

# **Harlow Local Development Plan GREEN BELT REVIEW**



**May 2016**

**This document forms part of the Evidence Base for  
the Harlow Local Development Plan.**

**The Evidence Base can be viewed at  
[www.harlow.gov.uk/evidence](http://www.harlow.gov.uk/evidence)**

# **Green Belt Review**

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## 1. History of the Green Belt

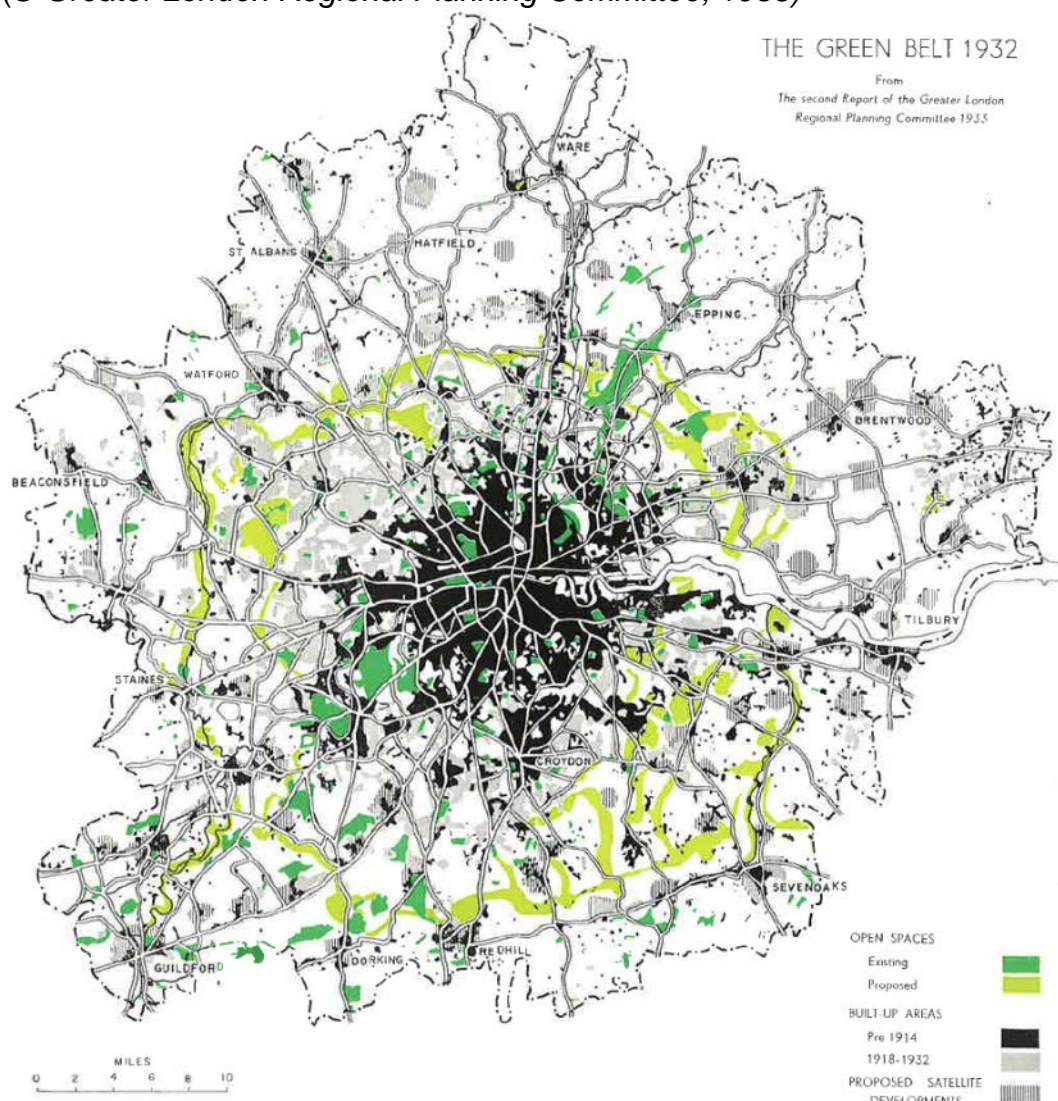
### Green Belt progression

1.1 The origins of the Green Belt can be traced back as far as the 16<sup>th</sup> century, although it was not until the 1930s when legislation was enacted which allowed an official Green Belt around the capital, known as the Metropolitan Green Belt, to be designated. For the purposes of this review, the term “Green Belt” refers to the Metropolitan Green Belt unless otherwise stated.

### 1.2 Timeline of Green Belt development

- **1890:** Lord Meath, Chairman of the Parks and Open Spaces Committee of the London County Council, suggested that suburban parks and open spaces should be linked by ‘broad sylvan avenues and approaches’
- **1898:** Ebenezer Howard first published visions for garden cities surrounded by rural belts
- **1901:** William Bull MP published proposals for a green girdle around London which would be half a mile wide and consist of a ‘circle of green sward and trees which would remain permanently inviolate’. Shortly after, Lord Meath published his own plan for a green girdle
- **1911:** George Pepler proposed a parkway around London, which would be a strip of land linking existing open spaces, with a transport system in the centre, interspersed with grass and trees
- **1919:** The Town and Country Planning Association called for towns to be ‘surrounded by a rural belt’. The London Society’s proposed Development Plan for London called for green spaces in the outer suburbs of London
- **1924:** The London County Council carried a resolution asking its Town Planning Committee to consider whether a green belt around London would be desirable (this is the first recorded use of the term ‘green belt’)
- **1929:** Raymond Unwin, chief planner of the Greater London Regional Planning Committee, proposed a Green Girdle/Belt around London – see Fig. 1.1. The Girdle would compensate for open space deficiencies in the capital and ensure separation between urban and rural areas. In terms of the city inhabitants, it would provide fresh air, fruit and vegetables, space for recreation, contact with nature and protection from disease.

**Fig. 1.1: Proposals for a Green Girdle/Belt around London, 1932**  
 (© Greater London Regional Planning Committee, 1933)



- **1935:** The Greater London Regional Planning Committee officially proposed a Green Belt. London County Council launched a Green Belt loans scheme, whereby the Council offered grants to local authorities towards the cost of acquiring land for inclusion in the Green Belt. Within a few years, local authorities reached agreements to purchase over 11,000 hectares of land to be protected
- **1938:** The Green Belt (London and Home Counties) Act 1938 enacted, which allowed land to be acquired by agreement, and meant authorities were prohibited from selling Green Belt land without permission from the Minister for Health (then in charge of planning)
- **1944:** Patrick Abercrombie's Greater London Plan mapped four zones around London, including a Green Belt zone (see Figs. 1.2 and 1.3)
- **1947:** The Town and Country Planning Act 1947 enacted, allowing Local Authorities to designate land as Green Belt without purchasing it. Development proposals on such land could be refused planning permission with compensation for landowners paid by central Government

- **1955:** Government circular (42/55) issued, requiring all Local Authorities to consider establishing clearly defined Green Belts in their Development Plans, with associated objectives and policies
- **Late 1950s – present:** Further central Government guidance on Green Belts issued and updated through Circulars, Planning Policy Guidance Notes and the National Planning Policy Framework & Guidance. Existing Green Belts extended and new ones created through County Development/Structure Plans, Regional Plans and Local Plans

1.3 In the Greater London Plan 1944, Abercrombie mapped four zones around London (see Fig. 1.2): Inner Urban Ring (high density areas with open space deficiencies), Suburban Ring (sprawl from Inner Urban Ring), Green Belt Ring (see Fig. 1.3) and Outer Country Ring (mostly agricultural land with potential for expansion and new settlements).



Fig. 1.2: The Four Rings  
(Greater London Plan, © Patrick Abercrombie, 1944; caption added)

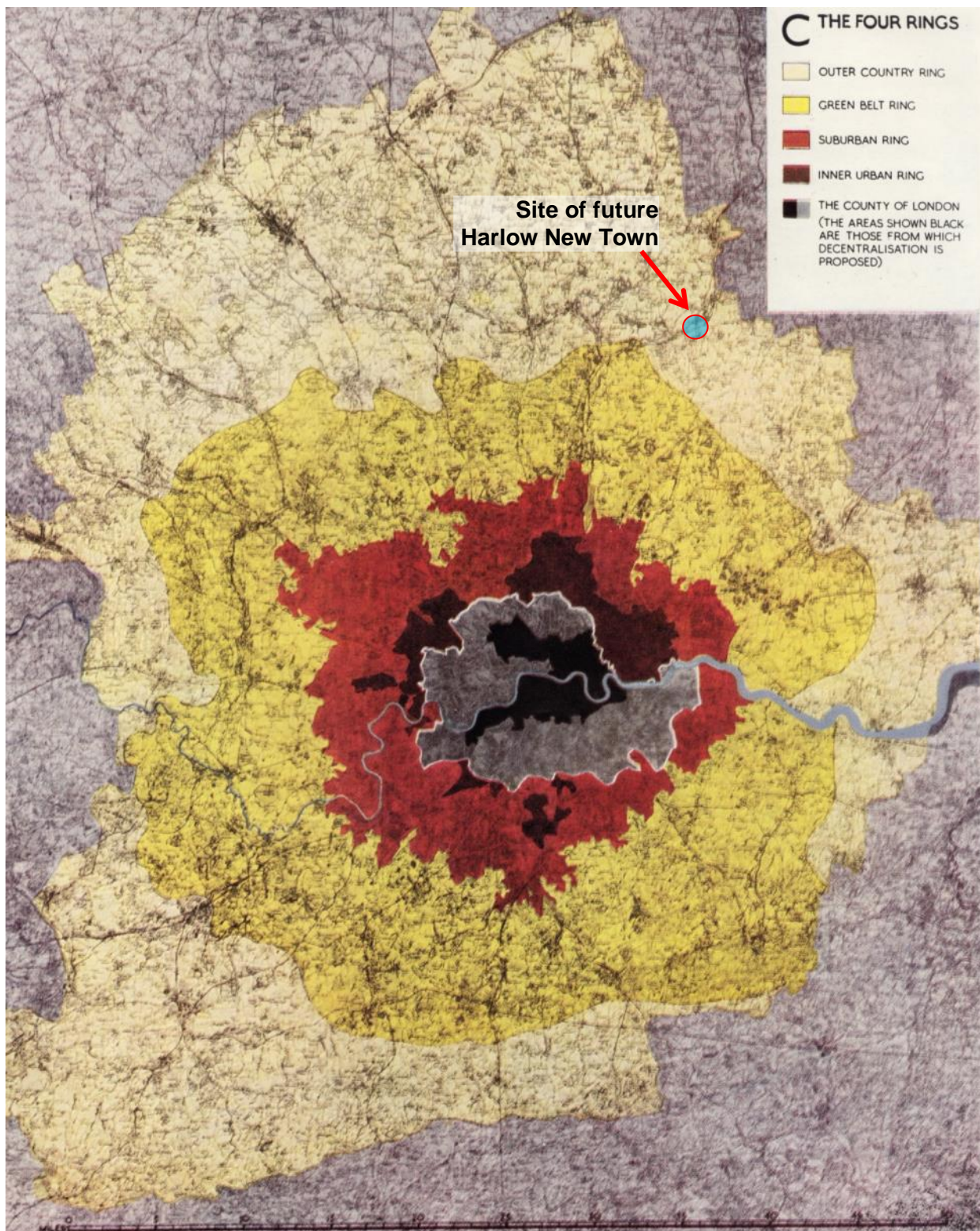
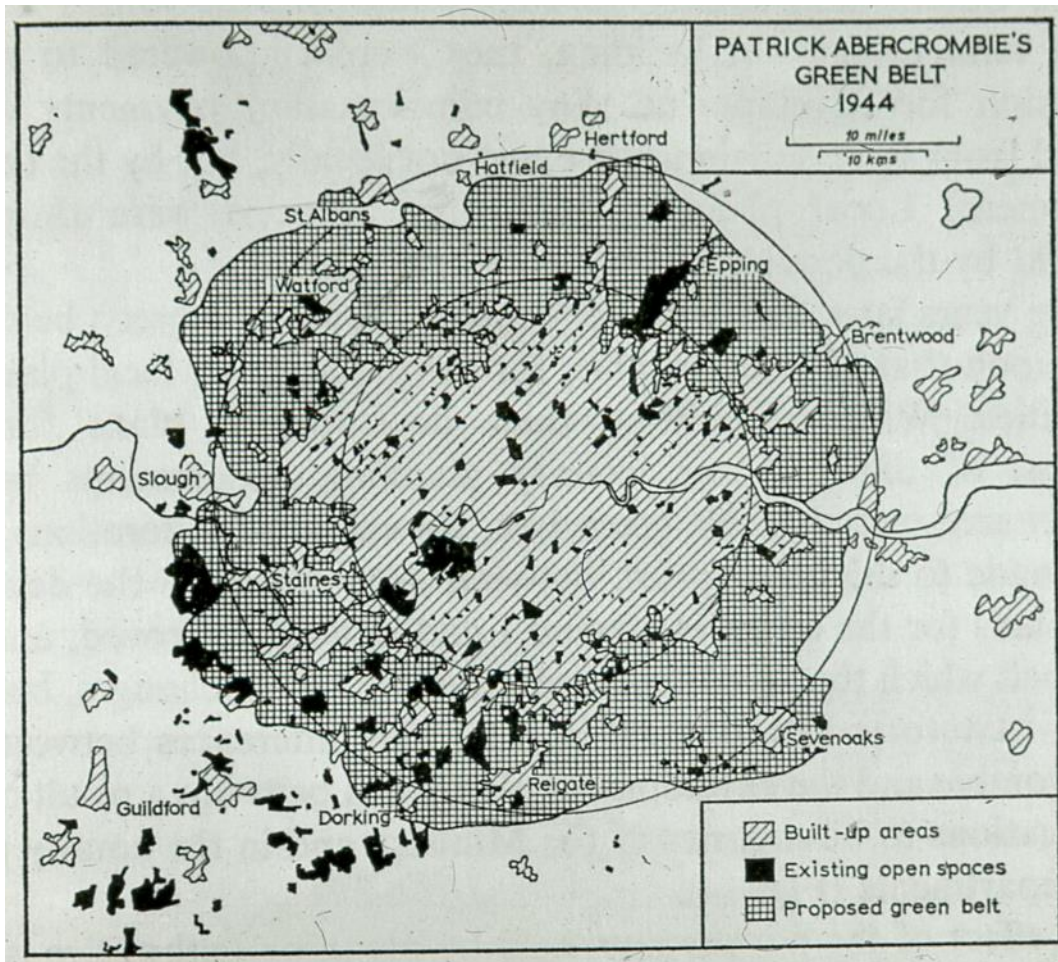




Fig. 1.3: Green Belt as set out in the Greater London Plan  
(Greater London Plan, © Patrick Abercrombie, 1944)



- 1.4 Abercrombie stated that the Green Belt Ring was of paramount importance because it provided the first stretches of open country and addressed the public open space deficiency of central London. It included private and open land permanently safeguarded from building, as well as wide areas of parks, woodlands and scenic landscapes. Expansion of existing communities was to be severely limited, except for immediate housing provision and restricted manufacturing expansion.
- 1.5 Circular 42/55 defined three main functions of Green Belt land:
  - to check the further growth of a large built-up area;
  - to preserve the special character of a town; and
  - to prevent neighbouring settlements from merging into each other
- 1.6 The circular also stated that approval should normally not be given to the construction of new buildings, or for the change of use of existing buildings to purposes other than agriculture, sport, cemeteries or other appropriate rural uses. Former unsightly Green Belt uses, such as worked-out gravel pits, were often adapted for sailing, fishing, water sports, playing fields or woodland. Other potentially unsightly uses, such as sewage disposal works, were made sympathetic to the landscape through suitable planting and landscaping.

