



# **Epping Forest District Council**

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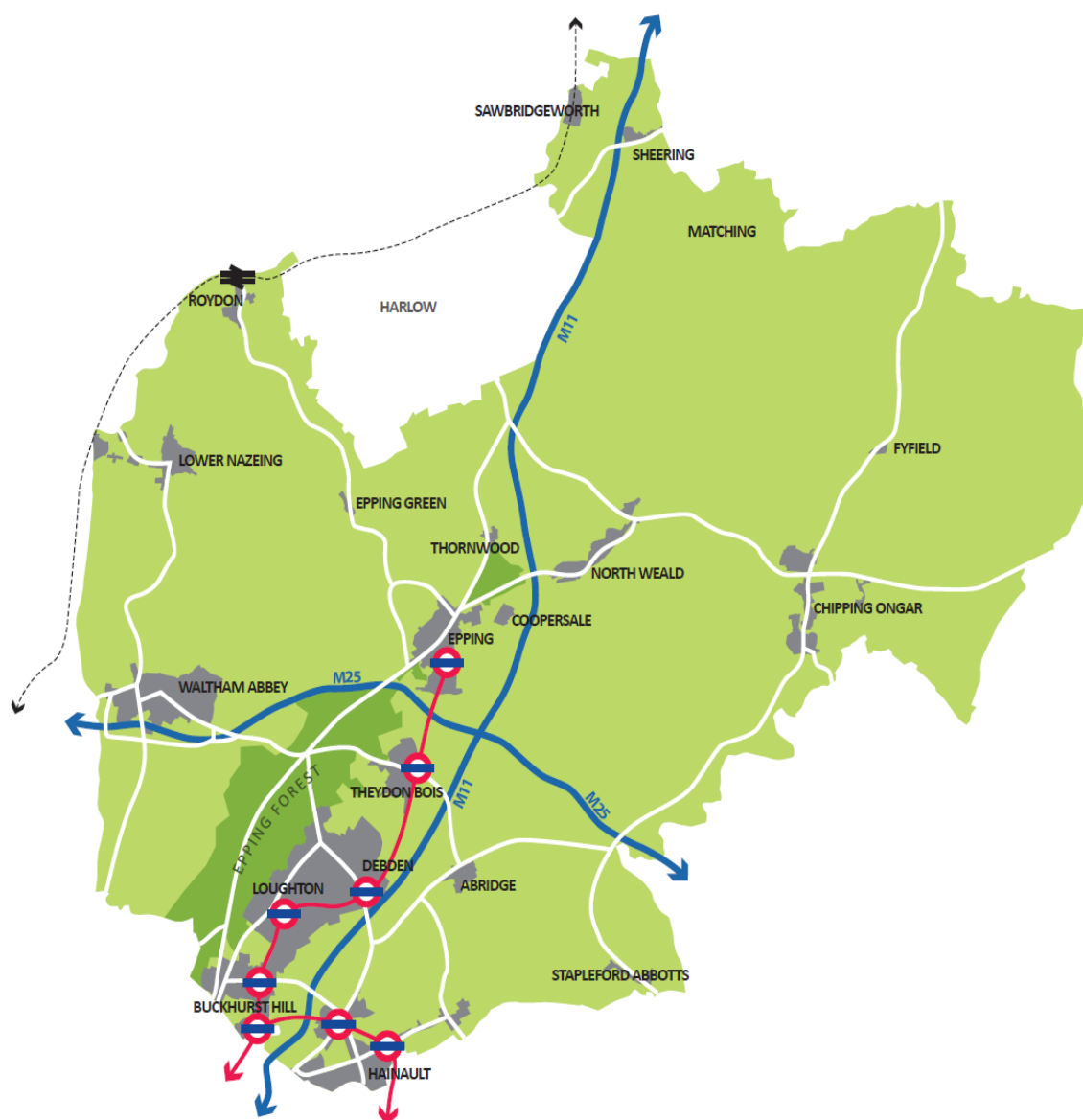
## **GREEN BELT REVIEW METHODOLOGY**

**August 2015**

## Introduction

1. Epping Forest District Council is currently preparing its Local Plan to cover the period of 2011 - 2033. Epping Forest District is covered by roughly 92% Green Belt designation. The National Planning Policy Framework (NPPF) is summarised below, and provides the framework within which local planning authorities should treat the Green Belt when preparing its Local Plan.

