



Epping Forest District Council

GREEN BELT REVIEW METHODOLOGY

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DRAFT

Introduction

1. Epping Forest District Council is currently preparing its Local Plan with a plan period of 20 years. Epping Forest District is covered by roughly 92% Green Belt designation therefore Green Belt is a key issue for the new Local Plan to consider. The National Planning Policy Framework (NPPF) provides the framework within which local planning authorities should undertake a Green Belt Review. Green Belt has been identified by EFDC as a strategic cross boundary matter which requires working with interested Duty to Cooperate organisations and authorities in the preparation of the Green Belt Review. Therefore, relevant Duty to Cooperate organisations and authorities have been invited to input into this Green Belt Review Methodology and will be continually invited to take part in the subsequent stages of the Green Belt Review as it is prepared.
2. This document sets out the methodology for undertaking a Green Belt Review in the District. A proposed methodology for the Green Belt Review in the District was reported to and approved by the Local Plan Cabinet Committee on 3 September 2012. The starting point for that methodology was to review the Green Belt boundaries for the sites submitted through the SLAA (Strategic Land Availability Assessment) (2012) and those sites considered to be potentially suitable for development from the 'Community Choices' (Issues & Options) consultation (summer 2012). Through recent Local Plan Examinations in Public (EiPs) throughout the country, it has become apparent that the Green Belt Review needs to be comprehensive in its scope and this is the intention of this Green Belt Review.
3. The review will consist of a high-level review of all Green Belt land across the District to identify the contribution of the Green Belt towards national Green Belt purposes as set out in the National Planning Policy Framework (NPPF). This will identify both the primary functions of the Green Belt, which deliver the national purposes, and identify areas of Green Belt land which are considered to contribute least towards national purposes. The latter land will be subject to further assessment by the Council in the context of wider issues not covered by this study, but that must be considered in preparing a Local Plan. The outcome of this review will therefore provide only one piece of evidence amongst a variety of other considerations that must be taken into account before deciding on any changes to Green Belt boundaries. Such issues include development needs, infrastructure capacity, the availability and viability of land for development, sustainability issues and the establishment of long term defensible boundaries.
4. The policy context section below sets out an overview of local and national Green Belt policy which is followed by the Green Belt Review methodology. The next section addresses further detailed assessments and the relationship to the preparation of the Local Plan and finally a consideration of cross-boundary matters and key stakeholders.

