
Hearing Statement for Epping Forest Local Plan Examination

Matter 15: Places and Sites

Hearing Date: 14th May 2019

On Behalf of Crest Nicholson Eastern

Introduction

- 1.1. This Hearing Statement has been prepared on behalf of Crest Nicholson (Eastern) in relation to land at Pickfield Nursery (SLAA site reference SR-0161). It has specifically been prepared to address **Matter 15: Places and Sites**, and responds to the associated issues and questions raised by the Inspector to test the legal compliance and soundness of the emerging Epping Forest District Local Plan 2011-2033 ("the Plan").
- 1.2. In order to make the Plan sound, the following amendments are considered necessary:
 - The identification of Pickfield Nursery as residential allocation WAL.R9 for approximately 90 homes under 'Policy P3: Waltham Abbey' and an amendment to Map 5.6 to reflect this, as shown at **Appendix 1**; and
 - An amendment to Map 5.6 to remove the delivered site Knolly's Nursery (located east of Pickfield Nursery and identified as site WAL.R8) from the Green Belt, which the Plan currently ignores.
- 1.3. In light of our evidence put forward to date from the outset of the Plan preparation process, we request that Pickfield Nursery is considered thoroughly by the Inspector, as it is suitable, available and deliverable for development in the first three years of the Plan period. A summary of the site promotion that has been undertaken to date is included at **Appendix 2**.
- 1.4. Pickfield Nursery's contribution to the purposes of the Green Belt is extremely limited and lower than nearby sites to the north of Waltham Abbey that have been proposed for allocation in the emerging Local Plan. It comprises predominantly previously developed land which has been derelict for over 25 years. 3 hectares of the 4.5 hectare site are characterised by a layer of overgrown scrubland and scattered glass above its hardstanding foundations (associated with the deterioration of the former horticultural greenhouses) as can be seen in the site photos at **Appendix 3**. The site is in a poor state and it is unviable to bring it forward for non-residential uses.
- 1.5. The Knolly's Nursery site, located just east of Pickfield Nursery, gained planning permission in July 2016 and has now been built out. It too contained previously developed land but significantly less than Pickfield Nursery, and it is considered that Pickfield Nursery represents a suitable residential development opportunity by virtue of its previously developed nature and derelict state which does not contribute to Green Belt purposes.

Response to Matter 15 Issues and Questions

Policy P3: Waltham Abbey - Site Specific Matters

What effect would the development of the following sites have on the purposes of the Green Belt: WAL.E5-E6; WAL.R1-R3 and R6; and T1?

Policy P3 and Appendix 6 of the Plan

- 1.6. The locations of the proposed allocations at sites WAL.E5-E6, WAL.R1-R3, R6 and T1 are illustrated on the Map 5.6 within the Plan, which is enclosed at **Appendix 1**. We have also marked up Map 5.6 with our client's site, Pickfield Nursery, identified as site 'WAL.R9', and land to the east of it, Knolly's Nursery, as site 'WAL.R8'.
- 1.7. Pickfield Nursery is located in close proximity to sites WAL.E6, WAL.R1, WAL.R2, WAL.R3 and WAL.T1, and therefore only these sites are considered in our response to the Inspector's question above. Within Policy P3 of the Plan, these sites are allocated as follows:
 - WAL.E6: Galley Hill Road Industrial Estate: Class B employment uses;
 - WAL.R1: Land West of Galley Hill Road: 295 homes;
 - WAL.R2: Lea Valley Nursery, Crooked Mile: 315 homes;
 - WAL.R3: Land adjoining Parklands: 130 homes; and
 - WAL.T1: Land to the rear of Lea Valley Nursery, Crooked Mile: Traveller accommodation, up to 5 pitches.
- 1.8. Within the supporting text to Policy P3, the Council have set out that a number of different spatial options to accommodate new homes at Waltham Abbey have been considered. These have informed the site allocation process.
- 1.9. One of the spatial options taken forward is the proposed expansion of the settlement to the north because the Council considers that this provides opportunities to support development within close proximity to existing town centre services, whilst minimising harm to the Green Belt.
- 1.10. As is illustrated on Map 5.6, the allocation of sites WAL.R1, WAL.R2, WAL.R3 and WAL.T1 together comprise the 'Waltham Abbey North Masterplan Area'. Policy P3 sets out that development proposals for the sites within the Masterplan Area must comply with a Strategic Masterplan that is to be produced and formally endorsed by the Council. This is to ensure that development proposals are 'front loaded', recognising the scale and complexity of delivering the site allocations.
- 1.11. The Strategic Masterplan is expected to make provision for a minimum of 610 homes, but also to, amongst other things, include:

- A new local centre and community facility;
 - The relocation and expansion of a secondary school within the Masterplan Area;
 - New road links between Crooked Mile and Galley Hill;
 - The potential to upgrade / widen the existing Galley Hill Road and Crooked Mile, in order to ensure a safe access point and sufficient capacity for the developments they serve;
 - Measures to ensure that the vulnerability to surface water flooding as well as the potential consequences for surrounding sites is suitably mitigated through appropriate surface water drainage; and
 - The strengthening, and / or creation of new Green Belt boundaries to the north and east of the site.
- 1.12. The above demonstrates that the Masterplan Area is proposed to be intensively developed, with significant housing delivery and supporting infrastructure, and that as a consequence the existing Green Belt boundaries will need to be strengthened or new ones created in order to mitigate the impact of the development. In principle, our client is not opposed to the boundary change here as this suggests that housing growth to the north and north east of the settlement is acceptable more generally. However, given the challenging housing trajectory and upfront infrastructure requirements associated with the Masterplan Area, housing development to the north and north east of Waltham Abbey should be more evenly distributed to accommodate the settlement's existing and forecasted housing need and demand. This could be achieved by including Pickfield Nursery as a housing allocation in the Plan.
- 1.13. Policy P3 also sets out that proposals for the allocated sites will be expected to accord with the site specific requirements in Appendix 6 of the Plan, which contains more detailed information about what is expected to be delivered with each of the draft allocations. In relation to site WAL.E6, Appendix 6 of the Plan sets out that the site has access constraints and that development proposals should consider the need to upgrade / widen Galley Hill Road, and be co-ordinated with the development proposals for the Masterplan Area.
- 1.14. In Green Belt terms, there is a need for the development proposals to include measures to strengthen the existing Green Belt features along the eastern edge of site WAL.E6. Accordingly, the infrastructure requirements associated with the development of site WAL.E6 are significant and the Plan is explicit that there will be implications to the Green Belt boundaries that will require mitigation.