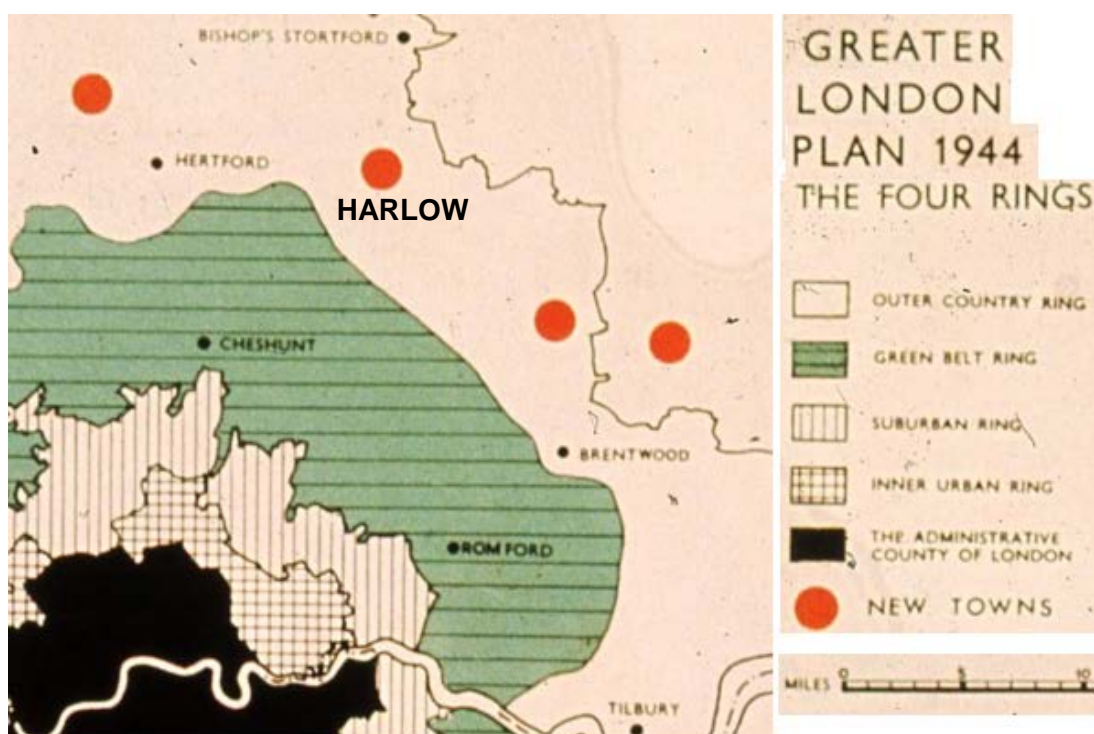


- 1.7 By the 1990s, the Metropolitan Green Belt around London had been extended through Country Structure/Development Plans and Local Plans. Other Green Belts across England were also established, including around Newcastle, York, Nottingham, Derby, Cambridge, Gloucester, Oxford and Bristol.

### Harlow and sub-regional context

- 1.8 In the 1930s, Essex County Council (then known as the County Council of Essex) worked with London County Council to protect land using a Green Belt designation.
- 1.9 The outer boundary of the north-eastern area of Abercrombie's proposed Green Belt around London was truncated approximately 3 miles to the south-west of the location of the proposed Harlow New Town (see Fig. 1.4).

*Fig. 1.4: Harlow in the context of The Greater London Plan Four Rings (Greater London Plan, © Patrick Abercrombie, 1944; 'Harlow' caption added)*



- 1.10 The County Council of Essex approved in principle Abercrombie's Green Belt, but the County of Essex Development Plan (approved in 1957) made modifications which increased the width of the Green Belt in Essex, resulting in the Green Belt boundary then broadly following the original southern built-up edge of Harlow. The Plan stated that the Green Belt was designed to prevent further sprawl of the built-up area of London and to maintain an area of natural countryside within reach of Londoners, with the possibility of designating some land as playing fields to address open space deficiencies in inner London.
- 1.11 Proposals to extend the Green Belt boundary to keep the sprawl of London in check were adopted in the Approved Review Essex Development Plan 1976. Through the Hertfordshire Structure Plan, the Green Belt was extended further northwards into the

southern area of Hertfordshire, resulting in Harlow being surrounded by Green Belt by 1988 (see Fig. 1.5).

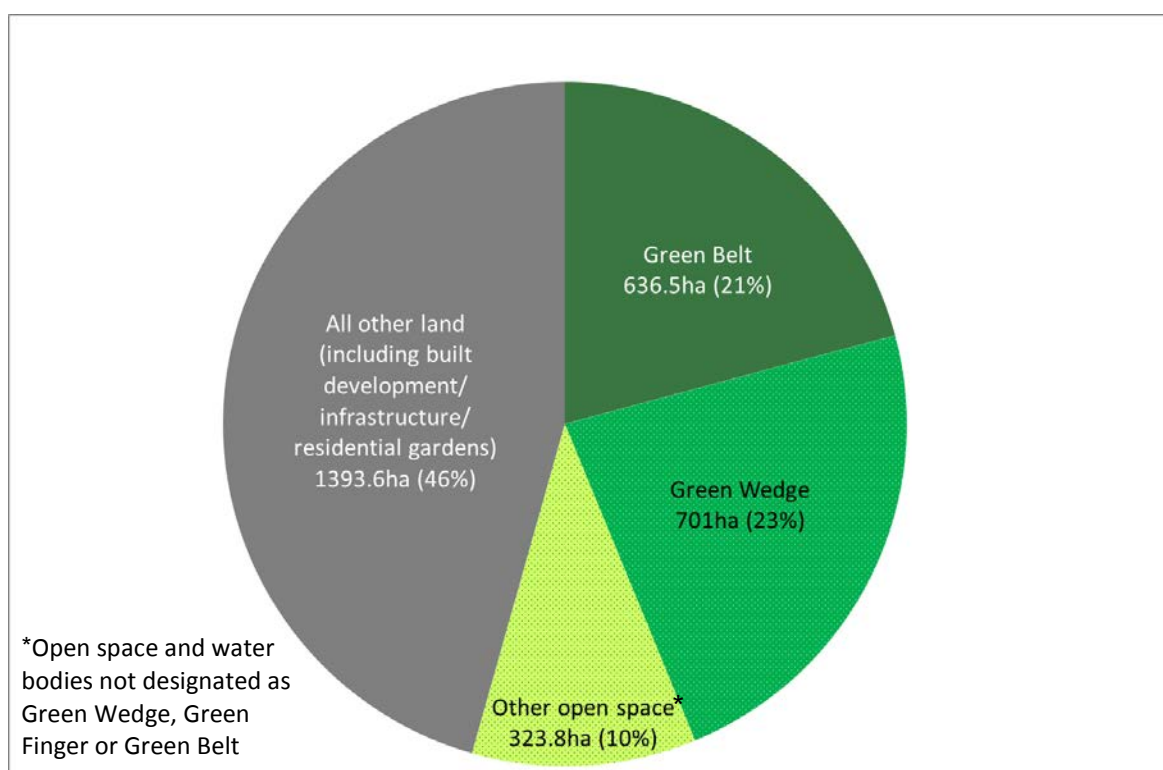
- 1.12 Despite the fact that the Green Belt extends beyond Harlow as far north as Hertfordshire, it is still part of the Metropolitan Green Belt which was established over 60 years ago, primarily to prevent the unrestricted sprawl of London. For brevity, the term 'Green Belt' is normally used when referring to the Metropolitan Green Belt.

*Fig. 1.5: Green Belt around Harlow*  
(The Green Belts, © HMSO, 1988)

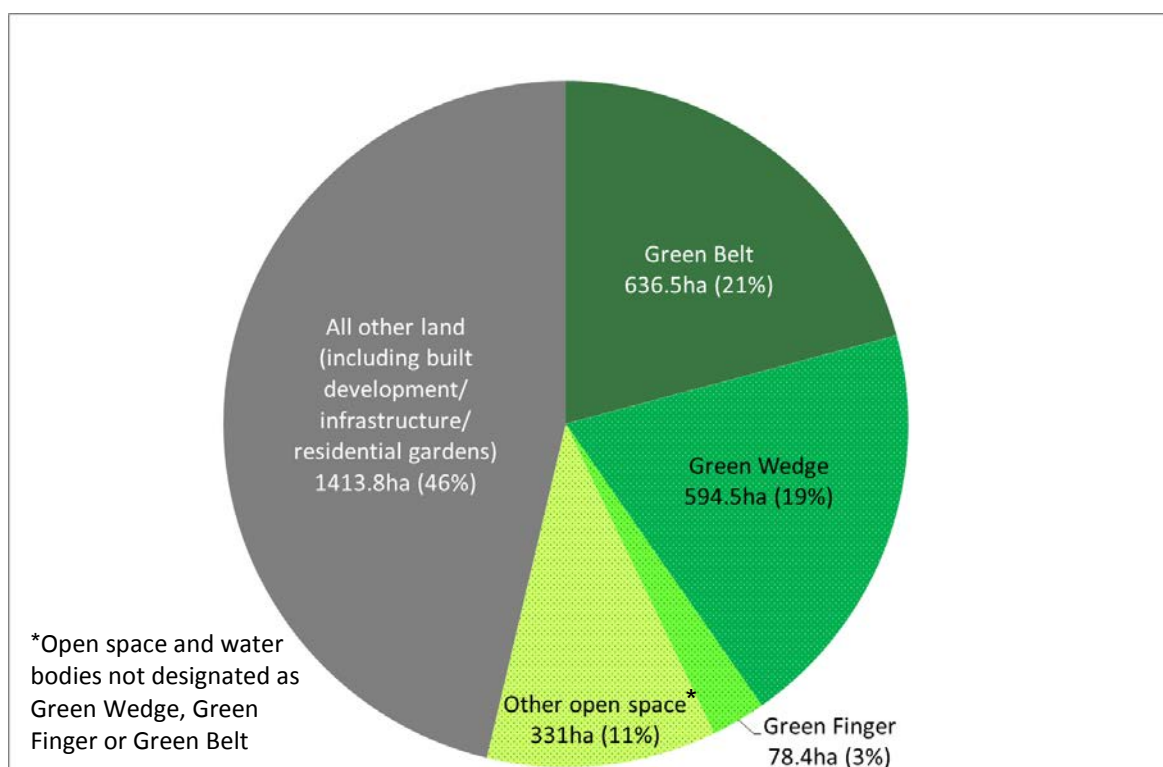


- 1.13 Harlow is a large, free-standing, planned former New Town with tight administrative boundaries. Approximately 54% of the district's area is covered by open space, specifically comprising Green Belt, Green Wedge and other open space; this figure increases further if you also include residential gardens.
- 1.14 Fig. 1.6 shows the proportions of land types in Harlow. Fig. 1.7 shows the same, but takes into account the outcomes of the Green Wedge Review which recommends minor modifications to the Green Wedge network (including removing secondary school building footprints and some small areas of open space from the Green Wedge).

*Fig. 1.6: Total land area in Harlow – land types (based on the Proposals Map of the Adopted Replacement Harlow Local Plan, 2006)*



*Fig. 1.7: Total land area in Harlow – land types (considering proposals in Green Wedge Review)*



- 1.15 In the local context, both graphs highlight the fact that over half of the entire land in Harlow is formed of open space – with around one fifth being designated as Green Belt.

