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- **inappropriate development in the Green Belt by virtue of its characteristic as substantial new build and it is likely to cause substantial harm to the Green Belt by virtue of a lack of effective integration with the existing settlement and proximity to Harlow causing the potential for coalescence, and causing substantial harm to the openness of the Green Belt.**
- **contrary to national policy and Local Plan Submission Version 2017 Policy D 4 Community, Leisure and Cultural Facilities in that it involves the unjustified loss of a facility.**
- **contrary to paragraph 155-165 of NPPF 2018, as well as Policy U2A Development in Flood Risk Areas of the adopted Local Plan and Local Plan Submission Version 2017 Policy DM 15 Managing and Reducing Flood Risk.**