



Epping Forest Local Plan

Examination Hearing Statement

Appendices

Matter 15 – Places and Sites

Prepared by Strutt & Parker on behalf of Croudace Homes (Stakeholder ID 19LAD0025)

April 2019

**Appendix A – Supplementary Representations on Epping Forest District Local Plan
Submission Document (Regulation 19) – Response to additional Site Assessment work**

**Appendix B – Landscape and Green Belt Assessment (September 2016) prepared by
David Jarvis Associates**



Supplementary Representations on Epping Forest District Local Plan Submission Document (Regulation 19) – Response to additional Site Assessment work

On behalf of Croudace Homes

Land east of Epping Road, Roydon

April 2018



1. Background

- 1.1 These representations are made in response to Epping Forest District Council's (EFDC) invitation, undated but received via email on 26 March 2018, to supplement the representations that were made in response to consultation on the Epping Forest Local Plan Submission Version (2017) (Regulation 19) (LPSV) on behalf of Croudace Homes, and in respect of land east of Epping Road, Roydon.
- 1.2 The invitation to supplement representations follows the publication of Appendices B and C to the Site Selection Report 2017. These appendices include *inter alia* an assessment of the suitability, achievability and availability of potential sites for development; and provide the Council's justification for the rejection or selection of sites for allocation in the LPSV. Furthermore, the Sustainability Appraisal / Strategic Environmental Assessment (SA/SEA) published alongside the LPSV makes references to the Site Selection Report, in respect of the approach taken to selecting sites for residential allocation. As such, the Site Selection Report – including key appendices in which the justification for the rejection / selection of sites is set out and confirmed – is critical to the issue of the Local Plan's soundness and its legal compliance.
- 1.3 On 14 December 2017, EFDC agreed publication of the LPSV for a six-week consultation period, followed by submission of the Local Plan to the Secretary of State. The LPSV was published for pre-submission consultation for six-weeks over the 2017 Christmas period, with consultation closing on 29 January 2018.
- 1.4 Representations were made to this consultation on behalf of Croudace Homes, and in respect of land east of Epping Road, Roydon. As explained within these representations, but restated here for completeness, land was divided into two: Area A to the west; Area B to the east. As noted in the January 2018 representations, for the purposes of consideration by EFDC, Area A and Area B combined were assessed as site SR-0306; separately, Area A was assessed by itself as site SR-0890.
- 1.5 These supplementary representations should be read in conjuncture with the representations originally made in January 2018 in response to the Regulation 19 consultation. These supplementary representations focus solely on the Site Selection Report 2017, the publication of additional appendices to this since the close of the pre-submission consultation, and their relevance to the Local Plan.

2. The Site Selection Report and decision-making in respect of the Local Plan

- 2.1. EFDC's Local Plan was approved for public consultation and subsequent submission to the Secretary of State at an Extraordinary Meeting of Council on 14 December 2017.
- 2.2. The precise date of the finalisation and publication of the complete Site Assessment Report (including appendices) is not known, but what is clear is that it was not available at the time

this decision was taken, nor at any point during the Regulation 19 consultation (18 December 2017 – 29 January 2018). It is notable that there are a number of plans within the Site Assessment Report Appendix B which are dated March 2018. The first we were made aware of the publication of the Site Assessment Report in full was via email from EFDC dated 26 March 2018.

- 2.3. We expressed concerns as to the absence of the Site Selection Report in full for the duration of the pre-submission consultation period within our Regulation 19 representations.
- 2.4. The Site Selection Report clearly plays an important role in the plan-making process, specifically in respect of decisions as to whether to allocate or to reject potential sites for allocation for development. The importance of the Site Selection Report to the Local Plan process becomes acutely apparent upon review of Appendix B, which comprises a series of documents which assess the suitability, availability and achievability of sites through an iterative process; and through which sites which fail to meet certain criteria are rejected, whereas others are ultimately progressed and – subject to the findings of the Site Selection Report – may ultimately be proposed for allocation.
- 2.5. In addition, it is noted that Appendix B attempts to fulfil the important role of explaining the justification as to why certain sites are rejected and others are proposed for allocation. Not only does this form an important element of seeking to demonstrate the soundness of the Local Plan, it is particularly pertinent given that the SA/SEA published alongside did not, unlike many SA/SEAs at this juncture, include a detailed comparative assessment of potential sites, nor did it set out the justification for the selection or rejection of sites.
- 2.6. In relation to the SA/SEA, we raised concerns in our original January 2018 representations, questioning how EFDC's Local Plan met the requirement of the Environmental Assessment of Plans and Programmes Regulations (2004) for SA/SEAs to set out the reasons for the selection of preferred options, and the rejection of alternatives.
- 2.7. As noted in our January 2018 representations, references to the Site Selection Report (in the future tense) are made in the SA/SEA. The SA/SEA also makes reference to the role of the Site Selection Report (specifically the 2017 iteration) in decision-making process.
- 2.8. As per our January 2018 representations, we consider that the absence of key elements of the Site Selection Report 2017, together with the absence of anything within the supporting evidence base which made clear the reason for the rejection of sites such as land east of Epping Road, Roydon represents a substantial concern in respect of the plan's legal compliance. However, and again as we sought to stress in our January 2018 representations, such flaws can be addressed – as confirmed through *Cogent Land LLP v Rochford District Council* [2012] defects in the SA/SEA can be cured at later stages.
- 2.9. Whilst we welcome EFDC's acknowledgment that action is required, and attempts to cure defects in the Local Plan process to date, we nevertheless still have reservations that the invitation to pre-submission consultation respondents to supplement their representations

may not be sufficient to ensure the Local Plan is sound and legally compliant. Our remaining concerns can be summarised as follows:

- The decision by the Council to both publish the LPSV for pre-submission *and* subsequently submit the Local Plan to the Secretary of State appears to have been taken in the absence of a complete version of the Site Selection Report, with elements unavailable at that time including the detailed assessment of sites, and the justification for their rejection or selection. It is unclear how key information within Appendix B of the Site Selection Report could have been considered and used by decision-makers to inform their decision to agree the LPSV and its submission.
- The status of the invitation to supplement representations made on the LPSV, and the scope of those who have been invited to comment is unclear. It is not clear, for example whether only those who responded to the original consultation on the LPSV have been invited to comment again at this juncture (as could be inferred from the letter that was issued). Such an approach could of course potentially exclude those who may have an interest in the future development of the District, but may have chosen not to respond to the original consultation in the absence of assessment of site and an explanation as to why sites had been selected / rejected.
- Linked to both of the above points, we remain concerned as to whether the SA/SEA is legally compliant given the lack of information contained within it explaining the assessment of sites, why options had been selected / rejected, and its reference to what was – at the time the SA/SEA was published – an incomplete Site Selection Report. We are not aware of the SA/SEA having been updated to reflect the completed Site Selection Report, nor does the invitation to supplement comments on the LPSV appear to include invitation to comment on the SA/SEA.

2.10. We are of the view that the above issues can be addressed, and a sound and legally compliant Local Plan for Epping Forest District can still be prepared. However, we would urge the Council to seek to take action to resolve the above. This may require, for example, the LPSV to be reconsidered by decision-makers in light of the information now available to Members in the complete Site Selection Report.

3. Site Selection Report and land east of Epping Road, Roydon

3.1. Two different configurations of land east of Epping Road, Roydon have been assessed by EFDC as part of the plan-making process. The first, SR-0306, is 14.05 ha and comprises the larger of the two configurations and incorporates Area A and Area B as shown in **Appendix 1** to this submission.

3.2. The western portion of this site, immediately to the east of the village and measuring 6.33 ha, has been assessed separately as site SR-0890.

- 3.3. Both sites were also assessed through the previous iteration of the Site Selection Report (the 2016 version), which supported the Epping Forest District Draft Local Plan 2016 (DLP), published by the Council for consultation at the Regulation 18 stage in 2016.
- 3.4. The Site Selection Report 2016 rejected site SR-0306 at Stage 2 of the site assessment process. The reason given for this was that the site was set out in Appendix B1.1 of the 2016 report, and was that the site was considered to be part of a strategic option which was “judged to be a less favourable growth direction”; and “would be most sensitive in Green Belt terms, risking the coalescence of Roydon and Harlow”.
- 3.5. The Site Selection Report 2016 concluded that part of site SR-0890 was suitable, available and achievable for development. The Site Selection Report 2016 started by considering the indicative baseline position of 247 dwellings for this site, which was then reduced to a net capacity of 15 dwellings, with the assessment stating that development should be limited to the land fronting Epping Road.
- 3.6. Detailed representations were made by Strutt and Parker on behalf of Croudace Homes on the DLP during the formal consultation period. These included a review of the Site Selection Report 2016’s assessment of sites SR-0306 and SR-0890.
- 3.7. A copy of the representation made at the Regulation 18 consultation stage is provided again for completeness as **Appendix 2** to this representation. A Landscape and Green Belt Assessment was prepared for the sites and submitted alongside these representations. For completeness, this is provided again as **Appendix 3** to this representation.
- 3.8. In summary, the points made in respect of the Site Selection Report 2016’s approach to sites SR-0306 and SR-0890 through our consultation response to the DLP were as follows:
- It was unclear what was meant by “less favourable growth location”. Whilst it is recognised that the site is not within a proposed strategic growth location for Harlow (Policy SP3) this clearly does not make it necessarily unsuitable as a housing location for Roydon.
 - Roydon is a sustainable, suitable location for additional homes, and one which national policy encourages a proportion of housing growth to be directed towards.
 - Whilst the proposal to restrict growth in Roydon to 40 additional homes may have been informed by the Community Choices exercise undertaken in 2012 (though it is far from clear from the published information that this is purported to justify the proposed limit of 40 homes) it must be recognised that this exercise was undertaken in very different circumstances to those which the Local Plan must now address. Such changes in circumstances include the need to deliver a much greater number of new homes to meet need.
 - The EFDC Green Belt Stage 1 Review considered various, large parcels of land and provided a broad scale assessment of the District’s existing Green Belt, but only at a scale

- that would not allow for a field-by-field assessment of sites' contributions to the Green Belt.
- A site-specific Landscape and Green Belt Assessment was prepared and submitted as Appendix 2 to the consultation response, which robustly demonstrated that development of site SR-0306 would not risk coalescence of Roydon and Harlow. The Landscape and Green Belt Assessment concluded that site SR-0306 (Areas A and B combined) and the western part of this site which the Council has separately considered as site SR-0890 (Area A) make a weak contribution to the purposes of including land in the Green Belt.
 - The detailed Landscape and Green Belt Assessment identified that, having regard to landscape impacts and the strategic purposes of the Green Belt, areas Area A and B have net development areas of 4 ha and 3 ha, respectively, i.e. 7 ha of site SR-0306 is suitable for development from this perspective.
 - A landscape led development strategy – informed by the findings of the Landscape and Green Belt Assessment – was submitted alongside the representations. This identified that SR-0306 could suitably accommodate 180 dwellings; and that SR-0890 alone could suitably accommodate 120 dwellings.
- 3.9. The representations provided a detailed and evidence-led argument that the rejection of site SR-0306 as a residential allocation was unjustified; as was the proposal to only allocate a small proportion of SR-0890 for 15 dwellings.
- 3.10. We would have expected the representations made to the Regulation 18 stage consultation to have fed into and be considered ahead of the preparation of the LPSV and the accompanying evidence base, including the update to the Site Selection Report.
- 3.11. Appendix B1.2.3 of the Site Selection Report 2017 (one of the appendices published in March 2018) purports to summarise representations received and explain how the site assessment work has been updated to account for these. However, it provides little detail as to how comments have been addressed.
- 3.12. Representations made by Strutt and Parker on behalf of Croudace Homes in respect of SR-0306 and SR-0890 (Stakeholder ID 4840) are summarised within Appendix B1.2.3 as follows:
- “Representation submitted by the site promoter commenting on the assessment of the site, including the indicative capacity assessment”
- 3.13. The stated update made to the site assessment work in response to comments submitted was as follows:
- “The assessment of the site was reviewed in light of the comments made. The assessment of the site is included in the appendices to the Report on Site Selection 2017”.

- 3.14. The Overview of Assessment of Residential Sites in the Site Selection Report 2017 (Appendix B1.1) provide greater detail in respect of the stated justification for rejecting site SR-0306 than the 2016 iteration, stating:

“This site did not proceed for further testing at Stage 3 as it is ranked lower in the land preference hierarchy which, based on the Council's Local Plan Strategy, as set out in the Site Selection Methodology, states the order in which sites should be identified for allocation. The site was less preferable because it is greenfield land not adjacent to a settlement and there are a sufficient number of sites within the settlement that are ranked more favourably.

“This site was re-considered as part of Stage 6.3 in 2017 since it was identified as potentially being able to contribute to the Council's five year housing land supply. Although the site could potentially contribute to the five year housing land supply, it was considered that this benefit did not override the constraints identified, including landscape sensitivity and harm to the Green Belt, and therefore the site did not proceed any further.”

- 3.15. In respect of the first paragraph of the purported justification for the rejection of the site, further detail is provided to the 2016 assessment description of the site as being in a “less preferable location”.

- 3.16. However, the reason why the site is less preferable, as confirmed within Appendix B1.1 of the 2018 assessment, is that firstly it is a “greenfield land not adjacent to a settlement”. This is simply factually incorrect. Whilst SR-0306 is a greenfield site (as per a number of sites that are proposed to be allocated) it *is* adjacent to the existing settlement of Roydon. Indeed, its relationship with the settlement boundary is as per site SR-0890: a site against which the Site Selection Report 2017 raises no concerns in terms of its relationship with the existing settlement boundary (correctly so, given that it too adjoins it); and part of which (an element adjoining the existing settlement) is proposed to be allocated.