Stage 1 and Stage 2 Green Belt Assessment

- 1.15. The Plan is underpinned by various evidence base documents, including Stage 1 and Stage 2 Green Belt Assessments.
- 1.16. The main purpose of the Stage 1 Assessment is to undertake a high level review of Green Belt land across the District, in order to identify the contribution of different Green Belt parcels towards the five Green Belt purposes set out within the National Planning Policy Framework (NPPF).

- 1.17. In the Stage 1 Assessment (document EB704A, September 2015), sites WAL.R1, WAL.R2, WAL.R3, WAL.T1 and WAL.E6 are positioned within Green Belt parcel DSR-068, the same as Pickfield Nursery. Parcel DSR-068 extends 745 hectares. The conclusion of the Stage 1 Assessment on this parcel is that its aggregated contribution is 'weak / relatively weak'. This is the only parcel around Waltham Abbey which has this low ranking. The strategic parcel was therefore identified as broad location for further consideration in the Stage 2 Assessment.
- 1.18. The Stage 2 Assessment (document EB705A, August 2016) and its Technical Annex (document EB705B, August 2016), breaks parcel DSR-08 into smaller sub-parcels. The Stage 2 Assessment identifies areas where development would be harmful in Green Belt terms and accordingly where the Green Belt policy designation should remain, focussing on land adjacent to the District's 22 settlements, including around Waltham Abbey.
- 1.19. In the Stage 2 Assessment, Pickfield Nursery falls within parcel 068.1. Sites WAL.R1, WAL.R2, WAL.R3, WAL.T1 and WAL.E6 are positioned in different Green Belt parcels to Pickfield Nursery as follows:
- WAL.R1 = Parcel 068.3
 - WAL.R2 = Parcel 068.2 and 068.3
 - WAL.R3 = Parcel 068.3
 - WAL.T1 = Parcel 068.2 and 068.3
 - WAL.E6 = Parcel 068.2
- 1.20. The scoring against the five Green Belt purposes from within the Stage 2 Assessment is summarised below.

	Purpose 1	Purpose 2	Purpose 3	Purpose 4	Purpose 5	Harm to Green Belt if Released
Parcel 068.1	No Contribution	Weak	Strong	Weak	Not Assessed	Very High
Parcel 068.2	No Contribution	Weak	Relatively Strong	Weak	Not Assessed	High
Parcel 068.3	No Contribution	Weak	Strong	Weak	Not Assessed	Very High

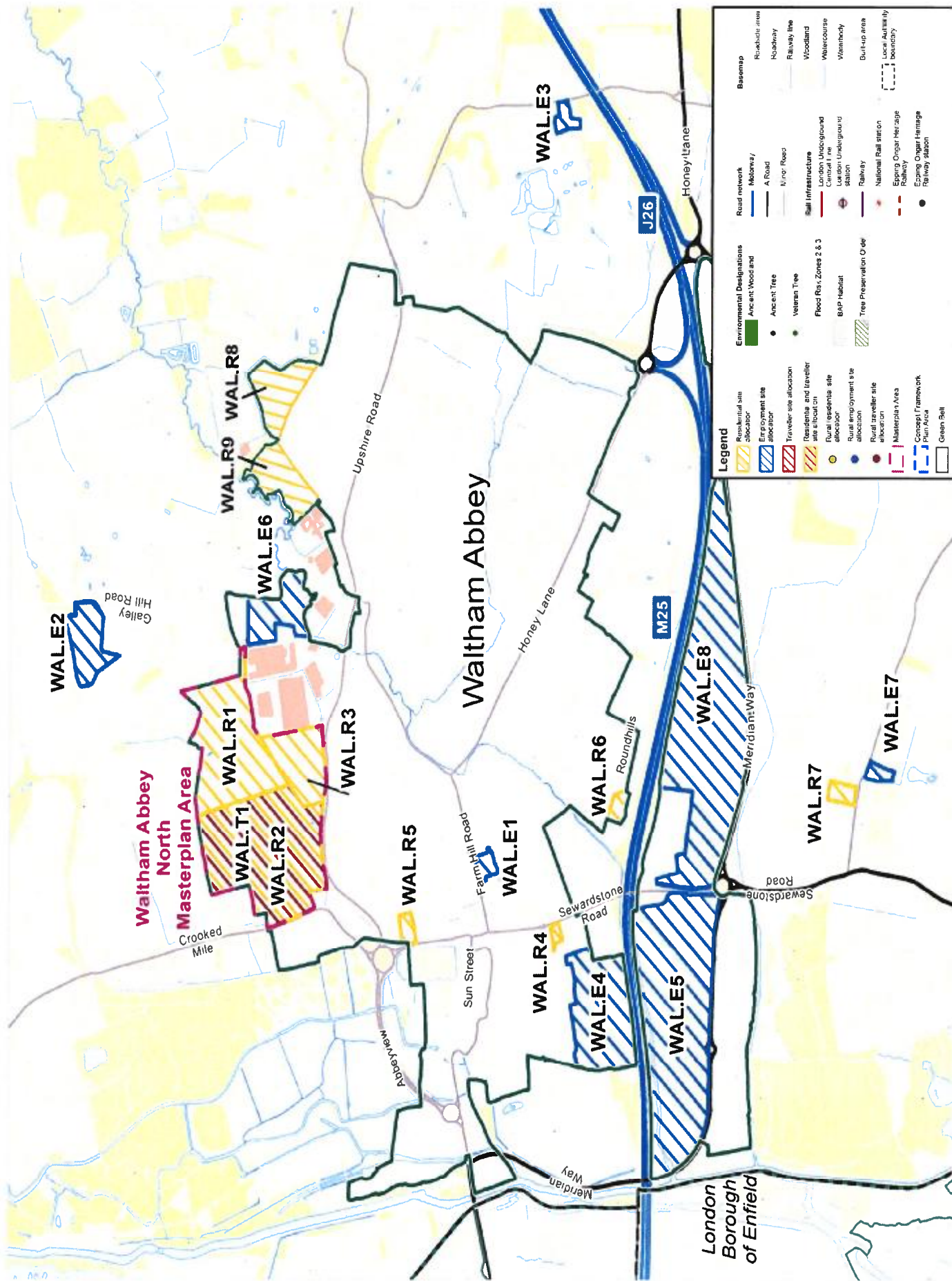
- 1.21. As can be seen, parcels 068.2 and 068.3 have ‘high’ and ‘very high’ Green Belt impact if released, similar to parcel 068.1 where Pickfield Nursery is located. However, these have not been discounted as development sites and remain as potential sites for release within the Plan. This is at odds with the Council’s decision to discount Pickfield Nursery. The assessments for parcels 068.1, 068.2 and 068.3 are included at **Appendix 4**.
- 1.22. Additionally, when considering the potential release of parcel 068.1, although the overall harm to the Green Belt is assessed a ‘very high’, there is a section within the assessment that gives consideration to alternative parcel boundaries. This states that:
- “Land to the east of the Paternoster Care Home could potentially form an alternative parcel boundary, which would create a small sub-parcel in the western section of the parcel. This area includes the care home and glasshouses and open fields but also includes an area within the floodplain constraint. Development within this sub-parcel could potentially be accommodated with limited harm to the Green Belt purposes”.*
- 1.23. The land referred to here is the Pickfield Nursery site. Therefore, on the basis of the Council’s own evidence, the release of Pickfield Nursery from the Green Belt and its allocation within the Plan would result in limited harm to the Green Belt. We have also undertaken our own assessment of the site against the NPPF Green Belt purposes, which is included at **Appendix 5**, to demonstrate that Pickfield Nursery has a negligible contribution to the Green Belt.
- 1.24. In addition, the Knolly’s Nursery site, which is also located in parcel 068.1, gained planning permission in July 2016 and has now been built out. It too contained previously developed land but significantly less than Pickfield Nursery whilst lying in a more open, sensitive area in Green Belt and landscape impact terms. This is acknowledged in the Plan’s evidence base and in written pre-application advice our client has received from officers at the Council. Knolly’s Nursery therefore erodes the landscape character and Green Belt purposes within this area to the north east of Waltham Abbey but is inexplicably ignored by the Plan and its evidence base. The development of Knolly’s Nursery therefore sets a precedent for the release of less sensitive Green Belt land in parcel 068.1, within which Pickfield Nursery is located. It also generally implies that parcel 068.1 is not conceived of as a sensitive Green Belt location.