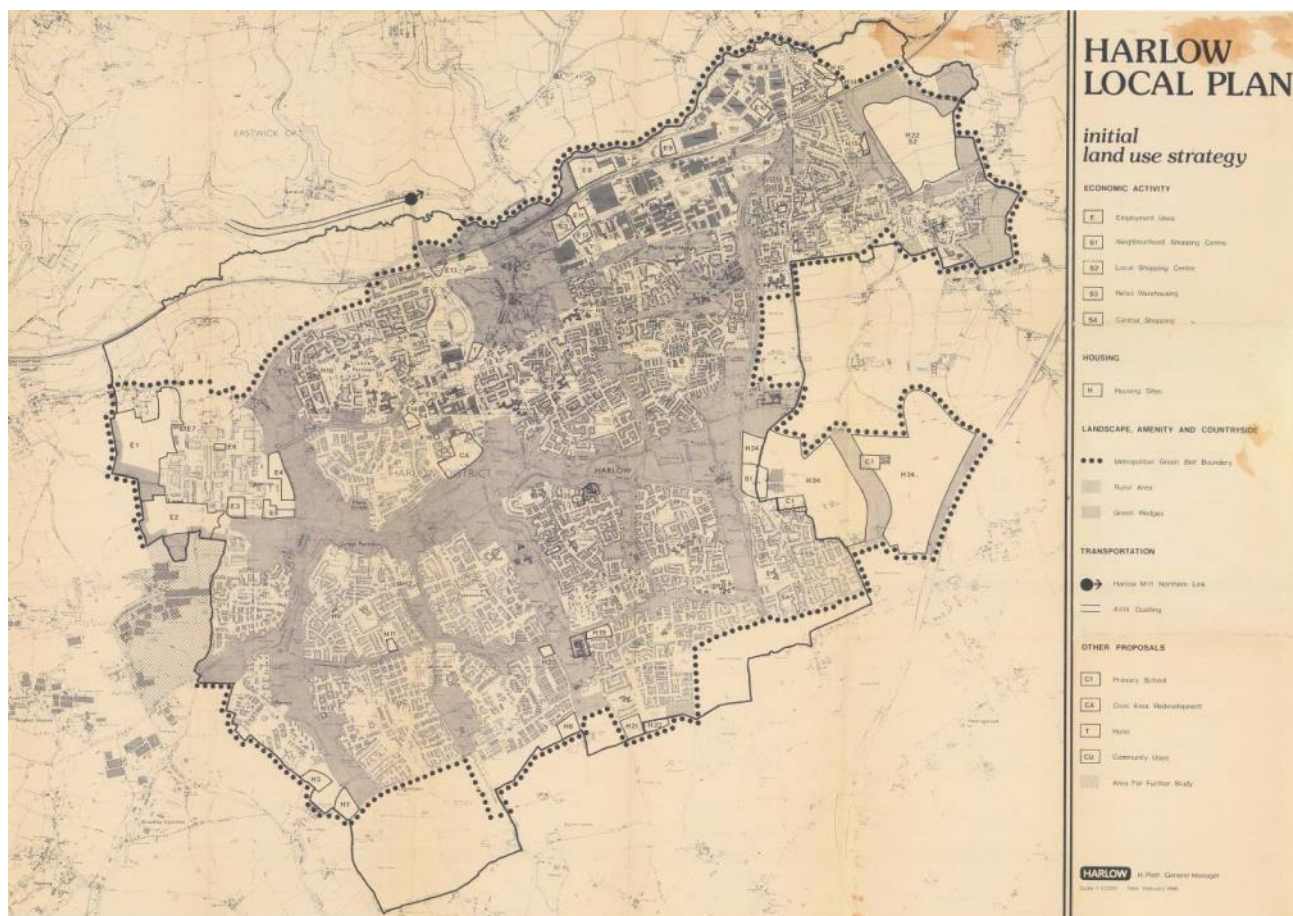


## 2. Local Green Belt Policies

### Harlow Local Plan – April 1995 (amended 1996)

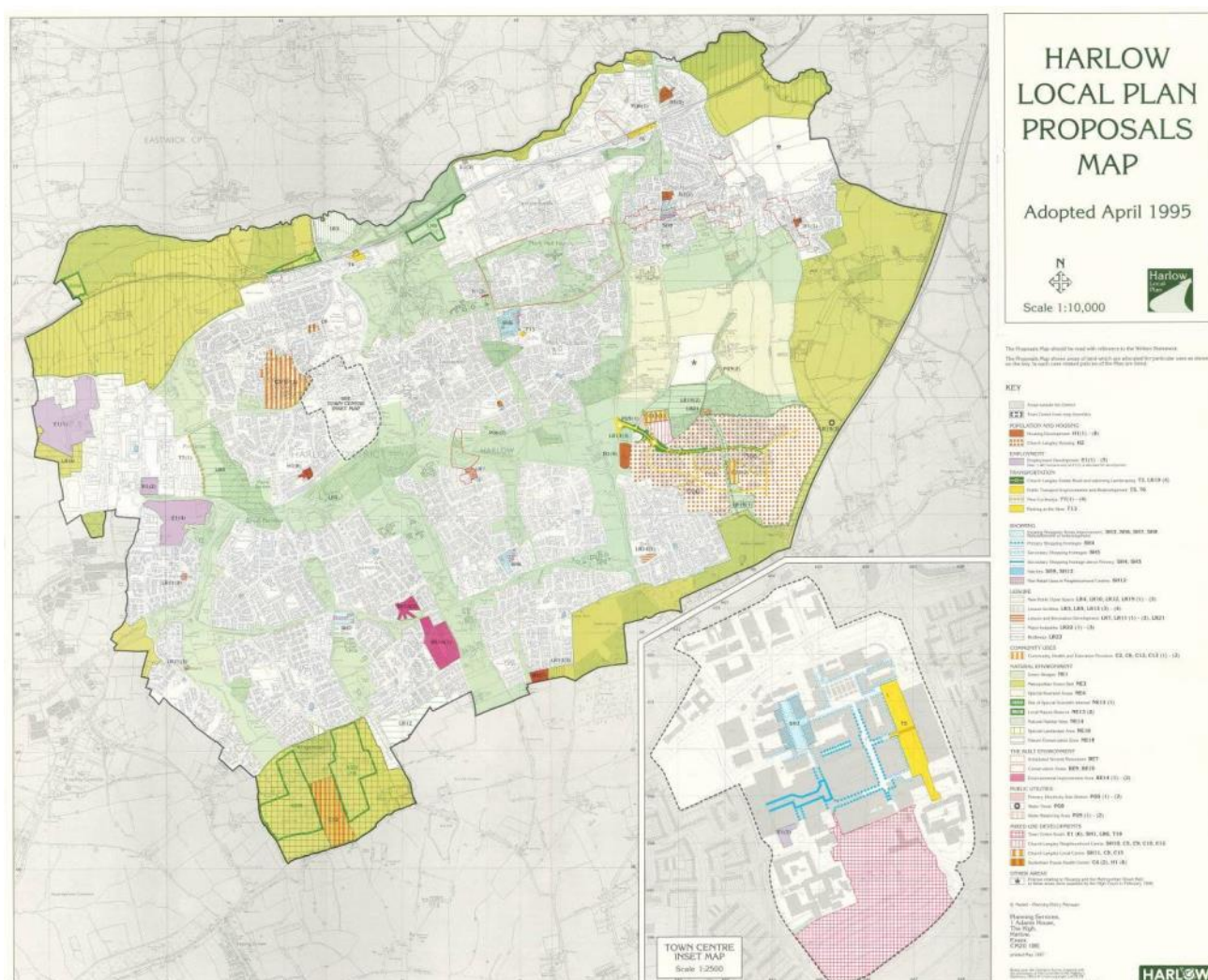
- 2.1 The Approved Essex Structure Plan (1982) adopted the general extent of the Green Belt boundary around Harlow and stated that it should meet the edge of the urban boundary, but exact Green Belt boundaries should be established through the Local Plan once adopted. The establishment of permanent Green Belt boundaries was, therefore, a major consideration during the preparation of the Harlow Local Plan.
- 2.2 In 1985, outline planning applications were submitted to Harlow and Epping Forest District Councils for the development of a new neighbourhood comprising 3,500 dwellings and associated facilities, on land to the north of Harlow Common and between the A414 and the M11. A local inquiry was eventually held to determine the applications.
- 2.3 At the time, the land was in the Epping Forest district and had been given 'interim' Green Belt status in the 1976 Approved Review Essex Development Plan. The Secretary of State agreed with the Inspector's conclusion that whilst the exact boundary of the Green Belt had yet to be established in an adopted Local Plan, the presumption against development inappropriate to a Green Belt site applied to this land.
- 2.4 However, the Secretary of State also agreed with the Inspector's conclusion that the housing needs of Harlow and Stansted needed to be met and that no other sites would likely be available; therefore it was concluded that very special circumstances existed which justified making an exception to the normal Green Belt restrictions. This decision was also in accordance with the inquiry into the expansion of Stansted Airport, which concluded that this area in general would need to accommodate some of the Airport's new housing needs.
- 2.5 In February 1988, planning permission was, therefore, granted for the development (now known as the Church Langley neighbourhood). Following a Boundary Commission Review, in October 1989 the land – along with land to the north, part of which became the New Hall development – was subsequently transferred to the Harlow district. Consequently, in the Harlow Local Plan (adopted 1995; modified 1996), the area which had been transferred from the Epping Forest district to the Harlow district was no longer shown designated as Green Belt.
- 2.6 An Initial Land Use Strategy, produced in 1986, initially mapped the boundary of the Green Belt in Harlow (see Fig. 2.1 – boundary marked by dotted line). Note that the Green Belt boundary was drawn such to exclude the development land referred to above.

*Fig. 2.1: Initial Land Use Strategy (Harlow Council, 1986)*



2.7 Following the adoption of the Plan, a Judicial Review was lodged in the High Court by developers regarding the inclusion of land north of Gilden Way in the Green Belt. It was ruled that part of the land to the north of Gilden Way (and the playing field to the south) should be excluded from the Green Belt. The result was that in 1996, the boundary was redrawn, but the new boundary was not clearly defined using readily identifiable features such as the railway line that had previously been used to define the boundary (see Fig 2.2 – Green Belt land shaded in lime green).

Fig. 2.2: Local Plan Proposals Map, including amendments as a result of the Judicial Review (Harlow Council, 1996)



- 2.8 The Harlow Local Plan stated that the purposes of the Green Belt are to check the unrestricted sprawl of large built-up areas, to safeguard the countryside from encroachment, to prevent neighbouring towns from merging into one another, to preserve the special character of historic towns, and to assist in urban regeneration.
- 2.9 The conflict between the need for development and the need for countryside conservation was recognised in the Plan; hence the Green Belt boundary was drawn to take account of longer term development needs that could arise in the future, resulting in the designation of a Special Restraint Area. The Plan also stated that due to the Green Wedge policy, there was no need for the Green Belt boundary to be drawn tightly around the Harlow built-up area. This was because Green Wedges were seen as a more nuanced approach to place making that was key to shaping the spatial character of the town in Gibberd's Masterplan.
- 2.10 Policy NE3 in the Plan only allowed development in the Green Belt in very special circumstances for specific purposes – including agriculture, forestry, small-scale facilities for sport and recreation, and other appropriate uses – so long as any such development would not impair the appearance of the countryside.

**Adopted Replacement Harlow Local Plan (ARHLP) – July 2006**

- 2.11 The Adopted Replacement Harlow Local Plan (July 2006), which replaced the Harlow Local Plan (1995) as the statutory development plan for the district, is the extant development plan for Harlow. It lists the same five main purposes of Green Belt land as in the Harlow Local Plan (1995). Additionally, it sets out objectives for use of the Green Belt as stated in the now-superseded Planning Policy Guidance 2: Green Belts – including providing opportunities for access to the countryside, outdoor sport and recreation for urban dwellers; to retain and enhance attractive landscapes; to improve damaged and derelict land; to secure nature conservation; and to retain land in uses relating to agriculture and forestry.
- 2.12 The ARHLP seeks the prevention of development on Green Belt land – unless it is for a defined ‘appropriate use’ – and the continued protection and permanence of the Green Belt.
- 2.13 Policy NE3 of the ARHLP sets out when development in the Green Belt would be considered acceptable:

**NE3:** Within the Metropolitan Green Belt there is a general presumption against inappropriate development. Except in very special circumstances, planning permission will not be granted unless for:

1. Development required for agriculture and forestry;
2. Essential small scale facilities for outdoor sport and outdoor recreation, for cemeteries and for other uses of land which fulfil the objectives of the Green Belt;
3. Limited extension, alteration and replacement of existing dwellings;
4. The reuse of existing buildings in accordance with Policy NE9

Development permitted under this policy should preserve the openness of the Green Belt and should not conflict with any of the main purposes of including land within it.

Development that is permitted must be of a scale, design and siting such that the character and appearance of the countryside is not harmed.

- 2.14 The ARHLP states that there is concern regarding the effects which extensions to houses can have on the appearance and character, both in itself and in relation to nearby buildings; as well as the enlarging of existing dwellings resulting in the reduction of supply of smaller dwellings suitable for first-time buyers. As such, Policy NE4 relates to the extensions of dwellings in the Green Belt:



**NE4:** Planning permission will not be granted for extensions to existing dwellings within the Green Belt unless they are:

1. Visually subordinate to the original building;
2. Designed to relate well to the existing buildings in terms of scale, size, design, siting and construction materials, following the design principles of the Essex Design Guide.

Modest extensions to small dwellings which are intended to provide kitchen, bathroom or amenities to meet the expectations of current living standards will be considered sympathetically.

The extension of the curtilage of a residential property onto adjoining agriculture or amenity land will not normally be permitted.

- 2.15 The ARHLP identifies the land north of Gilden Way as a Special Restraint Area, which had been designated as such in the Harlow Local Plan (1995) following a Judicial Review. Policy NE5, regarding Special Restraint Areas, states that:

**NE5:** The following Special Restraint Area has been identified on the Proposals Map: Ref NE5/1, Land North of Gilden Way.

There will be a presumption against development in the Special Restraint Area unless:

1. The development meets the Green Belt policy test, and does not prejudice the development of the site for longer term needs;
2. The land is shown to be needed for development resulting from a review of this Local Plan

- 2.16 Policy NE6 states additional considerations which must be taken into account if a need is established to develop land identified as a Special Restraint Area.

- 2.17 In accordance with the Essex and Southend-on-Sea Replacement Structure Plan (2001), a review of Green Belt boundaries – including safeguarded land – was carried out during the preparation of the ARHLP. An assessment was made as to whether there were any exceptional circumstances that justified altering the Green Belt boundaries. The ARHLP therefore recognised the principle of releasing Green Belt land in exceptional circumstances to meet future development needs.

- 2.18 However, it was considered that the housing and employment land allocations – set out in the Structure Plan – could be accommodated in the district without the release of any Green Belt land for development. The Green Belt boundaries were therefore not altered during preparation of the ARHLP.

### **Monitoring of Green Belt policies in the Adopted Replacement Harlow Local Plan**

- 2.19 In the thirty years following the introduction of the Town and Country Planning Act 1947, the policy of restraint on new development in the Green Belt in Essex was considered to be very successful. The countryside remained open, despite the close proximity of Greater London, and towns and villages maintained their identity and did not expand substantially or merge with one another. The presence of the Green Belt was also believed to deter people from making spurious planning applications on open countryside.
- 2.20 It is important to note, however, and contrary to some misconceptions, that little consideration was given to the environmental quality of land designated as Green Belt, or how land designated as such could have inhibited the creation of more sustainable

patterns of development, either in the form of planned urban extensions or new settlements. In the context of Essex, and other counties surrounding London, this has given rise to the significant expansion of settlements beyond the outer Green Belt boundary, such as Braintree, Chelmsford, Colchester and Witham where there are less severe restraint policies. This has resulted in the unsustainable extension of commuting patterns to 70 miles or more from the centre of London.

