysing the results of the Phase 2 appraisal

3.3.30 The purpose of Phase 3 was to provide a district-wide analysis of the long-term protection priorities for the Green Belt and the contribution that land within the District makes to fulfilling the Green Belt Purposes, with a view to releasing, safeguarding or extending land within the Green Belt.

3.3.31 It was recognised that *"Although it is useful to understand the parcels' contribution towards all the purposes of the Green Belt, the aggregate scores will not necessarily capture the contribution an individual parcel is making for each purpose"* and that: *"The focus of the*

analysis at this stage of the Green Belt Review will therefore be to determine which parcels or parts of parcels are the strongest and weakest against each purpose”.

- 3.3.32 As such, greater weight should be given to the findings of the Review in relation to fulfilment of the individual purposes.

Phase 4: Assessment of 'Non Green Belt' constraints

- 3.3.33 The following designations, which were considered to preclude development, were mapped:
- a. Strategic Flood Risk Assessment (April 2015) – showing zones 2, 3 and 3b (Zone 1 applies to all land outside of zones 2, 3 and 3b)
 - b. Special Protection Areas (SPA)
 - c. Special Areas of Conservation (SAC)
 - d. Sites of Special Scientific Interest (SSSI)
 - e. Local Nature Reserves (LNR)
 - f. Corporation of London Epping Forest Buffer land (land owned and managed by the Corporation of London, which although not a formal part of the Forest, is not available for development)

Phase 5: Identify broad locations for further assessment

- 3.3.34 The areas of search were then refined by applying a buffer around each settlement, and overlain with the existing defensible boundaries where these were present. The following buffers were used: town - 2km, large village - 1km, small village - 0.5km.
- 3.3.35 No note is made as to which settlements constitute town, large village, etc. Thus, it is not clear what buffer would be applied to Chigwell. That said, even assuming a 0.5km buffer from the edge of Chigwell, this would encompass the site.
- 3.3.36 The buffers were then amalgamated to create an area of future assessment.
- 3.3.37 Parcel 36, which includes the site, was included in an area for future assessment and therefore explored in more detail as part of the Stage Two review.

Phase 6: Reporting

- 3.3.38 The key findings of Phases 1 to 6 were presented as the Green Belt Review: Stage One, and included the area of further assessment for the Stage Two review.

3.4 Stage Two

Phase 7: Further site-specific assessment and reporting

- 3.4.1 The purpose of Stage Two of the Green Belt Review was to consider the release of specific sites from the Green Belt for development. It encompassed three stages:
- a more detailed appraisal of study areas against Green Belt purposes;

- an assessment of the harm to the Green Belt purposes if land within those areas is released in the Local Plan to accommodate new development; and
- a more detailed appraisal of physical features which are readily recognisable and likely to be permanent that could form clear Green Belt boundaries

3.4.2 The August 2015 Methodology noted that the exact methodology was to be established by the consultants preparing the Stage Two Review.

3.4.3 The outcomes from the Stage Two Review were to be published alongside the Draft Local Plan consultation. However, it was recognised that the Stage Two findings may need to be revisited and updated to provide further detail in order to take account of the consultation responses once further plan making decisions have been taken by the Council.

3.5 Cross boundary working and the duty to cooperate

3.5.1 No comments.

3.6 Appendix 1: EFDC Green Belt Parcel Assessment Criteria

3.6.1 See comments above.

3.7 Appendix 2: Glossary of terminology

3.7.1 No comments.

3.8 EFDC Green Belt Review: Stage Two, August 2016

3.8.1 A more detailed methodology for the second stage of the review was included within the Green Belt Review: Stage Two.

General approach to the Stage Two study

- The stated aim of the Stage Two study was to assess the areas immediately adjacent to the District's existing settlements, to identify:
- areas where the Green Belt policy designation should remain;
- any historic anomalies in the existing boundaries; and
- areas where development would be least harmful in Green Belt terms.

3.8.2 In summary, the study comprised:

- an assessment of the areas (identified in the Stage One review) against Green Belt purposes;
- an assessment of the harm to the Green Belt if land within those areas were to be released through the Local Plan to accommodate new development, considering potential effects on openness; and
- an appraisal of physical features which are readily recognisable and likely to be permanent that could form clear defensible Green Belt boundaries.

- 3.8.3 The site falls within Parcel 36.3. This encompasses the land bound by Chigwell Road/High Road to the south-east, Luxborough Lane to the north-east, the M11 to the north-west and an extension of the line of Meadgate Avenue to the south. As such, it includes agricultural land, the West Hatch High School and associated playing fields, a gas transmission station, and residential development within converted properties in their own grounds, as well as the site itself.
- 3.8.4 The following initial observations are made regarding the methodology used for the Stage Two review.
- Greater detail is provided as to the sub-division of parcels.
 - A similar process is followed as Stage One as regard to the assessment of the Green Belt purposes.
 - Although the assessment parcels are smaller, Parcel 36.3 still contains a disparate number of characteristics, and thus any conclusions as to its contribution in delivering the Green Belt purposes can only be a balanced average for the site as a whole. Individual areas within the parcel need to be assessed for their contribution.

4 Critique of EFDC Green Belt Review: Stage One

4.1 Background

- 4.1.1 The main purpose of the Epping Forest District Council Green Belt Review Stage One is to undertake a high-level review of Green Belt land across the District, in order to identify the contribution that the Green Belt land towards national Green Belt purposes as set out in the National Planning Policy Framework (NPPF).

- 4.1.2 It is noted at paragraph 1.4 of the Review that:

The outcome of this study will provide only one piece of evidence amongst a wide range of considerations that must be taken into account before any potential changes to the Green Belt boundaries are proposed. Such considerations include, but are not limited to, objectively assessed need for development, infrastructure capacity, the availability land for development and sustainability. Therefore this document should not be read in isolation. If a parcel (or part of a parcel) is appraised as not serving the purposes of the Green Belt, this does not mean that the parcel should or will be allocated for development in the Local Plan or that the Council would look favourably on a planning application.

- 4.1.3 The Epping Forest District Council Local Plan Alterations, Adopted July 2006, notes (in line with both PPG2 and the NPPF) that Green Belt boundaries will only be altered in exceptional circumstances. The following supporting text provides important information to consider when

making the case for exceptional circumstances that might justify the alteration of Green Belt boundaries.

4.1.4 Paragraph 5.12a notes:

The Council attributes very great importance to the character and appearance of the Green Belt, as well as its functions. The Green Belt has been very successful in restricting the urbanisation of the countryside around London. This has been achieved through strict adherence to policy by way of:

- *refusing planning permission for developments contrary to policy; and these decisions being upheld at appeal in the vast majority of cases.*

4.1.5 Paragraph 5.13a notes:

In accordance with Government guidance, the Council does not look to amend the Green Belt's boundaries as a matter of course when Local Plans are prepared or reviewed. This is in order for the Green Belt to retain its permanence. Furthermore PPG2 states that boundaries should not be changed unless alterations to the Structure Plan have been approved, or other exceptional circumstances exist. The Council has therefore only countenanced making a change to the boundary under one of the following circumstances:

- *there is a need to release land to meet the guidelines (for housing and/ or employment-generating uses) identified in the Structure Plan; or*
- *there is a significant change in circumstances (e.g. the site has been developed); or*
- *there is an exceptional and urgent reason for the change (e.g. the site is the most appropriate one to accommodate a necessary development).*

4.1.6 Exceptional circumstances are considered in more detail at Chapter 3. Para 3.1 notes:

As set out in the Methodology, once established, Green Belt boundaries should only be altered in 'exceptional circumstances'. The Green Belt Review will not on its own determine whether there are 'exceptional circumstances' to justify alterations to the Green Belt however it will provide evidence that will help support such a decision as the alteration of the Green Belt boundary is a policy decision.

