

Background Paper on Green Belt and District Open Land

1.0 Introduction

- 1.1 In total, 92.4% of the land within Epping Forest District is currently within the Metropolitan Green Belt. Some release of Green Belt land will be necessary to meet the growth needs and aspirations of the District, as insufficient previously developed land outside of the Green Belt is available. A site selection process has identified the most appropriate sites to allocate in the Local Plan to deliver the development to meet objectively assessed housing and employment needs over the Plan period. The site selection exercise has been undertaken taking account of all relevant criteria identified in the Council's Site Selection Methodology and the Traveller Site Selection Methodology.¹
- 1.2 The National Planning Policy Framework (NPPF) states (at paragraph 83) that, once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan. The purpose of this paper is to explain the approach which the Council has taken to review existing Green Belt boundaries in the District and to identify the exceptional circumstances that justify the alteration of existing Green Belt boundaries to accommodate planned development.
- 1.3 As part of the overall process of preparing a new Local Plan, the Council has taken the opportunity to undertake a thorough review of existing Green Belt boundaries in the District. That review has identified a number of anomalies in the Green Belt, where inappropriate development has taken place over time, such that the land no longer fulfils the purposes of the Green Belt. This paper identifies the opportunities to alter existing Green Belt boundaries to address such anomalies, having regard to their intended permanence in the long term, so that they should be capable of enduring beyond the Plan period.
- 1.4 The Draft Local Plan includes a proposal to introduce a new local land-use designation, namely, 'District Open Land' in the specific locations identified. The proposed designation of existing Green Belt land as 'District Open Land' arises where proposed alterations to existing Green Belt boundaries causes some Green Belt land currently in recreational, leisure or open space use to become vulnerable to inappropriate development proposals. Consequently, the Council proposes to remove this land from the Green Belt but afford it a level of local policy protection to retain its current function and to avoid its loss to alternative land uses.

2.0 National Planning Policy Framework and Case Law

- 2.1 Paragraphs 83–85 of the NPPF (see Appendix 1 to this Background Paper) provide the parameters for defining and reviewing Green Belt boundaries. The NPPF requires local planning authorities to demonstrate exceptional circumstances to justify any alteration to existing Green Belt boundaries, whether the proposal is to extend or diminish the Green Belt. There is no clear definition of what amounts to exceptional circumstances but case law

¹ See Appendix A of the Site Selection Report <http://eppingforest.consultationonline.co.uk/wp-content/uploads/sites/5/2016/08/Appendix-A-Site-Selection-Methodology.pdf>

is clear that any justification must be responsive to local conditions and take account of a range of factors.

2.2 National Planning Policy makes clear that the only mechanism for altering Green Belt boundaries is the review of a Local Plan. However, preparation of a Local Plan in itself, does not amount to exceptional circumstances. The courts have provided guidance on the relevant factors to take into account when seeking to demonstrate exceptional circumstances.

2.3 In *Gallagher Estates v Solihull MBC*² the High Court identified the proper approach to demonstrating exceptional circumstances. Relevant points are summarised below:

- planning guidance is a material consideration for planning, plan-making and decision-taking, however, it does not have statutory force: the only statutory obligation is to have regard to relevant policies;
- The NPPF allows for some review in detail of Green Belt boundaries through the new Local Plan process, but states that "the general extent of Green Belt's across the country is already established";
- paragraphs 83 and 84 of the NPPF ensure that sustainable patterns of growth should guide where any amendment to Green Belt boundaries take place;
- the process of preparing a new Local Plan is not, in itself, sufficient to be regarded as an exceptional circumstance; other planning judgments must also be brought to bear; and
- exceptional circumstances are required for any revision of a boundary, whether the proposal is to extend or diminish the Green Belt.

3.0 Exceptional Circumstances in Epping Forest District

3.1 The Council considers that, considered together, a number of factors demonstrate the exceptional circumstances to justify the proposed alterations to existing Green Belt boundaries within Epping Forest District. The District is to the north east of London, bisected by the M25 and M11 motorways; it is bounded to the west by the Lee Valley and the London to Stansted/Cambridge railway line; to the south by the built extent of suburban London (within the London Boroughs of Redbridge and Waltham Forest); and to the north by the River Stort and the boundaries of Harlow. To the east and north-east, the character of the District changes markedly and becomes very rural in nature. As stated above, in total, 92.4% of the District is currently within the Green Belt, with the existing settlements being tightly defined by Green Belt boundaries. These detailed Green Belt boundaries were initially defined during the 1980s in a series of Local Plans that covered what is now Epping Forest District. There has been little change to Green Belt boundaries over time, with the currently adopted Local Plan (1998) introducing only minor alterations. The overall policy of development restraint has been successful in Epping Forest District.