- 3.17. The second part of the justification as to why the site is considered less preferable is that there are “sufficient number of sites within the settlement that are ranked more favourably”.

- 3.18. There are two observations we wish to make in respect of the reasons given for the site's rejection:

1. The site has been judged to be less favourable than others within the settlement based on the erroneous assertion that it is not adjacent to the settlement; and
2. The assessment does not suggest that the site is unsuitable per se, and is only of relevance if there sufficient deliverable sites are proposed to be allocated which will meet objectively assessed housing needs in full, including the unmet needs of neighbouring areas, in a manner that ensures there will be a consistent five-year

housing land supply throughout the plan period, and with sufficient flexibility to respond to rapid change. As per our original representations at the Regulation 19 stage, this is not the case in respect of the LPSV.

- 3.19. The second paragraph of the justification for rejecting the site confirms that the site could potentially contribute to five-year housing land supply, but states that this benefit does not override landscape sensitivity and harm to the Green Belt. However, as noted earlier within this representation, a detailed Landscape and Green Belt Assessment has been prepared in respect of the site which confirms 7 ha of SR-0306 can be suitability developed from a landscape and Green Belt impact perspective. The Site Selection Report 2017 does not provide any evidence that the findings of the Landscape and Green Belt Assessment are incorrect, nor does it even refute its conclusions. Rather it appears to have simply ignored it.
- 3.20. Indeed, on review of the site suitability assessment for SR-0306, the scoring for the site in the Site Selection Report 2017 (Appendix B1.4.2) is identical to that in the Site Selection Report 2016 (again, Appendix 1.4.2). There is no evidence that the detailed information provided in response to consultation has been given due consideration.
- 3.21. In respect of site SR-0890, the LPSV proposes that only a small part of the site is allocated for residential, and that the site only has capacity to deliver 14 dwellings.
- 3.22. In terms of the purported justification for the limited allocation and the rejection of the majority of the site, the DLP (2016) – led by the conclusion of the Site Selection Report 2016 – set out such an approach for the iteration of the Regulation 18 iteration of the Local Plan. The Site Selection Report 2016 initially considered a capacity for the site of 60 dwellings (Stage 2 of the assessment, Appendix B 1.4.2). At Stage 3 of EFDC's 2016 site assessment process, an indicative baseline density of 39 dwellings per hectare was applied to the site, resulting in an indicative baseline yield of 247 dwellings. Such a figure has clearly not been derived from sitespecific matters or consideration of the site's characteristics, and an adjustment to this is clearly appropriate. However, the conclusion of the Stage 3 site assessment that the extent of the allocation should be limited to 6% of the site put forward, within the area to the west of the site, is not justified. On the contrary, the justification for the approach to SR-0890 set out within the Site Selection Report 2016 at Appendix B 1.1 where one would reasonably expect this approach to be explained simply stated: "Site is recommended for allocation".
- 3.23. In response to the Regulation 18 consultation on the DLP and accompanying Site Assessment 2016 – and as noted earlier within this representation – detailed representations were made, including in relation to SR-0890: its suitability and potential capacity having regard to sitespecific factors. As noted earlier, these included the results of Landscape and Green Belt assessment work, which evidenced the site's potential to accommodate 120 dwellings having regard to such factors.

- 3.24. However, as with SR-0306, it is far from clear how this information presented to the Council has been given proper consideration in respect of site SR-0890, the LPSV or the update to the Site Selection Report.
- 3.25. At Appendix B1.6.4 of the Site Selection Report 2017 an assessment of the potential capacity of the site is reported. This suggests an indicative net site capacity of 196 units. This is then reduced to 14 units, with the assessment stating that development should be limited to the property fronting Epping Road with a revised site area is 0.41 ha. No evidence is provided to justify this approach.
- 3.26. At Appendix B1.1 of the Site Selection Report 2017 (which sets out an overview of the assessment of sites), in a manner very similar to the Site Selection Report 2016, there is no reference to the majority of the site put forward being rejected. It simply states: "Site is proposed for allocation. The justification for the allocation can be found in Appendix B1.6.6".
- 3.27. Turning to Appendix B1.6.6 of the Site Selection Report 2017, this states that only an element of the site is proposed for allocation, and the capacity is only 14 dwellings. It confirms that the reasons (and the only reasons) why a large proportion of the site put forward has been rejected are:
- Potential for harm to the landscape character across the eastern part of the site; and □ Access constraints.
- 3.28. In respect of landscape impact, as set out earlier within this representation, and as provided as part of previous submissions, a detailed and site-specific Landscape and Green Belt Assessment has been undertaken in respect of land east of Epping Road, Roydon. This identified a net area of 4ha within Area A of the assessment (i.e. SR-890) in which residential development could be suitably accommodated through a landscape-led approach.
- 3.29. As in the case of the assessment of SR-0306, the Site Selection Report 2017 provides no evidence to suggest the findings of the Landscape and Green Belt Assessment are incorrect, and does not challenge its conclusion. Again, it appears to simply ignore it.
- 3.30. A detailed, site specific assessment has informed the conclusion that 4ha of SR-890 are suitable for residential development from a landscape and Green Belt perspective. Conversely, the Site Selection Report 2017's view that only 0.41ha of the site can be developed without undue harm to landscape considerations is not supported by any such equivalent evidence. The view that only 0.41ha of site SR-0890 should be allocated is unjustified.
- 3.31. In respect of access constraints, an Access Appraisal was prepared and submitted to the Council at an earlier stage in the plan-making process. It is provided again here, for completeness, as **Appendix 4**. This confirms that suitable access to the site can be achieved for land east of Epping Road, Roydon. As confirmed in information provided to the Council in

response to its Developer / Landowner / Promoter Survey in 2016, a vehicular access point has been designed and agreed in principle with Essex County Council.

- 3.32. Having regard to the above, concerns in respect of access are very much misplaced. The limiting of the extent of the allocation on the basis of access concerns is unjustified.
- 3.33. On review of Appendix B of the Site Selection Report 2017, it is clear that the decision to reject SR-0306 and the majority of SR-0890 is unjustified. The sites are suitable, available and achievable for residential development. Detailed, robust evidence has been provided to the Council as part of the plan-making process to demonstrate this is the case. However, to date, this does not appear to have been properly considered.

4. Summary and Overview

- 4.1. Critical evidence which seeks to provide the justification for the selection or rejection of sites has, albeit belatedly, been published and it is acknowledged that those who responded to the consultation on the LPSV have been invited to supplement their representations. Nevertheless, we remain concerned that the action taken by the Council to seek to cure defects in the plan-making process is not yet sufficient to ensure a sound and legally compliant Local Plan (particularly in relation to decision-makers opportunity to consider key information, and in respect of the SA/SEA). There remains opportunity for such issues to be addressed, and we urge the Council to take action to ensure the Local Plan is sound and legally compliant.
- 4.2. On review of Appendix B of the Site Selection Report 2017, it is clear that evidence submitted to the Council in respect of the suitability of sites SR-0306 and SR-890 has not been given due consideration.
- 4.3. The rejection of the sites is not justified, and is not supported by any robust, site-specific evidence. In respect of some concerns raised on the suitability of the sites, the Site Selection Report 2017 is simply factually incorrect, e.g. the rejection of SR-0306 on the basis that it is not adjacent to the settlement, when in fact it is.
- 4.4. Conversely, robust, site-specific evidence has been provided to the Council which confirms that the sites are deliverable, achievable and available; and that concerns expressed in respect of the allocation of the sites are misplaced.
- 4.5. The rejection of the sites is particularly disconcerting as, as per our representation on the LPSV, the proposed new Local Plan does not currently allocate sufficient land for housing across the District, or for Roydon itself, to ensure the Local Plan is sound.
- 4.6. In order to ensure the Local Plan evidence base is robust, the Council is urged to revisit its assessment of sites SR-0306 and SR-0890 to ensure it is factually correct and that evidence submitted is given due consideration. Following necessary revisions to the Site Selection

Report 2017, the Local Plan will require updating to ensure that it is justified and can be sound.

**Appendix B – Landscape and Green Belt Assessment (September 2016) prepared by
David Jarvis Associates**

CROUDACE HOMES

LAND EAST OF EPPING ROAD, ROYDON

LANDSCAPE AND GREEN BELT ASSESSMENT

ISSUE : Tuesday, 06 September 2016

**David Jarvis Associates Limited
1 Tennyson Street
Swindon
Wiltshire
SN1 5DT
Tel: 01793 612173
Email: mail@davidjarvis.biz**

CLIENT Croudace Homes

PROJECT Land East of Epping Road, Roydon

REPORT TITLE Landscape and Green Belt Assessment

DJA REFERENCE: 2516-4-1-T1-S5-P2 Roydon Landscape and Green Belt Assessment
060916.docx

REPORT NUMBER: T1

REVISION: P2

ISSUE DATE: Tuesday, 06 September 2016

REPORT REVISIONS

Revision	Date	Description	Prepared	Approved
P1.1	260816	First draft	PG	PG
P1	010916	Issue	PG	PG
P2	060916	Minor amendments	PG	PG

CONTENTS:

1.	INTRODUCTION	4
	NAME AND QUALIFICATIONS	4
	SCOPE.....	4
2.	SITE DESCRIPTION AND CONTEXT	5
3.	LANDSCAPE CHARACTERISTICS OF THE SITE AND ITS CAPACITY TO ACCOMMODATE DEVELOPMENT .	6
4.	CONTRIBUTION OF THE SITE TOWARDS THE PURPOSES OF INCLUDING LAND IN THE GREEN BELT.....	7
	AREA A	7
	AREA B	7
	EFDC GREEN BELT REVIEW	8
5.	ASSESSMENT OF THE POTENTIAL OF THE SITE TO ACCOMMODATE DEVELOPMENT	9
6.	CONCLUSIONS.....	10

FIGURES:

- 0001. Site Location
- 0002. Landscape Designations
- 0003. Public Rights of Way
- 0004. Representative Viewpoint Location Plan
- 0005. Landscape Character Areas
- 0006. Landscape Context
- 0007. Landscape Strategy
- 0008. Photographic record VP 1 and 2
- 0009. Photographic record VP 3 and 4
- 00010. Photographic record VP 5
- 00011. Photographic record VP 6
- 00012. Photographic record VP 7
- 00013. Photographic record VP 8
- 00014. Photographic record VP 9
- 00015. Photographic record VP 10 and 11
- 00016. Photographic record VP 12

APPENDICES:

- 1. DSR 064 (Area Surrounding Roydon)
- 2. Epping Forest District Council Landscape Character Assessment - Area C6 Roydon
- 3. Extract from Epping Forest District Council Settlement Edge Landscape Sensitivity Study

1. INTRODUCTION

Name and Qualifications

- 1.1 This report has been prepared by Paul Gibbs DipLA DipUD Director of David Jarvis Associates Limited (DJA), landscape architects and town planners.

Scope

- 1.2 This review concerns land east of Epping Road, Roydon.
- 1.3 It has been prepared to support further submissions to the Council for the removal of the land in question from the Green Belt and for the land to be considered ahead of the next iteration of the Local Plan.

2. SITE DESCRIPTION AND CONTEXT

- 2.1 The site being promoted is divided into two for the purposes of its submission as part of the plan-making process, see Figure PR-0001. Area A shows the area which has been submitted to Epping Forest District Council as the client's original promotion. Area B shows a larger area which is also within the client's control and could also be made available for development. The entirety of the area comprising both Area A and Area B is submitted for consideration for allocation for residential development.
- 2.2 The site is located on the edge of the existing settlement, with existing residential development to the north and west. Both Area A and Area B are greenfield land in agricultural use, together measuring approximately 14ha. Refer to Figures PR-0002 to 0006.
- 2.3 Area A measures approximately 6.4ha and is bounded by a belt of trees to the north, south and east. The rear gardens of existing properties lie to the west. To the south is open countryside. The site itself is one large field falling gently west to east from approximately 75m AOD on the western boundary to approximately 60m on the eastern boundary.
- 2.4 Area B measures approximately 7.6ha and is bounded by a belt of trees and woodland to the north, west and east. The rear gardens of existing properties lie to the north. To the south is open countryside. The site itself comprises three fields falling gently north to south from approximately 60m AOD on the western boundary to approximately 50m on the south eastern boundary.
- 2.5 The site lies within the jurisdiction of Epping Forest District Council.
- 2.6 Three Public Rights of Way cross the site, see Figure PR-0003. There is a well-developed Public Rights of Way network of in the area surrounding the site.
- 2.7 The nearest Listed Buildings are the Grade II Listed Buildings at Bothways and Lightfoots, both on Epping Road to the west of the site, see Figure PR-0002.
- 2.8 The site is not the subject of any landscape quality designations. The site currently lies within the Green Belt.
- 2.9 A number of TPOs are in place in and around the site boundary, see Figure PR-0006.
- 2.10 The site is in the vicinity of Ordnance Survey grid reference 541100, 411000.