**Figure 1: Extent of the Green Belt**



2. The NPPF (para 79) states:

*“The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.”*

3. 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.

4. The NPPF also advises 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)

5. 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).

6. 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.

7. In respect of villages and the Green Belt, the NPPF advises:

*"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)

8. Paragraph 81 explains that once a Green Belt 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;
- providing opportunities for outdoor sport and recreation;

- retaining and enhancing landscapes, visual amenity and biodiversity; or
  - improving damaged and derelict land.
9. 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.
10. This document sets out the methodology for undertaking a Green Belt Review in the District. The purpose of the Review is to assess the Green Belt within the District against the national Green Belt purposes whilst also taking into account physical constraints to accommodate further development. The Green Belt Review will be undertaken independently of the Local Plan Sustainability Appraisal and other evidence base work assessing potential development options. The Green Belt Review does not seek to balance Green Belt purposes with other sustainability objectives - the Council will undertake this balancing exercise as part of its decision-taking when preparing the Local Plan.

## **Stages of the Green Belt Review**

11. The Green Belt Review will comprise two stages which together form a proportionate assessment of the Green Belt within the District. Stage 1 of the Green Belt Review will be prepared in Phases 1 to 6 (below) culminating in a report on Stage 1, which will include the key findings and documentation of the high-level review to enable further site-specific work to be undertaken in Stage 2 of the Green Belt Review. Stage 2 will be undertaken subsequent to the Council identifying the broad locations within the existing Green Belt that should be subject to further assessment ('broad locations for further assessment'). The Stage 2 report will be separate to the Stage 1 report.

### **Stage 1**

#### **Phase 1: Understand the context for the Green Belt Review**

12. This phase will involve the preparation and recording of the following evidence:

- (i) The identification of the exceptional circumstances which may justify the alteration of Green Belt boundaries, including the identification of the types of development that may need to be accommodated in the Green Belt during the plan period and beyond; and
- (ii) An analysis of the history in relation to the designation, alteration and protection of the Green Belt in the District and the wider area.

13. As EFDC has yet to take any formal decision to identify whether the exceptional circumstances exist to justify the alteration of the Green Belt boundary, considerations will include the following:

- (i) The unavailability of sufficient land outside the Green Belt to meet objectively assessed development needs;
- (ii) The need to accommodate development in the Green Belt to meet objectively assessed development needs;

- (iii) Notwithstanding compliance with the Council's duty to co-operate, the absence of any viable alternatives to meet objectively assessed development needs outside the District; and
- (iv) Any material change in circumstances relating to the continued long-term protection of the Green Belt within the District.

## **Phase 2: Appraising the current status of Green Belt land within the District**

14. This phase of the Green Belt Review will prepare a 'high-level' appraisal of the current status of all Green Belt land within the District, including the extent to which the land within the Green Belt continues to serve the five Green Belt purposes (NPPF Paragraph 80). The appraisal will include the following stages:

- (i) Identification and definition of Green Belt parcels for appraisal and assessing whether and to what extent it is necessary to adjust the Green Belt Parcels to ensure the robustness of the evidence produced by the appraisal;
  - a) The appraisal of the Green Belt Parcels to identify the contribution they make to the five Green Belt purposes (NPPF paragraph 80) using the criteria attached in Appendix 1 along with a glossary of terms used (see Appendix 2). As set out in Table 1 below, a parcel will receive a score based on whether it makes a 'strong', 'relatively strong', 'moderate', 'relatively weak', 'weak' or 'no contribution'. The approach for scoring against each of the purposes is set out below. Not every parcel is likely to fall neatly into the scoring described below therefore a considerable amount of judgement is required to arrive at scores which consider the whole parcel's contribution to each purpose. Therefore a 'relatively strong' and 'relatively weak' contribution score has been included to allow for more sensitivity where the appraisal leads to the conclusion that the parcel should score between 'moderate' and 'strong' or between 'moderate' and

'weak'. For the first Green Belt purpose (Check the unrestricted sprawl of large built up areas) the Review defines large built up areas as London, Harlow, Cheshunt and Hoddesdon.