3.2 Since the Local Plan was adopted in 1998, there has been a substantial change in emphasis on the delivery of new growth and the requirement to deliver that growth in a sustainable

² *Gallagher Estates v Solihull MBC* [2014] EWHC 1283 (Admin) (30 April 2014), endorsed and upheld by the Court of Appeal: [2014] EWCA Civ 1610 (17 December 2014)

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manner. Previous higher-tier plans (County Structure Plans and Regional Strategies) have determined that Epping Forest District and other nearby Districts within the Green Belt, should continue to be treated as areas of development restraint. These plans are no longer in effect and each local planning authority is now required to determine its own Objectively Assessed Needs for housing (OAHN) and employment (OAEN) development.

- 3.3 In accordance with the duty to co-operate in section 33A of the Planning and Compulsory Purchase Act 2004, the Council has worked and continues to work in partnership with East Hertfordshire, Harlow and Uttlesford District Councils, to determine the appropriate level of growth across the Strategic Housing Market Area. The most recent Strategic Housing Market Assessment is dated September 2015³ and identifies that the OAHN for Epping Forest District is 11,300 homes between 2011 and 2033. The Housing Background Paper BGP1⁴ includes substantial detail on the evidence available to determine the most appropriate local plan housing requirement for the District and identifies the housing requirement for the Local Plan as 11,400 dwellings.
- 3.4 The level of need identified for Epping Forest District is not, in itself, a sufficient justification for amending Green Belt boundaries. Therefore, further analysis of the specific circumstances relating to the District is necessary.
- 3.5 The Council undertook an “Issues and Options” consultation in 2012,⁵ which considered different levels of possible housing growth that were relevant at the time. It also identified the opportunities for brownfield redevelopment that were known at that time. At that stage, it was clear that land available outside of the Green Belt was unlikely to be sufficient to meet the identified need. Nevertheless, taking proper account of consultation feedback, in parallel to its work on the Green Belt review, the Council has continued to explore whether additional opportunities to deliver growth are available on land outside of the Green Belt.
- 3.6 The Council has prepared a Green Belt Review in two stages. Stage 1 of the Green Belt Review (September 2015)⁶ considered all Green Belt land within the District, identifying the locations where the overall performance of existing Green Belt land against national planning policy for protecting Green Belt land was higher or lower. A number of areas were identified for further study which made a limited contribution to the Green Belt purposes set out in paragraph 80 of the NPPF, or are in close proximity to existing settlements where development allocations are more likely to be considered acceptable in sustainability terms. Stage 2 of the Green Belt Review (August 2016)⁷ considered the broad locations for further investigation in greater detail by subdividing the assessment parcels into smaller areas. This stage of the review has identified areas of the District where the Green Belt continues to perform very strongly against the purposes of including land within Green Belts, and areas where it performs less well.

³ Opinion Research Services *West Essex and East Hertfordshire Strategic Housing Market Assessment: Report of Findings* September 2015

⁴ Epping Forest District Council *Background Paper 1: Housing* September 2016

⁵ Epping Forest District Council *Issues & Options for the Local Plan: Community Choices* 2012

⁶ Epping Forest District Council *Green Belt Review: Stage 1* September 2015

⁷ LUC *Green Belt Review: Stage 2* August 2016

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3.7 Extensive analysis of the existing settlements has been undertaken to identify the potential opportunities for new homes to be delivered outside of the Green Belt. Evidence on land availability is derived from:

- Strategic Land Availability Assessment (NLP, July 2016)
- Settlement Capacity Assessment (Fregonese Associates, March 2016)
- Report on Site Selection (ARUP, September 2016)

3.8 A detailed Site Selection exercise has been completed for sites that were known potentially to be available for accommodating housing, traveller and employment growth. The methodology for this project incorporates a clear hierarchy of approach to the location of new development with a clear preference for sites outside of the Green Belt in the first instance as per the box below:

- the sequential flood risk assessment – proposing land in Flood Zone 2 and 3 only where need cannot be met in Flood Zone 1;
 - allocating sites around Harlow, within the District, to support the London Stansted Cambridge Corridor
 - sites located on previously developed land within settlements (the Green Belt boundaries were used as a proxy since more detailed settlement boundaries are not designated);
 - sites located on open space within settlements where such selection would maintain adequate open space provision within the settlement; and
 - previously developed land within the Green Belt (in anticipation of the NPPF being updated to take account of the proposed changes published in December 2015).
- Greenfield/Green Belt land on the edge of settlements:**
- of least value to the Green Belt if the land meets other suitable criteria for development;
 - of greater value to the Green Belt if the land meets other suitable criteria for development; and
 - Of most value to the Green Belt if the land meets other suitable criteria for development.
- Agricultural land:**
- of Grade 4-5 if the land meets other suitable criteria for development
 - enabling small scale sites in smaller rural communities where there is local need

3.9 Evidence provided by the Green Belt Review (in particular, Stage 2) has been used to inform the Site Selection process. This detailed and comprehensive assessment has determined there is insufficient land available outside of the Green Belt to meet the development requirements of the District. The hierarchy contained within the Report on Site Selection is clear that avoiding development in the Green Belt where possible, and protecting high

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performing areas of Green Belt where this is not possible are key factors in the choices made.

- 3.10 In seeking to deliver the most sustainable form of development across the District, the Council has sought to focus an element of growth around the periphery of Harlow. This growth is being delivered in a coordinated manner in cooperation with the other Local Authorities within the Housing Market Area and relevant additional parties. Growth at Harlow both makes best use of the services and facilities available in the largest settlement in the Housing Market Area, but also aids Harlow District Council and the London Stansted Cambridge Corridor Core Area vision⁸ in meeting aspirations for growth and regeneration across the town. The scale of growth envisaged in and around Harlow will necessitate the delivery of significant elements of new infrastructure, which will be located within the Green Belt in Epping Forest District.
- 3.11 The Draft Local Plan proposes to allocate growth such that this enables the delivery of the required infrastructure in a sustainable and cohesive manner, alongside housing and economic growth. The case for growth in and around Harlow is made on a number of levels. The London Stansted Cambridge Consortium is clear in its support for growth of Harlow and the improvements to key infrastructure that this growth will deliver. This will include a new motorway junction (Junction 7A) for the M11 that would be constructed on Green Belt land within Epping Forest and Harlow Districts. Across the Housing Market Area partners, Harlow has long been identified as a key sustainable location for growth and regeneration, providing with it the opportunity to bring real benefits to existing and future residents and workers.
- 3.12 For the sites around Harlow and all other locations across Epping Forest District, the Council has applied a number of planning judgements in reaching conclusions on the sites that should be proposed for allocation in the Draft Local Plan. These judgements vary slightly in different locations around the District and are largely encompassed by the criteria used in the Site Selection exercise. A balance has been reached between protecting areas of high performing Green Belt land where possible, but also taking into account matters of sustainability, protection of the environment and landscape, seeking regeneration and delivery of required growth. In some instances, the planning judgement applied has resulted in sites with high performing Green Belt land being proposed for allocation. This is particularly the case for the proposed sites around Harlow, recognising its location as a substantial town in the Metropolitan Green Belt, and the opportunities arising to meet housing, employment and regeneration needs along with necessary infrastructure. For the reasons set out in paragraph 3.9 (above), the Council considers that these sites are the most appropriate to deliver an overall benefit in planning terms.
- 3.13 For the reasons set out above, the Council considers that the need to promote sustainable patterns of development to meet objectively assessed needs for development in the District over the Plan period requires some alteration of Green Belt boundaries and that failing to deliver development to meet those needs would not contribute to the achievement of sustainable development in accordance with national planning policy. Therefore, the Council considers that exceptional circumstances have been demonstrated to alter existing Green

⁸ See Chapter 3 paragraph 3.11 of the Draft Local Plan

Belt boundaries as proposed in the Draft Local Plan. The alterations proposed amount to the loss of approximately 1.5% of the current land within the Green Belt.