- 1.25. On the other hand, within the site assessments for parcels 068.2 and 068.3 there is no consideration of alternative parcel boundaries where there could be less harm to the Green Belt, nor are there any existing planning permissions which would suggest that these parcels are less sensitive in Green Belt terms than the Stage 2 Assessment concludes. Consequently, the development of sites WAL.R1, WAL.R2, WAL.R3, WAL.T1 and WAL.E6 will either cause a 'high' or 'very high' level of harm to the Green Belt, according to the Council's own evidence base. This would not be the case if Pickfield Nursery were to be allocated, as the site has the potential to be developed with limited harm to the Green Belt.
- 1.26. It is for the reasons above that we recommend that Pickfield Nursery is included as residential allocation WAL.R9 for approximately 90 homes under 'Policy P3: Waltham Abbey' within the Plan, and that an amendment to Map 5.6 is made to reflect this. The site is suitable, available and deliverable for development in the first three years of the Plan period, as opposed to the proposed allocations WAL.R1, WAL.R2, WAL.R3, WAL.T1 and WAL.E6 which are harmful to the Green Belt and require substantial upfront infrastructure provision, which will delay their delivery.

Clarifications following Matter 5 Hearing Session

- 1.27. The Pickfield Nursery site was specifically discussed at the Matter 5 Hearing Session on 19 March 2019 relating to the site selection process. During the session, Chloe Salisbury of Arup (on behalf of EFDC) responded to our clients' concerns about the incorrect assessment of Pickfield Nursery as part of a larger parcel of land; and factual errors in EFDC's evidence base relating to flood risk at the site. On the latter point, she asserted that EFDC are confident that any errors were not determinative when it came to the decision not to allocate the site and that this had been picked up in the "write up" of the Site Selection Reports.
- 1.28. We have reviewed the 2016 and 2018 Site Selection Reports (documents EB801 and EB805) and have not located any information that provides our client with assurances in respect of the issues identified with Pickfield Nursery during the site selection process. As outlined in our Matter 5 Hearing Statement, Pickfield Nursery was originally rejected on the basis of flood risk when it was assessed as part of the wider land parcel SR-0020 in the July 2012 SLAA. Our client has worked closely with the EA to remodel the Cobbin's Brook flood risk zone and has obtained feedback from the EA that the proposals are achievable in flood risk terms, as a very small percentage (under 10%) of the site is impacted by flood risk. Consequently, and on the basis of our response on the relevant Matter 15 question set out within this Statement, we see no reason why Pickfield Nursery should not have a residential allocation within the Plan.

Appendix 1



Appendix 2

Background

The former Pickfield Nursery site extends to 4.5 hectares and lies adjacent to the northern settlement boundary of Waltham Abbey, one of the District's main settlements and subsequently one of the focuses of future housing growth.

The surrounding residential development, infrastructure, and fixed physical features create existing boundaries on all sides: residential dwellings to the south, Paternoster House Care Home to the west, a small commercial operation to the east and Cobbins Brook (forming a permanent boundary) to the north. These boundaries are reinforced by mature tree planting, which help screen views, define character within the site and ensure that there is no sprawl into the open countryside. As such, the former Pickfield Nursery site represents a natural and logical extension to the existing settlement boundary.

Although within the Green Belt, the former Pickfield Nursery site comprises predominantly previously developed land. From the 1960s up until the 1980s, the site was used as a commercial plant nursery. Its operations declined during the 1980s, and in October 1987, a number of glasshouses were destroyed in 'the great storm' and all commercial activity on the site ceased shortly afterwards.

Today, approximately 3 hectares of the site still consists of hard-standing and foundations associated with the former glasshouses. It is now overgrown and extensively covered with broken glass and rubble, representing a safety hazard and a visual blight on the landscape.

The high cost of remediating the site makes any form of future commercial horticultural use unviable. The former nursery represents a logical housing site between an area of established residential character and Cobbin's Brook to the north. Permanent existing boundaries mean that residential development of the site will not lead to sprawl into the wider, open Green Belt. Pickfield Nursery has good links to existing transport networks and infrastructure, and has provisions for access in place. Its redevelopment will significantly enhance the existing environment, improve local access and pedestrian linkage to the countryside, create new public open space (including a brook-side sensory garden for the adjacent care home) and provide ecological enhancements to Cobbin's Brook.

Pickfield Nursery was submitted to EFDC in response to the Call for Sites consultation in 2008 and has subsequently been promoted through the current Local Plan process since its inception in 2012. EFDC's July 2012 SLAA referred to Pickfield Nursery as site SR-0161 but incorrectly identified it as a duplicate site with a much larger parcel (SLAA Reference SR-0020). A time of events is shown in Figure 1 below.

Representations were then submitted in October 2012 highlighting this mistake. However, despite the submission of detailed representations and subsequent regular liaison with EFDC's officers (including a positive formal pre-application meeting in 2013), EFDC's Site Selection evidence base published in 2016 discounted Pickfield Nursery prior to Stage 1 of the selection process, once again incorrectly considering it as a duplicate site.