**New Local Development Plan – Issues and Options Consultation – January 2011**

- 2.21 In 2011, the Council completed public consultation on Issues and Options as part of preparation of a new Local Development Plan and which reflected the growth set out in the East of England Plan. This sought views on a range of spatial planning issues in the town. A specific question was asked regarding the Green Belt: “Question 15. Should the Council consider underused open spaces and other undeveloped land for development before considering releasing land in the Green Belt?” The majority (58%) of the 188 respondents to the question disagreed or strongly disagreed. In other words, the majority of respondents **did not** want open spaces in Harlow to be considered for development **before** Green Belt land was considered.
- 2.22 In response to the factors that shape and guide new development in Harlow, the protection of important landscapes and Green Wedges were ranked 1st and 2nd respectively with protection of the Green Belt ranked 3<sup>rd</sup>.
- 2.23 In some of the more detailed responses the following issues were raised:
- It would be better to build on Green Belt land than ‘destroy’ Green Wedges
  - Green Wedges should be built on before Green Belt land is developed
  - Development in the east of the district is preferable in terms of Green Belt as the M11 provides a boundary to expansion
  - The Green Belt should be protected and retained as undeveloped land
  - Vacant brownfield sites should be considered before development in the Green Belt
  - The Green Belt is valued land which plays a strategic regional role, both in Harlow and in adjoining authorities
  - A Green Belt Review needs to consider whether the Green Belt land is performing Green Belt functions
- 2.24 The responses to those questions highlighted the strong appreciation of the non-Green Belt open spaces within Harlow, suggesting that local designations, that were at the heart of place shaping within Harlow, were more highly valued than strategic planning tools such as the Green Belt.
- 2.25 A number of comments regarding the Green Belt were also made by other organisations, summarised as follows:
- Eastwick and Gilston Parish Council
- Proposed release of Green Belt north of Harlow demonstrates there is no recognition of its role in conserving the urban form of the New Town. It fails to appreciate that a key role of the Green Belt is to prevent coalescence of settlements. It is also there to encourage regeneration
  - The Green Belt should be expanded to recognise the need to contain pressures which will otherwise result in the coalescence of settlements from Harlow northwards to Bishops Stortford
- Environment Agency
- Harlow must consider underused open space and other undeveloped land for development before considering releasing land in the Green Belt

**Epping Forest District Council**

- Strategic objectives should be broader than the town itself and include the function of the Green Belt
- Underused open spaces and undeveloped land should be considered before releasing Green Belt, but this will also depend on whether the spaces have other currently unrecognised value, e.g. for wildlife or informal recreation

**Epping Upland Parish Council**

- Need to protect the Green Belt around Epping Green as it forms a strategic gap preventing Harlow and Epping from merging and any development in this location would impact upon the openness and function of the Green Belt

**Essex County Council (Environment, Sustainability and Highways)**

- Maximise use of existing urban area before considering sites in Green Belt. Priority should be to maximise regeneration benefits for existing urban area and communities

**Natural England**

- Green Wedges and Green Belt should be lowest priority for new development
- Should not consider underused open spaces for development before releasing land in the Green Belt
- Protecting the Green Belt should be the 4th most important priority directing new development

**NHS West Essex (Public Health and Property)**

- Protecting the Green Belt should be the 4th most important priority directing new development

**Roydon Parish Council**

- Additional issues include the role of the Green Belt

**Widford Parish Council**

- Object to any development on Green Belt land north of the River Stort in East Hertfordshire which is unnecessary, unsustainable and undemocratic

**New Local Development Plan – Emerging Strategy and Further Options Consultation – May 2014**

- 2.26 In 2014, the Council completed public consultation on the Emerging Strategy and Further Options as part of preparation of the new Local Development Plan. This primarily sought views on proposed growth levels and a number of examples of where new development could be located in the town up to the year 2031.
- 2.27 In some of the more detailed responses, the following issues were raised:
- Significant growth in Harlow, beyond the committed schemes at New Hall and Gilden Way, will necessitate a Green Belt Review
  - Development to the south of Harlow would destroy Green Belt land
  - Land to the south is considered to be less sensitive than the land to the west and south-west in terms of the Green Belt conflict considerations



- Development in the south-west could encroach on historic landscapes and the Green Belt
- Some scenarios might involve loss of Green Belt which is concerning
- Object to use of Green Belt land for development and creeping development which encircles the town and threatens quality of life
- Allowing sites to absorb residential development will reduce the council's need to allow development in the Green Belt
- More sustainable to develop a site within the established urban area and provide local facilities for residents as opposed to relying on Green Belt sites
- Harlow's 'grandiose' growth claim sadly includes the use of Green Belt
- Cooperation should include a comprehensive review of the Green Belt in Epping Forest District to ensure the needs of both districts are met
- Green Belt boundaries must be capable of enduring beyond the plan so the Council should aim for the upper (15,000 dwelling) growth level
- Harlow will need to work with adjoining authorities on a joint Green Belt review
- Urban sprawl must be prevented by keeping the Green Belt in place

2.28 A number of comments regarding the Green Belt were also made by various organisations, summarised as follows:

Essex County Council

- Welcomes appropriate green belt assessment and review as an integral component of the plan preparation process

Eastwick & Gilston Parish Council

- Oppose designation of land north of Harlow for housing development due to loss of Green Belt land among other factors

Hunsdon Parish Council and Eastwick & Gilston Parish Council

- Green Belt north of Harlow is of special significance and applies particularly to Harlow in preserving the town's landscape structure. The Green Belt boundaries in this area are well-established and robust and should not be altered

Natural England

- Green Belt land could be used for recreation to ensure communities have access to an appropriate mix of green spaces

English Heritage

- Development at Harlow North, Harlow South, West Katherine's, West Sumners and North East Harlow will require co-operative working with neighbouring authorities and the release of Green Belt land

### 3. National Green Belt Definitions and Policies

#### Planning Portal

- 3.1 The Planning Portal is hosted by central Government and serves as a resource for a range of planning topics. It describes Green Belt land as a specially designated area of countryside protected from most forms of development, to help stop urban sprawl, preserve the character of existing settlements and encourage development within existing built-up areas.

#### National Planning Policy Framework

- 3.2 The National Planning Policy Framework (NPPF), published in 2012, defines the overarching role of planning in securing sustainable development including meeting local housing need. This means that when preparing local plans, Councils should plan positively to ensure they are able to meet their Objectively Assessed Needs. This is also important to ensure that the Council is able to demonstrate a 5 year supply of developable land.
- 3.3 The NPPF provides national policies on planning issues, including housing supply, open space management and sustainable development. It informs the production of local planning policies and the determining of planning applications. It was published in March 2012 and replaced most existing national planning guidance, including PPG2: Green Belts.
- 3.4 The NPPF states that the Government attaches great importance to Green Belts and recognises the fundamental aim of Green Belts is to prevent urban sprawl by keeping land permanently open. Five purposes of Green Belt are identified in the NPPF:
- 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.
- 3.5 Whilst these purposes articulate the policy role of the Green Belt nationally, it is couched in language that reflects the concerns associated with unplanned sprawl rather than planned growth in the form of urban extensions or new settlements at sustainable locations.
- 3.6 In addition, the NPPF makes a number of requirements regarding Green Belt land:
1. Local Planning Authorities should plan to enhance the beneficial use of Green Belt land, such as looking for opportunities to provide access and outdoor sport and recreation; retain and enhance landscapes, visual amenity and biodiversity; and to improve damaged and derelict land
  2. New Green Belts should only be established in exceptional circumstances, when normal policies are not adequate and major changes in circumstance have occurred. The consequences of new Green Belt land for sustainable development would have to be considered, as well as consistency with Local

Plans for adjoining areas and how the new Green Belt would meet other NPPF objectives

3. Green Belt boundaries should be established in Local Plans and, once established, should only be altered in exceptional circumstances through the preparation or review of a Local Plan. Any alterations should have regard to the intended permanence of the boundaries in the long-term, so they can endure beyond the plan period
4. Local planning authorities should ensure that substantial weight is given to any harm to the Green Belt, when deciding planning applications for development in the Green Belt. Inappropriate development in the Green Belt is harmful and should only be approved in very special circumstances, although these circumstances will not exist unless the potential harm to the Green Belt is outweighed by other considerations.

3.7 In the context of the NPPF requirements, and having regard to the growth needs of the area as identified by the joint SHMA (produced on behalf of East Hertfordshire, Epping Forest, Harlow and Uttlesford Councils), the Council has undertaken this Green Belt Review to inform the preparation of its new Local Plan.

3.8 In defining Green Belt boundaries, the NPPF states that Local Planning Authorities should:

- Ensure consistency for meeting sustainable development requirements i.e. to enable towns and settlements to expand in a sustainable manner
- Not include land which is unnecessary to keep permanently open
- Identify areas of 'safeguarded land' between the urban area and the Green Belt, which is only to be developed on in the long-term to meet development needs beyond the plan period and following a review of the plan
- Ensure that Green Belt boundaries will not require alteration at the end of the plan period
- Define boundaries clearly, using physical features that are easily recognisable and likely to remain permanent

3.9 As part of this Green Belt Review, therefore, the Council will consider the appropriateness of existing Green Belt boundaries to ensure that they do not inhibit the ability of Harlow to expand in a sustainable manner.

3.10 Construction of new buildings in the Green Belt is inappropriate according to the NPPF, except for (subject to various criteria):

- buildings for agriculture and forestry;
- provision of appropriate facilities for outdoor sport, outdoor recreation and for cemeteries;
- the extension or alteration of a building which does not result in disproportionate additions;
- the replacement of a building, provided the new building is in the same use and not materially larger than the one it replaces;
- limited infilling in villages & affordable housing
- the redevelopment of brownfield land
- renewable energy projects (where there are very special circumstances which may include the introduction of wider environmental benefits)

- 3.11 The NPPF states that certain other forms of development may exceptionally be allowed in the Green Belt, provided they preserve the openness of the Green Belt and do not conflict with Green Belt purposes:
- mineral extraction;
  - engineering operations;
  - local transport infrastructure which can demonstrate a requirement for a Green Belt location;
  - the re-use of buildings provided that the buildings are of permanent and substantial construction; and
  - development brought forward under a Community Right to Build Order
- 3.12 Aside from the main guidance, the NPPF makes a number of more general statements regarding Green Belts:
- Land-use planning principles should protect the Green Belts around the main urban areas
  - It should be considered whether it is appropriate to establish Green Belt around or adjoining any new larger scale development

### **National Planning Practice Guidance**

- 3.13 The National Planning Practice Guidance (NPPG) is an online resource, originally published in 2014, which accompanies the NPPF.
- 3.14 Regarding the Green Belt, the NPPG reasserts the requirements of the NPPF that:
- Local Plans should meet objectively assessed needs unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, or specific policies indicate development should be restricted (such policies including land designated as Green Belt);
  - once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan; and
  - Green Belt issues should be discussed with adjoining authorities in accordance with the duty to co-operate
- 3.15 The NPPG also provides guidance on Local Green Space designations and the Green Belt, and sites and areas for waste management facilities in the Green Belt.

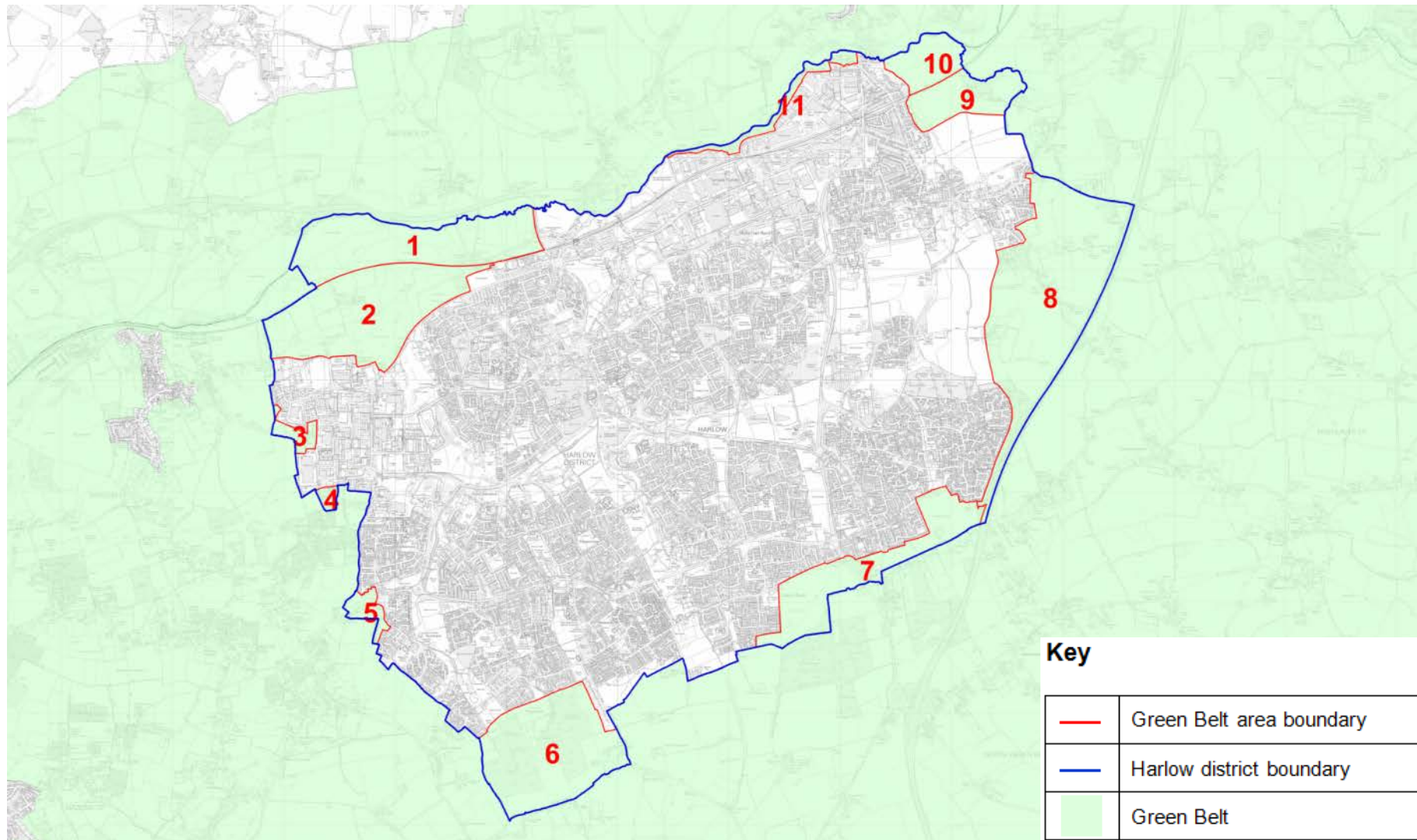
## 4. Purpose of the Green Belt Review

- 4.1. In order to address the Objectively Assessed Need for housing, and in accordance with national policies and guidance, the extent and boundaries of the Green Belt in Harlow has been reviewed. This is an integral part of the preparation of the new Harlow Local Development Plan and ensures all matters are reviewed to demonstrate the robustness of the Council's approach.
- 4.2. To accommodate Harlow's future housing need, and therefore meet the Council's key priority of providing more and better housing, all potential options that could be used for future housing sites need to be considered, including the possibility of allocating land currently within the Green Belt for such development.
- 4.3. More importantly, the Green Belt Review has demonstrated that the Council has considered all options for accommodating the district's housing needs. It has also provided appropriate evidence to reinforce the continued designation of areas of land within Harlow as Green Belt, in light of pressures for land to be allocated for development purposes.
- 4.4. It is important to note that the Review assesses how land is functioning as Green Belt, and **not** whether it would be suitable land for development. The Strategic Housing Land Availability Assessment (SHLAA), which has been undertaken independently from the Green Belt Review, assesses land for its suitability for development. Together, with the consideration of the provision of infrastructure, these assessments will help inform the allocation of land in the HLDP to meet Harlow's future development needs.



## 5. Green Belt Review Methodology

- 5.1. Whilst the NPPF provides guidance on Green Belt Reviews and identifies five key purposes of Green Belts, there is no nationally agreed Review methodology. However, a number of other Local Authorities have undertaken Green Belt Reviews in recent years, using a variety of approaches in assessing the functionality of Green Belt areas against the five key Green Belt purposes. Based on these, the Council created a bespoke Review methodology for Harlow.
- 5.2. Harlow is surrounded by Green Belt land; to the north in the East Hertfordshire district, and to the west, south and east in the Epping Forest district. Harlow, however, has a small geographical area compared to many other local authorities, resulting in a tight administrative boundary close to the urban area of the town. This means the Green Belt in Harlow forms part of the wider Metropolitan Green Belt that extends across the surrounding districts, which is acknowledged by this Green Belt Review.
- 5.3. In accordance with the duty to co-operate, the methodology was shared with the adjoining councils of Epping Forest District Council and East Hertfordshire District Council, from whom comments on the Review were sought. A workshop was also held with the Councils, whereby the methodologies and initial findings were discussed. A number of points relevant to the Harlow methodology were raised as a result of these cross-boundary discussions and minor amendments to the methodology were made as a result, to ensure a consistent approach to the Metropolitan Green Belt across the wider area.
- 5.4. In order to carry out the Green Belt Review in a manageable way, all Green Belt land in Harlow was divided into eleven areas (mapped in Fig. 5.1) to allow each area to be assessed in terms of the Green Belt purposes. These areas (and subsequently sub-areas for Stage 2 where necessary) were defined using identifiable features such as the railway line, roads and woodland edges.