- The parcel will be scored as making a '**Strong Contribution**' where the parcel acts itself and as part of a wider network of parcels as an effective barrier against the sprawl from large built-up areas and does not contain defensible boundaries which act as an effective barrier against sprawl. There is a strong reliance upon the Green Belt Policy designation to prevent sprawl from large built-up areas in these parcels.
  - The parcel will be scored as making a '**Moderate Contribution**' where it does not act itself as an effective barrier against sprawl, but may form part of a wider network of parcels to act as a strategic barrier to sprawl. Defensible boundaries may be present which are effective in the prevention of sprawl.
  - The parcel will be scored as making a '**Weak Contribution**' where the parcel is within reasonable distance to one of the defined 'large built-up areas' however makes very little contribution to the prevention of its sprawl.
  - The parcel will be scored as making '**No Contribution**' where the parcel is of such a distance from the built-up areas or on the opposite side of a defensible to such an extent that the parcel does not play a role in the prevention of sprawl.
- b) For the second Green Belt purpose (Prevent neighbouring towns from merging) the Review considers towns to be Epping, Waltham Abbey, Loughton / Debden, Chigwell, Buckhurst Hill, Chipping Ongar, North Weald Bassett, Theydon Bois, Roydon and Lower Nazeing. This is based on the Epping Forest District Settlement Hierarchy Technical Paper. The Review considers



towns to be Epping, Waltham Abbey, Loughton / Debden, Chigwell, Buckhurst Hill, Chipping Ongar, North Weald Bassett, Theydon Bois, Roydon and Lower Nazeing. This is based on the Epping Forest District Settlement Hierarchy Technical Paper's classification of these settlements as 'towns' and 'large villages'.

- The parcel will be scored as making a '**Strong Contribution**' where the parcel is considered to serve as a critical gap / space between the identified towns with weak or no defensible boundaries to prevent their merger. There is no or very little evidence of ribbon development on well used thoroughfares between towns and visual perception of the gap between the towns along such thoroughfares is one of openness. A reduction in the gap would compromise the separation of the towns physically and visually.
- The parcel will be scored as making a '**Moderate Contribution**' where the parcel forms part of a gap / space between the identified towns however it is not of critical importance and there are defensible boundaries present to prevent their merger. There may be evidence of ribbon development on well used thoroughfares indicating the Green Belt designation has not been particularly successful in preventing development which could result in the coalescence of towns. A reduction in the gap is not likely to compromise the separation of the towns physically or visually.
- The parcel will be scored as making a '**Weak Contribution**' where the parcel is located (or partially located) in a gap / space between the identified towns however they are of such a considerable distance apart that its contribution to the this purpose is negligible.
- The parcel will be scored as making '**No Contribution**' where the parcel does not form part of a gap / space

between the identified towns or the towns are of such a considerable distance that the gap is not relevant to the Review.

- c) The assessment of the functional performance of existing Green Belt land against the third Green Belt purpose will only assess whether and to what extent the land under consideration "*assists in safeguarding the countryside from encroachment*". The secondary considerations, which relate to opportunities to plan positively to enhance the beneficial use of the Green Belt land under consideration will only be relevant to the Detailed Site assessment in Phase 6. However, appraisers will record matters relevant to the secondary considerations, but they are not relevant to this phase of the appraisal.
- The parcel will be scored as making a '**Strong Contribution**' where the vast majority of the parcel contains countryside (as defined in the Glossary) in use for agriculture, outdoor sport and recreation, cemeteries and local transport infrastructure (uses that are considered Green Belt appropriate in the NPPF). The parcel does not contain 'visually significant slopes'<sup>1</sup> near settlements which may help safeguard the countryside from encroachment. Little or no encroachment has taken place in the parcel since the previous amendment to the Green Belt (1986).
  - The parcel will be scored as making a '**Moderate Contribution**' to the Green Belt where the parcel consists predominantly of countryside in use for agriculture, outdoor sport and recreation, cemeteries and local transport infrastructure. The parcel contains 'visually significant slopes' near settlement(s) which may help safeguard the countryside from encroachment. Some

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<sup>1</sup> As identified in Settlement Edge Landscape Sensitivity Study (January 2010)

encroachment has taken place since the previous amendment of the Green Belt.