Pickfield Nursery was finally acknowledged as an individual site in the Local Plan evidence base in the "Sites for consideration following Regulation 18 consultation" list published in July 2017. However, despite Crest Nicholson's promotion of the site through the Local Plan process since its inception in 2012, EFDC's long awaited three-paragraph assessment of the (Site Selection Report, March 2018, site SR-0161-N) is contrary to the advice from statutory consultees and their own Development Control and Landscape officers. These are referred to in previous representations.

These are not considered to be any sound grounds for the site's omission from allocation in the Local Plan. Crest Nicholson's proposals are supported by statutory consultees and local stakeholders including the adjacent Care Home, and have been informed by positive pre-application advice.

Figure 1

Date	Details of Site Promotion / Consideration
October 2008	Pickfield Nursery Submitted in response to EFDC's Call for Sites process.
July 2012	The July 2012 SHLAA referred to Pickfield Nursery as site SR-0161 but incorrectly identified it as a duplicate site with a much larger parcel of land (SR-0020).
October 2012	Representations submitted to EFDC's Issues and Options Consultation, highlighting the mistake in the 2012 SHLAA.
November 2013	Positive pre-application meeting with EFDC officers during which it was made clear that the site was being promoted separately to the wider site at Paternoster Hill
February 2014	Another positive pre-application meeting with officers took place. Formal feedback provided by EFDC officers reflecting positive discussions at pre-application meeting.
December 2016	Detailed representations submitted to the Draft Local Plan, including supporting evidence.
July 2017	Pickfield Nursery finally acknowledged as an individual site in the Local Plan evidence base in the "Sites for consideration following Regulation 18 consultation" list published in July 2017.
January 2018	Detailed representations submitted to the Submission Local Plan consultation.
March 2018	Pickfield Nursery assessed in the Site Selection Report. The assessment is contrary to the advice from statutory consultees and EFDC's landscape and development control officers.
April 2018	Representations made in respect of the March 2018 Site Selection Report addressing the issues set out in the site assessment, including on matters of Green Belt, landscape impact, ecology and flooding with supporting evidence.

Appendix 3

05 The Site

Site Photographs



Unused equipment associated with former glasshouses



Severely overgrown and structurally unsound glasshouse



18

General industrial debris accumulated on-site due to neglect



View across the site of Demolished glasshouses - poor quality character

The Site
Site Photographs

05



Poor quality landscape character created by remaining glasshouse structure



General debris accumulated on-site due to neglect, affecting amenity of existing dwellings on Pick Hill



General debris and dilapidated structure of former ancillary building



General industrial debris accumulated on-site due to neglect

Appendix 4

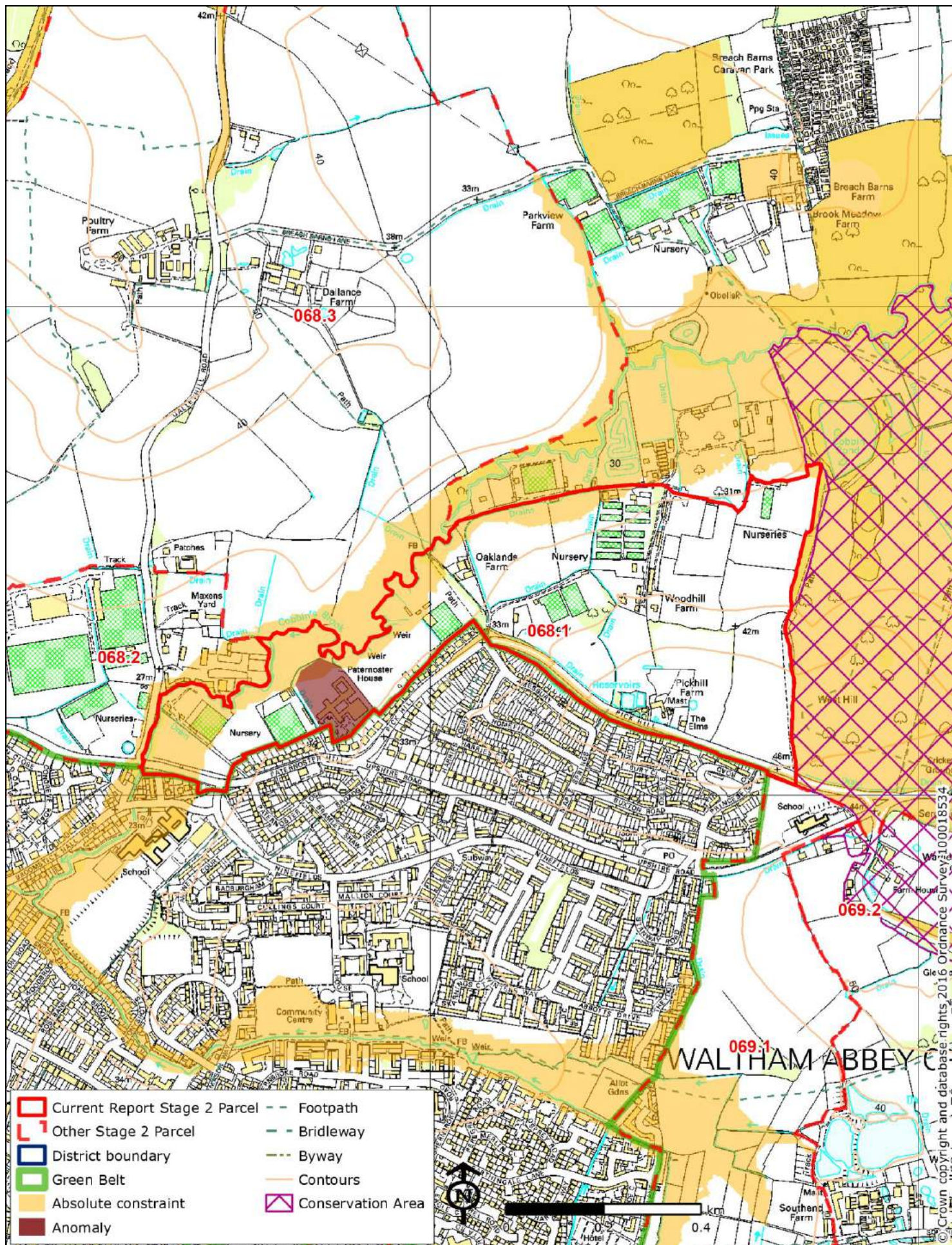
Settlement: **Waltham Abbey****Settlement Type:** **Town****Stage 1 Assessment****Parcel** DSR 068 - North of Waltham Abbey**Parcel Size (Ha)** - 747.51**Summary of Assessment - Parcel's Contribution to the Purposes of Green Belt**

1st Green Belt Purpose	No Contribution	0
2nd Green Belt Purpose	Weak	1
3rd Green Belt Purpose	Strong	5
4th Green Belt Purpose	Weak	1
Total		7