4.1.7 At paragraph 5.14a, the Local Plan Alterations, 2006, commits to a comprehensive review of the District's Green Belt as part of the production of the forthcoming plan:

A comprehensive review of the Green Belt boundaries in the District will be undertaken in the context of the production of the Local Development Framework. Such a review would look to address when and where the long term development needs of the District should be met and safeguard land accordingly.

- 4.1.8 It should be noted that since the Local Plan was adopted, Structure Plans have been abolished and the NPPF has replaced PPG2. However, the requirement to demonstrate that there are *exceptional circumstances* remains.

Green Belt appraisal

- 4.1.9 For purposes of the Review, the Green Belt was divided into 73No. parcels, which were subsequently refined to 61No. parcels. Paragraph 4.1 notes:

... The parcel boundaries generally follow well-defined physical features and the outer boundary of the study area is the District boundary. Settlements are not included within the parcel boundaries unless they are designated as Green Belt in the adopted Local Plan (generally only the smaller villages/hamlets are washed over with Green Belt). The parcel boundaries have been developed using a combination of the parcels from the EFDC Landscape Character Assessment (2010) (see Figure 4) and the following criteria:

- Boundaries should be aligned to natural or physical features where possible e.g. water courses, prominent hedgerows, roads, railway lines;*
- Boundaries should not split woodland or main areas of trees or existing settlements, existing housing or urban development.*

- 4.1.10 The site falls within parcel DSR-036. The parcel extends north-eastwards from the site, following the south-eastern edge of the M11, and then south-eastwards across the A113 to encompasses the Chigwell Golf Club course (bound by Manor Road to the south and Hainault Road to the east). The site is located on the south-western edge of parcel DSR-036 and the site's south-western boundary is commensurate with the boundary between Epping Forest DC and the London Borough of Redbridge.

- 4.1.11 Parcel DSR-036 encompasses a disparate number of land uses, including agricultural land, a school and playing fields, over-tipping, horticultural uses and a golf course. It also includes a number of built uses.

- 4.1.12 For the purposes of this review, commentary is provided regarding the Review's assessment of the contribution Parcel DSR-036 makes to the five identified Green Belt purposes.

- 4.1.13 Appendix 2 of the Green Belt Review: Stage 2 included the detailed findings in relation to each parcel. The findings relating to Parcel DSR 036 are considered below.

4.2 Parcel DSR 036 – Land South of Chigwell

- 4.2.1 The criteria questions used within the methodology to review each of the purposes and the resultant findings are reproduced below in italics. They are followed by The Landscape Partnership's commentary and observations concerning the findings.

4.3 Purpose 1: To check the unrestricted sprawl of large built-up areas

Question 1: Does the parcel act, in itself, as an effective barrier against sprawl from large built-up areas outside of the study area, specifically London and Harlow, Cheshunt and Hoddesdon?

- 4.3.1 The supporting text notes: *"The parcel adjoins the LB Redbridge at the southern border of the Epping Forest district boundary between the M11 and the western edge of Woodford Bridge. It also adjoins Grange Hill which although part of Epping Forest District is contiguous with London (LB Redbridge)."*
- 4.3.2 Parcel DSR-036 plays no role in preventing the unrestricted sprawl of Harlow, Cheshunt and Hoddesdon. It is not clear as to exactly how 'London' is to be defined. However, the supporting text notes the Settlement Hierarchy Technical Paper classifies Chigwell and other settlements within EFDC contiguous with Greater London as settlements in their own right; further, EFDC is noted to not technically be part of Greater London.
- 4.3.3 The boundary of the London Borough of Redbridge (classified as a large built-up area) follows the south-western edge of Parcel DSR-036 and therefore the parcel could be considered to provide an effective barrier against the unrestricted sprawl of London.
- 4.3.4 Development within Parcel DSR-036 would be restricted by London to the south, the M11 to the west, and the built form of Chigwell to the east. Chigwell already extends some 2.5km northwards of London at this point and development of the former over-tip site and other non-agricultural land uses within Parcel DSR-036 would constitute further managed growth; it would not lead to any potential for Chigwell to continue to grow into open countryside.
- 4.3.5 Development at the site would be of a high quality, controlled by a masterplan and would not be 'sprawl' (which suggests unplanned, poorly designed development).

Question 2: Does the parcel contribute, as part of a wider network of parcels, to a strategic barrier against the sprawl of these built-up areas?

- 4.3.6 The supporting text notes: *"The parcel adjoins DSR-035, DSR-038 and DSR-039 acting as a strategic barrier to the growth of London (Grange Hill / Woodford Bridge) to the east and south and Woodford to the west. Chigwell Golf Club and the undeveloped land to the west of the A113 create two areas of undeveloped gap between Chigwell in the north and Grange Hill Woodford Bridge in the south which are part of greater London. Development extends south of Chigwell and north from Woodford Bridge along High Road (A113)."*
- 4.3.7 As noted above, development within Parcel DSR-036 would be limited by the built edge of London, the built form of Chigwell and the M11. As such, any development within the parcel would constitute managed growth rather than "sprawl". The land uses within the Parcel DSR-036 are such that it makes little contribution to the undeveloped gap between Chigwell and Woodford Bridge.

Question 3: Are there any defensible boundaries within the parcel (see definition for defensible boundary) which act as an effective barrier against sprawl from large-built-up areas outside of the study area specifically London, Harlow Cheshunt and Hoddesdon?

- 4.3.8 The supporting text notes: *"Strong western boundary created by the M11 motorway and parts of northern boundary created by the Central line. However, the other boundaries are weak as they are formed by residential gardens."*
- 4.3.9 Other 'strong' boundaries in the vicinity of Parcel DSR-036 include the River Roding and its associated flood plain. Within other parcels, woodland is considered to provide a *"strong natural ... barrier"*.
- 4.3.10 'Weak' boundaries include that on the south-western and south-eastern edges of the site (the rear gardens of properties in Meadgate Avenue and properties fronting the A113 respectively), rear gardens of properties abutting Chigwell Golf Club, and to the west of the A113 the rear gardens of properties fronting various roads in the vicinity of Chigwell Park Drive.
- 4.3.11 Parcel DSR-036's contribution to Purpose 1: Relatively Strong – 4.
- 4.3.12 Having regard to the methodology for scoring, TLP consider that a more appropriate score for Parcel DSR-036's contribution to Purpose 1 is Relatively Weak – 2. Such judgement is made having regard to: the presence of defensible barriers (the M11, the built form of Chigwell); the small size of this parcel and so overall contribution it is able to make to the wider Green Belt; and the mix of land uses present within the parcel, including former overtopping, schools, nurseries and residential development, and so lack of opportunity for sprawl into open countryside.

4.4 Purpose 2: To prevent neighbouring towns merging into one another

Question 4: Does the parcel itself provide, or form part of, a gap or space between towns?

- 4.4.1 The Review considers towns to include Chigwell and Buckhurst Hill.
- 4.4.2 The supporting text notes: *"The parcel itself is situated south and southwest of Chigwell. The parcel forms part of a gap or space between the towns of Chigwell and Buckhurst Hill."*
- 4.4.3 South of the Central Line Parcel DSR-036 forms part of the gap between Chigwell and Buckhurst Hill in combination with DSR-038. However, here the narrow width of the parcel, the disparate land uses present within, and the topography which restricts intervisibility, limits the contribution that Parcel DSR-036 makes to the sense of a gap between the towns. This is reinforced by the presence of the M11 transport corridor. The principle and best-defined gap between Chigwell and Buckhurst Hill is that to the north of the Central Line. This gap comprises DSR-035 and DSR-039; Parcel DSR-036 makes no contribution to the gap here.