3. LANDSCAPE CHARACTERISTICS OF THE SITE AND ITS CAPACITY TO ACCOMMODATE DEVELOPMENT

3.1 Area A and B fall within the Epping Forest District Council Landscape Character Assessment¹ Area C6 Roydon, see Figure PR-0005. The key characteristics of the area are:

- *“Gently undulating fields of arable farmland plateau that overlook the valley of the River Stort to the north and River Lea to the west;*
- *Fields are lined with a network of mature hedgerows, often with hedgerow trees;*
- *Veteran trees are a feature of the area and contribute to historic landscape pattern;*
- *The large, nucleated village of Roydon is a key feature in the settlement pattern of the area.*

...This Landscape Character Area is dominated by the historic village of Roydon which is surrounded by a patchwork of predominantly arable fields. These fields are lined with a network of mature hedgerows and often contain mature veteran trees. As a result, there is a relatively strong sense of enclosure in proximity to the settlement.”

3.2 This Landscape Character Area is considered to have moderate to high sensitivity to change. This is predominantly associated with land the west of Roydon on the slopes of the Lea Valley. This land is more open than Areas A and B and sloping toward the rivers.

3.3 The Settlement Edge Landscape Sensitivity Study² does not identify the slopes within Areas A and B as being visually sensitive, see Figure 8.1 of Appendix 3. It identifies Areas A and B as falling within Landscape Setting Area 4, an expansive area that includes most of the land south of the village. Within this area there will be variation in the sensitivity of the landscape.

3.4 Around Areas A and B, the landscape’s sensitivity to development should be reduced to moderate as a consequence of the high level of enclosure, absence of any landscape constraints and limited longer distance views.

3.5 A photographic survey was carried out in July 2016 as part of this assessment, see Figure PR-0004 and PR-0008-0016. Views from within Areas A and B are limited, particularly from within Area A. Views from Public Rights of Way to the south are limited by existing vegetation and intervening landform to the extent that ground level views of Areas A and B on a Public Right of Way from the edges of Harlow are not available. The Brakes building on Flex Meadow on the edge of Harlow is visible in some views from within Areas A and B, for example VP 7.

¹ Epping Forest District Council Landscape Character Assessment January 2010

² Epping Forest District Council Settlement Edge Landscape Sensitivity Study January 2010

4. CONTRIBUTION OF THE SITE TOWARDS THE PURPOSES OF INCLUDING LAND IN THE GREEN BELT

4.1 This assessment considers the contribution made by the site as a whole, and by Areas A and B individually, to the purposes of including land in the Green Belt as set out at paragraph 80 of the NPPF, namely:

1. to check the unrestricted sprawl of large built-up areas;
2. to prevent neighbouring towns merging into one another;
3. to assist in safeguarding the countryside from encroachment;
4. to preserve the setting and special character of historic towns; and
5. to assist in urban regeneration, by encouraging the recycling of derelict and other urban land. This last purpose was not tested in the EFDC Green Belt Review³.

Area A

4.2 Roydon is not a large built up area. Harlow lies some 800m to the east along Harlow Road. Area A is a minimum of 850m from the western edge of Harlow and is well contained. It plays little part in controlling the growth of Harlow, and therefore makes a weak contribution in checking the unrestricted sprawl of large built-up areas.

4.3 Area A lies within the arc of two parts of the same settlement, namely the areas of development associated with Harlow Road and Epping Road. As both of these areas are part of the same settlement Site A plays no role in preventing neighbouring towns merging into one another.

4.4 Area A makes a moderate contribution in safeguarding the countryside from encroachment being visually well contained, containing no visually sensitive slopes and is in agricultural use with no encroachment. Area A is in agricultural use and is lined with a network of mature hedgerows, mature veteran trees and PRowS. The Roydon recreation ground and allotments lie immediately to the north. To the south and east of the village, including Area A, the topography is relatively level and the topography in this location prevents encroachment.

4.5 Roydon is not an historic town. Area A makes no contribution in preserving the setting and special character of historic towns.

4.6 Area A is not derelict and other urban land.

4.7 Overall Area A is assessed as having a weak contribution to the five purposes of the Green Belt.

Area B

4.8 Area B is a minimum of 580m from the western edge of from Harlow and fairly well contained. It plays little part in controlling the growth of Harlow, and therefore makes a relatively weak contribution in checking the unrestricted sprawl of large built-up areas.

³

Epping Forest District Council Stage 1 Green Belt Review 2015

- 4.9 Area B also lies within the arc of two parts of the same settlement, namely the areas of development associated with Harlow Road and Epping Road. As both of these areas are part of the same settlement Site B therefore plays no role in preventing neighbouring towns merging into one another.
- 4.10 Area B makes a moderate contribution in safeguarding the countryside from encroachment being fairly visually well contained, containing no visually sensitive slopes and is in agricultural use with no encroachment.
- 4.11 Roydon is not an historic town. Area B makes no contribution in preserving the setting and special character of historic towns.
- 4.12 Area B is not derelict and other urban land.
- 4.13 Overall Area B is assessed as having a relatively weak contribution to the five purposes of the Green Belt.

EFDC Green Belt Review

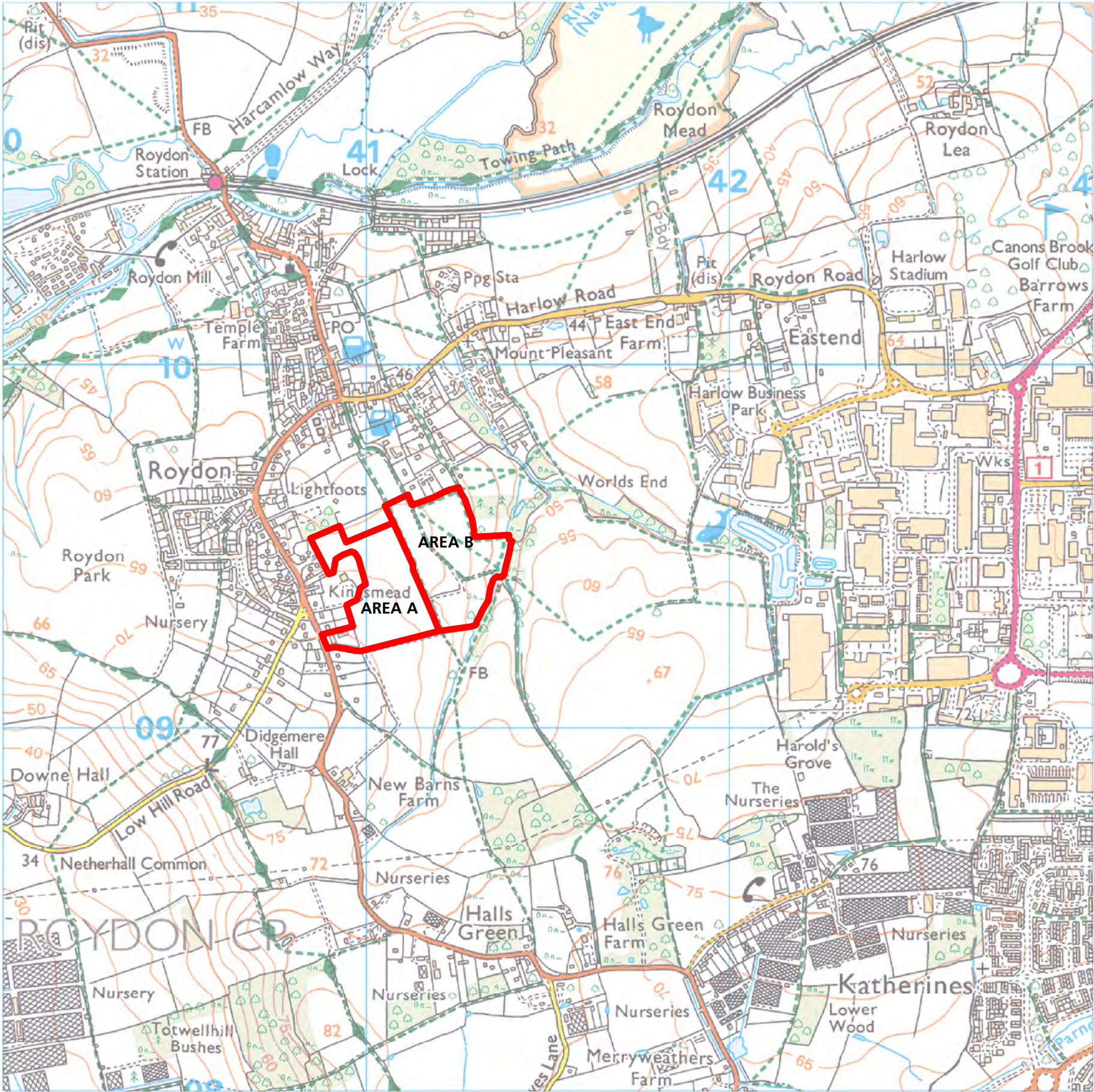
- 4.14 The Stage 1 Green Belt Review considered various parcels of land within the District, including DSR 064 (Area Surrounding Roydon) against four purposes of the Green Belt, see Appendix 1. The review found that land surrounding Roydon made a strong contribution to checking the unrestricted sprawl of large built-up areas; a relatively weak contribution to preventing neighbouring towns merging into one another; a relatively strong contribution to assisting in safeguarding the countryside from encroachment; and no contribution to preserving the setting and special character of historic towns.
- 4.15 Areas A and B fall with DSR-064. Area A is a single field, and Area B comprises three fields. The Stage 1 report subdivided the District into relatively large areas that would not be able to be tested at a field by field level of detail. On the basis that the scale of assessment of the Stage 1 report was much broader and did not consider individual fields, we do not contest the findings of the study. This study has however looked in more detail at the individual fields which comprise Areas A and B.
- 4.16 The overall findings of the Stage 1 review are not contested. The conclusions with regard to checking the unrestricted sprawl of large built-up areas relate more to the west of Roydon and the edges of Harlow. With respect to preventing neighbouring towns merging the review concluded that a reduction in the gap is unlikely to compromise the separation of towns in physical terms or compromise the separation of towns and the overall openness of the parcel visually. The area in which Areas A and B lie is relatively level. Therefore, it is unlikely that the topography in this location prevents encroachment.
- 4.17 The Stage 2 assessment should provide a finer level of detail, and should reflect findings of this assessment. It should conclude that both Sites A and B make a low contribution to purposes of including land in Green Belt.

5. ASSESSMENT OF THE POTENTIAL OF THE SITE TO ACCOMMODATE DEVELOPMENT

- 5.1 Figure PR-0006 identifies the landscape context for both Areas A and B.
- 5.2 Figure PR-0007 proposes a landscape lead strategy to accommodate development within Areas A and B, taking the landscape context into consideration. Areas of proposed development are shown in conjunction with open space and mitigation planting. A notional access arrangement is also shown.
- 5.3 The rationale behind this approach is to make the most efficient use of Area A, which is eminently suitable for development being generally flat and well screened. Area B should be less intensively developed, being the more sensitive of the two areas, and containing steeper land that is less suited to development. The development of Area A does not rely on Area B.
- 5.4 Area A has few landscape based constraints that restrict the scale and density of development within this area, and has the potential to accommodate development with little mitigation. Some reinforcement of the boundaries would be beneficial. Access is possible from Epping Road and there are no Rights of Way within the area. Area A could accommodate up to 4ha of net development, as shown on Figure PR-0007.
- 5.5 Area B cannot be developed without Area A as it has no means of access. Area B has a more limited potential to accommodate development given its less well contained position and presence of Rights of Way. Access would need to be through Area A with the more steeply sloping areas left undeveloped. It is proposed that the hedge and tree line marking one of the breaks in slope shown on Figure PR-0007 would be reinstated to help provide some screening of development on Area B from the wider landscape to the south whilst retaining the open more visible south facing sloping ground. The open spaces would also contain tree planting which would have a further screening effect.
- 5.6 With appropriate mitigation and reinforcement of boundaries Area B could accommodate up to 3ha of net development, as shown on Figure PR-0007. Area B should be developed at a lower density than Area A to reflect its slightly more prominent position and to sympathetically join to the existing development to the north.
- 5.7 The existing Green Belt boundary follows the line of rear gardens around this part of the village. This is compromised by the inclusion of the enclosed play area and pavilion. A new boundary for the Green Belt is shown on Figure PR-0007. The proposed new boundary for the Green Belt would follow established tree lines and field boundaries and could be drawn around the southern extent of the fields, forming a long-term, defensible Green Belt boundary. A defensible line does not currently exist through Area B. The proposed new boundary would rationalise the current situation.

6. CONCLUSIONS

- 6.1 Area A is assessed as making a weak contribution to the five purposes of the Green Belt and Area B is assessed as making a relatively weak contribution to the five purposes of the Green Belt.
- 6.2 Area A is well enclosed and not visually significant in the wider landscape. Area B is less well enclosed but is still of limited significance in the wider landscape.
- 6.3 Figure PR-0007 proposes a landscape led strategy to accommodate development within Areas A and B. A defensible Green Belt edge could be formed with the introduction of planting along the southern and south eastern boundaries.
- 6.4 Area A in isolation has the potential to accommodate development with little mitigation. Some reinforcement of the boundaries would be beneficial. Area A would realise up to 4ha of development.
- 6.5 Area B cannot be developed without Area A. Area B would require a higher degree of mitigation but could realise up to 4ha of development.
- 6.6 If developed together Areas A and B could realise up to 7ha of development within a new landscape structure provided by the mitigation strategy.