4.0 Anomalies in the Green Belt

- 4.1 The Green Belt Review: Stage 2 ("Stage 2")⁹ report identifies a number of major and minor anomalies in the Green Belt, where change has taken place. The major anomalies are all locations where significant development has taken place. The Stage 2 report draws out that these locations may not continue to meet the purposes of the Green Belt. A more detailed assessment of these areas has been undertaken (Appendix 2), which has identified eight locations where it is considered appropriate that an alteration to the Green Belt boundary is made.
- 4.2 This assessment has taken into account the analysis provided by the Stage 2 report, and provides additional discussion and context to determine whether a change to the boundary should be proposed. Chapter 5 of the Draft Local Plan reflects these proposed alterations.
- 4.3 A total of 36 minor anomalies have been identified by the Stage 2 report. These largely comprise small-scale locations where the Green Belt boundary no longer follows a clear feature on the ground. In many cases, this is because back garden boundaries have been extended over time. It is not desirable to make small-scale alterations in locations such as these, as there would be little practical benefit in doing so.

5.0 District Open Land

- 5.1 Paragraph 77 of the NPPF (and associated guidance) sets out the circumstances in which Local Green Space can be designated. In considering proposed alterations to Green Belt boundaries, it has been determined that a Local Green Space designation is required to offer protection from development in some locations where exceptional circumstances have been demonstrated to alter existing Green Belt boundaries. In these locations it is proposed to designate these areas as 'District Open Land', where alterations to the Green Belt boundaries may cause land which is currently in recreational, leisure or open space use to become vulnerable to inappropriate development proposals. It is proposed to remove this land from the Metropolitan Green Belt but afford it a level of local policy protection to protect it from loss to alternative land uses.
- 5.2 The tests identified in the NPPF are:
- *where the green space is in reasonably close proximity to the community it serves;*
 - *where the green area is demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and*

⁹ LUC *Green Belt Review: Stage 2 (Technical Annex)* August 2016
http://eppingforest.consonline.isready.co.uk/wp-content/uploads/sites/5/2016/08/Chapter-3-Final-Draft-Stage-2-Report-August-2016-V3_REDUCED.pdf

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- *where the green space concerned is local in character and is not an extensive tract of land.*

5.3 The following assessment has been completed to determine the specific circumstances in respect of the areas considered to warrant additional policy protection within the Local Plan.

Area	Proximity to community	Local significance	Local character
South of Waltham Abbey, north of M25	All land is within 360 m of the existing built edge of Waltham Abbey, and provides a large proportion of the green space for the town.	<p>There are a number of features within the proposed District Open Land to the south of Waltham Abbey. Town Mead recreation ground and playing fields in the west, moving towards the allotments and cemetery bordering Sewardstone Road, and the informal open space and BAP habitat south of Honey Lane towards the eastern edge of Waltham Abbey.</p> <p>The Recreation and Open Space Study (2012) identifies a number of the facilities in this broad area, and states that they all appear to be well used and in good condition</p>	<p>The land to the south of Waltham Abbey is contained by the existing built edge of the town and the M25 to the south.</p> <p>The Town Mead recreation ground and playing fields are approximately 28.8ha in area, with the nearby cemetery and allotments amounting to approximately 2.6ha. The land to the south of Honey Lane has an area of 42.8ha.</p> <p>It is therefore proportionate to the size of Waltham Abbey, and could not be considered an extensive tract of land.</p>
Recreational space to the north of Tempest Mead, North Weald	This area was designed as part of the housing scheme at Tempest Mead, to provide access to open space for the local residents. This area also provides access to the open space to the east. It is within a few metres of the houses to the north of the estate.	Planned open space connected to the development of Tempest Mead, providing recreational value to the local community.	The area of land is small in nature, covering 0.78ha in total. It was primarily designed into the housing scheme to meet the immediate open space requirements of the occupants of the properties.

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- 5.4 Two areas in the District within the settlements of North Weald Bassett and Waltham Abbey are proposed for designation as District Open Land in the Draft Local Plan. These areas are shown in Chapter 5 of the Draft Local Plan, within the policies and maps for each settlement. The responses to the consultation on the Draft Local Plan and further evidence gathering may identify further areas that should also be considered for designation.

Appendix 1

National Planning Policy Framework (extract)

“83. Local planning authorities with Green Belts in their area should establish Green Belt boundaries in their Local Plans which set the framework for Green Belt and settlement policy. Once established, 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.