Question 5: Are there any defensible boundaries within the parcel (see definition for defensible boundary) which prevent neighbouring towns from merging?

4.4.4 The supporting text notes: *"Strong western boundary created by the M11 motorway and parts of northern boundary created by the Central line. However, the other boundaries are weak formed by residential gardens."*

4.4.5 The M11 motorway along the north-western/western edge of Parcel DSR-036 provides a very strong defensible boundary between Chigwell and Buckhurst Hill. The strength of this boundary is supplemented on the western side of the M11 by the presence of the River Roding and its associated floodplain.

Question 6: What is the distance (km) of the gap between the towns?

4.4.6 The widths of the Green Belt gap between towns varies between 5.41km (Buckhurst Hill to Waltham Abbey) to 0.69km (Loughton/Debden to Theydon Bois) and 0.64km (Loughton/Debden to Buckhurst Hill).

4.4.7 The supporting text notes: *"The distance between the towns Chigwell and Buckhurst Hill is 1.2km"*. With development of the south-eastern portion of the Hill House site, the minimum gap between Chigwell and Buckhurst hill would be c.730m.

Question 7: Is there evidence of ribbon development on well used thoroughfares between towns (B roads and larger)?

4.4.8 The supporting text notes: *"There are no well-used thoroughfares in the parcel between the towns"*.

4.4.9 As such, Parcel DSR-036 can make no contribution to this criterion.

Question 8: What is the visual perception of the gap between the towns' well used thoroughfares?

4.4.10 The supporting text notes: *"There are no well-used thoroughfares in the parcel between the towns"*.

4.4.11 As such, Parcel DSR-036 can make no contribution to this criterion.

Question 9: Would a reduction in the gap compromise the separation of towns in physical terms?

4.4.12 The supporting text notes: *"The M11, the Central Line and the body of water to the east of Buckhurst Hill form very strong boundaries between the settlements of Chigwell and Buckhurst Hill as they relate to this parcel. A reduction in the gap is not likely to compromise the separation of the towns in physical terms with the M11 acting as a strong boundary to coalescence."*

- 4.4.13 Since the M11 forms the north-western/western boundary of Parcel DSR-036 and the other very strong boundary features noted above (the Central Line and the body of water to the east of Chigwell) are all to the west of the motorway, it follows that the exclusion of Parcel DSR-036 is not likely to compromise the separation of the towns in physical terms, a point which the Council's assessment accepts.

Question 10: Would a reduction in the gap compromise the separation of towns and the overall openness of the parcel visually?

- 4.4.14 The supporting text notes: *"Depending on the scale and location of development there could be a reduction in the gap in visual terms. Some development adjoining the urban areas could be considered appropriate provided the visual openness of the gap is not affected."*
- 4.4.15 It is noted that *"some development adjoining the urban areas"*, within Parcel DSR-036, *"could be considered appropriate ..."*. Careful consideration would need to be given to the specific visual qualities and visual influence of the particular portion of the parcel under consideration. However, even with development as proposed (see assumptions at Section 1.2), the gap would be at least c.760m in distance. The development would provide an extension of the landform on the site's north-western edge to provide additional screening along the M11 and be of a domestic/care home form, a maximum of three storeys in height. Development could be accommodated here without visually reducing the perceived distance of the gap between Chigwell and Buckhurst Hill.
- 4.4.16 Parcel DSG 036's contribution to Purpose 2 is considered to be Moderate – 3, although that is clearly not supported by the Council's commentary, which suggests a lower score would be appropriate.
- 4.4.17 Given that the exclusion of Parcel DSR-036 is unlikely to compromise the physical gap between Chigwell and Buckhurst Park, and that development could be considered appropriate within some parts of the gap (provided that the visual openness of the gap is not affected) a score of Moderate is considered to be rather high, and TLP considers that a judgement of Relatively Weak to be more appropriate. It is expected that a future drill-down and sub-division of the parcel is likely to reveal areas that make significantly less contribution to this Green Belt purpose.

4.5 Purpose 3: To assist in safeguarding the countryside from encroachment

Question 11: Does the Green Belt designation in this land parcel protect countryside that is in use for agriculture, forestry, outdoor sport and recreation, cemeteries and local transport infrastructure (uses that constitute appropriate development based on NPPF paragraph 89, bullets 1 and 2, and paragraph 90, bullet 3)?

- 4.5.1 Parcel DSR-036 encompasses a wide and disparate range of land uses. The supporting text notes: *"The land west of the High Road (A113) consists mostly of patches of woodland and*

the playing fields of West Hatch High School. The land to the east of the High Road (A113) consists of the Chigwell Golf Course."

- 4.5.2 The majority of the portion of Parcel DSR-036 to the west of the A113 is either in use as playing fields or is former over-tipping that has become vegetated with encroaching scrub. Playing fields are a land use that constitutes appropriate development within the terms of the NPPF para 89; however, the scrub and woodland present within the south-western portion of the parcel are unmanaged and could not be considered to be 'forestry'. As such, a significant portion of the Green Belt within Parcel DSR-036 does not protect countryside that is in uses that constitute appropriate development.

Question 12: Having regard to the topography of land and location relative to existing development, does the Green Belt designation in this land parcel prevent encroachment, or in some other way assist in safeguarding the countryside from encroachment?

- 4.5.3 The Review methodology makes reference to the presence or otherwise of 'visually significant slopes' (as identified in the Settlement Edge Landscape Sensitivity Study, January 2010), the presence of which may help safeguard the countryside from encroachment.
- 4.5.4 Reference to the Settlement Edge Landscape Sensitivity Study shows that there are no visually significant slopes within DSR 36.
- 4.5.5 Notwithstanding this, the supporting text notes: *"The parcel encompasses an undulating landform, which provides open views to the edges of Chigwell, to the north, as well as Hainault and Grange Hill to the south. Given that the landform forms relatively strong slope at the urban edges of Chigwell, Hainault and Grange Hill, it is likely that the topography prevents encroachment of development."*
- 4.5.6 More localised slopes that might prevent encroachment include the over-steepened valley side on the south-western boundary adjacent to the M11 that rises steeply up from the road.
- 4.5.7 Parcel DSR-036 is not connected to any extensive tracts of open countryside and is contained by the M11 and built development. As such, it is considered that there are a number of constraining features of Parcel DSR-036 that already safeguard any remaining countryside within from encroachment and therefore that any development within the parcel would not lead to any extension of the built area into open countryside.

Question 13: Has there already been any significant encroachment by built development or other urbanising elements?

- 4.5.8 The supporting text notes: *"The parcel has not been encroached by built development or other urbanising elements"*.
- 4.5.9 The Methodology notes that this is reference to encroachment that has taken place within the parcel since the previous amendment to the Green Belt in 1986. It is assumed that the current

development on the site predates 1986 and thus that there is little or no evidence of recent encroachment here.

4.5.10 Parcel DSG 036's contribution to Purpose 3 is assessed to be Relatively Strong – 3.

4.5.11 The Methodology provides descriptions for scores of Strong and Moderate contributions. Relatively Strong is assumed to be mid-way between Strong and Moderate.

4.5.12 Strong contribution:

The parcel will be scored as making a 'Strong Contribution' where the vast majority of the parcel contains countryside (as defined in the Glossary) in use for agriculture, outdoor sport and recreation, cemeteries and local transport infrastructure (uses that are considered Green Belt appropriate in the NPPF). The parcel does not contain 'visually significant slopes' near settlements which may help safeguard the countryside from encroachment. Little or no encroachment has taken place in the parcel since the previous amendment to the Green Belt (1986).