KEY

SITE BOUNDARY

Drawing Revision

Drawing Status

PLANNING

DAVID JARVIS ASSOCIATES

DAVID JARVIS ASSOCIATES LIMITED

1 Tennyson Street Swindon Wiltshire SN1 5DT

Tel: 01793 612173 Fax: 01793 613625

Email: mail@davidjarvis.biz

Client

CROUDACE HOMES

Project

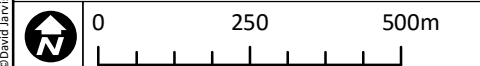
LAND EAST OF EPPING ROAD,
ROYDON

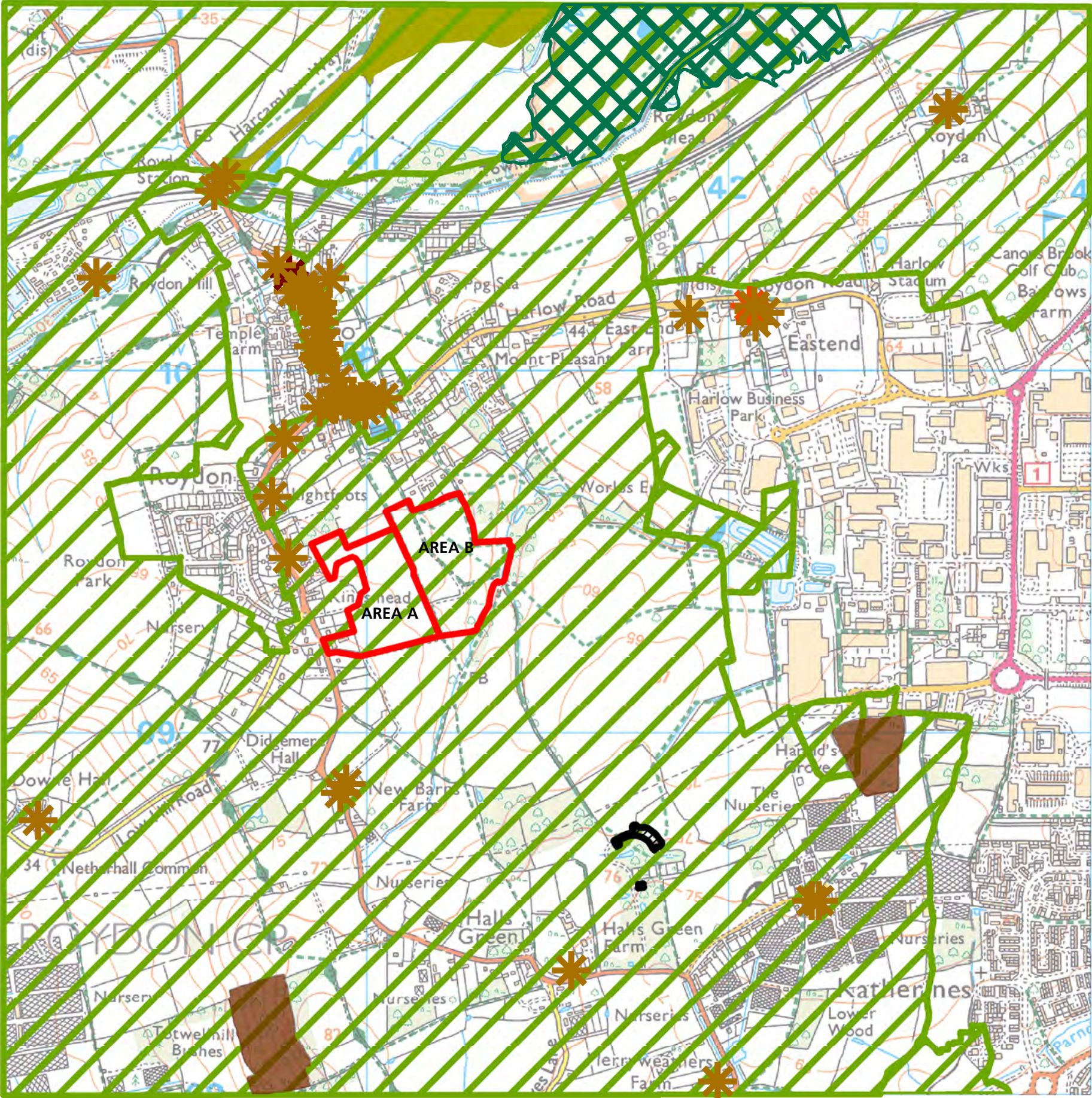
Drawing Title

SITE LOCATION

Scale	Sheet Size	Date
1:12500	A3	AUG 2016
Client Ref.	Drawing Ref.	Drawing No.
-	2516-4-1	PR-0001
		S5-P1

©David Jarvis Associates Ltd 2016





KEY

SITE BOUNDARY

HISTORIC DESIGNATIONS (HISTORIC ENGLAND)

LISTED BUILDING

GRADE I

GRADE II

GRADE II*

ECOLOGICAL DESIGNATIONS (NATURAL ENGLAND)

GREENBELT

SSSI (SITES OF SPECIAL SCIENTIFIC INTEREST)

ANCIENT WOODLAND

REGISTERED PARKS AND GARDENS

SCHEDULED ANCIENT MONUMENTS

Drawing Revision

Drawing Status

PLANNING

DAVID JARVIS ASSOCIATES

DAVID JARVIS ASSOCIATES LIMITED
1 Tennyson Street Swindon Wiltshire SN1 5DT
Tel: 01793 612173 Fax: 01793 613625
Email: mail@davidjarvis.biz

Client

CROUDACE HOMES

Project

LAND EAST OF EPPING ROAD,
ROYDON

Drawing Title

LANDSCAPE DESIGNATIONS

Scale

1:12500

Sheet Size

A3

Date

AUG 2016

Client Ref.

Drawing Ref.

Drawing No.

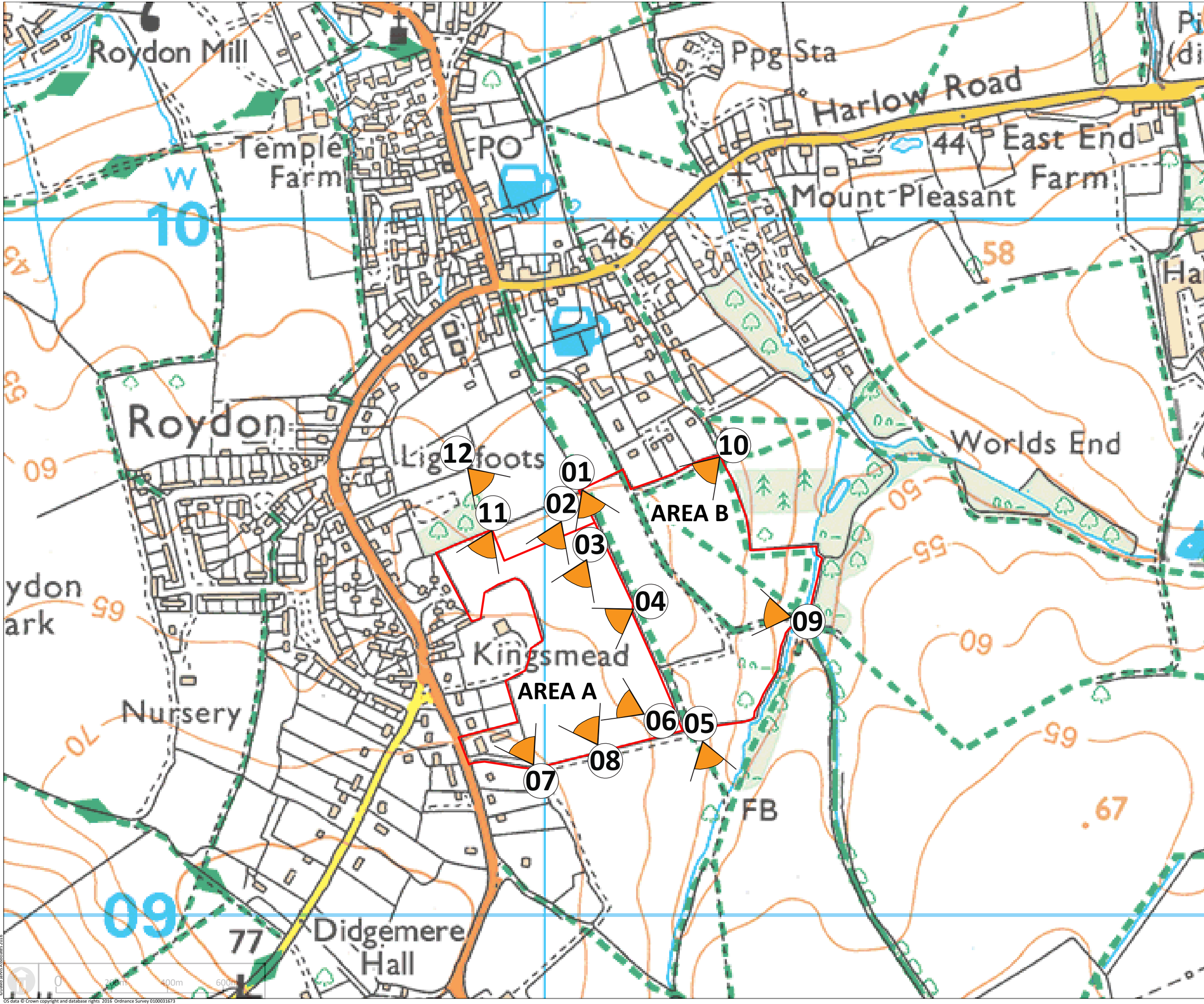
Status

-

2516-4-1

PR-0002

S5-P1



KEY

SITE BOUNDARY

01

REPRESENTATIVE VIEWPOINT
LOCATION AND REFERENCE

Notes

Drawing Status

PLANNING

Drawing Revision

Rev.	Date	Description	Drawn	Checked
P1	22/08/16	Final Issue	RK	PG

DAVID JARVIS ASSOCIATES

DAVID JARVIS ASSOCIATES LIMITED

1 Tennyson Street Swindon Wiltshire SN1 5DT

t: 01793 612173

e: mail@davidjarvis.biz

w: www.davidjarvis.biz

Client

CROUDACE HOMES

Project

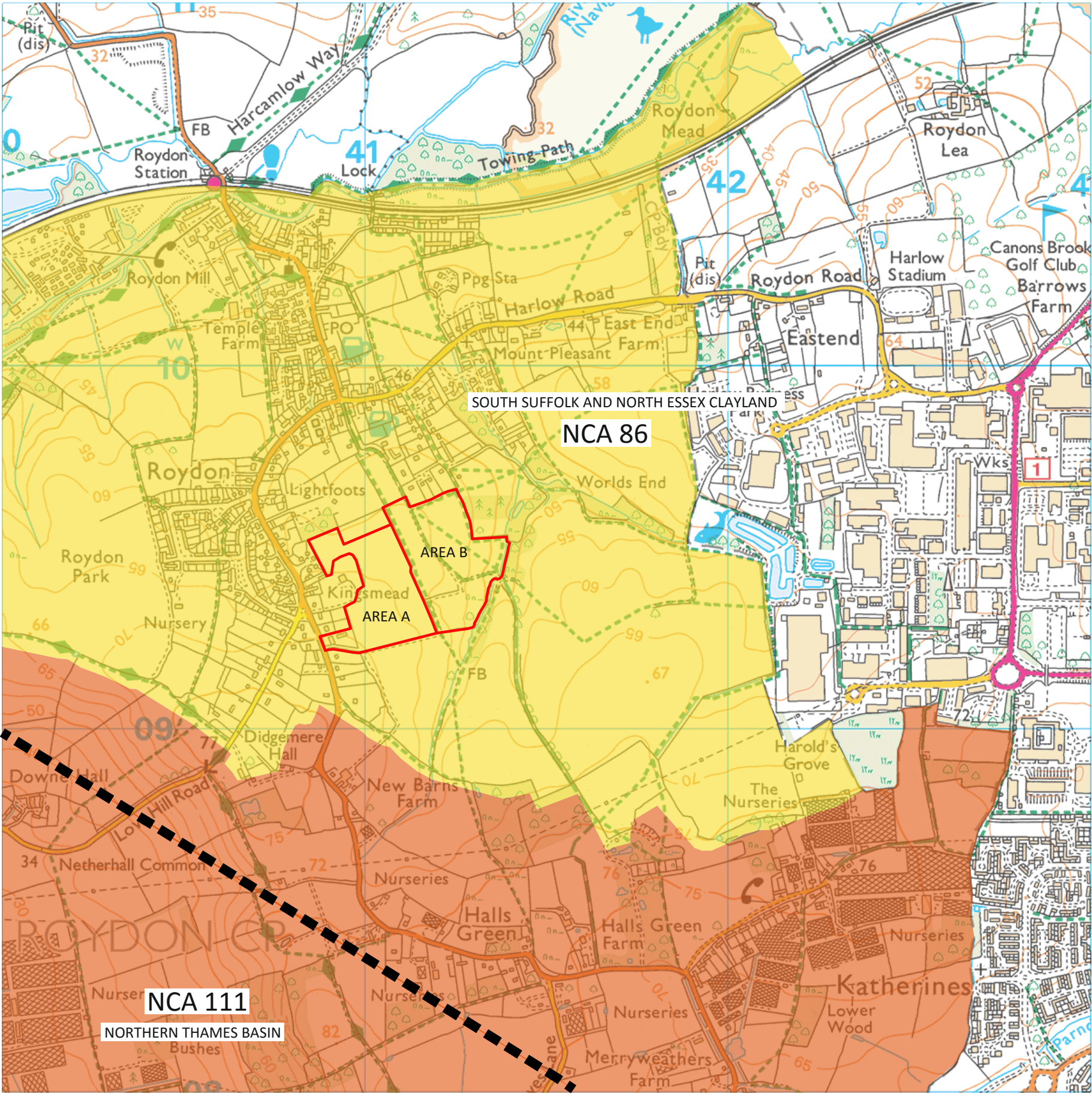
LAND EAST OF EPPING ROAD, ROYDON

Drawing Title

REPRESENTATIVE VIEWPOINT
LOCATION PLAN

Scale	Sheet Size	Date
1: 5000	A3	22/08/16

Client Ref.	Drawing Ref.	Drawing No.	Status
-	2516-4-1	PR-0004	S5-P1



KEY

SITE BOUNDARY

86

NCA 86 : SOUTH SUFFOLK AND NORTH ESSEX CLAYLAND

111

NCA 111 : NORTHERN THAMES BASIN

LANDSCAPE TYPES
(Farmland Plateau)