*Fig. 5.1: Green Belt Areas for Assessment in Harlow*

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5.5. The Green Belt Review was carried out in three stages.

### STAGE 1: Analysis of Green Belt areas

5.6. Information for each area was collected through desk-based exercises, including existing land-use, planning application history and presence of ecologically important sites. Each area was then assessed using criteria based on the purposes of the Green Belt as set out in the NPPF. The methodology for Stage 1 is detailed below.

#### AREA INFORMATION, PLANNING HISTORY & LAND USE

Information	Information Details
<b>Area Location</b>	Location of Green Belt area
<b>Land Coverage (ha)</b>	Total amount of land (in hectares) covered by the Green Belt area
<b>LWS/PLWS IDs</b>	IDs of any Local Wildlife Sites (LWS) or Potential Local Wildlife Sites (PLWS) which are wholly or partly located within the Green Belt area <i>Source: Harlow Local Wildlife Site Review 2011</i>
<b>LNR/SSSI IDs</b>	IDs of any Local Nature Reserve (LNR) sites or Sites of Special Scientific Interest (SSSI) which are wholly or partly located within the Green Belt area <i>Note: the IDs are those found in the GIS layers, so may not match IDs used elsewhere</i>
<b>OSS Study IDs</b>	IDs of any sites identified by the Open Space Study (OSS) 2013 which are wholly or partly located within the Green Belt area. The Value/Quality (VQ) rating of the sites is shown in brackets
<b>Planning History of area</b>	Commentary on planning applications submitted on sites within the Green Belt area between April 2001 and April 2014

For each of the land uses listed below, the following is specified for the Green Belt area:

Information	Information Details
<b>% of area</b>	The approximate percentage of the area covered by the land use
<b>Descriptions/ names of sites</b>	Descriptions and/or names of sites (including Open Space Study [OSS] site IDs where applicable) covered by the related land use

Land uses are categorised as follows:

- Recreation (*official recreation areas, outdoor sports areas, and sport/leisure centres and their grounds*)
- Park grassland / Park woodland (*areas of grassland / woodland found within a park*)
- Other grassland / Other woodland (*grassland / woodland which is found in areas not covered by another category, such as amenity greenspace, green corridors and natural/semi-natural greenspace*)
- Education (*land used by an educational establishment, such as primary/secondary schools and colleges, including associated buildings*)
- Allotments (*designated allotment plots*)
- Agriculture (*fields used for arable or pastoral farming*)
- Open water (*areas of water, such as rivers, ponds and lakes, which have not been included in another category*)
- Other use (*area where the use does not fit into any category, such as churches, public houses, roads, residential properties and residential gardens*)

## AREA ASSESSMENT

### Green Belt Purpose 1: Check the unrestricted sprawl of large built-up areas

- To what extent the area is contained by the Harlow urban area
- Whether the area acts as an effective barrier to prevent unrestricted sprawl from Harlow
- Whether there is an existing strong, physical feature that can provide this purpose without this area

### Green Belt Purpose 2: Prevent neighbouring towns from merging

- Whether removal of this area would result in the perceived merging of Harlow with an adjoining settlement
- Whether there is an existing strong, physical feature that can provide this purpose without this area

### Green Belt Purpose 3: Assist in safeguarding the countryside from encroachment

- The presence of land of ecological interest (including Sites of Scientific Interest, Local Nature Reserves, Local Wildlife Sites and Potential Local Wildlife Sites)
- Quality and value scores of land which was assessed in the Open Spaces Study
- The amount of woodland and hedgerows present

### Green Belt Purpose 4: Preserve the setting and special character of historic towns

Harlow has a unique history in terms of its New Town heritage. This purpose, therefore, considers factors relating to that heritage, including:

- The presence of Scheduled Ancient Monuments, Listed Buildings, Listed Gardens and Conservation Areas
- Whether there are any significant settings for any historic assets
- Whether the area links with the existing Green Wedge, as the surrounding countryside linking with the Green Wedge network was a fundamental part of Gibberd's original Masterplan for the New Town

For each purpose, the following scoring was used for each area:

Option	Score
Fulfils purpose	2
Partially fulfils purpose	1
Does not fulfil purpose	0

*Note: There is also a fifth Green Belt purpose – assist in urban regeneration, by encouraging the recycling of derelict and other urban land. It is possible that Green Belt land has been successful in assisting urban regeneration by encouraging the recycling of brownfield land. However, due to Harlow's tight administrative boundary and the proximity of the Green Belt to the town's urban area, it is possible that the restriction the Green Belt has placed on expansion has actually hindered urban regeneration.*

*As such it is not considered possible to objectively assess the effect of individual Green Belt areas on the urban regeneration and what may have occurred had the Green Belt designation not existed. Therefore in accordance with Green Belt Reviews carried out by other Local Authorities, the Green Belt areas have not been assessed for this purpose.*

## OVERALL AREA SCORE

An overall score for each area was calculated by totalling the scores for each purpose. As the areas were scored on four purposes, with a maximum of 2 points per purpose, the total possible score for an area is 8.

Total Score	Description
5 – 8	Area scored well overall
4	Area scored averagely overall
1 – 3	Area scored poorly overall

## STAGE 2: Further analysis of Green Belt areas

- 5.7. In Stage 2, the areas which scored **averagely** or **poorly** in Stage 1 were divided into sub-areas, using identifiable features such as roads and woodland edges, and further assessed. The sub-areas are mapped on the Stage 2 Findings Map (see Fig. 7.4).

## SUB-AREA ASSESSMENTS

Each sub-area was assessed on:

- **Attributes\*** (presence of certain designations, including Flood Zones and Tree Preservation Orders)
  - **Environment** (land types, land uses and Open Spaces Study assessments)
  - **Ecology and biodiversity** (presence of ecological designations such as Local Wildlife Sites and other assets of ecological interest)
  - **Landscape and visual amenity** (Harlow Area Landscape Study assessment of wider area and site visit results)
  - **Settings of historic assets**
  - **Connectivity with the Green Wedge network**
- Provides contextual information on sub-area
- Provides evidence on whether sub-area is contributing to Green Belt purpose 3 (assisting in safeguarding the countryside from encroachment)
- Provides evidence on whether sub-area is contributing to Green Belt purpose 4 (preserve the setting and special character of historic towns)

A **summary** for each sub-area is also provided to conclude whether it is functioning effectively as Green Belt, along with an assessment on whether it has **potential for redesignation as Green Wedge or Green Finger** (if it is not functioning effectively as Green Belt).

*Note: Sub-areas are not further assessed on purpose 1 (checking the unrestricted sprawl of large built-up areas) or purpose 2 (preventing neighbouring towns from merging into one another), because it is only appropriate to assess larger areas on these purposes.*



**\*Abbreviations used in Attributes:**

- LWS Local Wildlife Site(s) present
- PLWS Potential Local Wildlife Site(s) present
- LNR Local Nature Reserve(s) present
- SSSI Site(s) of Special Scientific Interest present
- FZ2 Sub-area is wholly or partially in Flood Zone 2
- FZ3 Sub-area is wholly or partially in Flood Zone 3
- OSS Sub-area was wholly or partially assessed in the Open Spaces Study
- GWL Sub-area has a physical connection to the Green Wedge network
- TPO Tree(s) protected by Tree Preservation Orders are present
- LB Listed Building(s) present
- LG Listed Garden(s) present
- SAM Scheduled Ancient Monument(s) present

**STAGE 3: Assessment of inner Green Belt boundaries**

- 5.8. The Government is clear that protection of the Green Belt must continue. Paragraph 85 of the NPPF states that when defining Green Belt boundaries, local planning authorities should “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”.
- 5.9. The assessment of Green Belt boundaries is an important part of the preparation of the Local Development Plan, because removal of land from the Green Belt may not be justified if it would result in a weaker boundary (where there is no potential to strengthen it). There could also be cases where making a minor modification to a boundary to strengthen it could result in a small loss or gain of land in the Green Belt.
- 5.10. Stage 3 of the Review assessed the strength of the existing inner Green Belt boundaries where they meet the urban area of Harlow, and assessed the strength of any new inner boundaries which would be created as a result of carrying out potential changes identified at Stage 2 (such as removing land from the Green Belt).
- 5.11. It should be noted that this is seen against the wider context of the Metropolitan Green Belt, whereby the inner boundary is in fact that which adjoins the outer edge of the urban area of London, whereas the outer Green Belt boundary is in effect the other edge, north of Harlow in East Hertfordshire.

## GREEN BELT INNER BOUNDARY ASSESSMENTS

For each Green Belt area, the following was assessed:

- the strength of the existing inner boundary;
- the strength of the potential new inner boundary (as a result of potential changes identified at Stage 2 of the Review); and
- whether there is potential to strengthen any weak parts of the inner boundaries by making minor boundary modifications

Note: The 'inner boundary' is where the Green Belt boundary meets the urban area of Harlow. As Harlow is surrounded by Green Belt in adjoining districts, the 'outer boundary' is the district boundary. Stage 3 of the Review focussed on the inner boundary and, for brevity, this is usually referred to as the 'boundary'.

The strength of the inner boundaries was assessed by analysing the features that make up the boundaries. The strength that a certain type of feature has is detailed in the table below.

Boundary Type	Strong	Moderately Strong	Weak
Road	Motorway, A-road, B-road	Unclassified (e.g. residential street)	Private, unmade or unadopted
Railway	Functioning mainline		Disused
Water body	River	Edge of lake	Stream, drainage course or edge of pond
Hedgerow		Substantial	Insubstantial
Edge of land with environmental designation	National designation (i.e. SSSI)	Local designation (i.e. LWS or LNR)	
Tree belt	Protected (with or without shrubs)	Un-protected but substantial (with or without shrubs)	Sparse
Woodland edge	Protected woodland	Un-protected woodland	
Edge of residential/non-residential development		Clear edge	Less clear edge
Other			Rights of way; Field boundaries (e.g. fence or line on ground)

By considering the length and strength of the boundaries, it was possible to analyse boundary strengths in quantitative terms. For example, a Green Belt area with 300 metres of strong boundary, 200 metres of moderately strong boundary and 100 metres of weak boundary would have a boundary which is 50% strong, 33% moderately strong and 17% weak.

Where public access allowed, site visits were made and photographs taken of the existing inner boundaries and any potential new boundaries.

- 5.12. Regardless of any findings and conclusions in the Green Belt Review, any alterations to the inner Green Belt boundaries must be made and justified through the usual Local Plan preparation process (i.e. any alterations will be subject to consultation).
- 5.13. Evidently, the establishment of exact Green Belt boundaries in Harlow will be reliant on joint work with adjoining authorities because Harlow is surrounded by Green Belt in these authorities. As such, joint work on boundaries was to be carried out with Epping Forest District Council, but that Council made the decision to not pursue the joint work. Nonetheless, the results of this Review have been shared and discussed with both the authorities which adjoin Harlow to assist with the establishment of final Green Belt boundaries.

## Glossary

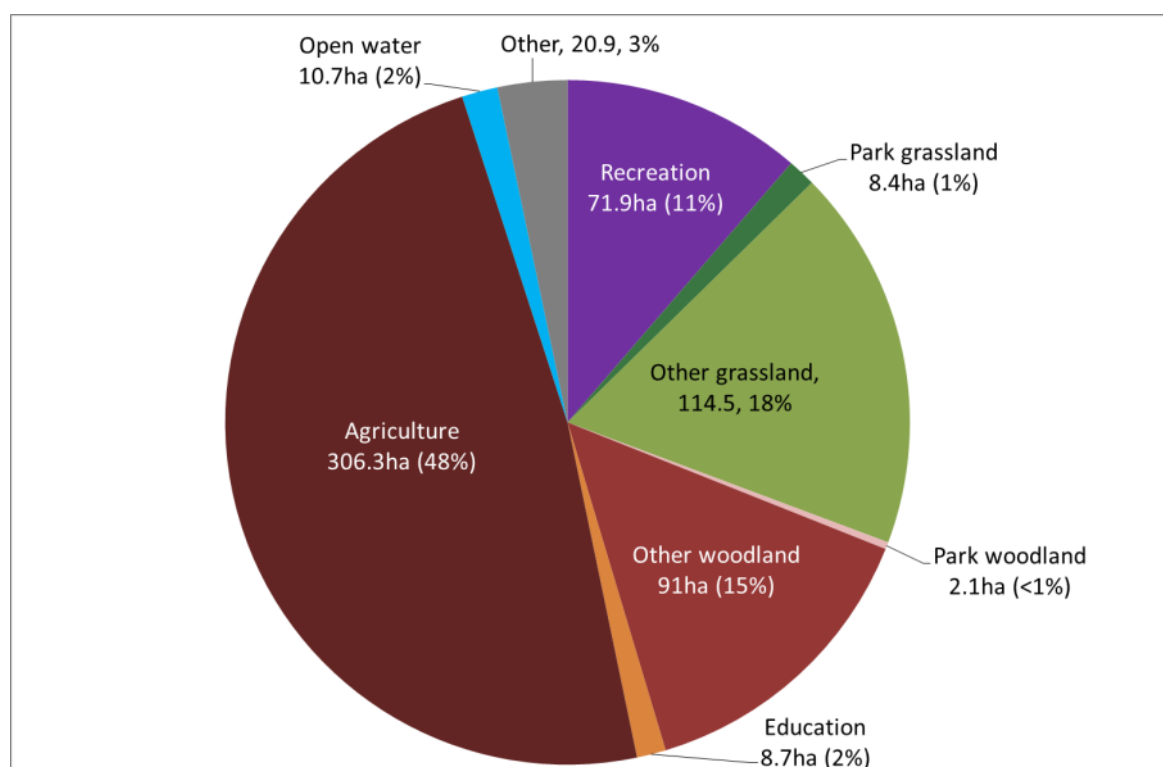
- *Contained by urban area* – closely surrounded by the urban area of Harlow
- *Countryside* – open land with rural uses (e.g. agriculture), absence of built development and a lack of urban characteristics
- *Effective barrier* – a substantial area of Green Belt land with a strong inner boundary (such as a road, river, large hedgerow or tree-belt)
- *Encroachment (into the countryside)* – Gradual advance of surrounding urbanity into the countryside beyond acceptable limits
- *Green Fingers* – linear open (and predominantly green) spaces which link to Green Wedges and have a recreational/movement function. (Note that Green Fingers are not currently designated, but are proposed for designation in the emerging Local Development Plan. See the separate *Green Wedge Review* document for more information.)
- *Green Wedges* – large areas of open (and predominantly green) space which were part of the town's original masterplan and provide a number of functions, including separating neighbourhoods and bringing the countryside into the urban area
- *Historic assets* – Scheduled Ancient Monument, Conservation Area, Listed Building or Listed Garden
- *Large built-up areas* – the only large built-up area in the Harlow district is the urban area of Harlow
- *Linkage with the Green Wedge network* – a physical connection of green space with the designated Green Wedges
- *Merging* – the merging of settlements, either through general unrestricted sprawl or through ribbon development
- *Perceived merging* – the reduction of visual and physical separation between Harlow and an adjacent settlement
- *Significant setting (for historic assets)* – could be, for example, a listed building set in extensive grounds
- *Strong physical feature* – such as a motorway, A-road, B-road, functioning mainline railway, river or protected woodland
- *Unrestricted sprawl* – the expansion of an urban area in an irregular way
- *Urban area* – the urban area of Harlow (i.e. areas of neighbourhoods and industrial areas, and open areas which are not in the Green Belt or Green Wedge network)

## 6. Green Belt Review Findings: Stage 1

*It is important that the findings are read in conjunction with the previous chapters to ensure full understanding.*

- 6.1. Stage 1 individually assessed the eleven areas of Green Belt in Harlow, by collecting information on each area (including land use and planning history) and by assessing how well each area provides the Green Belt purposes set out in the NPPF. Each area was given a score on how well it is providing the purposes.
- 6.2. As can be seen in Fig. 6.1, almost half the Green Belt land in Harlow is used for agriculture – with recreation, other grassland and other woodland being the other main uses. Most of the agricultural Green Belt land is located in areas 1 and 8, in the north-west and east of the district respectively. The majority of other Green Belt areas have a mix of land uses.