4.5.13 Moderate contribution:

The parcel will be scored as making a 'Moderate Contribution' to the Green Belt where the parcel consists predominantly of countryside in use for agriculture, outdoor sport and recreation, cemeteries and local transport infrastructure. The parcel contains 'visually significant slopes' near settlement(s) which may help safeguard the countryside from encroachment. Some encroachment has taken place since the previous amendment of the Green Belt. [Our emphasis]

4.5.14 Given that a significant portion of the Green Belt within Parcel DSR-036 does not protect countryside and contains some slopes that might safeguard the area from encroachment, and notwithstanding that no encroachment has taken place since 1986, a score of Relatively Strong is considered too high.

4.5.15 It is anticipated that a future drill-down and sub-division of the parcel is likely to reveal areas of Parcel DSR-036 that make significantly less contribution to this Green Belt purpose. At this stage we consider an appropriate score would have been Weak – 1.

4.5.16 It is interesting to note that Parcel DSR-038 (land to the south-west of the M11 and the London Underground Fairlop Loop) located to the north-west of Parcel DSR-036, beyond the M11, is judged to make a Relatively Weak contribution to safeguarding the countryside from encroachment. The supporting text notes "There is no evidence of encroachment or other urbanising elements within the parcel", and that:

The Green Belt designation in this land parcel does protect countryside uses as much of the area that adjoins the M11, at the south-western boundary is used for outdoor sports and recreation however no or very little land is used for agriculture. The

remaining land consists of a disused sewage treatment works with patches of woodland and overall the countryside is of rather low quality in this parcel.

- 4.5.17 As such, it is considered that the characteristics and land uses of Parcel DSR-038 are very similar to those of Parcel DSR-036 and that the Council should have scored the two parcels as making a comparable contribution to Purpose 3.

4.6 Purpose 4: To preserve the setting and special character of historic towns

Question 14: Are there any historic towns (Chipping Ongar, Waltham Abbey, Epping and Sawbridgeworth) within or adjacent to the parcel?

- 4.6.1 The supporting text notes: *"There are no historic towns within or adjacent to the parcel"*. It follows that Parcel DSR-036 makes no contribution to this criterion.

Question 15: To what extent is Green Belt land within the setting of the historic towns and/ or any heritage assets within those towns, especially those closest to the settlement boundary?

- 4.6.2 The supporting text notes: *"There are no historic towns within or adjacent to the parcel"*. It follows that Parcel DSR-036 makes no contribution to this criterion.

Question 16: Does the open character of the Green Belt land contribute positively to the historic significance of the town and/or heritage assets within the town?

- 4.6.3 The supporting text notes: *"There are no historic towns within or adjacent to the parcel"*. It follows that Parcel DSR-036 makes no contribution to this criterion.

Question 17: Would the removal of the Green Belt designation and consequent loss of openness from urbanising development on that land, cause harm to the setting and significance of the historic town and heritage assets?

- 4.6.4 The supporting text notes: *"There are no historic towns within or adjacent to the parcel"*. It follows that Parcel DSR-036 makes no contribution to this criterion.

- 4.6.5 Parcel DSG 036's contribution to Purpose 4 is assessed as: No contribution – 0

4.7 Aggregated parcel scores

- 4.7.1 The aggregated appraisal scores are presented at Appendix 5 of the Review. Parcel DSR-036 is noted to have a total of 11 (out of 20 points). However, the parcel appraisal proforma reproduced at Appendix 6 records a score of 3 against Purpose 3 (rather than the score of 4 recorded at Appendix 5) to give a total of 10.

- 4.7.2 In our view the appraisal should have scored in total 5:

- Purpose 1: Relatively Weak – 2
- Purpose 2: Relatively Weak – 2
- Purpose 3: Weak – 1

- Purpose 4: No contribution- 0
- Purpose 5: Not assessed

4.7.3 Para 5.38 notes that there are particular areas of parcels that performed less well than the rest of the parcel, and which should be assessed in more detail in further phases of the Review. Parcel DSR-036 is not included in the list. However, as noted above, there are discrete areas of this parcel that are considered to contribute less to the Green Belt purposes than the parcel as a whole.

4.8 Broad locations for further assessment

4.8.1 In accordance with the NPPF (para 84), it was necessary to consider land with a direct relationship to existing settlements in more detail. The Green Belt in those areas was to be considered for:

- minor amendments to the Green Belt boundary where anomalies have been created over time;
- continued confirmation that land should remain the Green Belt; or
- potential release from the Green Belt for development purposes.

4.8.2 Chigwell was identified as one of the settlements that should be considered in more detail.

4.8.3 Absolute environmental constraints that afforded legislation that would protect areas from development were mapped (e.g. FRA Zones 2, 3 and 3b, SPAs and SACs) and the land excluded from further consideration. Such exclusion did not include land within Parcel DSR-036.

4.8.4 A buffer was applied around each settlement to ensure areas for detailed assessment were not remote from service and facilities. Chigwell was defined as a large village and so a 1km buffer was applied, which encompassed Parcel DSR-036.

4.8.5 The Review noted the following with regard to further assessment around the settlement edge of Chigwell:

The Green Belt land within the defined buffer extends to Chigwell Lane, Abridge Road, Pudding Lane, Gravel Lane and Miller's Lane to the north east, the M11 to the north west and the District boundary to the south. The identified area joins the area around Chigwell Row and Buckhurst Hill to ensure a continuous assessment of the land between settlements.

4.8.6 As such the area for further assessment includes Parcel DSR-036.

5 Critique of EFDC Green Belt Review: Stage Two

5.1 Background

5.1.1 In October 2015, following the Stage One Review, EFDC commissioned LUC to undertake a Stage Two Green Belt Review. The main aim was to *"undertake an assessment of the areas immediately adjacent to the District's 22 existing settlements"*, in order to identify:

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

5.1.2 The findings of this Review were published in Epping Forest District Green Belt Assessment: Stage 2, dated August 2016.

5.1.3 With regard to the purpose of the Stage Two Review, para 1.4 notes:

Its aim was not to identify land for removal from or addition to the Green Belt. Such decisions will need to be taken in the context of wider Local Plan evidence relating to exceptional circumstances for removing land from the Green Belt (or adding land to it) and the sustainability of spatial development options. It is anticipated that the relative performance of land in Green Belt terms will form part of such a review.

5.1.4 Chapter 2 provides some commentary on national Green Belt policy. Para 2.3 notes:

Current guidance therefore makes it clear that the Green Belt is a strategic planning tool designed primarily to prevent the spread of development and the coalescence of urban areas. To this end, land should be designated because of its position, rather than its landscape quality or recreational use. However, the NPPF states "local planning authorities should plan positively to enhance the beneficial use of the Green Belt, such as looking for opportunities to provide access; to provide opportunities for outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity; or to improve damaged and derelict land" (Paragraph 81).

5.1.5 Para 2.4 notes:

It is important to note, however, that these positive roles should be sought for Green Belt, once designated. The lack of a positive role, or the poor condition of Green Belt land, does not necessarily undermine its fundamental role to prevent urban sprawl by being kept permanently open. Openness is not synonymous with landscape character or quality.

5.1.6 Chapter 2 then provides a background to the need for the Green Belt Review, noting that as part of the preparation of the new Local Plan, consultation on an initial Issues and Options

style document was undertaken in 2012, and this included a section on the Green Belt, highlighting the following key issues:

- Green Belt boundaries were established in the 1980s; there will have to be release of some Green Belt land adjoining settlement to meet the needs for housing and employment growth in the period up to 2033.
- Development on settlement edges will change local landscape character.
- There will be potential pressure for development on urban green spaces in order protect the Green Belt.

5.1.7 Thus, the need to review the Green Belt and potentially release some land from it to accommodate development has been recognised in early consultation.