1. Check the unrestricted sprawl of large built-up areas	No Contribution - 0
<p>(1) The parcel does not act, in itself, as an effective barrier against sprawl from large built-up areas outside of the study area.</p> <p>(2) Although the parcel adjoins DSR-061 at the western boundary, which borders Cheshunt, DSR068 is not within the 'primary' network of parcels preventing sprawl from Cheshunt. There are number of constraints that provide strong defensible barriers located to the west of DSR061 that are unlikely to be breached (see DSR061 appraisal).</p> <p>(3) The parcel is not in close proximity to Cheshunt or the other large built-up areas.</p>	
2. Prevent neighbouring towns from merging into one another	Weak - 1
<p>(4) The parcel adjoins the north of Waltham Abbey and provides and forms part of a gap (together with DSR061 and DSR067) between Waltham Abbey and Lower Nazeing.</p> <p>(5) Marsh Hill and Waltham Road provide strong defensible boundaries to the north, as does the Galleyhill Wood combined with Deerpark Wood. Parklands and Pick Hill provide a strong boundary to the south, with the exception of Paternoster Hill where the boarder follows rear gardens of the town Waltham Abbey.</p> <p>(6) The distance of the gap between Waltham Abbey and Lower Nazeing is 4.2 km.</p> <p>(7) There are small areas of existing ribbon development throughout the parcel, but mostly concentrated on Crooked Mile, Claverhambury Road, Holyfield Road and Pick Hill.</p> <p>(8) The parcel is largely undeveloped, and the overall perception of the area along the B194 is open countryside.</p> <p>(9) Given the significant distance between the towns it is unlikely that a reduction in the gap would compromise the separation of towns in physical terms.</p> <p>(10) A reduction in the gap is unlikely to compromise the separation of towns and the overall openness of the parcel visually</p>	
3. Assist in safeguarding the countryside from encroachment	Strong - 5
<p>(11) The Green Belt designation in this parcel protects in the countryside as the parcel consists largely of fields used for agricultural purposes. Most of the fields that adjoin Waltham Abbey at the southern boundary of the parcel are designated glasshouse areas and a small part of the north western edge is within the Lea Valley Regional Park. There are two areas of ancient woodland (Galleyhill wood and Deerpark wood) at the north western and north eastern boundaries. Between the two ancient woodlands, there is a relatively large area of deciduous woodland (Galleyhill Green, The Springs and Broadgate Springs). Towards the western boundary the deciduous woodlands (Homefield Wood and Kennel Wood) follow to the edges of fields. Within the areas of woodland are three LoWS (Ep16, Ep25 and Ep48). There are areas of unprotected woodland, at the northern boundary and towards the south- eastern boundary, adjoining Breach Barns Caravan Park.</p> <p>(12) The parcel encompasses a gently undulating landform, with relatively prominent ridges and slopes around Aimes Green to the north of Waltham Abbey, which provide open views to the edge of Waltham Abbey urban area to the south. The Green Belt designation in this land is considered to make a major contribution in safeguarding the countryside from encroachment.</p> <p>(13) The parcel has been encroached by approx. 0.28% (2.05 hectares) at the northern edge of Waltham Abbey.</p>	
4. To preserve the special character of historic towns	Weak - 1
<p>(1) The parcel adjoins the historic town Waltham Abbey. Waltham Abbey was been extended significantly to the north and east, as a result of the growth of industrialisation within the town.</p> <p>(2) Because DSR-068 abuts development that occurred during 20th century, there is weak relationship between the Green Belt land in this parcel and the setting of the historic core of Waltham Abbey and/ or any heritage assets.</p> <p>(3) Given that the parcel does not have a physical or visual relationship with the historic core of Waltham Abbey, the open character of the Green Belt land in this parcel does not contribute positively to the significance of the town and/or heritage assets within the town.</p> <p>(4) Given that the parcel does not have a physical or visual relationship with the historic core of Waltham Abbe, the consequent loss of openness from the urbanising development on the land within parcel DSR-068 is unlikely to cause harm to the setting and significance of the historic town and heritage assets within the town.</p>	

Settlement: **Waltham Abbey**Settlement Type: **Town**

Stage 2 Assessment



Settlement: **Waltham Abbey**Settlement Type: **Town****Stage 2 Assessment****Parcel** 068.1**Parcel Size (Ha)** - 43.39**Summary of Assessment - Parcel's Contribution to the Purposes of Green Belt**

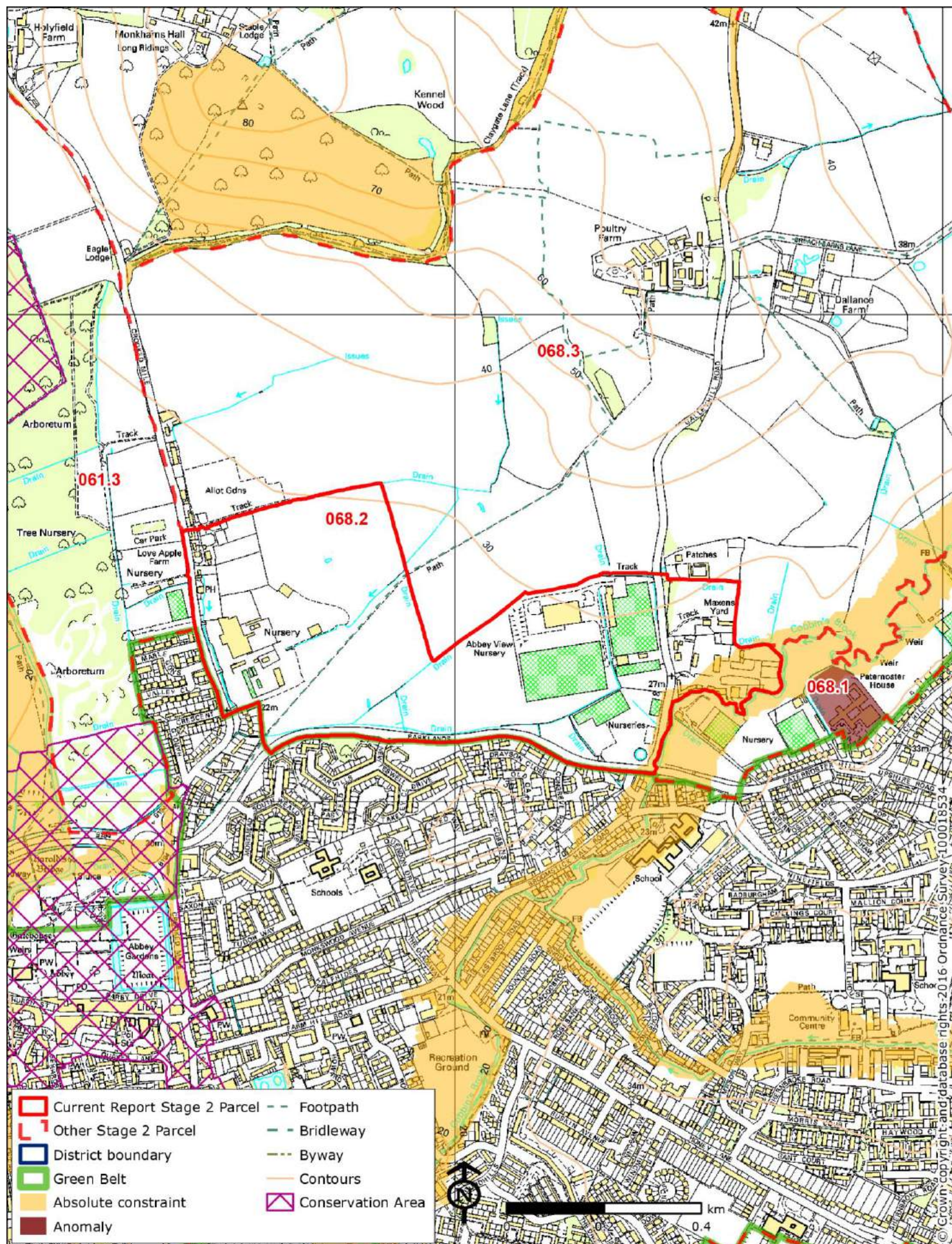
1st Green Belt Purpose	No Contribution
2nd Green Belt Purpose	Weak
3rd Green Belt Purpose	Strong
4th Green Belt Purpose	Weak
5th Green Belt Purpose	Not Assessed