84. When drawing up or reviewing Green Belt boundaries local planning authorities should take account of the need to promote sustainable patterns of development. They should consider the consequences for sustainable development of channelling development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary.

85. 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. “*

Appendix 2

Major anomalies in the Green Belt (identified by Green Belt Review: Stage 2)

Location	GB Review Stage 2 Parcel Ref.	LUC report findings	Discussion & Justification	Revise GB boundary	Proposed new boundaries	Additional designation required?
Tempest Mead, North Weald	11.1	The modern (c.2000) development at Tempest Mead, on the western edge of the parcel, can be considered an anomaly which should be excluded from the Green Belt. The railway line to the south and hedgerow to the east would form strong boundaries. The small, isolated area of open land between Tempest Mead and the B181 High Road is considered to make little contribution to Green Belt purposes.	Tempest Mead is a relatively dense form of development on the southern edge of North Weald village, sitting between High Road and the former Central Line, and accessed via Station Road. The developed area adjoins other developed areas to the west, with the eastern boundary of the development being formed by a strong, mature tree line. The developed area now in situ does not meet any of the purposes of land within the Green Belt. An appropriate defensible boundary is therefore the Central Line to the south, and the tree line to the east.	YES	Continuation of existing boundary at Kiln Road/former Central Line underpass along former Central Line. Boundary turns north west along eastern boundary of Tempest Mead development to meet existing Green Belt boundary at the eastern corner of Dukes Close.	District Open Land designation required to immediate north of Tempest Mead estate, south of Kings Head car park/garden and Dukes Close, bounded by hedgerows and gardens of properties on the northern edge of Tempest Mead. District Open Land designation also required for small area immediately south of junction of Station Road and Tempest Mead.

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Location	GB Review Stage 2 Parcel Ref.	LUC report findings	Discussion & Justification	Revise GB boundary	Proposed new boundaries	Additional designation required?
			<p>The land currently undeveloped to the west of Station Road, and directly to the rear of the King's Head will also be removed from the Green Belt. In isolation, neither of these areas continue to meet the purposes of including land within the Green Belt.</p>			
The Gables, Ongar	16.1	<p>The residential development at The Gables to the west of the parcel is a developed area with a similar pattern, form and character to the adjoining settlement to the west. It therefore performs weakly against the Purposes of Green Belt and lacks openness, and should therefore be considered as a potential anomaly. The road which provides access to these dwellings, an extension of The Gables, separates the built development from an area of public recreational open</p>	<p>A small number of homes at the eastern edge of the "The Gables" development are currently within the Green Belt. They are part of the housing estate and therefore do not meet the purposes of the Green Belt. A more appropriate long term boundary is to the rear of these properties.</p>	YES	Adjustment to remove c. 4 homes to the east of "The Gables".	None

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Location	GB Review Stage 2 Parcel Ref.	LUC report findings	Discussion & Justification	Revise GB boundary	Proposed new boundaries	Additional designation required?
		space, and marks a stronger distinction between developed and open space than the hedgerow that separates it from sports pitches to the east.				
Mill Grove, High Ongar	23.5	The residential development along Mill Grove contains houses and roads of a similar form and density to the existing settlement. This area lacks openness and performs weakly against Green Belt Purposes. It should therefore be considered as a potential anomaly. The edges of gardens on the eastern side of the development follow the pre-existing boundary to an open, grassland field. The southern limit of the development is dictated by floodplain, but hedgerow alongside a tributary of the River Roding forms the nearest distinct boundary.	Mill Grove has been built adjacent to the existing inset from the Green Belt boundary. The development forms a continuation of the built form of the village along Mill Lane, and a long term boundary is formed by the outer edge of development to the eastern edge. The density of development and lack of openness means that the area no longer meets the purposes of including land within the Green Belt.	YES	Hedgerow to rear of residential properties to the south & east of Mill Grove. Boundary to be drawn tightly to south of village hall. Village hall grounds to remain in GB.	None
Kensington Park,	33.1	Potential anomaly at Kensington Park (recent	The development at Kensington Park in itself	YES	From Oak Hill Road, to follow hedgerow to north	None