5.1.8 Para 2.11 notes:

In relation to the issue of releasing Green Belt land, EFDC's consultation report noted that a large number of respondents made reference to a need to undertake a "Brownfield Land Review", prior to considering any Green Belt land for development purposes. Paragraph 21 of the consultation report notes that, while EFDC would prefer to use brownfield land first, it is highly likely that some Green Belt land will have to be released to accommodate development needs over the next twenty years. The report states that the Council is committed to minimising the amount of Green Belt land required, and that it would undertake a full and robust review of the Green Belt to ensure that this evidence is available to aid in the eventual selection of development sites.

5.1.9 The Stage One Review identified broad locations for further assessment in Stage Two. As noted above, these encompassed the environs of Chigwell including Parcel DSR-036 and the Hill House site.

5.2 General approach

5.2.1 Para 3.2 identified the key stages of work:

- *an assessment of the areas (identified in the Stage 1 review) against Green Belt purposes;*
- *an assessment of the harm to the Green Belt if land within those areas were to be released through the Local Plan to accommodate new development, considering potential effects on openness; and*
- *an appraisal of physical features which are readily recognisable and likely to be permanent that could form clear defensible Green Belt boundaries.*

- 5.2.2 Para 3.3 notes that the study, *"also recognised the importance of 'barrier' features within or bordering parcels in determining performance against Green Belt purposes"*.

5.3 Definition of parcels

- 5.3.1 The sub-division of the study area into sub parcels was informed by initial desktop study and refined by field work (e.g. where a more obvious boundary was visible on the ground). The outer edges of the Stage One parcels were recognised as being indicative; for the Stage Two Review these were aligned to topographical features or features on the ground.
- 5.3.2 Para 3.12 notes: *"As far as possible, the boundaries of each of the sub parcels were defined using physical features that are readily recognisable and likely to be permanent, and which could therefore potentially act as a basis for establishing a future Green Belt boundary should the Council decide to release a parcel (or combination of parcels) from the Green Belt"*.
- 5.3.3 A distinction was made between 'stronger' (e.g. roads, railways, watercourse, woodland, strong tree belts, clear existing building lines, prominent features like ridgelines or strong slopes) and 'weaker' (e.g. fence lines, private/unmade roads, power lines, field boundaries) boundaries, with a strong preference for the use of the former in defining Stage Two parcels. Where it is necessary to use weaker boundaries, consideration should be given to strengthening the boundaries, e.g. with planting. For each of the Stage Two parcels, the assessment outputs included: *"brief text to describe the boundary features and includes explanation of the weaker boundary features where relevant"*.
- 5.3.4 Reference to Figure 3.1 shows that the Hill House site falls within Stage Two Parcel 36.3.
- 5.3.5 The south-western half of Parcel 36.3 is commensurate with the boundaries of the Hill House site. It extends north-eastwards to Luxborough lane and so encompasses the grounds and playing fields of West Hatch High School, the triangle of land between the school and the motorway and the gas transmission station and the grounds of Cedar Park. Parcel 036.3 extends to 42.45ha. See Figure 01.
- 5.3.6 Whilst the Stage Two Review employs finer grained parcels than Stage One, Parcel 036.3 still contains a number of disparate land uses with varying characteristics that have the potential to have very different effects on the delivery of the Green Belt purposes. Such land uses include:
- Former land fill in the form of significant and pronounced land form over much of the southern portion of the parcel. The land forms have been encroached by scrub vegetation such that they have very limited visual influence on the surrounding landscape and streetscape.
 - A small holding with associated stables, etc. to the rear of High Road, to the north of the over-tipping.

- A pair of Victorian cottages fronting High Road.
- West Hatch School, comprising a complex of buildings and hard standings, fronting High Road in the central portion of parcel.
- Playing fields associated with, and to the rear of, West Hatch School, abutting the M11.
- The grounds of Cedar Park, a gated residential development in the north-eastern corner of the site, retaining much of the original layout and parkland-style vegetation patterns.
- A former nursery site to the north-west of Cedar Court.
- A gas transmission station fronting Luxborough Lane, between the gas transmission station and the former nursery.

5.3.7 As such, commentary is also provided as to the role that the Hill House site itself plays in delivering the Green Belt function.

5.4 The Stage Two assessment

5.4.1 The Stage Two parcels were assessed in a similar manner as the Stage One parcels; again, individual parcels were not assessed against Purpose 5. Slight amendments were made to the purposes criteria and no individual responses were provided to each of the criterion. An element of professional judgement was used to reach an overall rating for each purpose.

5.4.2 Barrier features were referred to in the Stage Two Review in relation to two roles: 1/ containing potential future development; and 2/ creating a defined edge between existing settlement and countryside. Para 3.21 notes that:

Barrier features at the outer edge of the parcel could be considered to form a strong boundary which would provide containment to future development within the parcel if it was released from the Green Belt. These parcels were typically assessed as performing less well in Green Belt terms, because future development within the parcel could potentially occur without causing harm to the wider Green Belt.

Conversely:

In relation to Purpose 3, if features which form the existing Green Belt boundary are strong and form a clear distinction between the settlement and countryside, the parcel on the whole, was assessed as performing better, because the existing settlement edge is likely to be perceived as well-contained.

And:

A parcel judged to be both separate from the settlement and contained from the wider countryside, or conversely to lack separation from the settlement but also be uncontained from the wider countryside, would be expected to make a more moderate contribution to Purpose 3.

5.5 Stage Two Parcel 36.3**5.6 Assessing the Stage Two parcels**

5.6.1 Each of the Stage Two parcels was assessed in terms of its contribution to the Green Belt purposes in the same manner as the Stage One parcels. Again, individual parcels were not assessed against Purpose 5 (assisting urban regeneration).

5.6.2 The findings of the assessment are considered below. Commentary is also provided as to contribution that the Hill House site itself makes in the successful delivery of the five identified Green Belt purposes, i.e. how successful would the Green Belt be in achieving its objectives if the boundaries were to be amended so as to exclude the Hill House site from the Green Belt.

5.7 Purpose 1: Check the unrestricted sprawl of large built-up areas***Stage Two Assessment***

5.7.1 The following criteria were used to assess the function of Stage Two Parcel 36.3 in delivering Purpose 1:

- 1) *Does the parcel act, in itself, as an effective barrier against sprawl from large built-up areas outside of the study area, specifically London and Harlow, Cheshunt and Hoddesdon?*
- 2) *Does the parcel contribute, as part of a wider network of parcels, to a strategic barrier against the sprawl of these built-up areas?*
- 3) *Are there any defensible boundaries within the parcel (see definition for defensible boundary) which act as an effective barrier against sprawl from large-built-up areas outside of the study area specifically London, Harlow Cheshunt and Hoddesdon?*

5.7.2 The Stage Two Assessment recorded that Stage Two Parcel 36.3 made a Strong contribution to Purpose 1, noting:

The parcel lies adjacent to the large built-up area of London (Woodford Bridge, in the London Borough of Redbridge). The parcel also acts as a strategic barrier, in combination with other land within parcels 036.1 and 036.2, 038.1 and 035.6, to the growth of London (Woodford Bridge to the south and west and Hainault/ Grange Hill to the south and east). The Green Belt designation is therefore considered to act as an integral part of the strategic network restricting the sprawl of London north-wards.

TLP commentary in relation to Stage Two Parcel 36.3:

5.7.3 Parcel 36.3 is located on the northern edge of Woodford Bridge, adjacent to the boundary of the London Borough of Redbridge. As such it plays a role, along with Parcels 036.1, 036.2, 038.1 and 035.6 in restricting the growth of London northwards.