Policy Context

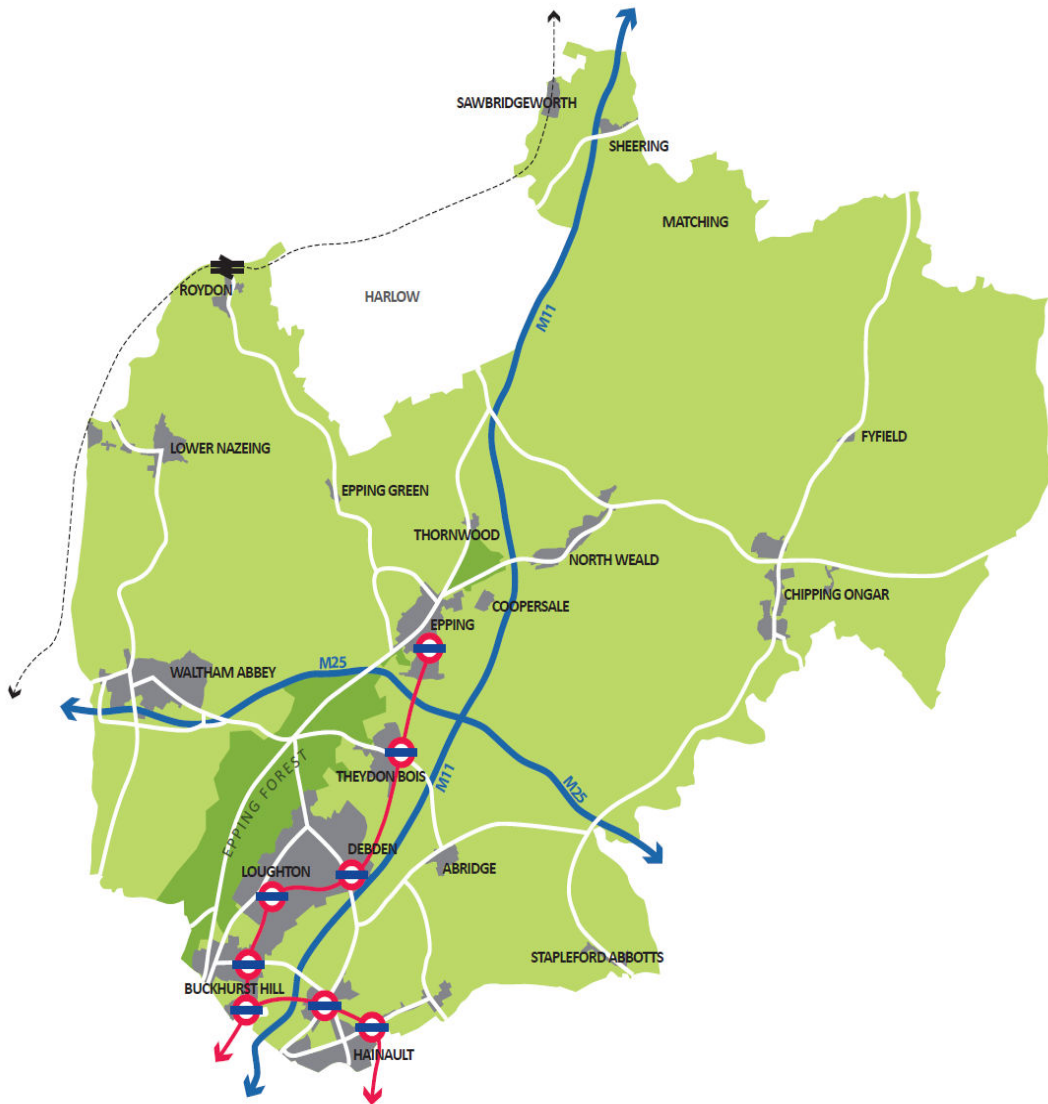
Local Policy

5. The Metropolitan Green Belt, which covers part of Epping Forest District, has been a central feature of planning policy in the Home Counties since it was first formally approved in 1957. The concept of a Green Belt around London originated before the Second World War in response to the need to control the outward spread of London. The first Green Belt was defined by the London County Council in the Greater London Plan of 1944. Soon after, the Town and Country Planning Act 1947 led to the designation of a Green Belt by the councils around London.
6. The Green Belt proved to be an effective tool in limiting the extent of development. So much so that, in 1955, the Government published a Circular (No 42/55) setting out the purposes of the Green Belt and encouraging other cities to follow London's example and consider establishing a Green Belt. This Circular suggested that local authorities prepare policies to ensure that new development (a) was only permitted where it would lead to a rounding off of, or infilling within, a settlement in the Green Belt, or (b) was for the purposes of agriculture, recreation, cemeteries, institutions standing in large grounds or other uses appropriate to a rural area. The basic objectives of Green Belt policy have remained unchanged since that time.
7. The current Epping Forest Green Belt boundaries were established in the 1980s in the Council's first three local plans. The 1998 Local Plan only introduced very minor changes to the Green Belt.
8. The current extent of the District's Green Belt designation and Green Belt policies are set out in the Adopted Local Plan maps of 1998 (The Local Plan Alterations of 2006 made no amendments to Green belt boundaries). There are eighteen Green Belt policies in the 2006 plan, the majority of which are District-wide criteria-based policies which set out the conditions under which development will or will not be permitted in the Green Belt. The exception to this is Policy GB1 which establishes the Green Belt boundary. The Green Belt essentially covers the whole of Epping District apart from the following settlements/villages/hamlets:
 - Abridge
 - Buckhurst Hill
 - Chigwell
 - Chigwell Row
 - Chipping Ongar
 - Coopersale
 - Dobbs Weir (north of Lower Nazeing)
 - Epping
 - Epping Green
 - Fyfield
 - Grange Hill
 - High Ongar

- Loughton
- Loughton Broadway (a.k.a. Debden)
- Lower Nazeing
- Lower Sheering
- North Weald Bassett
- Roydon
- Sheering
- Stapleford Abbots
- Theydon Bois
- Thornwood Common
- Waltham Abbey

9. Policy GB18 is a site specific Green Belt policy for the Former Radio Station Site at North Weald Bassett and GB19 is also a site specific policy relating to Grange Farm Chigwell.