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Location	GB Review Stage 2 Parcel Ref.	LUC report findings	Discussion & Justification	Revise GB boundary	Proposed new boundaries	Additional designation required?
Stapleford Abbotts		housing development) which is adjoined to the main settlement and extends development away from the main road (the B175 Oak Hill Road) in what is currently a very linear settlement. It may create a stronger Green Belt boundary if the boundary was drawn around the edge of the development, however, the dwellings along Kensington Park are set in large grounds and so do create more of a transition to the countryside rather than having urban character.	would not warrant a change to the Green Belt boundary. However, since the Green Belt Review: Stage 2 report analysis was completed further planning consent has been granted on the car park to the rear of the Royal Oak public house, and pre-application discussions are currently on going for land immediately to the north west of the area subject to this consent. Taking all of these changes in combination the area will not meet the purposes of including land within the Green Belt. A more appropriate Green Belt boundary in this location would be around the development at Kensington Park and the rear of the Royal Oak.		of Kensington Park, follow road end/turning space at eastern end, mature treeline to south of eastern-most property in Kensington Place, follow hedgerow/treeline to rear of current PH car park. Rejoin existing GB boundary at rear gardens of properties on Oak Hill Road.	
Grange Manor, Adj Grange Station,	35.6	The Grange Hill station / Froghall Lane area is a developed area, but the pattern of development is distinct from residential	The development that has taken place on this land now means that the purposes of the Green Belt are not met. A long term boundary can	YES	To remove developed area and cutting of the Central Line from the Green Belt. Amend alignment from eastern	None

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Location	GB Review Stage 2 Parcel Ref.	LUC report findings	Discussion & Justification	Revise GB boundary	Proposed new boundaries	Additional designation required?
Chigwell		development to the south and west, and is separated from the former by Manor Road and the latter by a belt of woodland alongside the railway line. Well-defined vegetation along Froghall Lane defines the developed area to the east edge and a hedgerow contains it to the north, but it sits within a larger field bounded by hedgerow which would be weakened as Green Belt should the existing boundary be moved north of Manor Road.	be achieved by bring the Green Belt boundary into line with the extent of development and Froghall Lane.		end of Mount Pleasant to follow line of mature vegetation towards the east. GB boundary to align with northern extent of Grange Manor development and Froghall Lane to the east, rejoining Manor Road.	
Debden Park High School, Loughton	42.2	Debden Park High School in the south western corner of the parcel is a developed area adjacent to the existing settlement edge. The school building lacks openness and lies adjacent to the built-up area, but is separated from it by a well-treed stream which also marks the settlement edge to the north. The school playing fields have a reasonably	The school buildings were identified as a possible anomaly within the Green Belt. The school buildings represent a large built form in the Green Belt, but are separated from the urban edge by the allotments, community orchard and stream. There is no clear defensible boundary around the school buildings, and to remove both the buildings	NO	No change	None

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Location	GB Review Stage 2 Parcel Ref.	LUC report findings	Discussion & Justification	Revise GB boundary	Proposed new boundaries	Additional designation required?
		strong hedge line boundary, but adjusting the Green Belt edge to exclude both the school and its playing fields would affect an area which does make some contribution to Green Belt purposes.	and the playing fields from the Green Belt would not be appropriate as the playing fields continue to meet at least some of the purposes of the Green Belt.			
Fallow Fields, Loughton	54.3	The Fallow Fields residential estate to the south of Loughton/ Debden is a developed area with a similar density and form to the main settlement. Its character and lack of openness represent urbanising elements which do not meet the Purposes of Green Belt and it should therefore be considered as a potential anomaly. However its physical separation from both Buckhurst Hill and Loughton, and containment by tree belts, mean that any amendment to the Green Belt would either be isolated or would require release of open land which makes	The gated estate is set back and well screened from High Road/A121, providing the impression from public view points of a gap between Loughton and Buckhurst Hill. This is the only gap of significance between the two settlements, and to make an amendment to the Green Belt boundary in this location would create a further inset, which would not be desirable nor appropriate.	NO	No change	None