- 5.7.4 With regard to boundaries, there are no strong defensible boundaries on the southern edges of Parcel 036.3 preventing the northwards spread of London. However, the M11 provides a strong boundary to the west/north-west (supplemented by a twin-pipe high-pressure gas main on the Chigwell side that cannot be crossed) and, in a northerly direction, a strong boundary within the parcel is provided by the school buildings and the residential development within Cedar House beyond, and so Parcel 036.3 is considered to make only a small contribution to this purpose.
- 5.7.5 To the east of the A113, for a distance of 4km along the B173 Manor Road between the site and Grange Hill Underground station, Chigwell is already contiguous with the built-up area of Woodford Bridge (together with Grange Hill further east). Development at Parcel 036.3 would have the effect of replicating built form to the south-east of the A113 (much as infill of the existing built development within Parcel 036.3: school, gated residential area) but would have little effect on the overall spread of London northwards, beyond the loss of a localised break in the streetscape. The golf course would continue to provide a gap between the Chigwell village and Grange Hill areas of Chigwell parish and the school playing fields, Cedar Park and woodland south of the Chigwell Nursery would continue to provide a gap between the site and Chigwell. There would be no effect on the spread of London westwards.
- 5.7.6 It is the adjacent parcels that play a role in restricting the growth of London northwards. Given its nature and the presence of defensible boundaries, Parcel 036.3 contributes little to this purpose.
- 5.7.7 Looking at the bigger picture, it is arguable that the factor that has most effect in limiting the spread of the urban mass of London northwards in the vicinity of Chigwell is the break to the south of Woodford Bridge that separates it from Clayhall and Barkingside and which encompasses Hospital Hill. Parcel 036.3 plays no role in safeguarding this gap.
- 5.7.8 Having regard to Table 3.3 and the definitions for Stage Two assessment ratings, TLP considers that a more appropriate rating for Parcel 036.3's contribution to delivering Purpose 1 is Weak - 1, i.e. *"where the parcel is within reasonable distance to one of the defined 'large built-up areas' however makes very little contribution to the prevention of its sprawl."* [TLP emphasis].

TLP commentary in relation to the Hill House site:

- 5.7.9 Any development at the site would be limited to the south-east of a line approximating to properties in Waltham Road and the western limits of the West Hatch School. Such development would then be contained by the first strong defensible boundary – the school. In plan form, any development at the site would have little effect on the overall expansion of London since it would represent more of an infill between the developed areas of Woodford Bridge and the school.

- 5.7.10 Further, any development at the Hill House site would be high quality, controlled by a masterplan and would not be "sprawl" which suggest unplanned, poorly design development.

5.8 Purpose 2: Prevent neighbouring towns from merging

Stage Two Assessment

- 5.8.1 The supporting text notes: *"The Stage 2 assessments consider the separation of the Large Built Up Areas as well as the towns for this Purpose. This helps to add additional detail on the relationships between all of the larger settlements with regards to the separation between them."*

- 5.8.2 The following criteria were used to assess the function of Stage Two Parcel 36.3 in delivering Purpose 2:

- 4) *Does the parcel itself provide, or form part of, a gap or space between towns?*
- 5) *Are there any defensible boundaries within the parcel (see definition for defensible boundary) which prevent neighbouring towns from merging?*
- 6) *What is the distance (km) of the gap between the towns?*
- 7) *Is there evidence of ribbon development on well used thoroughfares between towns (B roads and larger)?*
- 8) *What is the visual perception of the gap between the towns' well used thoroughfares?*
- 9) *Would a reduction in the gap compromise the separation of towns in physical terms?*
- 10) *Would a reduction in the gap compromise the separation of towns and the overall openness of the parcel visually?*

- 5.8.3 The Stage Two Assessment recorded that Stage Two Parcel 36.3 made a Strong contribution to Purpose 2, noting:

The parcel lies to the south west of Chigwell (core), within the gap between Chigwell and London which is approx. 1km in this area. Merging of Chigwell (southern part) and London has already occurred to a degree to the south of the parcel. However, development within the parcel (including cumulative development of the adjacent parcel 036.2 from the south of Chigwell) would lead to a substantial reduction/ merging of the towns of Chigwell and London. The parcel is also located within a gap between the towns of Chigwell and Buckhurst Hill, which is approx. 1.2km in this area. However, other areas of land (the M11, central line and body of water to the east of Buckhurst Hill) form strong barriers that would prevent separation. Development within the parcel may reduce the perception of the gap between the towns. The higher rating than the

Stage One assessment is due to the direct relationship of the parcel between the towns at this more detailed scale of assessment.

TLP commentary in relation to Stage Two Parcel 36.3:

- 5.8.4 The Stage Two Assessment notes that Parcel 036.3 plays a role in the separation of three towns, in that it is located within the gap between Chigwell and London (Woodford Bridge) and between Chigwell and Buckhurst Hill. It should be noted that there is an inconsistency here between the Stage 1 and the Stage 2 assessments in that the former did not classify London as a "town" and therefore did not include within the remit of Purpose 2.
- 5.8.5 As noted in the Review, there is already continuous frontage between the urban form in the London Borough of Redbridge and Epping Forest District. This runs for a distance of 4km along the B173 between the site and Grange Hill Station. Following development of the site, the golf course would continue to provide a gap between Grange Hill and Chigwell and the school playing fields, Cedar Park and woodland south of the Chigwell Nursery would continue to provide a gap between the site and Chigwell. A portion of the parcel's frontage with the A113 is already developed, e.g. the built elements of West Hatch School and does little to contribute to a sense of separation. Likewise, the portion of the parcel to the south, is a former over-tip site containing extensive earthworks; here, the frontage to the road comprises hoop-topped railings and gates, contributing to an urbanised street scene, with dense vegetation beyond.
- 5.8.6 The vegetation is such that there is little or no visual connection between the road and the land beyond the immediate frontage.
- 5.8.7 The Stage One review found that the M11 motorway and the body of water to the east of Buckhurst Hill form very strong boundaries between the settlements of Chigwell and Buckhurst Hill and that: *"A reduction in the gap is not likely to compromise the separation of the towns in physical terms with the M11 acting as a strong boundary to coalescence"*.
- 5.8.8 There are no well-used throughfares between Chigwell and Buckhurst Hill and so visual perception of a gap from such routes. Likewise, there is little or no evidence of ribbon development extending between the two settlements.
- 5.8.9 The Stage One review goes on to note: *"Depending on the scale and location of development there could be a reduction in the gap in visual terms. Some development adjoining the urban areas could be considered appropriate provided the visual openness of the gap is not affected."* Given that there are little or no opportunities for a visual perception of a gap between Chigwell and Buckhurst Hill and only limited visual perceptions of a gap between Chigwell and Woodford Bridge beyond the immediate frontage, it is considered that Parcel 036.3 is one of the places within the wider Parcel DSR-036 where development on the urban edge could be appropriate.

- 5.8.10 Having regard to Table 3.3 and the definitions for Stage Two assessment ratings, TLP consider that a more appropriate rating for Parcel 036.3's contribution to delivering Purpose 2 is Relatively Weak - 2, i.e. between Moderate: e.g.: *"where the parcel forms part of a gap / space between the identified towns but it is not of critical importance due to perceived distance between the settlements and/or the presence of barrier features to preserve separation. There may be evidence of ribbon development on well-used thoroughfares indicating the Green Belt designation has not been particularly successful in preventing development which could result in the coalescence of towns. A reduction in the gap is not likely to compromise the separation of the towns physically or visually"* and Weak: e.g. *"where the parcel is located (or partially located) in a gap/space between the identified towns however they are of such a considerable distance apart that its contribution to this purpose is negligible"*. [TLP emphasis]

TLP commentary in relation to the Hill House site:

- 5.8.11 Development at the site would be set back from the A113 frontage and so safeguard the limited sense of separation between Chigwell and Woodford Bridge that currently exists. Likewise, to the west, development would be limited to the south-east of a line approximating to properties in Waltham Road and the western limits of the West Hatch School, with public open space beyond, including substantial areas of existing woodland. Such a layout would reinforce the strong defensible barrier of the motorway.