ROYDON

ROYDON HAMLET

Notes

Drawing Status

PLANNING

Drawing Revision					
Rev.	Date	Description	Drawn	Checked	
P1	23/08/16	Final Issue	RK	PG	

DAVID JARVIS ASSOCIATES

DAVID JARVIS ASSOCIATES LIMITED
1 Tennyson Street Swindon Wiltshire SN1 5DT
t: 01793 612173
e: mail@ davidjarvis.biz
w: www.davidjarvis.biz

Client

CROUDACE HOME

Project

LAND EAST OF EPPING, ROYDON

Drawing Title

LANDSCAPE CHARACTER AREAS

Scale		Sheet Size	Date	
1:12500		A3	23/08/16	
Client Ref.	Drawing Ref.	Drawing No.	Status	
-	2516-4-1	PR-0005	S5-P1	

0

200m

400m

600m

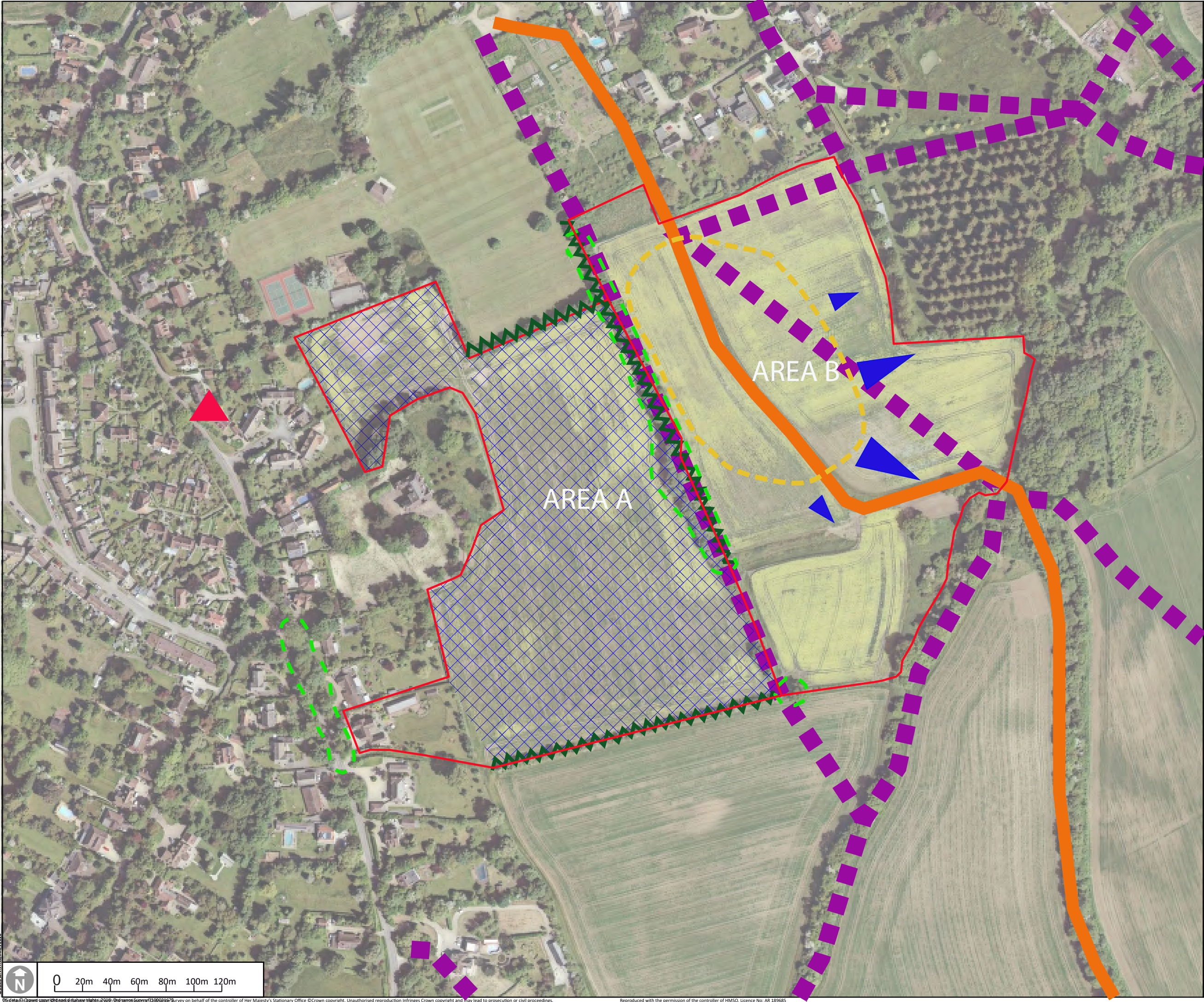
0

200m










400m

600m

05 data © Crown copyright and database rights 2016 Ordnance Survey 0100031673



KEY

-  SITE BOUNDARY
-  LISTED BUILDING
-  TREE PRESERVATION ORDER (TPO)
-  LESS VISUALLY WELL CONTAINED AREA
-  VISUALLY WELL CONTAINED AREA
-  STEEPER GROUND LESS SUITED TO DEVELOPMENT
-  STRONG TREE LINE
-  PUBLIC FOOTPATH
-  BRIDLEWAY

Notes

Drawing Status

PLANNING

Drawing Revision

Rev.	Date	Description	Drawn	Checked
P1	23/08/16	Final Issue	RK	PG
P2	06/09/16	Amendments to the Key	RK	PG

DAVID JARVIS ASSOCIATES

DAVID JARVIS ASSOCIATES LIMITED
1 Tennyson Street Swindon Wiltshire SN1 5DT
t: 01793 612173
e: mail@davidjarvis.biz
w: www.davidjarvis.biz

Client

CROUDACE HOMES

Project

LAND EAST OF EPPING, ROYDON

Drawing Title

LANDSCAPE CONTEXT

Scale	Sheet Size	Date
1:2500	A3	06/09/16
Client Ref.	Drawing Ref.	Drawing No.
-	2516-4-1	PR-0006
		Status
		S5-P2



KEY

- SITE BOUNDARY
- POTENTIAL DEVELOPMENT AREAS
- INDICATIVE ACCESS
- NEW/ENHANCED TREE LINES
- AREAS OF OPEN SPACE
- NEW GREEN BELT BOUNDARY

Notes

Drawing Status

PLANNING

Drawing Revision

Rev.	Date	Description	Drawn	Checked
P1	23/08/16	Final Issue	RK	PG

DAVID JARVIS ASSOCIATES

DAVID JARVIS ASSOCIATES LIMITED
1 Tennyson Street Swindon Wiltshire SN1 5DT
t: 01793 612173
e: mail@davidjarvis.biz
w: www.davidjarvis.biz

Client

CROUDACE HOMES

Project

LAND EAST OF EPPING, ROYDON

Drawing Title

LANDSCAPE STRATEGY

Scale	Sheet Size	Date
1:2500	A3	23/08/16

Client Ref.	Drawing Ref.	Drawing No.	Status
-	2516-4-1	PR-0007	S5-P1



Viewpoint 1



Viewpoint 2



Viewpoint 3



Viewpoint 4 (Continued Below)



Viewpoint 4

Drawing Revision			Client		Drawing Title		Status		Scale		Sheet Size	Date	DAVID JARVIS ASSOCIATES	
Rev	Date	Description	CROUDACE HOMES		VIEWPOINTS 3 AND 4		PLANNING		NTS		A3	AUGUST 2016		
P1	24/08/16	Final Issue	Project						Drawing No.			Revision	1 Tenmyon Street Swindon Wiltshire SN1 5DT	
			LAND EAST OF EPPING ROAD, ROYDON						2516-4-1-PR-0009			P1	Tel: 01793 612173 Fax: 01793 613625	
													Email: mail@davidjarvis.biz	



Viewpoint 5(Continued Below)



Viewpoint 5

©David Jarvis Associates

Drawing Revision		
Rev	Date	Description
P1	24/08/16	Final Issue

Client
CRoudACE HOMES
Project
LAND EAST OF EPPING ROAD, ROYDON

Drawing Title
VIEWPOINT 5

Status
PLANNING

Scale	Sheet Size	Date
NTS	A3	AUGUST 2016
Drawing No.		Revision
2516-4-1-PR-0010		P1

DAVID JARVIS ASSOCIATES

DAVID JARVIS ASSOCIATES LIMITED
1 Tennyson Street Swindon Wiltshire SN1 5DT
Tel: 01793 612173 Fax: 01793 613625
Email: mail@davidjarvis.biz



Viewpoint 6(Continued Below)



Viewpoint 6

©David Jarvis Associates

Drawing Revision		
Rev	Date	Description
P1	24/08/16	Final Issue

Client
CRoudACE HOMES
Project
LAND EAST OF EPPING ROAD, ROYDON

Drawing Title
VIEWPOINT 6

Status
PLANNING

Scale	Sheet Size	Date
NTS	A3	AUGUST 2016
Drawing No.		Revision
2516-4-1-PR-0011		P1

DAVID JARVIS ASSOCIATES

DAVID JARVIS ASSOCIATES LIMITED
1 Tenmyon Street Swindon Wiltshire SN1 5DT
Tel: 01793 612173 Fax: 01793 613625
Email: mail@davidjarvis.biz



Viewpoint 7(Continued Below)



Viewpoint 7

©David Jarvis Associates

Drawing Revision			Client
Rev	Date	Description	CROUDACE HOMES
P1	24/08/16	Final Issue	
			Project
			LAND EAST OF EPPING ROAD, ROYDON

Drawing Title	Status
VIEWPOINT 7	PLANNING

Scale	Sheet Size	Date
NTS	A3	AUGUST 2016
Drawing No.		Revision
2516-4-1-PR-0012		P1

DAVID JARVIS ASSOCIATES

DAVID JARVIS ASSOCIATES LIMITED

1 Tenmyson Street Swindon Wiltshire SN1 5DT
Tel: 01793 612173 Fax: 01793 613625
Email: mail@davidjarvis.biz



Viewpoint 8(Continued Below)



Viewpoint 8

Drawing Revision

Rev	Date	Description
P1	24/08/16	Final Issue

Client

CROUDACE HOMES

Drawing Title

VIEWPOINT 8

Status

PLANNING

Scale	Sheet Size	Date
NTS	A3	AUGUST 2016
Drawing No.		Revision
2516-4-1-PR-0013		P1

DAVID JARVIS ASSOCIATES

DAVID JARVIS ASSOCIATES LIMITED
1 Tenmyon Street Swindon Wiltshire SN1 5DT
Tel: 01793 612173 Fax: 01793 613625
Email: mail@davidjarvis.biz



Viewpoint 9(Continued Below)



Viewpoint 9

Drawing Revision		
Rev	Date	Description
P1	24/08/16	Final Issue

Client
CROUDACE HOMES
Project
LAND EAST OF EPPING ROAD, ROYDON

Drawing Title
VIEWPOINT 9

Status
PLANNING

Scale	Sheet Size	Date
NTS	A3	AUGUST 2016
Drawing No.		Revision
2516-4-1-PR-0014		P1

DAVID JARVIS ASSOCIATES

DAVID JARVIS ASSOCIATES LIMITED
1 Tennyson Street Swindon Wiltshire SN1 5DT
Tel: 01793 612173 Fax: 01793 613625
Email: mail@davidjarvis.biz



Viewpoint 10



Viewpoint 11(Continued Below)



Viewpoint 11

Drawing Revision		
Rev	Date	Description
P1	24/08/16	Final Issue

Client	
CROUDACE HOMES	

Project
LAND EAST OF EPPING ROAD, ROYDON

Drawing Title
VIEWPOINTS 10 AND 11

Status
PLANNING

Scale	Sheet Size	Date
NTS	A3	AUGUST 2016
Drawing No.		Revision
2516-4-1-PR-0015		P1

DAVID JARVIS ASSOCIATES

DAVID JARVIS ASSOCIATES LIMITED
1 Tenmyon Street Swindon Wiltshire SN1 5DT
Tel: 01793 612173 Fax: 01793 613625
Email: mail@davidjarvis.biz



Viewpoint 12(Continued Below)