Figure 1: Extent of the Green Belt in Epping Forest District



10. Green Belt policy has historically been effective in restricting inappropriate development in the countryside in the District. This has been achieved through the adherence to the adopted Green Belt policies and by way of refusing planning permission for developments contrary to policy; and these decisions being upheld at appeal in the vast majority of cases. However the current Strategic Land Availability Assessment (SLAA) estimates the yield of the 25 sites that are 'suitable' within the envelope of existing Council planning policy (i.e. they are not within the Green Belt)

being only 1,216 dwellings. Although no decisions has yet been taken on Objectively Assessed Housing Need or a new housing target for the emerging Local Plan, current evidence indicates that likely housing need is higher than 1,216 dwellings. This clearly indicates a need to review the Green Belt boundary through the Local Plan to accommodate future development needs.

National Planning Policy Framework (NPPF)

11. The NPPF explains that the Government attaches great importance to Green Belt and that the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open and that the essential characteristics of Green Belts are their openness and their permanence. Paragraph 80 sets out the five purposes of the Green Belt which are:

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

12. The National Planning Policy Framework (NPPF) states that:

“Local planning authorities with Green Belts in their area should establish Green Belt boundaries in their Local Plans which set the framework for Green Belt and settlement policy. Once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan. At that time, authorities should consider the Green Belt boundaries having regard to their intended permanence in the long term, so that they should be capable of enduring beyond the plan period”
(paragraph 83)

13. The NPPF requires that local planning authorities, when reviewing Green Belt boundaries, take account of the need to promote sustainable patterns of development and it states that they should consider the consequences for sustainable development of channelling development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary (paragraph 84).

14. When defining boundaries, the NPPF (paragraph 85) requires that local planning authorities should:

- ensure consistency with the Local Plan strategy for meeting identified requirements for sustainable development;
- not include land which it is unnecessary to keep permanently open;

- where necessary, identify in their plans areas of ‘safeguarded land’ between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period;
- make clear that the safeguarded land is not allocated for development at the present time. Planning permission for the permanent development of safeguarded land should only be granted following a Local Plan review which proposes the development;
- satisfy themselves that Green Belt boundaries will not need to be altered at the end of the development plan period; and
- define boundaries clearly, using physical features that are readily recognisable and likely to be permanent.

15. The NPPF provides the following in respect of villages and green belt:

“If it is necessary to prevent development in a village primarily because of the important contribution which the open character of the village makes to the openness of the Green Belt, the village should be included in the Green Belt. If, however, the character of the village needs to be protected for other reasons, other means should be used, such as conservation area or normal development management policies, and the village should be excluded from the Green Belt” (paragraph 86)

16. Paragraph 81 explains that once a Green Belts has been defined, local planning authorities should plan positively to enhance the beneficial use of the Green Belt. The beneficial uses include:

- opportunities to provide access;
- to provide opportunities for outdoor sport and recreation;
- to retain and enhance landscapes, visual amenity and biodiversity; or
- to improve damaged and derelict land.

17. In terms of introducing new Green Belt areas, the NPPF (paragraph 82) explains that this should only be done in exceptional circumstances when planning for larger scale development such as new settlements or major urban extensions. If a local planning authority were to propose new Green Belt areas, the NPPF explains that the authority should:

- demonstrate why normal planning and development management policies would not be adequate;
- set out whether any major changes in circumstances have made the adoption of this exceptional measure necessary;
- show what the consequences of the proposal would be for sustainable development;
- demonstrate the necessity for the Green Belt and its consistency with Local Plans for adjoining areas; and
- show how the Green Belt areas would meet the other objectives of the Framework.

18. The Planning inspectorate has noted on a number of occasions (e.g. West Lancashire Local Plan examination report) that the objectively assessed housing need does constitute the exceptional circumstances for reviewing the green belt as part of the local plan production process.