Summary of AssessmentResultant harm to the Green Belt purposes if parcel released from the Green Belt: **Very High**

Purpose 1. Check the unrestricted sprawl of large built-up areas	No Contribution
(Large built-up areas are: London, Harlow, Cheshunt and Hodddesdon)	
The parcel is remote from a large built-up area (London, Harlow, Cheshunt and Hodddesdon) and therefore contributes little to this purpose.	
Purpose 2. Prevent neighbouring towns from merging	Weak
(Towns are: London, Harlow, Cheshunt, Hodddesdon, Epping, Waltham Abbey, Loughton / Debden, Chigwell, Buckhurst Hill, Chipping Ongar, North Weald Bassett, Theydon Bois, Roydon and Lower Nazeing)	
The parcel is located adjacent to the northern edge of Waltham Abbey. It is located within the gap between Waltham Abbey and Lower Nazeing which is approx. 4.5km in this area. There is no relationship between the two towns due to intervening topography (e.g. Galley Hill). Other land such as Cobbins Brook would prevent merging of the two towns. It is likely that development could be accommodated within the parcel without causing merging or perception of merging of the two towns.	
The parcel also lies indirectly between Waltham Abbey and Cheshunt, to the west (2.8km distant in this location). The parcel is not important in maintaining separation between them. The parcel is located indirectly between Waltham Abbey and Epping (4.4km gap in this location) and it is not important in separating the settlements.	
Purpose 3. Assist in safeguarding the countryside from encroachment	Strong
Existing development within the parcel includes Pick Hill Farm and glasshouses, which are spread across the parcel area. These are located so as to be associated with the countryside rather than the settlement of Waltham Abbey and therefore are not considered to represent encroachment. The Green Belt designation therefore provides a constraint to further development. The existing Green Belt boundary to the urban area is strongly defined by woodland and the ridgeline which falls away to the north, away from the urban area. Cobbins Brook does form a strong outer boundary to the north of the parcel, however, the parcel is more strongly related to the countryside (due to the topography) and therefore development within the parcel is likely to be visible in the wider countryside and be perceived as encroachment.	
Purpose 4. To preserve the setting and special character of historic towns	Weak
(Historic towns are: Chipping Ongar, Waltham Abbey, Epping and Sawbridgeworth)	
The parcel lies adjacent to the historic town of Waltham Abbey, approximately 1km of the Waltham Abbey Conservation Area, and 1.5km of the Royal Gunpowder Factory Conservation Area - both to the west of the parcel, at the opposite side of the town. The parcel is approximately 1.5km from the edge of the Historic Urban Area as identified in the Essex Historic Towns – Supplementary Planning Guidance (1999). It is therefore physically and visually separated from the Historic Urban Area by extensive (largely 20th century) development within the town. It is unlikely that the openness of the parcel contributes positively to the setting of the historic town. Consequently it is unlikely that development within the parcel would cause harm to the setting and significance of the historic town of Waltham Abbey.	
Purpose 5. To assist in urban regeneration, by encouraging the recycling of derelict and other urban land	Not Assessed
Not assessed at individual parcel level, as explained in Methodology section of report.	
Consideration of alternative parcel boundaries	
The woodland to the east of the Paternoster Care Home could potentially form an alternative parcel boundary, which would create a small sub-parcel in the western section of the parcel. This area includes the care home and glasshouses and open fields but also includes an area within the floodplain constraint. Development within this sub-parcel could potentially be accommodated with limited harm to the Green Belt purposes.	
Potential anomalies identified for consideration by EFDC	
The Paternoster Care Home is a developed area adjoined to the existing settlement and appears to continue the pattern of development north of Paternoster Hill. The highlighted area does not retain a distinction between settlement and countryside, and the built form does not maintain openness. This area can therefore be considered a potential anomaly.	