Viewpoint 12

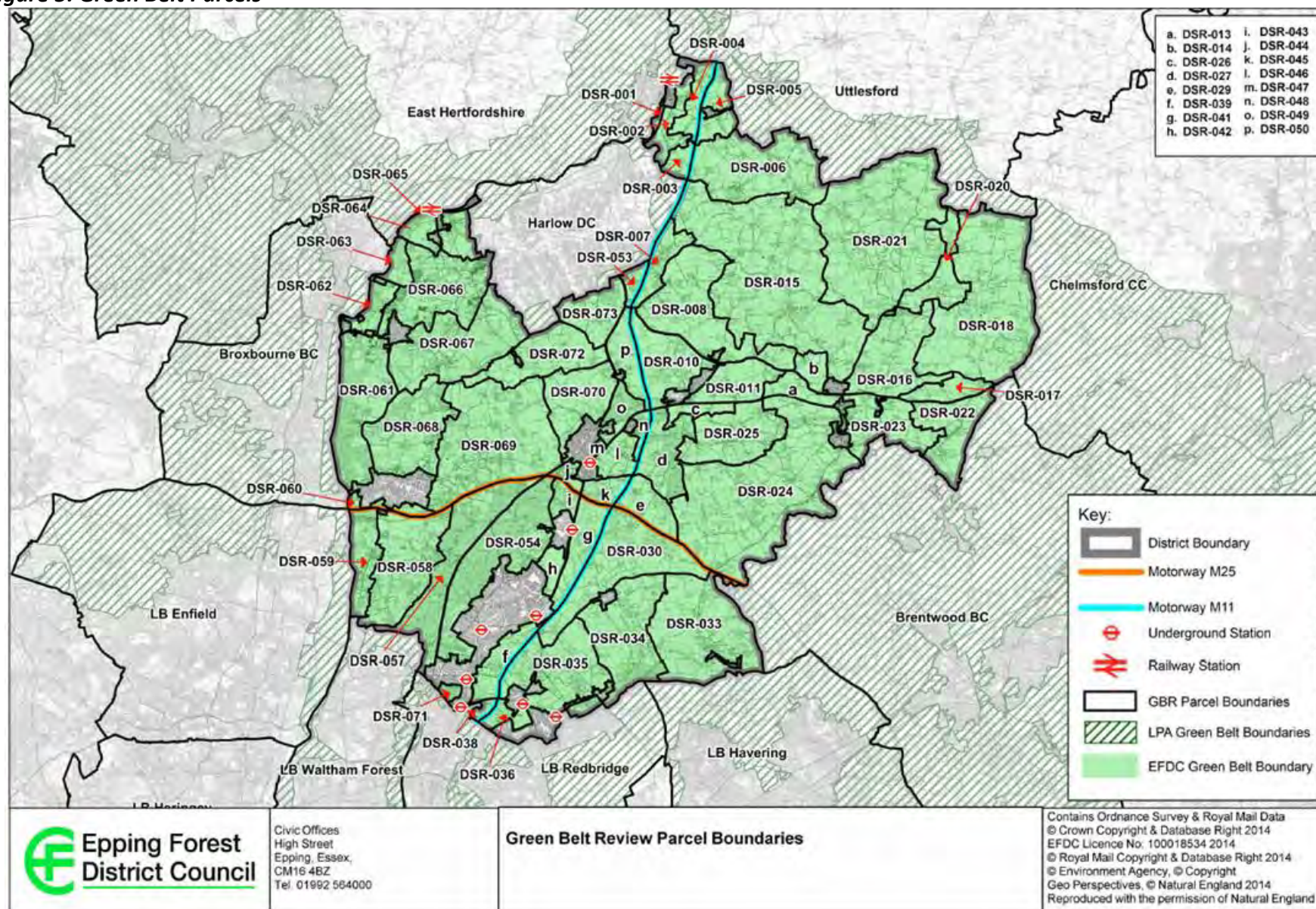
APPENDIX 1

DSR 064 (Area Surrounding Roydon)

Parcel DSR 064 – (Area Surrounding Roydon)		
Parcel Size: 310.20 hectares		
Summary of Assessment		
Parcel's Contribution to the Purposes of the Green Belt		
1st GB Purpose	Strong	5
2nd GB Purpose	Relatively Weak	2
3rd GB Purpose	Relatively Strong	4
4th GB Purpose	No Contribution	0
Total		11
1. Check the unrestricted sprawl of large built-up areas		Strong – 5
<p>(1) The parcel acts, in itself, as an effective barrier against sprawl from Harlow and Hoddesdon</p> <p>(2) The parcel contributes, as part of a wider network of parcels, to a strategic barrier against the sprawl of Harlow and Hoddesdon. The parcel adjoins DSR-063 and DSR-066 at the southern boundary and DSR-065 at the northern boundary.</p> <p>(3) The River Stort, Marina and railway line all act as strong defensible boundaries to the sprawl of Hoddesdon. There are no notable north-south boundaries acting as an effective barrier to sprawl. Harlow Road which runs east-west is the strongest boundary. The western edge of Harlow adjoins an open field.</p>		
2. Prevent neighbouring towns merging into one another		Relatively Weak – 2
<p>(4) The parcel forms part of a gap with DSR-066 between the towns of Roydon and Lower Nazeing.</p> <p>(5) The parcel provides defensible boundaries within the parcel to prevent neighbouring towns from merging. A mature hedgerow and trees line the southern boundary of the parcel south of Roydon creating a good defensible boundary.</p> <p>(6) The distance of the gap between Roydon and Lower Nazeing is 2.8 km.</p> <p>(7) There is some evidence of ribbon development at the southern edge of Roydon, along Epping Road (B181).</p> <p>(8) The visual perception of the gap along Epping Road (B181) is of open countryside.</p> <p>(9) A reduction in the gap is unlikely to compromise the separation of towns in physical terms.</p> <p>(10) A reduction in the gap would be unlikely to compromise the separation of towns and the overall openness of the parcel visually.</p>		
3. Assist in safeguarding the countryside from encroachment		Relatively Strong – 4
<p>(11) The Green Belt designation in this parcel protects the countryside. The western part of the parcel is within the Lea Valley Regional Park (LVRP), with the exception of a pocket of unprotected woodland at the south-western edge of the settlement Roydon. The river Stort flows along the north-western boundary within the LVRP and is used for recreational activities such as fishing. The fields are predominantly used for agricultural purposes that are lined with a network of mature hedgerows, mature veteran trees and PRoWs, with the exception of Roydon recreation ground and allotments to the south east and an enclosed field to the north east of Roydon. There are also two local wildlife sites located within the eastern part of the area, the Worlds End which is relatively central and the other at the lower edge.</p> <p>(12) The linear village Roydon runs north to south across the area. To the west of the village, the topography encompasses a hill which slopes downwards to the west towards the valley of the River Lee (the western slopes of this hill form the eastern valley sides). To the southeast of the</p>		

<p>village, the topography rises from the edge of the settlement to the top of two hills. These slopes are considered to be visually significant. Therefore the topography in this location does prevent encroachment.</p> <p>To the south and east of the village the topography is relatively level. Therefore it is unlikely that the topography in this location prevents encroachment.</p> <p>(13) The parcel has been encroached by approximately. 1 % (3.11 hectares) east of Roydon.</p>	
4. To preserve the special character of historic towns	No Contribution – 0
<p>(14) There are no historic towns within or adjacent to the parcel.</p> <p>(15) See Question 14 above.</p> <p>(16) See Question 14 above.</p> <p>(17) See Question 14 above.</p>	

Figure 5: Green Belt Parcels

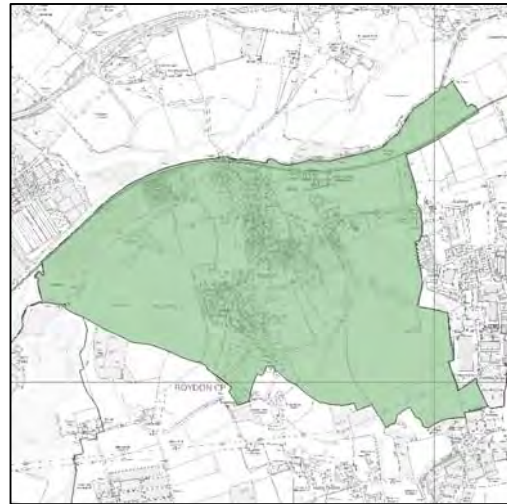


APPENDIX 2

Epping Forest District Council Landscape Character Assessment - Area C6 Roydon

C6: ROYDON

Location and Boundaries



3.4.32 Roydon Landscape Character Area is situated at the north of the District. To the south, this area abuts Roydon Hamlet Landscape Character Area (C7) and Rye Meads River Valley Floodplain (A1) Landscape Character Area. To the east this area abuts the western settlement edge of Harlow (outside the District).

Key Characteristics

- Gently undulating fields of arable farmland plateau that overlook the valley of the River Stort to the north and River Lea to the west;
- Fields are lined with a network of mature hedgerows, often with hedgerow trees;
- Veteran trees are a feature of the area and contribute to historic landscape pattern;
- The large, nucleated village of Roydon is a key feature in the settlement pattern of the area.

Overall Character

- 3.4.33 This Landscape Character Area is dominated by the historic village of Roydon which is surrounded by a patchwork of predominantly arable fields. These fields are lined with a network of mature hedgerows and often contain mature veteran trees. As a result, there is a relatively strong sense of enclosure in proximity to the settlement. At distance from the immediate environs of Roydon, arable fields are larger and a combination of open and framed views can be gained into the Stort Valley to the north and to the western edge of Harlow urban area. Sense of tranquillity is strong throughout most of the area.

Visual Character

- Views to Industrial Estates at the western edges of Harlow from the east of this area;
- Framed views into and along the meandering corridor of the River Stort, to the north of the area;
- Views to the edges of Roydon village from adjacent fields.

Historic Land Use

- 3.4.34 The historic character of this area is dominated by the settlement of Roydon, the historic heart of which is a Conservation Area and Roydon Park to the west. In the Domesday Book, Roydon was already a substantial village of at least 20 households at the centre of a manor of 720 acres, and the manor held Harlow as a less valuable outlier. Medieval Roydon contained four manor houses, one of which was granted to the Order of the Knights Templar, and Temple Farm on the High Street still carries the name of these crusaders. Roydon Hall, a second manor, was owned by Christ College Cambridge until it passed to the Tudor monarchs. Henry VIII presented his infant son and heir, Edward, to the villagers at Roydon Hall in 1538. Whilst Roydon Hall was demolished in 1864, the village still contains several buildings of historic interest, including the 13th century church and the area of domestic closes behind the High Street. Removal of hedgerows to the southeast of Roydon village was a result of 19th century enclosure of common land. A key historic lane within the village (Blind Lane) is lined with

veteran trees. In addition, several field edges have important stands of female native Black Poplar.

Ecological Features

- 3.4.35 Part of Hunsdon Mead SSSI is nationally designated for its unimproved grassland (it is also a registered common and one of the last remaining sites in Essex still to be managed on the ancient Lammas system of hay making). Hunsdon Mead is also designated as a County Wildlife Site, alongside four other sites of local nature conservation interest. Other key ecological features include hedgerows and veteran trees. Roydon Countrycare (a volunteer organisation) together with Epping Forest Countrycare has replaced significant lengths of hedgerows over the last twenty five years within this area, which make a positive contribution to the landscape and are key ecological features.

Key Planning and Land Management Issues

- Potential for the erection of new farm buildings within agricultural fields, or residential dwellings at the edges of Roydon, which could be conspicuous on the skyline if not designed sensitively;
- Potential increases in volume of traffic on narrow rural lanes and road corridors;
- Potential for loss of hedgerows or veteran trees due to inappropriate management.

Sensitivities to Change

- 3.4.36 Sensitive key characteristics and landscape elements within this Landscape Character Area include hedgerows, veteran trees and sites of ecological interest, including Hunsdon Mead. Framed and open views into the corridor of the River Stort to the north are visually sensitive to new development. This area also forms the backdrop to views eastwards from the corridor of the River Lea to the west. Any potential new development within the area is therefore likely to be visually prominent if not designed sensitively. The relatively strong sense of tranquillity throughout most of the area is also sensitive to potential new development. As a result of the above factors, overall this Landscape Character Area is considered to have **moderate to high** sensitivity to change.

Suggested Landscape Planning Guidelines

- Conserve and enhance the landscape setting of Roydon;
- Conserve the predominantly rural character of this area;
- Maintain characteristic views across farmland and into the valleys of the Stort and Lea;

- Ensure that any new development within the farmland is small-scale, responding to historic settlement pattern, landscape setting and locally distinctive buildings styles.

Suggested Land Management Guidelines

- Conserve and enhance the existing hedgerow pattern (and adjacent headlands) and strengthen through planting using local provenance species;
- Conserve veteran trees as key landscape and ecological features;
- Conserve and promote the use of building materials which are in keeping with local vernacular/landscape character;
- Establish species rich field margins within arable fields as an important nature conservation habitat.

APPENDIX 4

Extract from Epping Forest District Council Settlement Edge Landscape Sensitivity Study

8.0 ROYDON FRINGES

8.1 Overview

8.1.1 Roydon is situated within the northwestern corner of Epping Forest District, to the north of Lower Nazeing and northwest of Epping Green. Roydon Farmland Plateau Landscape Character Area (C6) provides the landscape setting to the village, whilst Roydon Hamlet Farmland Plateau Landscape Character Area (C7) is situated to the south of the village.

8.1.2 At the western edge of the village, the landscape setting encompasses a large arable field (at Roydon Park) which cloaks a hill, sloping downwards to the west towards the Lee Valley. A series of smaller-scale arable fields which are lined with mature hedgerows are situated at the settlement edge.