Methodology

19. A proposed methodology for the Green Belt Review in the District was reported to and approved by the Local Plan Cabinet Committee on 3 September 2012. The starting point for that methodology was to review the Green Belt boundaries for the sites submitted through the SLAA (Strategic Land Availability Assessment) (2012) and those sites considered to be potentially suitable for development from the 'Community Choices' (Issues & Options) consultation (summer 2012).
20. There is no nationally prescribed methodology for undertaking a Green Belt Review. However there have been a number of recent (since 2012) Local Plan Examinations in Public (EiPs) which provide insight into the approach the Planning Inspectorate expects when a local planning authority undertakes a Green Belt review. An example of this is the Dacorum Core Strategy EiP whereby the Inspector clearly expected a comprehensive review of the Green Belt to be undertaken by the Council before the release of Green Belt.
21. Therefore this revised methodology reflects the need for a comprehensive Green Belt Review of the District. The main purpose of the review is to undertake a comprehensive high-level review of all Green Belt land across the District to identify the contribution of the Green Belt as stipulated in the NPPF. It will identify both the primary functions of the Green Belt, which deliver the national purposes, and identify areas of Green Belt land which are considered to contribute least towards national purposes using the same criteria as used in the previous methodology . The high-level review of the district's Green Belt will help inform the development of a preferred option for the draft Local Plan, along with other evidence including development needs including housing, employment and infrastructure, sustainability appraisal, financial viability assessment and deliverability.

Stage 1 – Defining Strategic Parcels

22. The first stage of the Green Belt Review is to sub-divide the district's Green Belt into strategic parcels of land for assessment against the purposes criteria. The parcel boundaries generally follow well-defined physical features and the outer boundary of the study area is the district boundary. Settlements are not included within the parcel boundaries unless they are designated as Green Belt in the adopted Local Plan (generally only the smaller villages/hamlets are washed over with Green Belt). The parcel boundaries have been developed using a hybrid of the parcels from the Landscape Character Assessment (2010) and the following criteria:
 - Boundaries should be aligned to natural or physical features where possible e.g. water courses, prominent hedgerows, roads, railway lines;

- Boundaries should not split woodland or main areas of trees or existing settlements, existing housing or urban development.

If during the course of the review, alterations to the parcel boundaries are required to better reflect the situation on the ground, the reasons for changes to the boundary will be explained in the report. Overall, 73 parcels of land have been provisionally identified, subject to review. A map illustrating this can be found in Appendix 1.

Stage 2 - Assessing the Parcels against the Green Belt Purposes

23. This section explains the methodology for assessing the Green Belt parcels including the criteria and the questions that will be used to determine to what extent the strategic Green Belt parcels meet the purposes of the NPPF and ultimately the overall value of each of the parcels. The criteria reflect those used in the previous methodology and primarily relate to the first four national Green Belt purposes set out in the NPPF:
- to check the unrestricted sprawl of large built-up areas;
 - To prevent neighbouring towns from merging into one another;
 - To assist in safeguarding the countryside from encroachment; and
 - To preserve the setting and special character of historic towns.
24. The fifth NPPF purpose of the Green Belt which is *“to assist in urban regeneration, by encouraging the recycling of derelict and other urban land”* has not been included as a standard criterion for the assessment of the parcels. The reason for this is that there is little available derelict and other urban land remaining in the district, reflecting the success of the current Green Belt policy in fulfilling this objective in the District and in London. However, if there are settlements in the District where there is an identified need for regeneration this criterion will be considered.
25. No local purposes of the Green Belt are proposed as part of the Green Belt Review.
26. In order to assess the Green Belt land against the NPPF purposes, a set of questions for each purpose have been developed as used in the previous methodology. These questions are set out below and will be included in a survey pro-forma for each parcel to record the findings of the assessments, with questions answered with a ‘Yes’, ‘No’ or ‘Partial’ with comments provided where appropriate. The completion of the pro-forma will be undertaken in a consistent and structured manner by EFDC Planning Policy Officers through desk-based analysis using GIS and relevant evidence studies as well as site visits where necessary in order to provide consistent results. Each feature of the parcel will be assessed in relation to the assessment criteria which contribute to Green Belt purposes as described below.

Questions to Assess Green Belt Parcels against the National Purposes

1. Check the unrestricted sprawl of large built up areas

Question 1a: Would development of the area lead to, constitute or extend ribbon development?

Question 1b: Is the area well connected to a settlement?