- The parcel will be scored as making a **‘Weak Contribution’** where the parcel contains very little countryside and significant encroachment has taken place since the previous amendment to the Green Belt.
- The parcel will be scored as making a **‘No Contribution’** where the parcel contains no countryside and significant encroachment has taken place since the previous amendment to the Green Belt.

d) In terms of the fourth Green Belt purpose (Preserve the setting and special character of historic towns) the Review will treat the following settlements as ‘historic towns’ as defined in the Epping Forest District Settlement Hierarchy Technical Paper: Chipping Ongar; Waltham Abbey; Epping; and Sawbridgeworth which although is located in East Herts, meets the criteria of a ‘historic town’ and is in close proximity to EFDC.

- The parcel will be scored as making a **‘Strong Contribution’** where there is historic town within or adjacent to the parcel, and a significant portion of the parcel is within the setting of the historic towns and/ or any heritage assets within those towns, especially those closest to the settlement boundary. The Green Belt in contributes positively to the historic significance of the town and/or heritage assets within the town and the removal of the Green Belt here is likely to cause harm to the setting and significance of the historic town and its heritage assets.
- The parcel will be scored as making a **‘Moderate Contribution’** where there is historic town within or adjacent to the parcel, and a significant portion of the parcel is within the setting of the historic towns and/ or any heritage assets

within those towns, especially those closest to the settlement boundary. The Green Belt here only provides a moderate contribution to the historic significance of the town and/or heritage assets within the town and the removal of the Green Belt here is unlikely to cause considerable harm to the setting and significance of the historic town and its heritage assets.

- The parcel will be scored as making a '**Weak Contribution**' where there is historic town within or adjacent to the parcel, however only a small portion of the parcel is within the setting of the historic towns and/ or any heritage assets within those towns. The Green Belt here does not contribute positively to the historic significance of the town and/or heritage assets within the town and the removal of the Green Belt here is unlikely to cause harm to the setting and significance of the historic town and its heritage assets.
  - The parcel will be scored as making '**No Contribution**' where there no historic town within or adjacent to the parcel.
- e) In terms of fifth Green Belt purpose (To assist in urban regeneration, by encouraging the recycling of derelict and other urban land) this purpose is considered to be more complex to assess than the other four purposes at a local / parcel level because the relationship between the Green Belt and recycling of urban land can be influenced by a range of factors including local plan policies, brownfield land availability and the land / development market and cannot practically be assessed on a parcel by parcel basis. It is therefore considered that the Green Belt as a whole has uniformly fulfilled this purpose and the fifth purpose is not factored into the detailed assessment of sites for this reason.

- f) Each parcel will be scored against the first four national purposes of the Green Belt and will be scored according to its level of contribution.
- g) If the parcel makes 'no contribution' it will receive a score of 0; if it makes a 'weak' contribution it will receive a score of 1 and so forth up to 5, as set out in Table 1 below. All purposes are considered to be of equal importance at this stage therefore no weighting will be applied to the scoring

**Table 1: Scoring parcels against the national purposes of the Green Belt**

<b>Score</b>	
<b>0</b>	<b>No Contribution</b>
<b>1</b>	<b>Weak</b>
<b>2</b>	<b>Relatively Weak</b>
<b>3</b>	<b>Moderate</b>
<b>4</b>	<b>Relatively Strong</b>
<b>5</b>	<b>Strong</b>

- h) The scores will be aggregated for each parcel to provide an indication of its overall contribution to the Green Belt across the four purposes of the Green Belt.
- i) Documentary evidence recording the outcome of the appraisal this will include:
- Maps
  - Site photos
  - Aerial / Satellite photos
  - Site appraisal schedule

### **Phase 3: Analysing the results of the Phase 2 appraisal**

15. The purposes of this phase are (i) to produce a District-wide analysis identifying the priorities for the protection of the Green Belt in the long-term and, (ii) by reference to the relative significance of the contribution land within the District makes in serving the Green Belt purposes, the scope for releasing

and safeguarding land currently within the Green Belt. If appropriate, this phase of the Review will also consider the scope for including additional land within the Green Belt.