8.1.3 To the north of Roydon, the gently meandering corridor of the River Stort, which is lined with mature trees and linear belts of woodland, provides the landscape setting to the village. The main railway line also crosses this area, lined in places with trees. Associated with the river corridor is a patchwork of small-scale arable and pastoral fields which are lined with mature hedgerows. The river corridor and its associated vegetation provide a strong sense of enclosure to the northern edge of the village.

8.1.4 At the eastern edge of Roydon village, the landscape setting comprises large arable fields lined with mature hedgerows and interspersed with sinuous belts of mature deciduous woodland to the south of Harlow Road and at World's End. To the south of the village, a patchwork of small to medium-scale arable fields, lined with mature hedgerows and trees at field boundaries provide a sense of enclosure.

8.2 Visual Character

8.2.1 The analysis of key visual characteristics and attributes that contribute to variations in the overall character of the landscape (as defined by 'Landscape Setting Areas') within the fringes of Roydon are illustrated on **Figure 8.1** and described in summary below:

- The majority of the settlement edges are lined with mature hedgerows or trees, which create a soft, green edge;
- The road corridors in proximity to the village are lined with mature trees and hedgerows, which limit views to the settlement;
- There is one area of urban greenspace within the village, which consists of recreational grounds located within the western fringes;



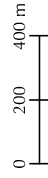
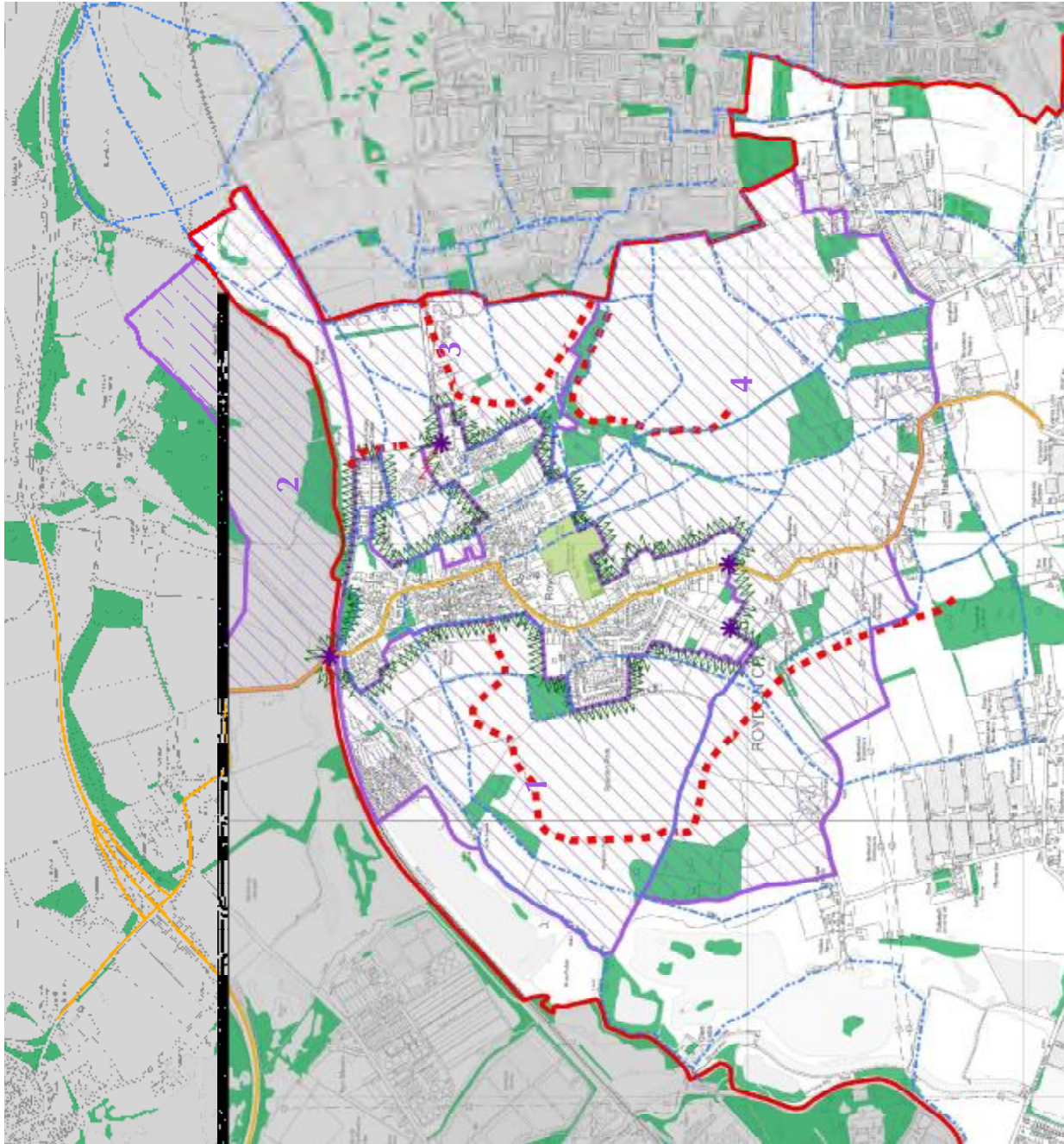
KEY

Existing Features

- Visually Significant Slope
- Major Woodland Block

Analysis

- Soft Green Urban Edge
- Hard Exposed Urban Edge
- Urban Greenspace Character
- Urban Gateway
- Key Traffic Route
- Key Pedestrian Route
- Landscape Setting Area
- Study Area



This map is based on Ordnance Survey material with the permission of Ordnance Survey on behalf of the Controller of Her Majesty's Stationary Office. © Crown copyright. Unauthorised reproduction infringes Crown copyright and may lead to prosecution or civil proceedings. OS PCA Licence No. 100016334 - 2009

- There are four urban gateways which mark the transition between rural landscape and settlement within the village, two of which are located on the B181 road corridor and the other two are on minor roads extending out of the village to the east and west;
- Roydon is connected by the main road corridors of the B181 and Harlow Road. To the north of the settlement, the B181 road corridor provides access to the A414 to the north and to the south, the B181 road corridor provides access to Epping to the south and Harlow to the west;
- There are several Public Rights of Way within the setting of Roydon including the recreational paths of the Three Forests Way (to the west and south of the village) the Stort Valley Way and the Harcamlow Way (to the north of the village) which connect the village with the River Lee to the west and Harlow to the east;
- There are several small blocks of woodland within the setting of Roydon, which limit views of the settlement edges from the west, south and east;
- To the west of the village, the topography encompasses a hill which slopes downwards to the west towards the valley of the River Lee (the western slopes of this hill form the eastern valley sides). These slopes are considered to be visually significant; and
- Visually significant slopes have also been identified to the east of the village, where the topography rises from the edge of the settlement to the top of two hills.

8.3 Historic Character

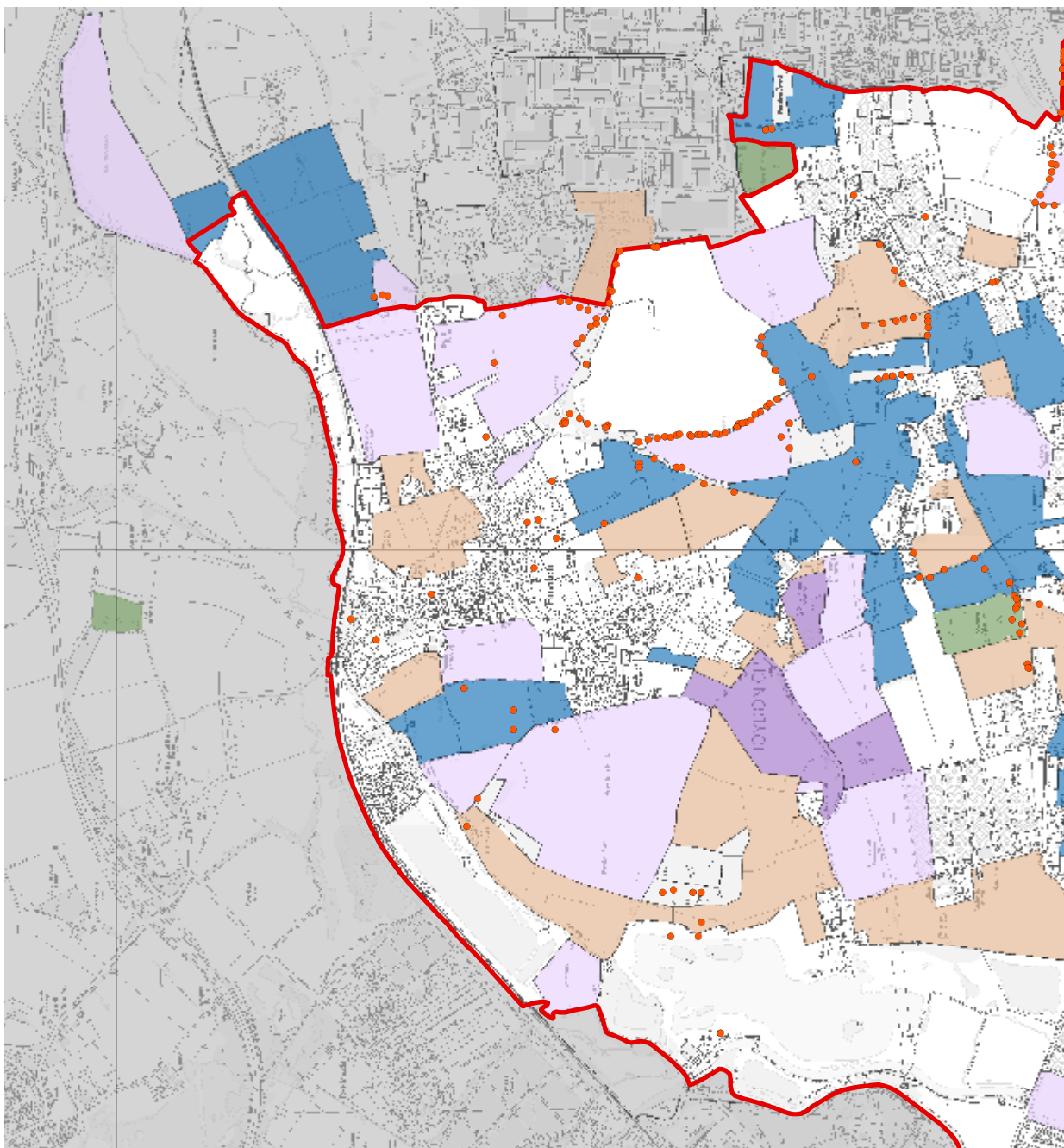
8.3.1 The analysis of historic patterns of land use and how they contribute to the overall character of the modern landscape within the fringes of Roydon is illustrated on **Figure 8.2** and described in summary below:

- There are two small blocks of Ancient Woodland within the landscape setting of Roydon. One is situated to the east within Harlow District and the other to the south of Roydon village;
- There are several patches of small to medium sized pre 18th Century fields to the east and west of Roydon, with a large concentration within the southern fringe of the village, to the north of Hall's Green;
- There are a few areas of 18th to 19th Century Enclosure at the south-eastern edge of the village;
- Several of the fields within the landscape setting of the village have suffered post 1950s boundary loss, however remnant historic boundaries are apparent;
- There are several pockets of Modern fields (post 1950) surrounding Roydon, some of which touch the fringes of the settlement;
- There are no areas of Mineral extraction surrounding Roydon; and



KEY

- Ancient Woodland (pre 1600)
- Veteran trees
- Pre 18th century fields
- 18th to 19th century enclosure
- Historic fields with boundary lost
- Modern fields: post 1950
- No data / Unclassified
- Study Area



Notes: this map is based on aerial photography and is not a true survey. It is not intended to be used for legal purposes. It is not a true survey. It is not intended to be used for legal purposes.

This map is based on Ordnance Survey material with the permission of Ordnance Survey on behalf of the Controller of Her Majesty's Stationary Office © Crown copyright. Unauthorised reproduction infringes Crown copyright and may lead to prosecution or civil proceedings. OS PCA Licence No. 100016334 - 2009

CHRIS BLANDFORD ASSOCIATES
www.cba.uk.net

December 2009

EPHING FOREST DISTRICT COUNCIL LANDSCAPE STUDIES LANDSCAPE SENSITIVITY STUDY

Figure 8.2
Roydon -
Historic Landscape Analysis

- There is a high concentration of veteran trees at field boundaries within the fringes of Roydon, particularly to the southeast of the village, to the south of World's End.

8.4 Designated Environmental Constraints

- 8.4.1 The analysis of the critical and less critical environmental designations within Roydon fringes related to nature conservation, the historic environment, landscape and other aspects such as protected floodplains, is illustrated in **Figure 8.3** and described in summary below. The weighting between constraints reflects the statutory (critical) and non-statutory (less critical) or 'moderate' status of individual environmental designations:

Critical Constraints

- There are two Scheduled Monuments at some distance from Roydon including a moat at Netherhall to the southwest and a Cold War heavy aircraft gun station to the southeast;
- There is a wide, vast floodplain to the north and west of Roydon which follows the paths of River Lee and River Stort corridors;
- There is a medium sized area of Registered Common Land to the northeast of Roydon (most of which lies within Harlow District to the north);
- There are two small blocks of Ancient Woodland within the southern fringes of the village, at some distance from the settlement edge (one at Totwellhill Bushes and another to the west of this); and
- There are no Conservation Areas within the village; however there is one at the southeastern edge.