*Fig. 6.1: Land use of Harlow Green Belt*



- 6.3. Between April 2001 and April 2014, 59 planning applications on Green Belt land were determined. The majority of the applications were granted, but they were mostly for environmental improvements, minor works such as installation of solar panels and telecommunications equipment, replacements of existing buildings and modest extensions to existing buildings.
- 6.4. Of particular note is the planning application to build 1,200 dwellings (and associated facilities and open space) at land north of Gilden Way, which was granted on appeal in 2012. As part of this development, the western section of Green Belt Area 9 will provide land for playing pitches and allotments.



- 6.5. The majority of areas score averagely or poorly at checking the unrestricted sprawl of large built-up areas (i.e. Harlow). This is mostly due to these areas being contained to an extent by urbanity and/or a strong, physical feature being present which would check unrestricted sprawl in the context of unplanned development in any case without the Green Belt designation.
- 6.6. All the areas score poorly (with the exception of one which scored averagely) at preventing neighbouring towns from merging. This is due to the lack of notable settlements in the vicinity of Harlow (the nearest towns are Sawbridgeworth, approx. 5km to the north-west; Epping, approx. 6km to the south-east; and Hoddesdon, approx. 6km to the west).
- 6.7. The majority of areas score well at safeguarding the countryside from encroachment. This is due to these areas possessing additional qualitative elements – specifically large areas of hedgerows/woodland, Local Wildlife Sites, Potential Local Wildlife Sites, Local Nature Reserves and/or SSSIs.
- 6.8. Most of the areas score averagely at preserving the setting and special character of historic towns, as they possess links with the Green Wedge network and/or provide significant settings for historical assets such as Listed Buildings. As detailed in the methodology, Harlow is not a historic town in the same way that Oxford is, for example, but it has a unique heritage in terms of its New Town origin, including the network of Green Wedges which were planned from the outset.
- 6.9. Overall:
- three areas (1, 6 and 10) score well and are functioning as Green Belt
  - two areas (7 and 9) score averagely
  - six areas (2, 3, 4, 5, 8 and 11) score poorly

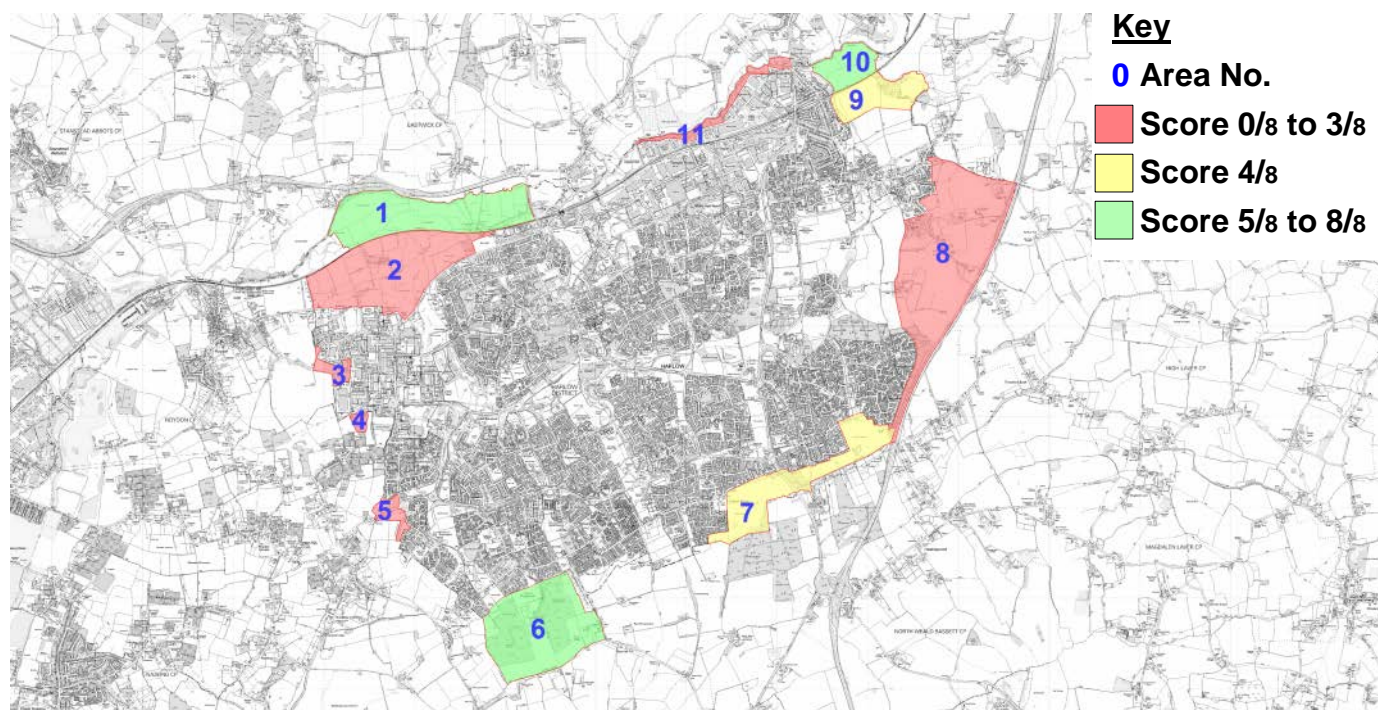
**The findings are summarised in the table and maps on subsequent pages (Figs. 6.2 to 6.7).**

**The full findings are available in Appendix 1 (separate document).**

Fig. 6.2: Stage 1 Findings - Summary

Area	Total Score (out of 8)	Green Belt Purpose Scores (out of 2)			
		1: Check the unrestricted sprawl of large built-up areas	2: Prevent neighbouring towns from merging	3: Assist in safeguarding the countryside from encroachment	4: Preserve the setting and special character of historic towns
1	5	1	0	2	2
2	3	1	0	1	1
3	1	0	0	1	0
4	2	0	0	2	0
5	1	0	0	0	1
6	5	2	0	2	1
7	4	1	0	2	1
8	3	1	0	1	1
9	4	1	0	1	2
10	5	1	1	2	1
11	3	0	0	2	1

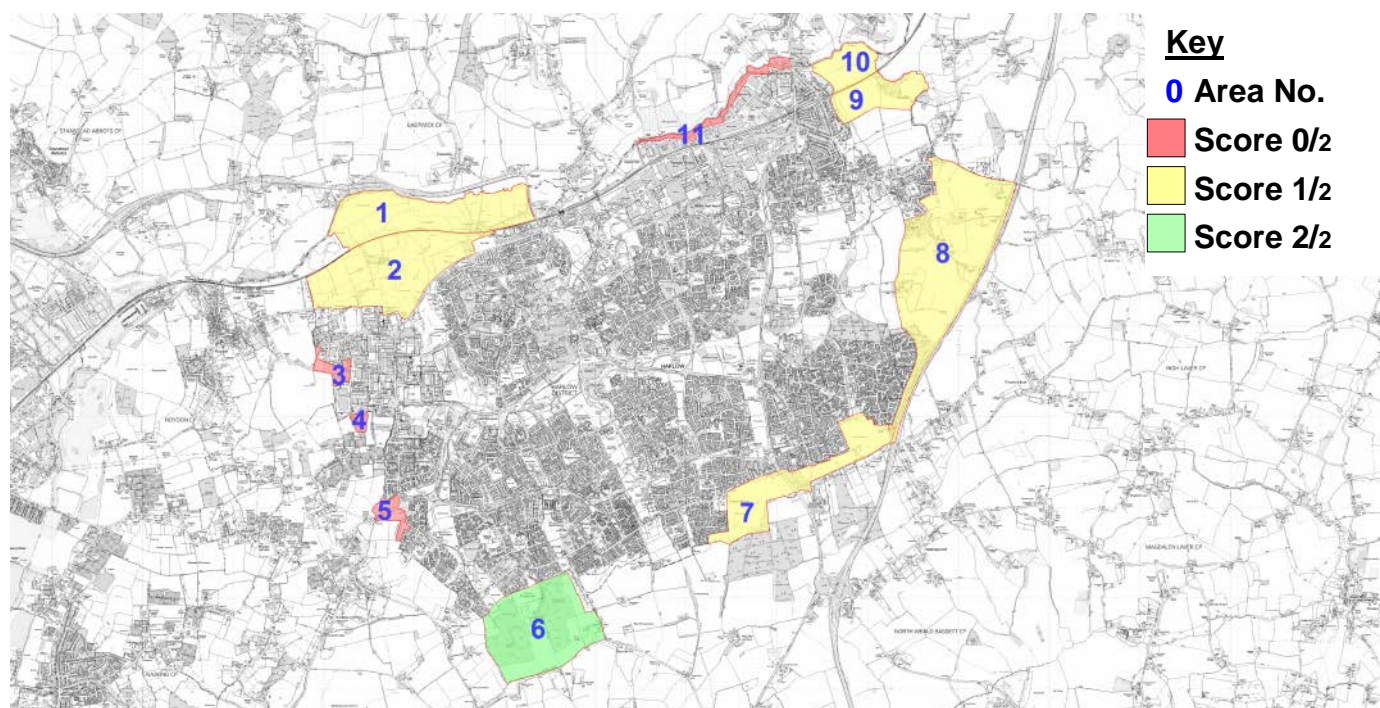
Fig. 6.3: Map - Overall Green Belt Area Scores



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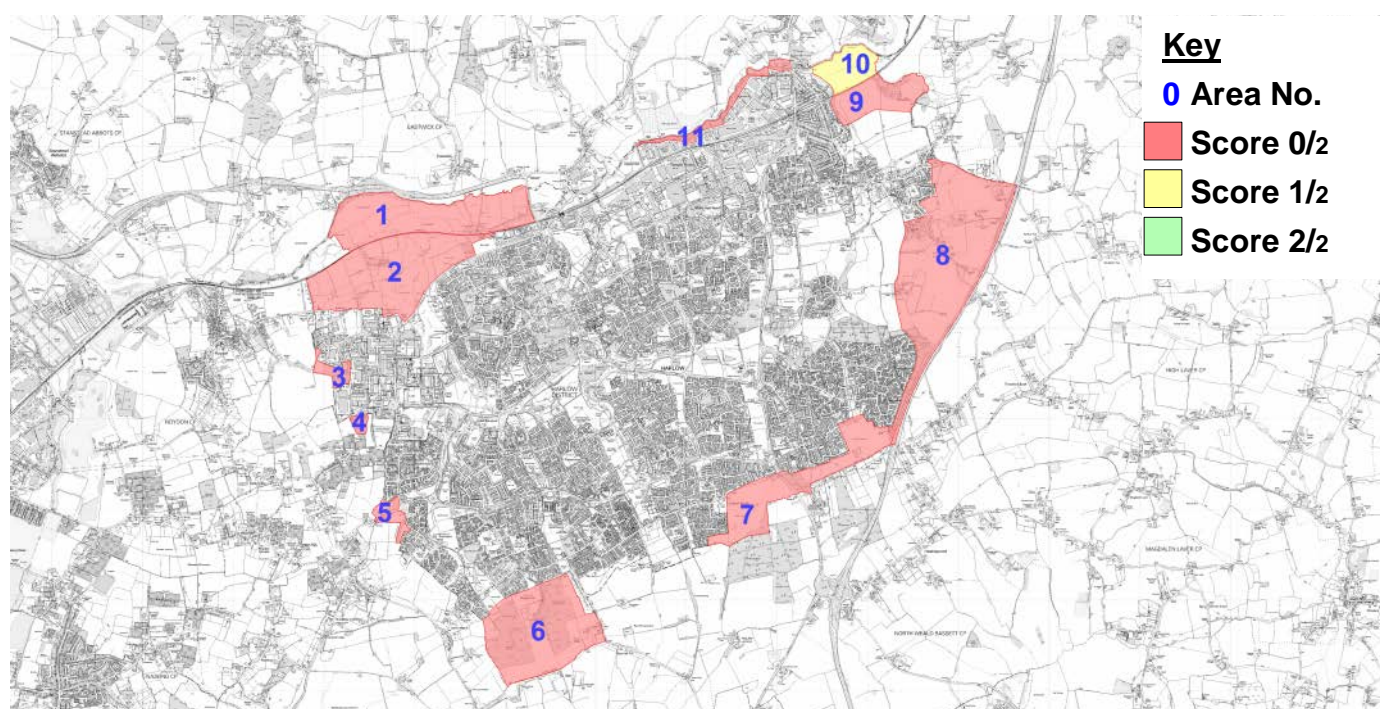