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Location	GB Review Stage 2 Parcel Ref.	LUC report findings	Discussion & Justification	Revise GB boundary	Proposed new boundaries	Additional designation required?
		some contribution to Green Belt purposes.				
Davenant Foundation School, Loughton	54.6	The Davenant Foundation School buildings in the north western corner of the parcel constitute a developed area adjacent to the existing settlement edge, lacking in openness. A hedgerow creates some separation from the settlement but Debden Lane to the north of the school forms a stronger boundary. The school playing fields, subdivided by hedgerows, retain openness and make some contribution to Green Belt purposes. An access road, with adjacent parking areas, separates the school from the playing fields to the south-east, and a treed hedgerow separates it from the fields to the north-east.	Davenant Foundation School sits to the north of Loughton, adjoining the existing Green Belt boundary that runs along the residential properties to the north of Grosvenor Drive and Willingale Road. There are potential long term boundaries to the west and north of the school buildings, but an appropriate boundary does not exist between the buildings and the playing fields. It would not be appropriate to remove the playing fields from the Green Belt, and therefore no change is recommended.	NO	No change	None
Gilwell Hill, Chingford	59.2	The developed area at Gilwell Hill is of a density and pattern such that it is related to the adjacent	This developed area adjoins the built edge of Chingford to the south (outside of the District), and would form an	YES	Realign GB boundary to follow extent of residential development as defined by Baden Drive and	Further check - some area of local green space may need to be

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Location	GB Review Stage 2 Parcel Ref.	LUC report findings	Discussion & Justification	Revise GB boundary	Proposed new boundaries	Additional designation required?
d		settlement to the south rather than the countryside. The lack of openness means that it should be considered as a potential anomaly. A hedgerow forms a clear boundary between this and the lakes and grasslands of Picks Cottage Fishery to the north.	appropriate extension to the land inset from the Green Belt. The developed area is well contained from the wider landscape by hedgerows and trees to the north and east. The developed area does not meet the purposes of including land within the Green Belt.		substantial hedgerow to north and hedgerow/tree line to east. GB boundary to follow alignment of Sewardstone Road (A112) to District boundary, crossing road at junction of Sewardstone Road/Boardman Avenue.	designated.
Sainsbury's Depot & Housing, Waltham Abbey	59.3	The parcel contains the large Sainsbury's depot building, associated car/lorry parking and residential development. Although separated from the rest of Waltham Abbey by the M25, the built development lacks openness and the parking areas are too contained by development to retain any open relationship with the countryside. It should therefore be considered as a potential anomaly. Strong boundaries define this area: the M25 to the north, the A4112 Sewardstone Road to the east, the River Lea to	Substantial change has taken place on the former Royal Ordnance site to the south of the M25, with the development of the Sainsbury's distribution depot, business units, approximately 400 dwellings and the Gunpowder Park to the south. The developed area immediately south of the M25 to the outer edge of the residential development no longer meets the purposes of the Green Belt. An appropriate long term Green Belt boundary would be to the immediate south of the residential properties.	YES	Southern extent of development around Meridian Way residential area and A121 Dowding Way. Green Belt boundary to align with M25 (jct 26) off ramp leading to junction with Honey Lane.	District Open Land designation required at Town Mead, land west and east of Sewardstone Road (cemetery and allotments respectively) and land to the south of Round Hills and Honey Lane.

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		the west and Gunpowder Park to the south.	This adjustment also requires that land to the east of Sewardstone Road and north of Dowding Way is also considered against the purposes of the Green Belt. An allocation for employment development in this location is likely, and it would therefore be appropriate to consider the wider context. If development of a similar scale and nature to the Sainsbury's Distribution centre were to take place north of Dowding Way, the purposes of the Green Belt would no longer be met. In turn, the land to the north of the M25, immediately to the south of the current built edge of Waltham Abbey would therefore need to be reconsidered in Green Belt terms. No substantial change due to development is proposed in this broad location, with the exception of the redevelopment of the existing Waltham Abbey			

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			Swimming Pool site. It is therefore proposed that a designation of District Open Land is applied to the land broadly bounded by the M25, the River Lea navigation, the southern edge of Waltham Abbey across the Honey Lane and junction 26 of the M25. This adjustment would ensure the long term suitability of the Green Belt boundary to the south of Waltham Abbey.			
Beaulieu Drive, Waltham Abbey	not within GBR2 (outside area of search)	Substantial developed area adjacent to existing GB boundary to west of Walton Gardens, Leaview and Flagstaff Road. Boundaries of developed area are well defined by two sections of the River Lea to the east and west, and mature planting to the immediate west of Beaulieu Drive. Development extent to the north defined by Hoppit Road/access to the Royal	Development at Beaulieu Drive is well contained by the River Lea on both east and west, with each turning being gated from general access. The development sits alongside the existing Green Belt boundary at Flagstaff Close and Leaview. The area of residential development does not meet the purposes of the Green Belt, and the River Lea to the west provides an appropriate	YES	To the west of Beaulieu Drive, north of Hoppit Road and across the River Lea to the east, adjoining the existing Green Belt boundary at Flagstaff Road.	None