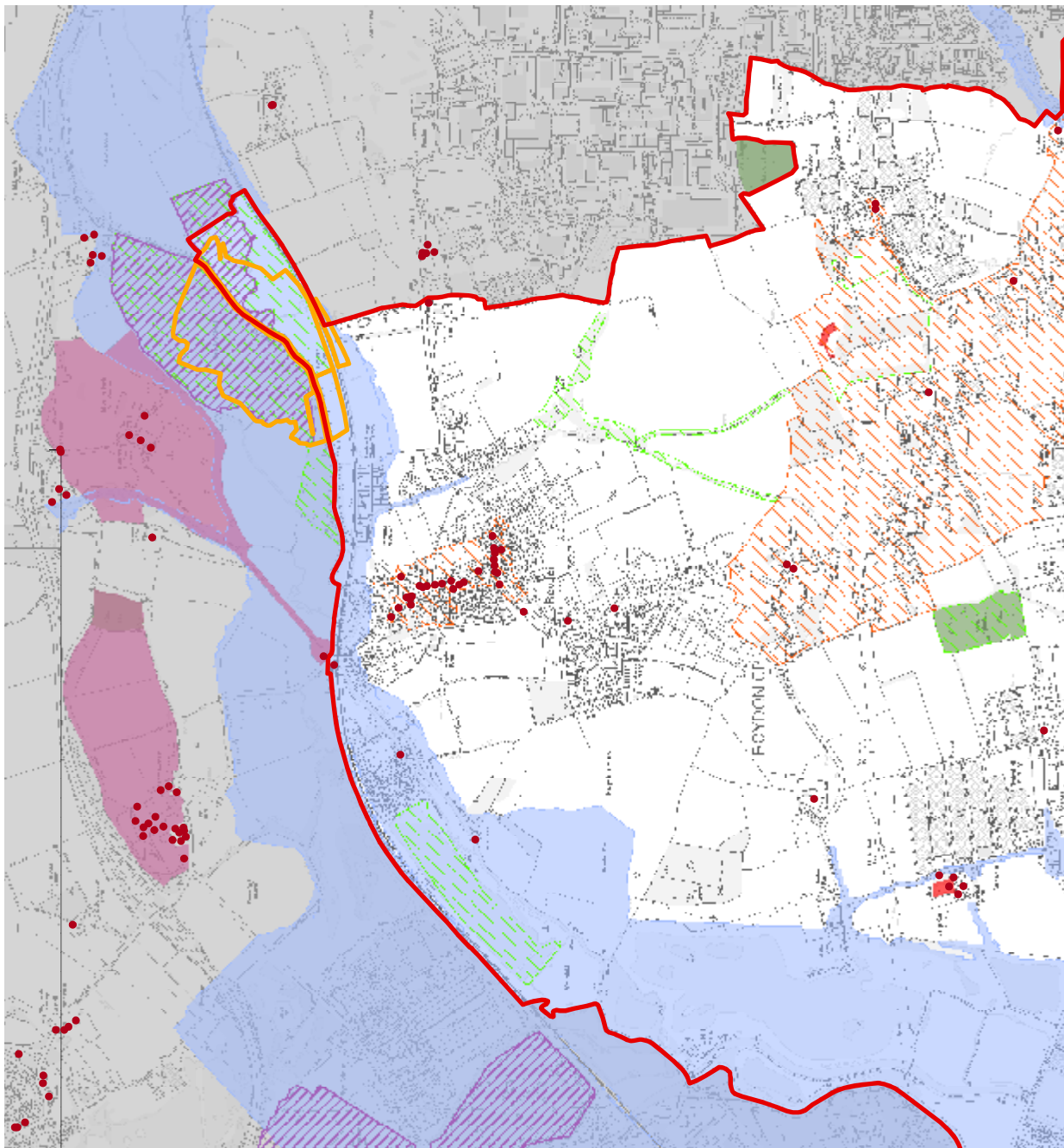
Moderate Constraints

- There are several Local Wildlife Sites scattered within the fringes of the village.

8.5 Landscape Sensitivity

- 8.5.1 Drawing on the above analysis, the key sensitive landscape/environmental features that are considered desirable to safeguard within the fringes of Roydon are shown on **Figure 8.4** and described in summary below:

- There are patches of sensitive historic landscape scattered to the west, south and east of the village which comprise pre 18th Century fields and some 18th to 19th century enclosure;



0 200 400 m

This map is based on Ordnance Survey material with the permission of Ordnance Survey on behalf of the Controller of Her Majesty's Stationary Office © Crown copyright. Unauthorised reproduction infringes Crown copyright and may lead to prosecution or civil proceedings. OS PCA Licence No. 100016334 - 2009

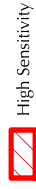
Figure 8.3
Roydon -
Designated Environmental Constraints



KEY

- Sensitive Historic Landscape:
Pre 18th Century Fields
- Sensitive Historic Landscape:
18th - 19th Century Enclosure
- Sensitive Woodland Area
- Sensitive Recreational Route
- Veteran trees
- Floodplain
- Urban Greenspace Character

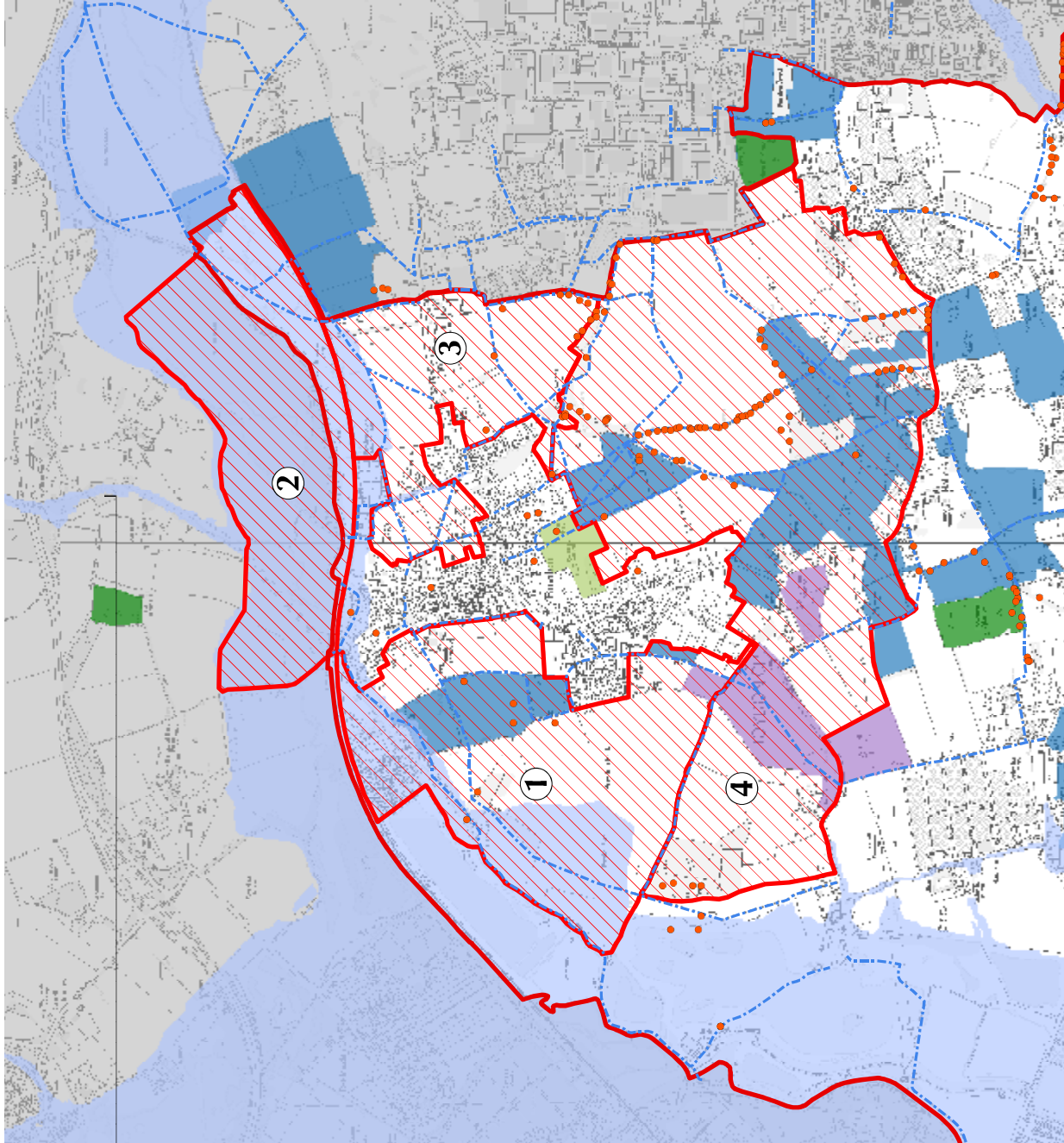
Sensitivity
(See Section 8.5 of the Report)



①
Landscape Setting Area



0 200 400 m



This map is based on Ordnance Survey material with the permission of Ordnance Survey on behalf of the Controller of Her Majesty's Stationery Office. Crown copyright. Unauthorised reproduction infringes Crown copyright and may lead to prosecution or civil proceedings. OS PCA Licence No. 100016334 - 2009

- There is one small area of urban greenspace character on the southern edge of the settlement edge which contributes toward the local landscape character within the eastern fringe of the settlement;
- There are two medium sized patches of sensitive woodland within the fringes of the village which contribute to local landscape character;
- There are many veteran trees located within the landscape of the village which are sensitive landscape and historic features;
- An interconnected network of public footpaths creates sensitive recreational routes within the fringes of the village. These provide access for pedestrians and cyclists throughout the area and connect the settlement to the surrounding landscape; and
- The wide floodplain of the River Stort borders the northern edge of the village, whilst the wide floodplain of the River Lee is situated in relatively close proximity to the western edge of the village.

Sensitivity of Landscape Setting Areas

8.5.2 Taking into account the above, the sensitivity of each Landscape Setting Area is evaluated as follows, based on the criteria set out in section 1.5.3:

Landscape Setting Area	Landscape Character Sensitivity									Visual Sensitivity									Overall Sensitivity to change
	Representation of typical character			Number of sensitive natural, cultural and historic features			Overall Landscape Character Sensitivity			Intervisibility			Visual Prominence			Overall Visual Sensitivity			
	Positive	Moderate	Limited	Many	Some	Few	High	Moderate	Low	High	Moderate	Low	High	Moderate	Low	High	Moderate	Low	
1																			High
2																			High
3																			High
4																			High

8.6 Key Opportunities for Growth

8.6.1 Drawing on the above analysis, those Landscape Setting Areas identified as high or moderate overall sensitivity are considered desirable to safeguard in landscape terms and are considered to have a significant role in contributing to the structure, character and setting of the settlement. Landscape Setting Areas that have been identified as low sensitivity may be suitable for development in landscape terms and are considered to have a less significant role in

contributing to the structure, character and setting of the settlement. Further assessment work would, however, be needed to examine site-specific landscape and visual sensitivities.

8.7 Contribution to Green Belt

- 8.7.1 In line with methodology set out within Section 1.5.27, an evaluation of the contribution that the landscape setting of Roydon makes to the purposes of including land within the Green Belt (PPG2: Paragraph 1.5) is set out within the table below:

Contribution to Green Belt Purpose

Green Belt Aim	Summary Evaluation: Based on the Visual Character Information set out within Section 8.2 above and Figure 8.1	Landscape Setting Areas			
		1	2	3	4
Contribution to openness of Green Belt?	The setting of the village is predominantly open and rural, with few built elements. Built elements do, however include the railway track, campsite and caravan park and occasional scattered farmsteads and dwellings.	Major	Major	Moderate	Major
Green Belt Purposes	Summary Evaluation: Based on the Visual Character Information set out within Section 8.2 above and Figure 8.1	Summary Evaluation: Based on the Visual Character Information set out within Section 8.2 above and Figure 8.1			
Checking unrestricted sprawl of large built up areas?	The northern and western fringes are at distance from the large built up area of Harlow; however, the eastern and southeastern edges are in close proximity to the town. Despite this, predominantly rural landscape provides separation between the Roydon and Harlow.	Major	Major	Moderate	Moderate
Preventing neighbouring towns from merging into one another?	The landscape setting is predominantly rural and is considered to provide separation between neighbouring towns and villages.	Major	Major	Major	Major
Assisting in safeguarding the countryside from encroachment?	Whilst occasional built elements are present, these are not considered to generally encroach upon the surrounding landscape setting.	Major	Major	Moderate	Major
Preserving the setting and character of	Not applicable.	Major	Major	Major	Major

historic towns?		Not Applicable	Not Applicable	Not Applicable	Not Applicable
Assisting in urban regeneration by encouraging the recycling of derelict and other urban land?	The landscape setting is considered to make a limited contribution to assisting in urban regeneration by encouraging the recycling of derelict and other urban land.	Limited	Limited	Limited	Limited

Contribution to Green Belt Objectives

8.7.2 In relation to Paragraph 1.6 of PPG2, the landscape setting to Roydon is considered to play a role in fulfilling the following objectives:

- *To provide opportunities for access to the open countryside for the urban population:* An interconnected network of key pedestrian routes cross the landscape, connecting the settlement with adjacent landscapes;
- *To provide opportunities for outdoor sport and outdoor recreation near urban areas:* There is one area of urban greenspace at the settlement edge;
- *To secure nature conservation interest:* There is a small pocket of Ancient Woodland to the southwest of the village within the landscape setting and a few Local Wildlife Sites; and
- *To retain land in agricultural, forestry and related uses:* Most of the land within the landscape setting of the settlements is under one of these uses.