**Fig. 6.4: Map - Green Belt Area Scores (Purpose 1 – Check the unrestricted sprawl of large built-up areas)**



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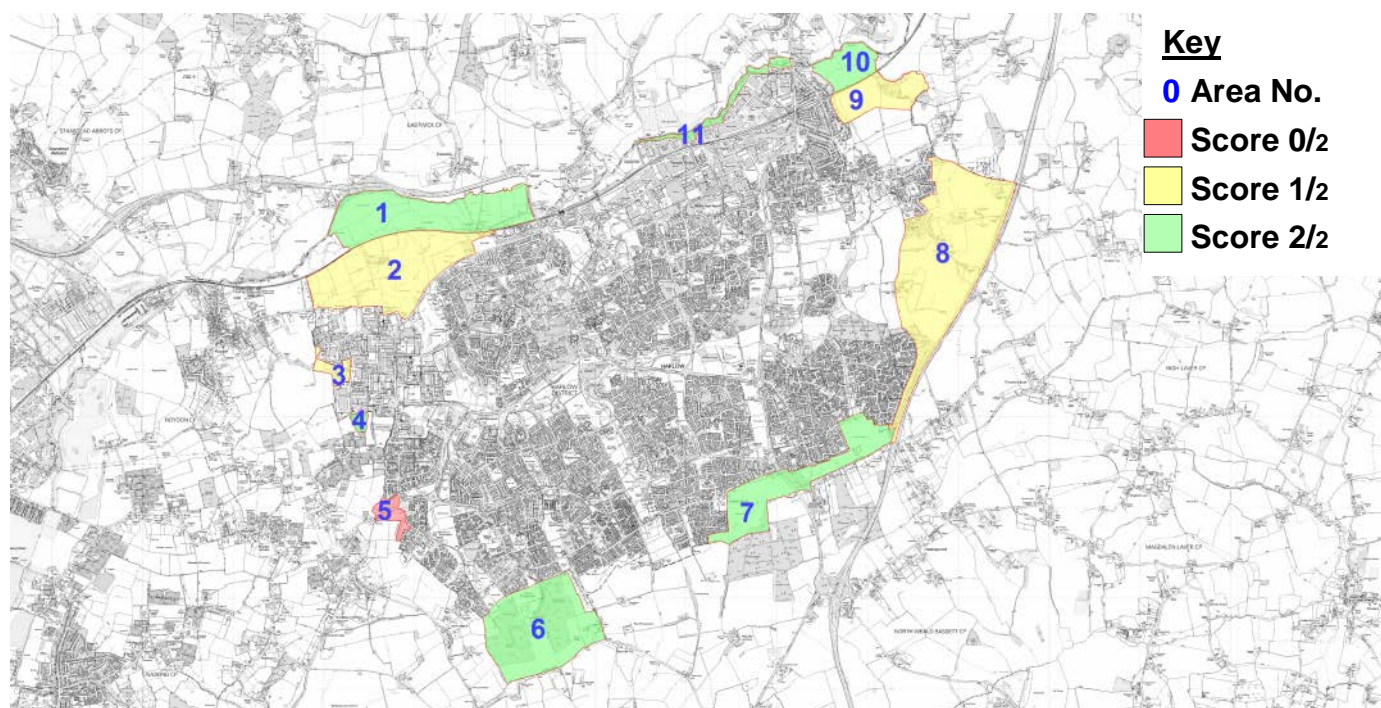
**Fig. 6.5: Map - Green Belt Area Scores (Purpose 2 – Prevent neighbouring towns from merging)**



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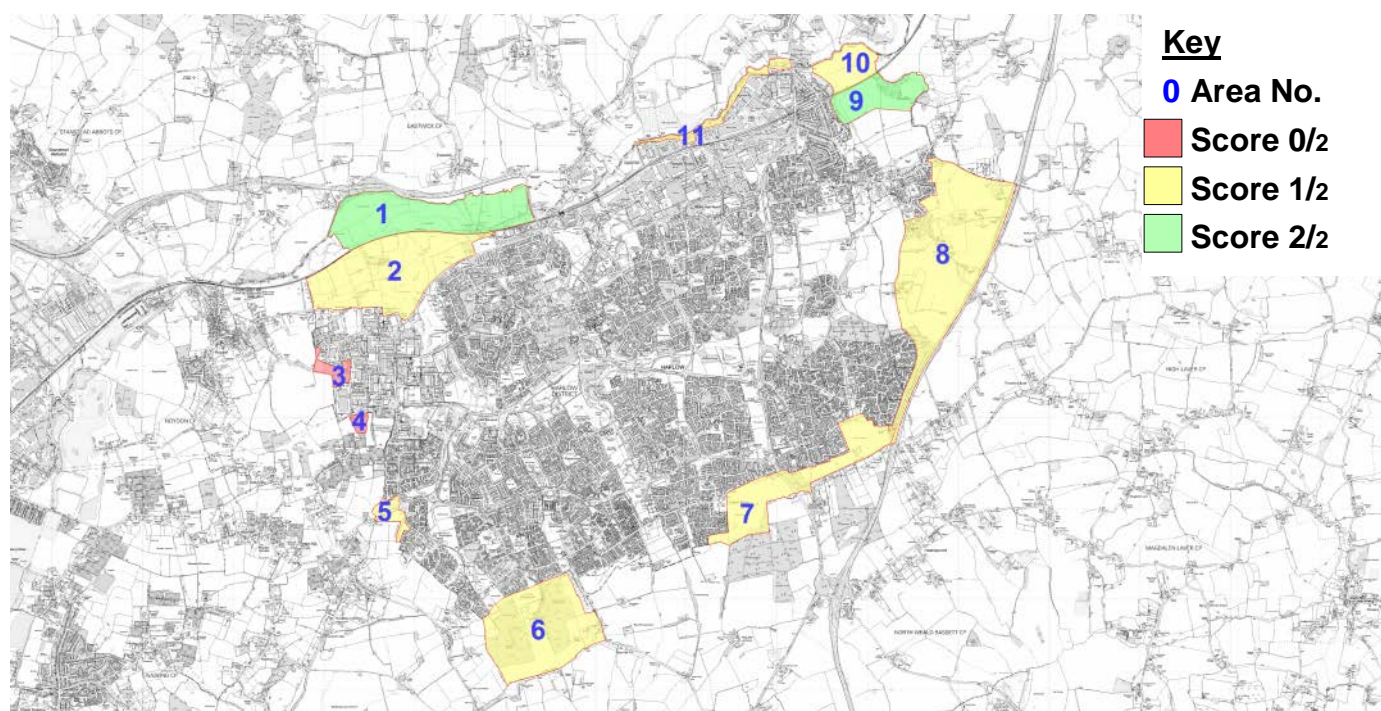


**Fig. 6.6: Map - Green Belt Area Scores (Purpose 3 – Assist in safeguarding the countryside from encroachment)**



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**Fig. 6.7: Map - Green Belt Area Scores (Purpose 4 – Preserve the setting and special character of historic towns)**



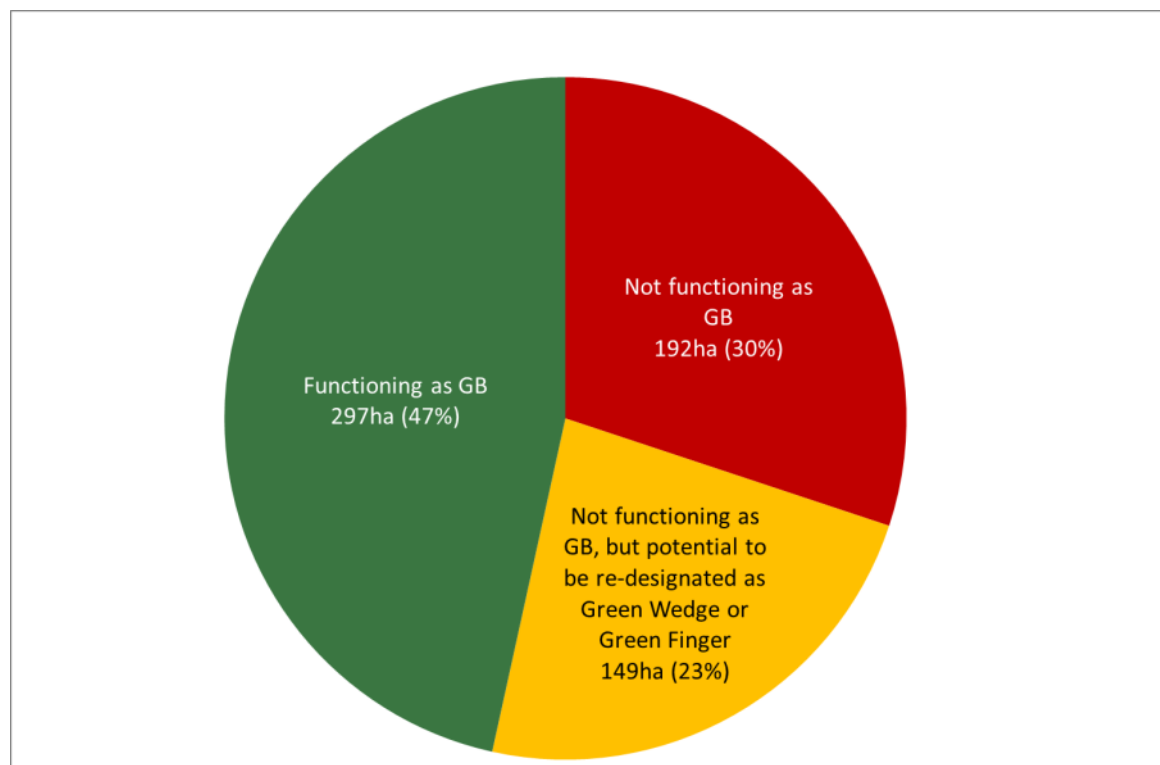
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## 7. Green Belt Review Findings: Stage 2

*It is important that the findings are read in conjunction with the previous chapters to ensure full understanding.*

- 7.1. The eight areas which scored averagely or poorly were divided into sub-areas to allow them to be further assessed (with the exception of areas 3, 4 and 11 which are too small to be divided into sub-areas). The sub-areas were then assessed on a number of factors to establish whether they are contributing to Green Belt purpose 3 (assist in safeguarding the countryside from encroachment) and purpose 4 (preserve the setting and special character of historic towns). They were also assessed on recreational characteristics to establish if they could function as Green Wedges or Green Fingers if they are not functioning as Green Belt, as Green Wedges and Green Fingers have more of a recreational purpose than Green Belt land.
- 7.2. As well as the overall contributions to purposes 3 and 4, the overall score of each area was also considered. Evidently, if a sub-area is in an area with a very low overall score, it would have to make significant contributions to purposes 3 and 4 in order to provide evidence that it is functioning as Green Belt.
- 7.3. A conclusion was made for each sub-area as to whether it is functioning as Green Belt or not; and if not, whether it is functioning as Green Wedge or Green Finger and could be re-designated as such through the Local Plan preparation process. Only land which has an existing link with the Green Wedge network could be considered for re-designation as Green Wedge or Green Finger.
- 7.4. For many of the sub-areas, there is little evidence from the Stage 2 assessments to prove that they are functioning as Green Belt. However, for a number of sub-areas in areas which score averagely overall, the Stage 2 assessment provides evidence that they are functioning as Green Belt.
- 7.5. Fig. 7.1 overleaf visualises the Stage 1 & 2 findings based on proportions of the Green Belt land. In summary:
  - 47% of the Green Belt is functioning as Green Belt
  - 23% of the Green Belt is not functioning as Green Belt but has potential to be re-designated as Green Wedge or Green Finger
  - 30% of the Green Belt is not functioning as Green Belt



*Fig. 7.1: Stage 1 & 2 Findings*

7.6. A summary of the results (Fig. 7.3), along with a map which visualises the results (Fig. 7.4), are available on the following pages.

**The full findings are available in Appendix 2 (separate document).**

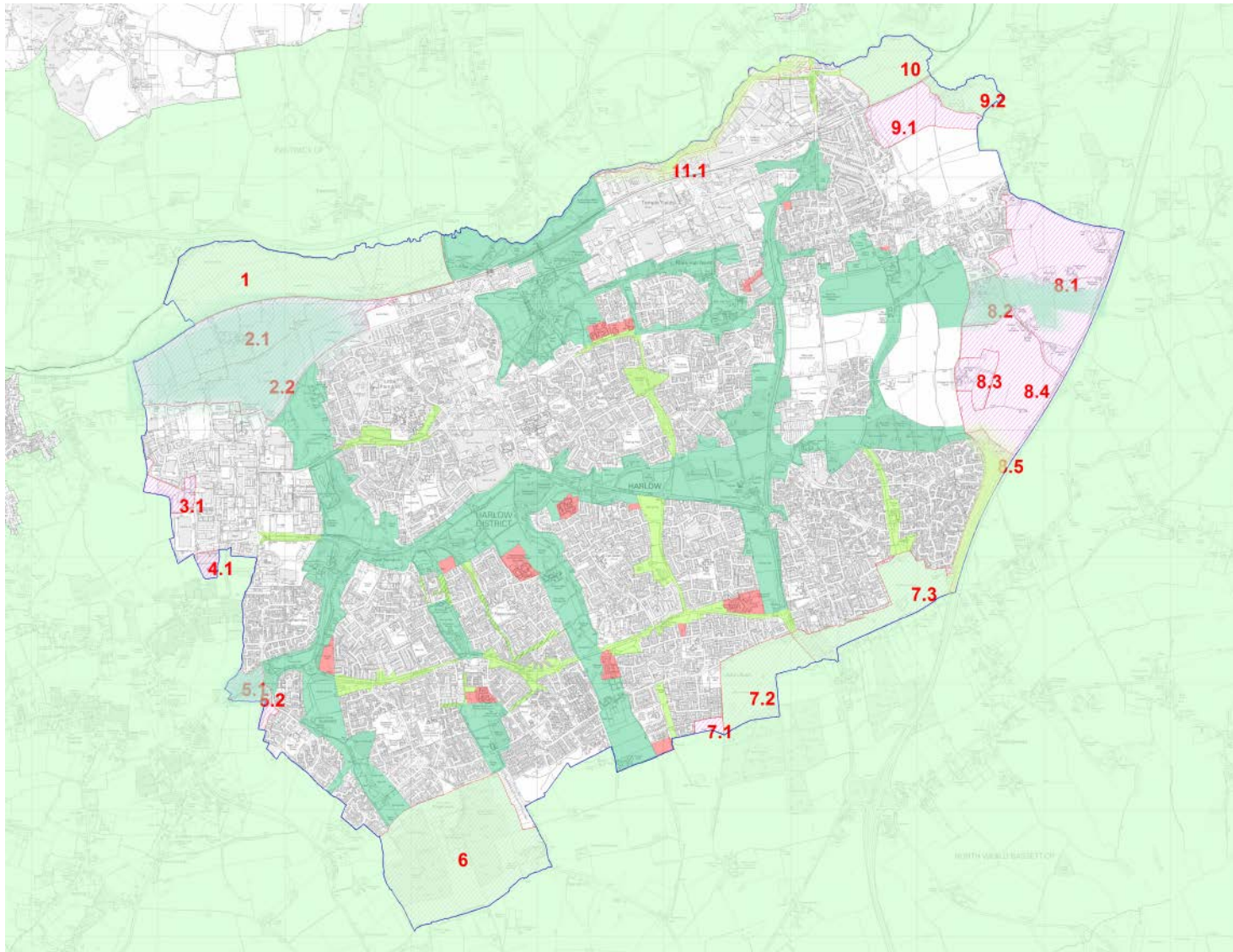
Fig. 7.3: Stage 2 Findings – Summary











Sub-area	Contributing to Purpose 3?		Contributing to Purpose 4?		Conclusion
2.1	Yes (minor)	Little to moderate landscape & visual amenity value	No		Area 2 scored poorly overall at Stage 1. Contributions do not provide sufficiently strong evidence that sub-area is functioning as Green Belt. Potential for re-designation as Green Wedge (except for small area in north-east) if sub-area 2.2 to the south is also re-designated as such
2.2	Yes	Little to moderate ecological value Moderate landscape & visual amenity value	Yes (minor)	Physical connection to the Green Wedge network	Area 2 scored poorly overall at Stage 1. Contributions do not provide sufficiently strong evidence that sub-area is functioning as Green Belt. Potential for re-designation as Green Wedge
3.1	Yes (minor)	Moderate ecological value	No		Area 3 scored poorly overall at Stage 1. Contributions do not provide sufficiently strong evidence that sub-area is functioning as Green Belt.
4.1	Yes	High ecological value	No		Area 4 scored poorly overall at Stage 1. Contributions do not provide sufficiently strong evidence that sub-area is functioning as Green Belt.
5.1	No		Yes (minor)	Physical connection to the Green Wedge network	Area 5 scored poorly overall at Stage 1. Contributions do not provide sufficiently strong evidence that sub-area is functioning as Green Belt. Potential for re-designation as Green Wedge
5.2	No		Yes (minor)	Physical connection to the Green Wedge network	Area 5 scored poorly overall at Stage 1. Contributions do not provide sufficiently strong evidence that sub-area is functioning as Green Belt. Potential for partial re-designation as Green Wedge
7.1	No		No		Area 7 scored poorly overall at Stage 1. No contributions, so there is no evidence that sub-area is functioning as Green Belt
7.2	Yes	High ecological value Moderate landscape & visual amenity value	No		Area 7 scored averagely overall at Stage 1. Contributions provide sufficiently strong evidence that sub-area is functioning as Green Belt
7.3	Yes	High ecological value Moderate landscape & visual amenity value	Yes (minor)	Physical connection to the Green Wedge network	Area 7 scored averagely overall at Stage 1. Contributions provide sufficiently strong evidence that sub-area is functioning as Green Belt
8.1	Yes (minor)	Little to moderate ecological value Little to moderate landscape & visual amenity value	No		Area 8 scored poorly overall at Stage 1. Contributions do not provide sufficiently strong evidence that sub-area is functioning as Green Belt. Potential for partial re-designation as Green Wedge