16. Although it is useful to understand the parcels' contribution towards all the purposes of the Green Belt, the aggregate scores will not necessarily capture the contribution an individual parcel is making for each purpose. For example, if a parcel has scored a 'strong' for preventing the sprawl of a large built up area, but has scored less favourably against other purposes and has a low aggregate score, it is nonetheless making a 'strong' contribution to the Green Belt. Likewise, if a parcel has scored a 'moderate contribution' across a number of the Green Belt purposes but has a high aggregate score, it should not necessarily be concluded that it is making a strong contribution to the Green Belt. The focus of the analysis at this stage of the Green Belt Review will therefore be to determine which parcels or parts of parcels are the strongest and weakest against each purpose.

#### **Phase 4: Assessment of 'Non Green Belt' constraints**

17. The Settlement Hierarchy Technical Paper has established categories of settlements: town, large village, small village and hamlet. Settlements have been placed into the most appropriate categories in accordance with the services and facilities available in each location. This analysis also draws on the accessibility assessment that has been undertaken by Essex County Council on behalf of the District.
18. The smallest settlements (hamlets) are those where there is no discernible centre, are fully within the Green Belt, and with few (if any) community facilities. Given the relative lack of existing services, and the emphasis in the NPPF on locating new development in and around places to make the best use of existing facilities, it is not reasonable or desirable to consider hamlets as a potential location for planned growth or release from the Green Belt. Therefore the towns, large villages and small villages will be the focus for areas of search during Stage 2.

19. There are a number of environmental designations within the district which preclude development taking place. The following constraints will therefore be applied on a district wide basis, using GIS mapping software:
- a. Strategic Flood Risk Assessment (April 2015) – showing zones 2, 3 and 3b (Zone 1 applies to all land outside of zones 2, 3 and 3b)
  - b. Special Protection Areas (SPA)
  - c. Special Areas of Conservation (SAC)
  - d. Sites of Special Scientific Interest (SSSI)
  - e. Local Nature Reserves (LNR)
  - f. Corporation of London Epping Forest Buffer land (land owned and managed by the Corporation of London, which although not a formal part of the Forest, is not available for development)
20. Natural England apply “Impact Risk Zones” for development around SSSIs. These IRZs do not necessarily restrict development, but require detailed analysis of the potential impacts of development, and agreement with Natural England on whether any mitigation measures may be needed. For the purposes of this work, it is not necessary to apply the IRZs, but they will need to be applied when potential preferred allocations are identified later in the Plan making process.
21. Areas of the district that fall within Flood Zones 2, 3 and 3b, and/or any of the designations in b. to f. in para 19 above, will not be considered further for development purposes. However, if analysis indicates there is insufficient suitable land available to meet development needs, land within Flood Zone 2 will also be considered for development purposes, in accordance with the sequential approach.

#### **Phase 5: Identify broad locations for further assessment**

22. The areas of search will be refined by applying a buffer around each settlement, and using this in conjunction with existing defensible boundaries where they are present. It is reasonable that the area of search around each settlement is varied to reflect the categories in the settlement hierarchy. It is not sensible to apply the same buffer to each location, as this would lead to

disproportionate areas of search i.e. too small for the larger settlements, and too big for the smaller settlements. As such, the following buffers will be applied:

- |                  |        |
|------------------|--------|
| a. Town          | 2 km   |
| b. Large village | 1 km   |
| c. Small village | 0.5 km |

23. The buffers used broadly reflect the Essex County Council Accessibility Assessment, in that 2km represents a maximum reasonable walking distance. A range of points will be used to determine the appropriate area to be included. Where designated town centres or local shopping parades exist, the appropriate buffer will be drawn from the boundary of this. In addition, further buffers will be created from Central Line stations (8) and main line rail stations (2). Lastly, buffers will be created from bus stops within existing settlements, as identified by the Essex County Council Accessibility Assessment. This work has already taken account of the frequency of bus services, and this has subsequently informed the position of settlements in the hierarchy. This series of buffers will provide an amalgamated area of search, which will be refined taking into account the presence of defensible boundaries as defined by the Green Belt Review methodology. Where defensible boundaries exist, the area of search will be adjusted further away, or nearer to ensure this area of search is sensible and robust.