Settlement: **Waltham Abbey**Settlement Type: **Town**

Stage 2 Assessment



Settlement: **Waltham Abbey**Settlement Type: **Town****Stage 2 Assessment**

Parcel 068.2

Parcel Size (Ha) - 40.68

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

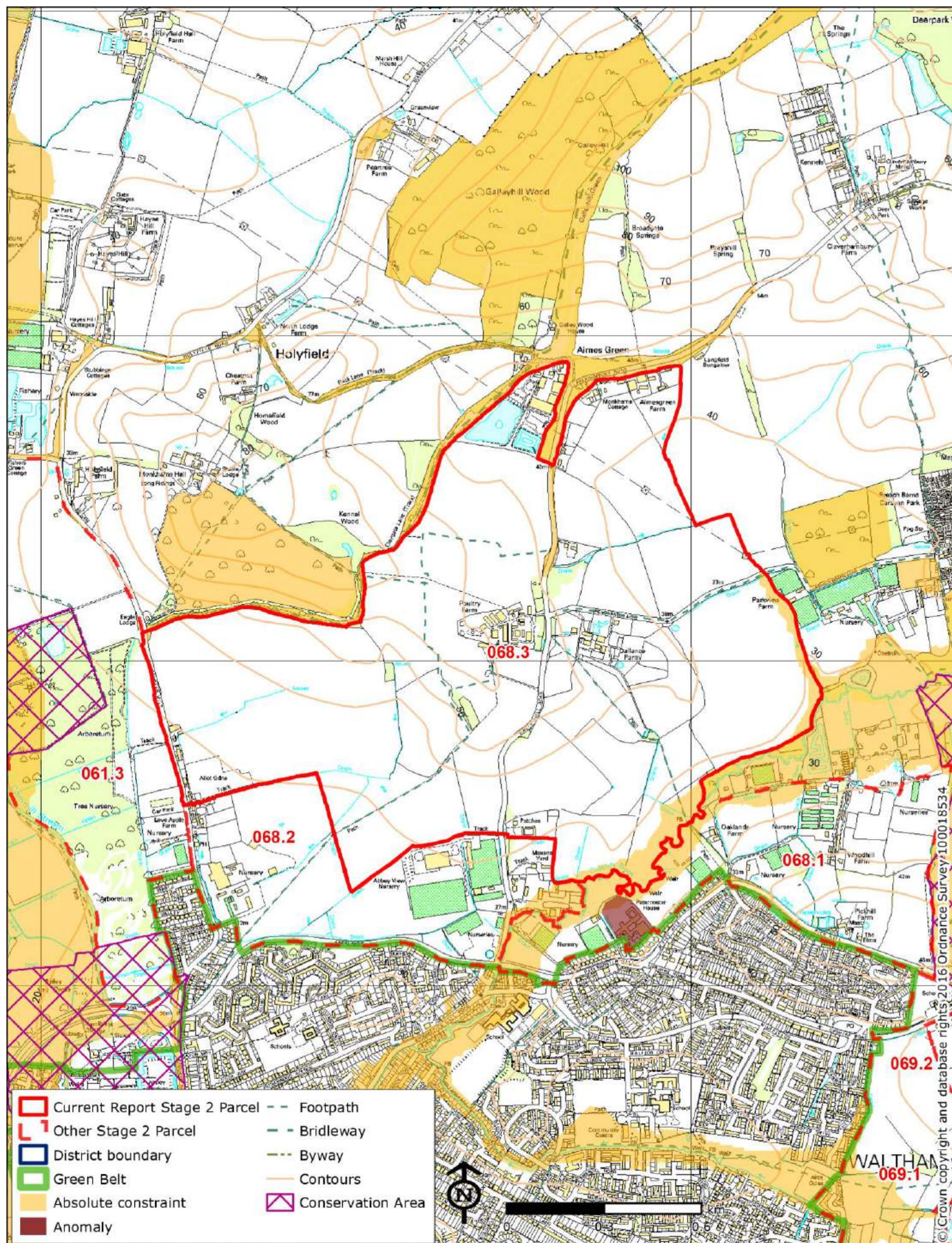
1st Green Belt Purpose	No Contribution
2nd Green Belt Purpose	Weak
3rd Green Belt Purpose	Relatively Strong
4th Green Belt Purpose	Weak
5th Green Belt Purpose	Not Assessed

Summary of AssessmentResultant harm to the Green Belt purposes if parcel released from the Green Belt: **High**

Purpose 1. Check the unrestricted sprawl of large built-up areas	No Contribution
(Large built-up areas are: London, Harlow, Cheshunt and Hodddesdon)	
The parcel is remote from a large built-up area (London, Harlow, Cheshunt and Hodddesdon) and therefore contributes little to this purpose. It does adjoin parcel 061.3 at the western boundary which borders Cheshunt but is not within a primary network of parcels preventing sprawl from Cheshunt, as concluded in the Stage One assessment of parcel DSR 068.	
Purpose 2. Prevent neighbouring towns from merging	Weak
(Towns are: London, Harlow, Cheshunt, Hodddesdon, Epping, Waltham Abbey, Loughton / Debden, Chigwell, Buckhurst Hill, Chipping Ongar, North Weald Bassett, Theydon Bois, Roydon and Lower Nazeing)	
The parcel is located adjacent to the northern edge of Waltham Abbey. It is located within the gap between Waltham Abbey and Lower Nazeing, which is approximately 4.5km in this area. There is no direct relationship between the two towns due to intervening topography (e.g. Galley Hill) and woodland (e.g. Galleyhill Wood and Kennel Wood). This other area of landscape would prevent merging of the two towns. It is likely that development could be accommodated within the parcel without causing merging or perception of merging of the two towns.	
The parcel also lies indirectly between Waltham Abbey and Cheshunt, to the west. Development within the parcel may lead to a very small reduction in the perception of a gap between the two towns although intervening land (including strong barriers of the Lea Valley Regional Park, lakes, river, railway line and parcel 061.3) to the west of the parcel would continue to maintain the separation between the towns.	
Purpose 3. Assist in safeguarding the countryside from encroachment	Relatively Strong
The parcel contains some development including nurseries and glasshouses (these are considered "not inappropriate" uses in the Green Belt in the NPPF and are located so as to be associated with the countryside rather than the settlement of Waltham Abbey, therefore are not considered to represent encroachment), and ribbon development along the B194 in the west of the parcel which could be considered to represent encroachment to a small degree. The existing Green Belt boundary (to the south) is strongly defined by Parklands which makes a clear distinction between town and countryside. The outer parcel boundary to the north is relatively weakly defined by low hedgerow field boundaries.	
Purpose 4. To preserve the setting and special character of historic towns	Weak
(Historic towns are: Chipping Ongar, Waltham Abbey, Epping and Sawbridgeworth)	
The parcel lies adjacent to the historic town of Waltham Abbey, approximately 200m from the Waltham Abbey Conservation Area, and 450m from the Royal Gunpowder Factory Conservation Area - both to the west of the parcel. The parcel is approximately 390m from the edge of the Historic Urban Area as identified in the Essex Historic Towns – Supplementary Planning Guidance (1999).	
The area in which the parcel is located is not mentioned within the Supplementary Planning Guidance as being important to the setting of the historic town. It is considered that the historically significant areas are more closely associated with the landscape to the west of the town. The parcel lies the other side (east) of more recent (20th century) development (e.g. Harold Crescent) thereby reducing the relationship between the historic core and the parcel. It is therefore unlikely that the openness of the parcel contributes positively to the setting of the historic town and consequently it is unlikely that development within the parcel would cause harm to the setting and significance of the historic town of Waltham Abbey.	
Purpose 5. To assist in urban regeneration, by encouraging the recycling of derelict and other urban land	Not Assessed
Not assessed at individual parcel level, as explained in Methodology section of report.	
Consideration of alternative parcel boundaries	
No reasonable alternative boundaries which would significantly alter the assessment have been identified.	
Potential anomalies identified for consideration by EFDC	
None identified.	