Fig. 7.3: Stage 2 Findings – Summary (continued)

Sub-area	Contributing to Purpose 3?		Contributing to Purpose 4?		Conclusion
8.2	No		Yes (minor)	Physical connection to the Green Wedge network	Area 8 scored poorly overall at Stage 1. Contributions do not provide sufficiently strong evidence that sub-area is functioning as Green Belt Potential for re-designation as Green Wedge
8.3	Yes (minor)	Little to moderate ecological value	Yes	Two listed buildings with significant settings	Area 8 scored poorly overall at Stage 1. Contributions do not provide sufficiently strong evidence that sub-area is functioning as Green Belt
8.4	Yes (minor)	Little to moderate landscape and visual amenity value	No		Area 8 scored poorly overall at Stage 1. Contributions do not provide sufficiently strong evidence that sub-area is functioning as Green Belt Potential for small part in southwest to be re-designated as Green Finger, along with sub-area 8.5 to the south
8.5	Yes (minor)	Little to moderate ecological value	No		Area 8 scored poorly overall at Stage 1. Contributions do not provide sufficiently strong evidence that sub-area is functioning as Green Belt Potential for re-designation as Green Finger
9.1	Yes (minor)	Little to moderate ecological value Little to moderate landscape & visual amenity value	No		Area 9 scored poorly overall at Stage 1. Contributions do not provide sufficiently strong evidence that sub-area is functioning as Green Belt
9.2	Yes	Moderate ecological value Moderate landscape & visual amenity value	Yes	Listed garden with significant setting	Area 9 scored averagely overall at Stage 1. Contributions provide sufficiently strong evidence that sub-area is functioning as Green Belt
11.1	Yes	Moderate ecological value Moderate landscape & visual amenity value	Yes (minor)	Physical connection to the Green Wedge network	Area 11 scored poorly overall at Stage 1. Contributions do not provide sufficiently strong evidence that sub-area is functioning as Green Belt Potential for re-designation as Green Finger

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Key	
	Green Belt sub-area boundary
	Harlow district boundary
	Green Belt in adjoining authority
	Green Wedge
	Green Wedge proposed (in the Green Wedge Review) to be re-designated as a Green Finger
	Green Wedge proposed (in the Green Wedge Review) to be removed from the Green Wedge
	Green Belt land not functioning as Green Belt
	Green Belt land functioning as Green Belt
	Green Belt land which is not functioning as Green Belt, with the possibility of being re-designated as Green Wedge
	Green Belt land which is not functioning as Green Belt, with the possibility of being re-designated as Green Finger

- 7.7. As detailed in the methodology (see Chapter 5), any alterations to the Green Belt boundaries in Harlow will be proposed following discussion and joint working with the adjoining East Hertfordshire and Epping Forest District Councils in accordance with the duty to co-operate. Any new Green Belt boundaries will be designated through the in the new Local Development Plan, following the usual preparation processes that the Plan is subject to.
- 7.8. The NPPF places particular importance on the strength and longevity of Green Belt boundaries. As such, whilst an area or sub-area may be identified in Stages 1 and 2 as not functioning as Green Belt, its release may not be justified if it would result in a boundary becoming weaker.

## 8. Green Belt Review Findings: Stage 3

*It is important that the findings are read in conjunction with the previous chapters to ensure full understanding of the findings.*

- 8.1. As established in Stage 2 of the Green Belt Review, some areas of land are not functioning as Green Belt based on the nationally-set purposes. There is, therefore, the opportunity for these areas to be removed from the Green Belt and used to address other objectives of the emerging Local Plan and, in some cases, re-designated as Green Wedge or Green Finger. However, in accordance with the NPPF, any resulting amended Green Belt boundaries must be strong and defensible.
- 8.2. In accordance with the methodology (see Chapter 5), Stage 3 analysed the strength of the existing inner Green Belt boundaries, and the strength of any new Green Belt boundaries which would be created as a result of potential changes to Green Belt land which were identified at Stage 2.
- 8.3. In most cases, Stage 3 concluded that the changes would result in a stronger inner Green Belt boundary. However, some changes would have resulted in a weaker boundary – in these cases, Stage 3 analysed whether the change could be made in such a way that retains/increases the inner boundary strength. If not, then the change could not be justified. This ensured that any changes would not result in a weaker inner boundary.
- 8.4. When considering the results of the Review and the potential boundary adjustments, the Review concluded that, of the Green Belt land in Harlow, there is potential for:
  - 299ha to be retained
  - 143ha to be released and redesignated as Green Wedge
  - 14ha to be released and redesignated as Green Finger
  - 182ha to be released and become undesignated land
- 8.5. The detailed findings of Stage 3 are summarised in Fig. 8.1.



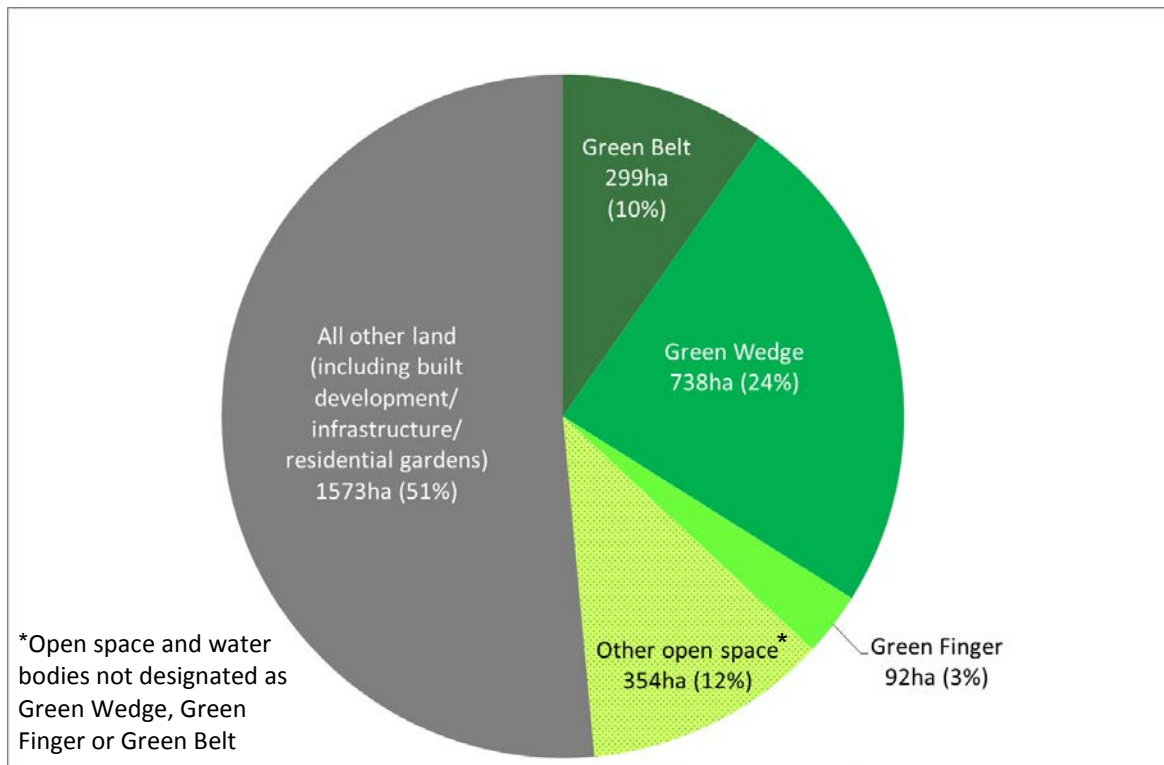
Fig. 8.1: Stage 3 Summary

Green Belt Area	Existing inner boundary (%)			Potential changes	Potential new inner boundary (%)		
	Strong	Mod. strong	Weak		Strong	Mod. strong	Weak
1 & 2	13	60	27	Area 1 performed well at Stage 1 so being retained as Green Belt. Remove sub-areas 2.1 and 2.2 from Green Belt and (mostly) redesignate them as Green Wedge	89	11	0
3	0	36	64	Mostly remove from Green Belt	0	100	0
4	0	100	0	N/A (retain as Green Belt)	N/A		
5	0	71	29	Remove from Green Belt and (partially) redesignate as Green Wedge	0	100	0
6	38	48	14	Performed well at Stage 1 so being retained, but small part being removed from Green Belt and redesignated as Green Wedge to increase boundary strength	55	45	0
7	0	88	12	Remove small area which cuts across gardens in order to increase boundary strength	0	94	6
8	0	58	42	Remove from Green Belt, but redesignate part as Green Wedge and part as Green Finger	76*	24*	0*
9 & 10	0	14	86	Area 10 performed well at Stage 1 so being retained. Remove sub-area 9.1 from Green Belt. Retain sub-area 9.2 as Green Belt	31	36	33
11	12	88	0	Remove from Green Belt and redesignate as Green Finger	100*	0*	0*

\*The new inner boundary at this location would entirely follow the district boundary.

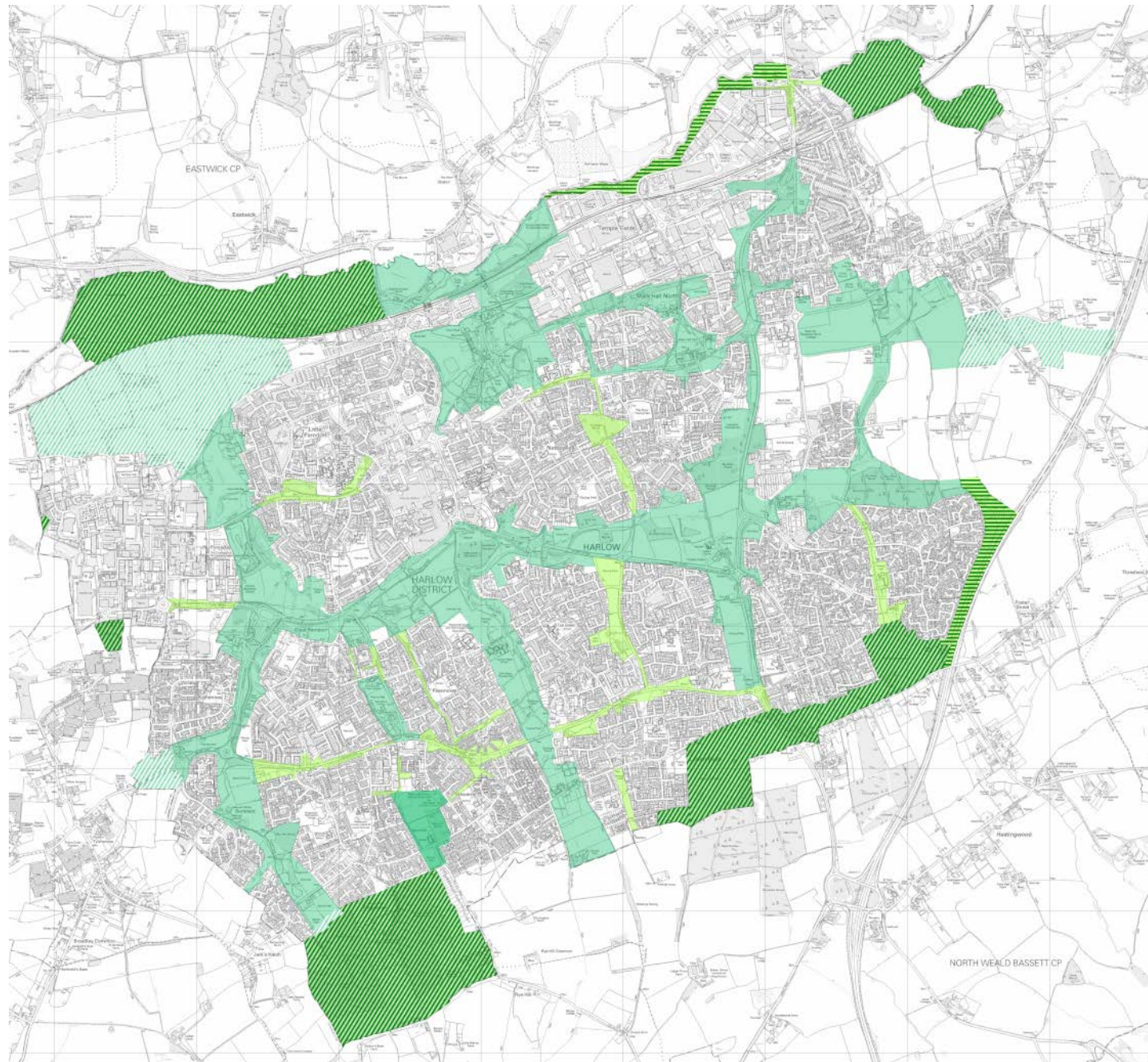
- 8.6. Incorporating the changes identified above would result in the following proportions of land use in Harlow (assuming the changes in the Green Wedge Review are also implemented).



*Fig. 8.2: Proportions of land use in Harlow following changes to the Green Belt and Green Wedge network*






**The full findings are available in Appendix 3 (separate document).**

Fig. 8.4: Stage 3 Findings – Map

**Key**

-  Green Wedge
  -  Green Finger
- } incorporating changes proposed in Green Wedge Review

**Potential for:**

-  Land to be retained as Green Belt
-  Land to be removed from Green Belt and redesignated as Green Wedge
-  Land to be removed from Green Belt and redesignated as Green Finger

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