5.9 Purpose 3: Assist in safeguarding the countryside from encroachment

Stage Two Assessment

- 5.9.1 The supporting text notes: *"Reference is made to countryside being defined in the Stage One glossary as 'the land and scenery of a rural area' "*
- 5.9.2 The following criteria were used to assess the function of Stage Two Parcel 36.3 in delivering Purpose 3:
- 11) *Does the Green Belt designation in this land parcel protect countryside that is in use for agriculture, forestry, outdoor sport and recreation, cemeteries and local transport infrastructure (certain other forms of development are also not inappropriate development based on NPPF paragraph 89, bullets 1 and 2, and paragraph 90, bullet 3)?*
 - 12) *Having regard to the topography of land and location relative to existing development, does the Green Belt designation in this land parcel prevent encroachment, or in some other way assist in safeguarding the countryside from encroachment?*
 - 13) *Has there already been any significant encroachment by built development or other urbanising elements?*

- 5.9.3 The Stage Two Assessment recorded that Stage Two Parcel 36.3 made a Moderate contribution to Purpose 3, noting:

The parcel currently contains some development, including buildings and playing fields of West Hatch High School, dwellings at Cedar Park (this part has a relatively greater urbanising influence due to black metal security fencing which relates in character to the rest of the main settlement) in the east of the parcel and a sub station in the north east of the parcel. The remainder of the parcel contains fields and areas of woodland. The parcel shares some relationship with settlements to the south west and south east (Woodford Bridge and Grange Hill) and the outer (north eastern) boundary formed by the M11 is relatively strong which may help to physically safeguard the wider countryside if the parcel was to be developed. However, the undulating topography and open views indicate that new development is likely to be visible in the wider countryside, potentially contributing to the perception of encroachment to a degree. Furthermore the existing boundary with the settlement is well-defined, and the development within the parcel is of a lower density and set within spacious grounds, thereby relating more to the wider countryside than the settlement.

TLP commentary in relation to Stage Two Parcel 36.3:

- 5.9.4 TLP agrees that the "parcel currently contains some development" and that the black metal security fencing around Cedar Park relates to the wider settlement in terms of character. However, it does not concur that the "remainder of the parcel contains fields".
- 5.9.5 The southern portion of the site contains a former land fill with a pronounced land form that has been formed following the dumping of large amounts of materials derived during the construction of the adjacent M11 and/or from clearance works after the war. As such, they could not be considered to be fields and it is many decades since the land within has played such a role.
- 5.9.6 It is agreed "that the outer (north eastern) boundary formed by the M11 is relatively strong which may help to physically safeguard the wider countryside if the parcel was to be developed". However, TLP does not agree that: "the undulating topography and open views indicate that new development is likely to be visible in the wider countryside, potentially contributing to the perception of encroachment to a degree". The land form rises steeply up from the motorway on the north-western boundary of the site and the established woodland clothing it is such that the site affords very little visual influence on the wider landscape to the west and north. Further boundary vegetation and built forms limit visual connections to the south and east.
- 5.9.7 As regards density of existing development, the Review notes: "Furthermore the existing boundary with the settlement is well-defined, and the development within the parcel is of a lower density and set within spacious grounds, thereby relating more to the wider countryside

than the settlement". TLP considers that the land uses within the northern portion of the site bear little relationship to and visual connection with the wider countryside.

- 5.9.8 Having regard to Table 3.3 and the definitions for Stage Two assessment ratings, TLP considers that a more appropriate rating for Parcel 036.3's contribution to delivering Purpose 3 is Weak, e.g. *"where the parcel contains some countryside, but the uses within it represent a distinct urbanising influence and it is separated from the wider countryside by significant barrier features".*

TLP commentary in relation to the Hill House site:

- 5.9.9 The Hill House site comprises a former land fill site. Like the wider Parcel 036.3, it could not be considered to be countryside. Neither does it encompass any of the appropriate development land uses listed in the NPPF. Further, the site is not connected to any extensive tracts of open countryside and so development would not therefore lead to any extension of the built area into an open tract of countryside or Green Belt.
- 5.9.10 Immediately to the north-west, the M11 motorway provides a strong defensible boundary and for much of the north-eastern boundary, the adjacent school buildings do likewise. Reference to para 3.21 of the Stage Two Review shows that:

Barrier features at the outer edge of the parcel could be considered to form a strong boundary which would provide containment to future development within the parcel if it was released from the Green Belt. These parcels were typically assessed as performing less well in Green Belt terms, because future development within the parcel could potentially occur without causing harm to the wider Green Belt

- 5.9.11 Appendix 1 of the Stage Two Review makes reference to brownfield land, in relation to comments received at the Duty to Cooperate Workshop of 02.02.2016. With regard to the comment: *"Brownfield land within Green Belt may contribute differently to Green Belt purposes"*, the following response was made:

Agreed that brownfield land may influence the overall spatial strategy, but land quality is not a factor in the Stage 2 study. In so far as built structure on brownfield land are present, these have been taken into account in the assessment of openness etc.

- 5.9.12 The consideration of brownfield land within the Green Belt is particularly important to the role the site itself plays. Whilst there are only limited buildings on site (e.g. stables in the eastern corner of the site) the form of the greater part of the site has been significantly altered by previous over-tipping and land form exercises and the resultant contamination is such that the land could not be utilised for land uses defined in the NPPF as appropriate development within the Green Belt without very extensive and costly intervention.
- 5.9.13 The community responses received by EFDC with regard to their Issues and Options consultation document in 2012 identified *"using 'brownfield (i.e. previously developed Land)*

before releasing any Green Belt land for development” as the second most frequent response, behind only *“Continuing to protect the Green Belt”*. As noted above, EFDC’s consultation report noted that a large number of respondents made reference to a need to undertake a ‘Brownfield Land Review’, prior to considering any Green Belt land for development purposes.

5.10 Purpose 4: To preserve the setting and special character of historic towns

Stage Two Assessment

5.10.1 The following criteria were used to assess the function of Stage Two Parcel 36.3 in delivering Purpose 4:

14) *Are there any historic towns (Chipping Ongar, Waltham Abbey, Epping and Sawbridgeworth) within or adjacent to the parcel?*

15) *To what extent is Green Belt land within the setting of the historic towns and/ or any heritage assets within those towns, especially those closest to the settlement boundary?*

16) *Does the open character of the Green Belt land contribute positively to the historic significance of the town and/or heritage assets within the town?*

17) *Would the removal of the Green Belt designation and consequent loss of openness from urbanising development on that land, cause harm to the setting and significance of the historic town and heritage assets?*

5.10.2 The Stage Two Assessment recorded that Stage Two Parcel 36.3 made No Contribution to Purpose 4, noting:

There is no relationship between the parcel and any historic town.

TLP commentary in relation to Stage Two Parcel 36.3:

5.10.3 Agreed.

TLP commentary in relation to the Hill House site:

5.10.4 There is no relationship between the parcel and any historic town.

Score – No Contribution – 0.

5.11 Purpose 5: To assist in urban regeneration, by encouraging the recycling of derelict and other urban land

5.11.1 As noted above, the Stage Two Review did not consider the Stage Two parcel’s contribution to delivering Purpose 5. However, as also noted previously, land uses at the Hill House site include evidence of previous engineering works, spoil heaps, over-tipping, etc.