Settlement: **Waltham Abbey**Settlement Type: **Town**

Stage 2 Assessment



Settlement: **Waltham Abbey**Settlement Type: **Town****Stage 2 Assessment****Parcel** 068.3**Parcel Size (Ha)** - 189.63**Summary of Assessment - Parcel's Contribution to the Purposes of Green Belt**

1st Green Belt Purpose	No Contribution
2nd Green Belt Purpose	Weak
3rd Green Belt Purpose	Strong
4th Green Belt Purpose	Weak
5th Green Belt Purpose	Not Assessed

Summary of AssessmentResultant harm to the Green Belt purposes if parcel released from the Green Belt: **Very High**

Purpose 1. Check the unrestricted sprawl of large built-up areas	No Contribution
(Large built-up areas are: London, Harlow, Cheshunt and Hodddesdon)	
The parcel is remote from a large built-up area (London, Harlow, Cheshunt and Hodddesdon) and therefore contributes little to this purpose. It does adjoin parcel 061.3 at the western boundary which borders Cheshunt but is not within a primary network of parcels preventing sprawl from Cheshunt, as concluded in the Stage One assessment of parcel DSR 068.	
Purpose 2. Prevent neighbouring towns from merging	Weak
(Towns are: London, Harlow, Cheshunt, Hodddesdon, Epping, Waltham Abbey, Loughton / Debden, Chigwell, Buckhurst Hill, Chipping Ongar, North Weald Bassett, Theydon Bois, Roydon and Lower Nazeing)	
The parcel is separated from the northern edge of Waltham Abbey by parcels 068.1 and 068.2. It is located within the gap between Waltham Abbey and Lower Nazeing, which is approximately 4.5km in this area. There is no relationship between the two towns due to intervening topography (e.g. Galley Hill) and woodland (e.g. Galleyhill Wood and Kennel Wood). This other land would prevent merging of the two towns. It is likely that development could be accommodated within the parcel without causing merging or perception of merging of the two towns.	
The parcel also lies indirectly between Waltham Abbey and Cheshunt, to the west. Development within the parcel may lead to reduction in the perception of a gap between the two towns to a small degree, although intervening land (including strong barriers of the Lea Valley Regional Park, lakes, river and railway line) to the west of the parcel would continue to maintain the separation between the towns.	
Purpose 3. Assist in safeguarding the countryside from encroachment	Strong
There is limited existing development within the parcel which currently consists predominantly of agricultural fields crossed by a number of public rights of way. Existing development includes farmsteads/ equestrian facilities in the centre of the parcel (Breaches Farm and Dallance House) and Aimesgreen Farm in the north of the parcel. There is also a small amount of ribbon development and allotments along the B194 at the western edge of the parcel. There is very limited intrusion from development and a strong rural countryside character as a result of the strongly undulating topography which continues outside the parcel to the north and into the wider Green Belt. The prominent ridgeline in the northern half of the parcel provides open views across the countryside and to the edge of Waltham Abbey urban area to the south. The Green Belt designation in this parcel is considered to make a major contribution to safeguarding the countryside from encroachment. If developed, it is considered that this would lead to clear encroachment into the countryside.	
Purpose 4. To preserve the setting and special character of historic towns	Weak
(Historic towns are: Chipping Ongar, Waltham Abbey, Epping and Sawbridgeworth)	
The parcel is separated from the northern edge of the historic town of Waltham Abbey by parcels 068.1 and 068.2. It lies approximately 400m from the Waltham Abbey Conservation Area, and 170m from the Royal Gunpowder Factory Conservation Area - both to the west of the parcel. The parcel is approximately 700m from the edge of the Historic Urban Area as identified in the Essex Historic Towns – Supplementary Planning Guidance (1999).	
The area in which the parcel is located is not mentioned within the Supplementary Planning Guidance as being important to the setting of the historic town. It is considered that the historically significant areas are more closely associated with the landscape to the west of the town. The parcel lies to east of more recent (20th century) development (e.g. Harold Crescent) which separates it from the Abbey area, thereby reducing the relationship between the historic core and the parcel. There may be some visual relationship with the Gunpowder area from higher ground within the parcel. It is, however, unlikely that the openness of the parcel contributes positively to the setting of the historic town and consequently it is unlikely that development within the parcel would cause harm to the setting and significance of the historic town of Waltham Abbey.	

Settlement: **Waltham Abbey**Settlement Type: **Town****Stage 2 Assessment****Purpose 5. To assist in urban regeneration, by encouraging the recycling of derelict and other urban land****Not Assessed**

Not assessed at individual parcel level, as explained in Methodology section of report.

Consideration of alternative parcel boundaries

No reasonable alternative boundaries which would significantly alter the assessment have been identified.

Potential anomalies identified for consideration by EFDC

None identified.

Appendix 5

Green Belt Function	Savills Comments
To check the unrestricted sprawl of large built-up areas	The site is modest in size and is bound by permanent physical features in all directions. It comprises an enclosed, small-scale extension to the settlement. Defensible boundaries are created by Cobbin's Brook and its floodplain to the north-west, Pick Hill to the south, Paternoster House Care Centre to the south-west and a mature tree belt to the north-east. These features would limit the extent of development at the site and prevent development from spreading further in any direction. For this reason development of the site would not result in the unrestricted sprawl of the built up area so would not contravene purpose 1 of the Green Belt.
To prevent neighbouring towns from merging into one another	The site lies on the northern edge of Waltham Abbey which is physically separated from other towns by a vast expanse of Green Belt. Development of the site would not affect the separation gap between Waltham Abbey and other towns within the District so would not compromise purpose 2 of the Green Belt.
To assist in safeguarding the countryside from encroachment	The development of the site would be a natural extension to the existing built up area of Waltham Abbey. The context of the site is "urbanised" by the presence of residential development to the east (i.e. the Knolly's Nursery site). The potential to reinforce the screening of new development with vegetation along the site's north-west boundary, will help conserve the character of the wider countryside and reinforce a new edge to the Green Belt.
To preserve the setting and special character of historic towns	Waltham Abbey is a historic town but the site is some distance from the Conservation Areas and Historic Urban Area. The land parcel in its current form is unlikely to make a positive contribution to the setting of the historic town and is visually separated by existing development within the settlement. Therefore the site has limited relevance to purpose 4 of the Green Belt.
To assist in urban regeneration by encouraging the recycling of derelict and other urban land	The development of this site would not affect the potential of EFDC to facilitate urban regeneration through the recycling of derelict or other urban land elsewhere in the District. There is insufficient land within the existing built up areas of the District to meet housing requirements. As such Green Belt releases are necessary and the site is arguably more sustainable than other options because it was previously developed.