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		Gunpowder Mills Park.	long term boundary.			
Little Brook Rd Housing, Roydon	64.3	Houses along Little Brook Road are of an age, density and form that is considered to represent an anomaly in Green Belt terms. There is only a short physical distance between the potential anomaly area and the existing inset boundary of Roydon, but a strong belt of trees creates some separation and in visual terms they have a contained setting, with reasonably strong tree cover on all sides. Although perception of housing in this area is limited, extending the Green Belt boundary to include it would reduce the defined gap between the built-up areas of Roydon and Harlow. It would also lengthen the already long Green Belt boundary around Roydon, which is weakened by number of turns it makes to follow the settlement form, and create a new	Little Brook Road is a relatively dense form of development, but is well contained by tree cover. Amendment to the Green Belt boundary in this location would weaken the gap between the east of Roydon and the west of Harlow, and would likely lead to the further sprawl of the village itself into the land between Grange Lane and Little Brook Road. The significant area of trees to the west of Little Brook Road continues to provide a long term defensible Green Belt boundary.	NO	No change.	None

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		<p>edge adjacent to further dwellings to both the east and north (across Harlow Road), raising the question of whether those houses ought also to be considered anomalous. This would also call into question the status of houses along the southern half of Grange Lane (in parcel 64.4 to the west). On balance the woodland between Little Brook Road and the built-up area as defined at present is probably a stronger boundary than that which would be created were Little Brook Road to be released from the Green Belt.</p>				
<p>Paternoster House (Care Home), Waltham Abbey</p>	<p>68.1</p>	<p>The Paternoster Care Home is a developed area adjoined to the existing settlement. The highlighted area does not retain a distinction between settlement and countryside, and the built form does not maintain openness. Strong hedgerows separate this</p>	<p>The care home sits to the rear of the houses on Pasternoster Hill and Pick Hill. To the west is a large glasshouse, which is an appropriate use in the Green Belt, and to the north west there is an area of industrial and commercial uses accessed from Galley</p>	<p>NO</p>	<p>No change.</p>	<p>None</p>

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		<p>area from commercial uses within the Green Belt off Galley Hill Road, a block of scrub woodland lies to the east and the access road to a large glasshouse defines the western edge. This area can therefore be considered a potential anomaly.</p>	<p>Hill. Although it is recognised that the care home itself is a large building in the Green Belt, the boundary to the rear of the building appears no stronger in Green Belt terms than the existing boundary to the rear of the residential properties.</p>			
St John's School, Epping	70.1	<p>The buildings of St Johns School in the area between Bury Lane and Tower Road/ Lower Swaines Road constitute development that abuts the built-up area edge on two sides, although hedgerows retain some separation. The open playing fields to the north can still be considered to make some contribution to Green Belt purposes, but have strong outer boundaries creating separation from the wider countryside. There are no natural features to define a boundary between the new school buildings and the</p>	<p>The new development of residential properties has taken place outside of the Green Belt, with the new school buildings having been constructed on part of the existing playing fields within the Green Belt. There is no long term defensible boundary between the school buildings and the playing fields. The playing fields still make a contribution to the Green Belt, and therefore it is not appropriate to make any change in this location.</p>	NO	No change.	None

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		playing fields.				
Teazle Mead, Thornwood	70.5	The residential development at Teazle Mead to the east of Thornwood is highlighted as an anomaly because the density and character of development in this location and its relationship to the adjacent settlement means that it is perceived as part of the settlement. It is contained by hedgerows.	Teazle Mead is a gated development at the end of Carpenters Arms Lane. It is adjacent to the existing Green Belt boundary around Thornwood, but represents a small isolated extension into the Green Belt. Amendment to the Green Belt boundary is not considered appropriate in this location.	NO	No change.	None