Question 1c: Is there a strong, defensible boundary between the existing urban area and the site - wall, watercourse, main road etc (as opposed to garden boundary lines), which if breached may set a precedent for unrestricted sprawl?

2. Prevent neighbouring towns from merging

Question 2a: Do natural features and infrastructure provide a good physical barrier or boundary to the area that would ensure that development was contained?

Question 2b: Would development of the area lead to physical connection of 2 or more settlements?

Question 2c: Would the reduction in the gap compromise the separation of settlements and the overall openness of the parcel visually?

3. Assist in safeguarding the countryside from encroachment

Question 3a: Does the area include national or local nature conservation designated areas (SSSIs etc)?

Question 3b: Does the area include areas of woodland, trees or hedgerows that are protected or significant unprotected tree/hedge cover?

Question 3c: Does the area include any grade 1 or grade 2 (excellent or very good quality) agricultural land?

Question 3d: Is the site regarded as being sensitive to change as stated in the Landscape Character Assessment?

4. Preserve the setting and special character of historic towns

Question 4a: Is there a strong relationship, either physically or visually, to a conservation area, listed building or other historical features?

Question 4b: Is there a historic feature such as a Listed Building or Scheduled Monument within the site?

27. Following the assessment, values will then be attributed to the contribution which the individual parcel makes towards Green Belt purposes. In some or all instances

there may be particular areas of the parcel that perform distinctively differently to other areas of the parcel. Where this is the case, the review will explain this and 'sub-sections' of the parcel could emerge where justified to reflect such distinct differences. There will be no weighting applied to the different purposes of the Green Belt as the NPPF does not prioritise the purposes.

28. The assessment will judge the value of the Green Belt on the basis of a high, medium or low level of contribution to Green Belt purpose. The results of the assessment are recorded in a matrix and mapped with a traffic light system as follows:

Dark Green	a high/ significant contribution to Green Belt purposes
Green	a medium contribution to Green Belt purposes
Light Green	a limited contribution to Green Belt purposes

29. In addition to the assessment questions set out above, the review will also assess the following issues:

- identify where development could lead to cross boundary issues with neighbouring local authorities by identifying the local authority and specifying the potential cross boundary issue; and
- identify areas where the current boundary of the Green Belt is illogical: for instance where the boundary does not adhere to a natural or built feature or defensible boundary and should be considered for realignment.
- Identify any areas where it may be appropriate to extend the Green Belt
- Identify smaller parcels of land that may be suitable for Green Belt release within the larger sites.

Detailed Site Assessments and the Local Plan

30. Following the preparation of the draft Green Belt Review, there will be a need for a more detailed assessment and consideration of sites located within parcels which were deemed as contributing least to the purposes of the Green Belt. As part of this process the Council will also consider whether there are opportunities to promote positive use of the Green Belt in line with paragraph 81 of the NPPF, such as creating links between areas of green infrastructure and providing opportunities for outdoor sport and recreation. This further assessment will be considered alongside a host of other evidence base studies such as the Strategic Housing Market Assessment, Strategic Land Availability Assessment (SLAA), Employment and Economic Evidence Study, Infrastructure Delivery Plan, Green Infrastructure Strategy, Transportation Modelling, Sustainability Appraisal and the Development Viability Assessment. The outcome of this review will therefore provide only one piece of evidence amongst a variety of other considerations that must be taken into account before any changes to Green Belt boundaries can be justified for proposal in the draft Local Plan.

Cross Boundary Working and the Duty to Cooperate

31. The Localism Act (2011) and NPPF require that local authorities and other identified bodies in the Localism Act work together on an active, ongoing and constructive basis on strategic cross boundary matters. Green Belt has been identified by EFDC as a cross boundary issue with the following adjoining local authorities and organisations. EFDC will work with these organisations and any others identified through the course of preparing the Green Belt Review including the preparation of this methodology:

- Harlow District Council;
- Uttlesford District Council;
- Chelmsford Borough Council;
- Broxbourne Borough Council;
- Brentwood Borough Council;
- London Borough of Redbridge;
- London Borough of Enfield;
- London Borough of Waltham Forest;
- London Borough of Havering;
- Essex County Council;
- Essex Highways;
- Lee Valley Regional Park Authority;
- Mayor of London / Greater London Authority;
- Corporation of London Conservators of Epping Forest;
- Natural England.