### **Phase 6: Reporting**

24. This phase of the Green Belt review will compile evidence necessary to produce a report on the work undertaken at Phases 1 to 5. The report will set out the key findings of the high-level review and include the maps, aerial photos and other documentation necessary to decide on the broad locations for further assessment in the Stage 2 Review.



## Stage 2

### **Phase 7: Further site-specific assessment and reporting**

25. Stage 2 of the Green Belt Review will involve the following which will help inform consideration of the release of specific sites from the Green Belt for development and the associated alterations to the Green Belt boundary in the Local Plan:

- a more detailed appraisal of study areas against Green Belt purposes;
- an assessment of the harm to the Green Belt purposes if land within those areas is released in the Local Plan to accommodate new development;
- a more detailed appraisal of physical features which are readily recognisable and likely to be permanent that could form clear Green Belt boundaries

26. Stage 2 is to be undertaken by consultants appointed following a competitive quotation exercise. The methodology will be established in detail by those appointed, in discussion with EFDC officers, but will take into account evidence base work already completed including, but not limited to, Landscape Character Assessment (CBA 2010) and Settlement Edge Landscape Sensitivity Study (CBA 2012)

27. The outcomes from the Stage 2 Review will be published alongside the Draft Local Plan consultation. However it is likely that Stage 2 may need to be revisited and updated providing further detail after taking account of the consultation responses once further plan making decisions have been taken by the Council.

### **Cross Boundary Working and the Duty to Cooperate**

28. Section 33A of the Planning and Compulsory Purchase Act 2004 and the NPPF require that local authorities and other prescribed agencies work together on an active, ongoing and constructive basis on strategic cross boundary matters. The Council has identified the long-term protection of the

Green Belt's permanence and openness as a cross boundary issue with neighbouring local authorities and other identified organisations (see below). It is important that these organisations are engaged in the preparation of the Green Belt Review given the extent of the Green Belt in the District and the cross-cutting issues related to potential Green Belt release affecting areas in the District and neighbouring local authority areas.

29. The organisations listed below will be engaged throughout the preparation of the methodology and Stage 1 and Stage 2 of the Green Belt Review including through the cross boundary 'Co-operation for Sustainable Development Group'. Town and Parish Councils will have the opportunity to be briefed on the outputs of the Stage 1 Review prior to finalising the Stage 1 Report and prior to undertaking the Stage 2 Review. The purpose of this is to allow key stakeholders the opportunity to review technical information collected and provide input through their local knowledge into findings of the Stage 1 Review. The final Stage 1 Report will be published once it has been considered by EFDC's Cabinet and accepted into the evidence base which is the protocol for all Local Plan Evidence.
  
30. The Stage 2 Report will be published alongside the Draft Local Plan (Regulation 18) Consultation Document once the evidence has been accepted into the Council's evidence base as explained above.
  
31. The Council will work with these organisations and any others identified through the course of preparing the Green Belt Review.
  - Essex County Council (including Highways)
  - Hertfordshire County Council
  - Uttlesford District Council
  - Harlow District Council
  - East Hertfordshire District Council
  - Broxbourne Borough Council
  - Brentwood Borough Council

- Chelmsford City Council
- Relevant London authorities (LB Enfield, LB Redbridge, LB Havering, LB Waltham Forest, Greater London Authority)
- City of London Corporation
- Epping Forest District Council: Various Officers, Chief Executive, Leader and Portfolio Holder
- Co-operation for Sustainable Development Member Board
- Co-operation for Sustainable Development Officer group
- Lee Valley Regional Park Authority
- Town and Parish Councils within Epping Forest District (Town and Parish and Councils within adjoining authority areas as appropriate)
- Highways England
- Natural England
- Historic England
- Homes and Communities Agency
- Environment Agency