5.12 Summary of assessment

5.12.1 The Stage Two Review concluded that the resultant harm to the Green Belt purposes if Parcel 036.3 was released from the Green Belt would be Very High.

5.12.2 TLP considers that Parcel 036.3 makes the following contributions to the Green Belt purposes:

- Purpose 1: Weak contribution - 1
- Purpose 2: Relatively Weak contribution - 2
- Purpose 3: Weak contribution - 1
- Purpose 4: No contribution - 0
- Purpose 5: Not assessed
- Total: 4

5.12.3 Reference to Table 3.4 shows that parcels that make a Relatively Weak contribution to one or more Green Belt purposes but no Strong, Relatively Strong or Moderate contribution to any purpose are considered to have the potential to cause Low harm to the Green Belt purposes should the land be released from the Green Belt.

5.13 Consideration of alternative parcel boundaries

5.13.1 The Stage Two Review did not identify any alternative boundaries for Parcel 36.3 that would significantly alter the assessment results.

5.14 Potential anomalies identified for consideration by EFDC

5.14.1 The Stage Two Review identified no anomalies in relation to Parcel 36.3.

5.15 Overall performance of the Green Belt

5.15.1 The Stage Two Review has demonstrated that much of Green Belt within the study area fulfils its purposes well; here, the removal of such land would cause High or Very High levels of harm to the Green Belt. However, within the study area there are variations in the contribution that different parcels of land make to the five identified Green Belt purposes, with the result that some parcels contribute less to the purposes than others. It is considered that Parcel 036.3 is one such parcel, and that were it released from the Green Belt, there would be overall Low harm to the Green Belt purposes.

5.15.2 The Stage Two review recommends that: *"separate evidence on landscape character and quality should be applied in order to distinguish between areas that are more and less sensitive to development in landscape terms."* An initial review of the landscape of the Hill House site suggests that the site has only limited visual influence in the wider landscape; that its character is strongly influenced by former land uses (e.g. the pronounced man-made topography) and the neighbouring urban streetscape; and that it displays few of the key characteristics of the Roding Valley countryside (e.g. a patchwork of gently undulating, mostly arable, fields delineated with mature hedgerows). Further, only the south-eastern portion of the site would be developable. The landform on the north-western boundary would be retained and extended and as such (together with the retained and supplementary vegetation) would largely screen views of the proposed development from points to the west.

As such, it is likely that the site is one of the areas that is *"less sensitive to development in landscape terms"*.

5.15.3 With regard to meeting development requirements, Paras 5.5 to 5.7 state:

As noted in Section 2, the NPPF requires changes to the Green Belt to be made through the Local Plan process. This should include:

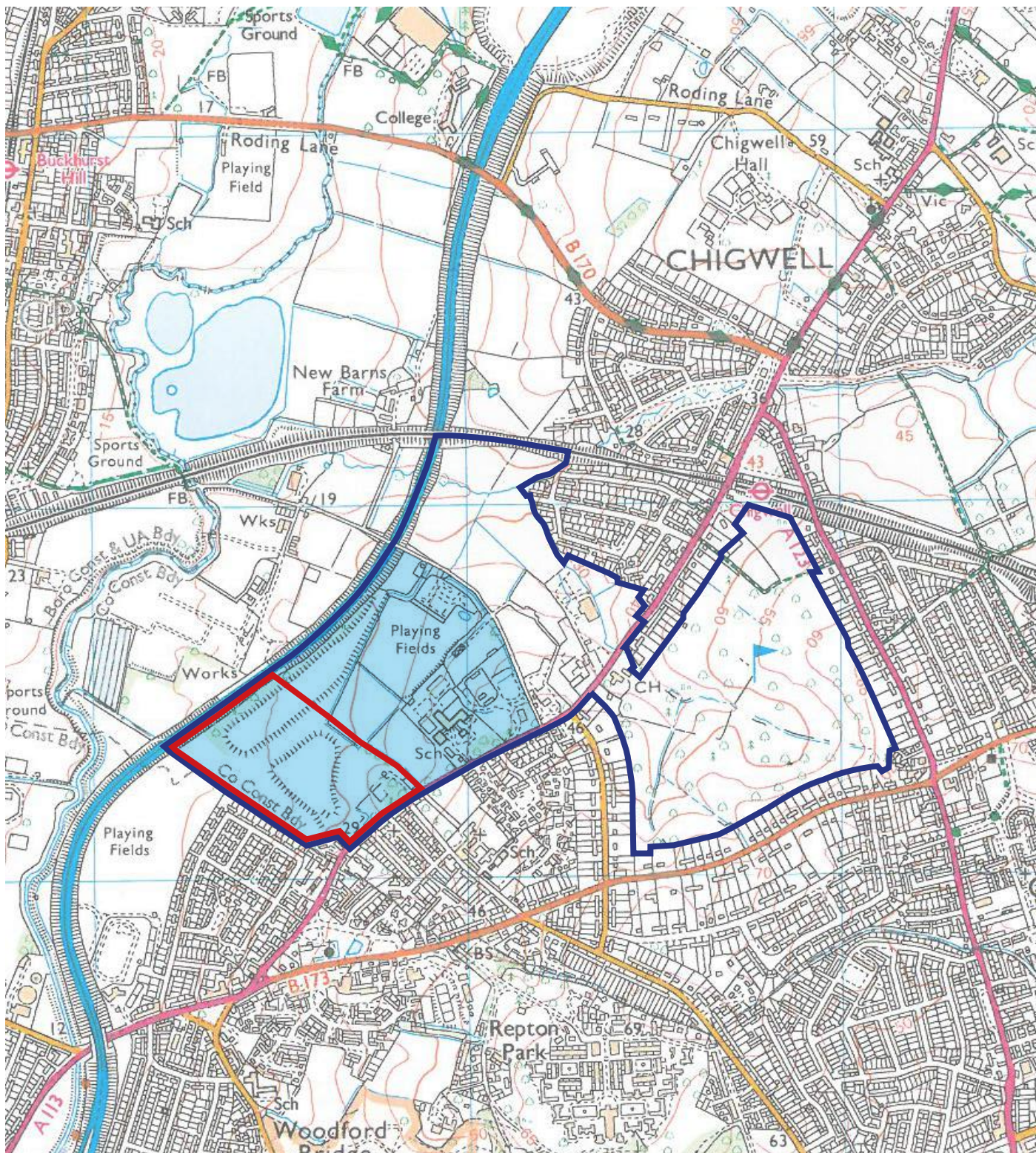
- i. demonstration of exceptional circumstances, such as unmet housing or employment land needs, that cannot be met elsewhere; and*
- ii. consideration of the need to promote sustainable patterns of development, considering a range of local, regional and national issues such as economic growth, health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

A common interpretation of the policy position is that, where necessitated by development requirements, plans should identify the most sustainable locations, unless outweighed by adverse effects on the overall integrity of the Green Belt according to an assessment of the whole of the Green Belt based around the five purposes.

In other words, the relatively poor performance of the land against Green Belt purposes is not, of itself, an exceptional circumstance that would justify release of the land from the Green Belt.

5.15.4 Para 5.10 recommends that should EFDC decide to release land from the Green Belt, then outline masterplans should be prepared as part of the Local Plan process. Such masterplans should indicate development areas and (new and existing) defensible Green Belt boundaries. It is considered that such an approach, together with policies for the development of the land would *"help to engender public confidence and support, as well as mitigate harm to the remaining Green Belt"*.

5.15.5 Such an outline masterplan has been prepared for the Hill House site.



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Key



Green Belt Review: Stage One - Parcel DRS-036



Green Belt Review: Stage Two - Stage Two Parcel 036.3



Hill House Site

N12629 Hill House Farm, Chigwell

Site context

Figure 01

Scale 1:15,000 @ A4

January 2018