## Appendix 1: EFDC Green Belt Parcel Assessment Criteria

<p><b>1<sup>st</sup> Purpose: Check the Unrestricted Sprawl of Large Built Up Area</b> (Built up areas are London, Harlow, Cheshunt and Hoddesdon)</p>
1) Does the parcel act, in itself, as an effective barrier against sprawl from large built-up areas outside of the study area, specifically London and Harlow, Cheshunt and Hoddesdon?
2) Does the parcel contribute, as part of a wider network of parcels, to a strategic barrier against the sprawl of these built-up areas?
3) Are there any defensible boundaries within the parcel (see definition for defensible boundary) which act as an effective barrier against sprawl from large-built-up areas outside of the study area specifically London, Harlow Cheshunt and Hoddesdon?
<p><b>2<sup>nd</sup> Purpose: Prevent Neighbouring Towns from Merging</b> (Towns are Epping, Waltham Abbey, Loughton / Debden, Chigwell, Buckhurst Hill, Chipping Ongar, North Weald Bassett, Theydon Bois, Roydon and Lower Nazeing)</p>
4) Does the parcel itself provide, or form part of, a gap or space between towns?
5) Are there any defensible boundaries within the parcel (see definition for defensible boundary) which prevent neighbouring towns from merging?
6) What is the distance (km) of the gap between the towns?
7) Is there evidence of ribbon development on well used thoroughfares between towns (B roads and larger)?
8) What is the visual perception of the gap between the towns' well used thoroughfares?
9) Would a reduction in the gap compromise the separation of towns in physical terms?
10) Would a reduction in the gap compromise the separation of towns and the overall openness of the parcel visually?
<p><b>3<sup>rd</sup> Purpose: Assist in Safeguarding the Countryside from Encroachment</b></p>
11) Does the Green Belt designation in this land parcel protect countryside that is in use for agriculture, forestry, outdoor sport and recreation, cemeteries and local transport infrastructure (uses that constitute appropriate development based on NPPF paragraph 89, bullets 1 and 2, and paragraph 90, bullet 3)?
12) Having regard to the topography of land and location relative to existing development, does the Green Belt designation in this land parcel prevent encroachment, or in some other way assist in safeguarding the countryside from encroachment?
13) Has there already been any significant encroachment by built development or other urbanising elements?
<p><b>4<sup>th</sup> Purpose: Preserve the Setting and special Character of Historic Towns</b> (Historic Towns are Chipping Ongar, Waltham Abbey, Epping. Sawbridgeworth which is located in East Herts was also included as 'historic town' due to its proximity to EFDC)</p>
14) Are there any historic towns (Chipping Ongar, Waltham Abbey, Epping and Sawbridgeworth) within or adjacent to the parcel?
15) To what extent is Green Belt land within the setting of the historic towns and/ or any heritage assets within those towns, especially those closest to the settlement boundary?
16) Does the open character of the Green Belt land contribute positively to the

historic significance of the town and/or heritage assets within the town?
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17) Would the removal of the Green Belt designation and consequent loss of openness from urbanising development on that land, cause harm to the setting and significance of the historic town and heritage assets?
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## Appendix 2: Glossary of Terminology

<b>Countryside:</b>	The land and scenery of a rural area. (Oxford Dictionary online)
<b>Defensible Boundary:</b>	A physical feature which is readily recognisable marking the limit or dividing line of an area which is likely to be permanent. (Based on Oxford Dictionary online). Such features include a wall, woodland, watercourse, body of water, main roads or other significant piece of infrastructure.
<b>Encroachment:</b>	A gradual advance beyond usual or acceptable limits. (Oxford Dictionary online)
<b>Historic Town:</b>	Chipping Ongar, Waltham Abbey and Epping
<b>Large Built Up Areas:</b>	London, Harlow, Cheshunt and Hoddesdon
<b>Merging</b>	This can be by way of general sprawl (above) or ribbon development (see below);
<b>Neighbouring towns:</b>	Towns or villages that function as towns (see Settlement Hierarchy Technical Paper).
<b>Openness</b>	Absence of built development or other urbanising elements (not openness in a landscape character sense - topography and woodland / hedgerow cover).
<b>Ribbon development</b>	The building of houses along a main road, especially one leading out of a town or village'. (Oxford Dictionary Online) This includes historical patterns of, or current pressures for, the spread of all forms of development along movement corridors, particularly major roads.
<b>Sprawl:</b>	Spread out over a large area in an untidy or irregular way. (Oxford Dictionary online)
<b>Thoroughfare</b>	A road or path forming a route between two places (Oxford Dictionary online). B roads higher classification will be considered.
<b>Urban:</b>	In, relating to, or characteristic, of a town or city. (Oxford Dictionary online)